IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO.

v. : DATE FILED:

NYSARE ALSTON : VIOLATIONS:

CHRISTOPHER CORLEY

18 U.S.C. § 1951(a) (robbery which interferes with interstate commerce -5

KEN THOMAS counts)

: 18 U.S.C. § 924(c)(1) (using, carrying, and

brandishing a firearm during and in)

: relation to a crime of violence – 5 counts)

18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

- 1. America's Cash Express, 5045 Wayne Avenue, Philadelphia,
 Pennsylvania, was a check cashing business engaged in and affecting interstate commerce, by
 engaging extensively in interstate monetary transactions.
- 2. On or about February 15, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON, CHRISTOPHER CORLEY, and KEN THOMAS

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants NYSARE ALSTON, CHRISTOPHER CORLEY, and KEN THOMAS unlawfully took and obtained, and aided and

abetted the unlawful taking and obtaining of, personal property, that is, approximately \$49,957 in United States currency, belonging to America's Cash Express, 5045 Wayne Avenue, in Philadelphia, Pennsylvania, from an employee of that business, against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to his person and property, that is, by brandishing a gun, forcing the employee inside the store, and, once inside, by forcing the employee to open the business' safe, demanding money from him, threatening to shoot and "blow" the employee's "brains out," forcing the employee into a bathroom at gunpoint, and forcing him to throw his cell phone into the toilet, in order to facilitate the robbers' escape and evade capture by law enforcement.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 15, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON, CHRISTOPHER CORLEY, and KEN THOMAS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951, as charged in Count One of this indictment, and brandished, and aided and abetting the brandishing of, that firearm.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times relevant to this indictment:

- 1. Diamond Check Cashing, 4261 Frankford Avenue, Philadelphia,
 Pennsylvania, was a check cashing business engaged in and affecting interstate commerce, by
 engaging extensively in interstate monetary transactions.
- 2. On or about July 12, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON and CHRISTOPHER CORLEY

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants NYSARE ALSTON and CHRISTOPHER CORLEY unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$34,000 of United States currency belonging to Diamond Check Cashing, 4261 Frankford Avenue in Philadelphia, Pennsylvania, in the presence of an employee of that business, and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to her person and property, that is, by putting a gun to the back of the employee's head and forcing her inside the store, demanding, "open the door, open the door," brandishing a gun, forcing the employee to open the safe, demanding money from the employee, then forcing her to unlock the front door, in order to facilitate the robbers' escape and to evade capture by law enforcement.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 12, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON and CHRISTOPHER CORLEY

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951, as charged in Count Three of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

At all times relevant to this indictment:

- 1. The Ace Check Cashing, 2557 W. Sterner Street, Philadelphia,
 Pennsylvania, was a check cashing business engaged in and affecting interstate commerce, by
 engaging extensively in interstate monetary transactions.
- 2. On or about July 25, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON and KEN THOMAS

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants NYSARE ALSTON and KEN THOMAS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$10,000 of United States currency, belonging to Ace Check Cashing, 2557 W. Sterner Street in Philadelphia, Pennsylvania, in the presence of an employee of that business, and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to his person and property, that is, by brandishing a gun, forcing the employee into the store while threatening, "don't do anything stupid, get in the store," and, once inside, demanding money from the employee of Ace Check Cashing.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 25, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON and KEN THOMAS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951, as charged in Count Five of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

At all times relevant to this indictment:

- 3. The Ace Check Cashing, 4244 N. Broad Street, Philadelphia, PA, was a check cashing business engaged in and affecting interstate commerce, by engaging extensively in interstate monetary transactions.
- 4. On or about August 2, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

HASSAN CORLEY and KEN THOMAS

attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by robbery, in that defendants HASSAN CORLEY and KEN THOMAS unlawfully attempted to take and obtain, and aided and abetted the attempted unlawful taking and obtaining of, personal property, that is, United States currency, belonging to Ace Check Cashing, 4244 N. Broad Street in Philadelphia, Pennsylvania, in the presence of an employee of that business, and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to her person and property, that is, by brandishing a gun, demanding that the employee open the safe, demanding money from, and threatening the employee of Ace Check Cashing.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

HASSAN CORLEY and KEN THOMAS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, attempted robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951, as charged in Count Seven of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

At all times relevant to this indictment:

- 5. Don's Check Cashing, 1202 E. Hunting Park Avenue, Philadelphia, Pennsylvania, was a check cashing business engaged in and affecting interstate commerce, by engaging extensively in interstate monetary transactions.
- 6. On or about September 10, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON and KEN THOMAS

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants NYSARE ALSTON and KEN THOMAS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, personal property, that is, approximately \$31,000 of United States currency, belonging to Don's Check Cashing, 1202 E. Hunting Park Avenue in Philadelphia, Pennsylvania, in the presence of an employee of that business, and against her will, by means of actual and threatened force, violence, and fear of injury, immediate and future to her person and property, that is, by brandishing a gun, threatening the employee while holding the gun to her neck, demanding money from her, and forcing the employee to lay down on the floor, in order to facilitate the robbers' escape and evade capture by law enforcement.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

NYSARE ALSTON and KEN THOMAS

knowingly used and carried, and aided and abetted the use and carrying of, a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, United States Code, Section 1951, as charged in Count Nine of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER United States Attorney