

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
KHAYREE GAY	:	VIOLATIONS:
	:	18 U.S.C. § 1951 (attempted
	:	robbery which interferes with interstate
	:	commerce- 1 count)
	:	18 U.S.C. § 1201 (kidnapping)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. The National Watch and Diamond Exchange store (National Watch), located at 101 South 8th Street, in Philadelphia, Pennsylvania, was a retail business engaged in and affecting interstate commerce, by selling watches and jewelry, which were produced, purchased, and transported from states outside the Commonwealth of Pennsylvania.
2. On or about April 4, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KHAYREE GAY

and others unknown to the grand jury, attempted to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, by robbery, in that defendant GAY unlawfully attempted to take and obtain, and aided and abetted the attempted taking and obtaining of, property, that is, jewelry and money, from National Watch through victim I.V., a person known to the grand jury, against her will by means of actual and threatened force, violence, and fear of injury, immediate and future, to her person and their property, that is, by forcibly abducting I.V., beating I.V., holding her captive, and using a weapon to force I.V. into providing the codes to the alarm and safe at National Watch, to steal jewelry and money.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2015, in Philadelphia, in the Eastern District of Pennsylvania,
defendant


KHAYREE GAY

and others unknown to the grand jury, knowingly, willfully, and unlawfully seized, confined, kidnapped, abducted, carried away, and held, and aided and abetted the unlawful seizure, confinement, kidnapping, abduction, carrying away, and holding of, I.V., a person known to the grand jury, for ransom, reward, and otherwise, that is, for the purpose of gaining information to rob the National Watch and Diamond store, of jewelry and money, and, in committing the offense, used I.V.'s ATM card, a means, facility, and instrumentality of interstate commerce.

In violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

A TRUE BILL:

FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY