

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
TERRENCE HARPER	:	VIOLATIONS: 18 U.S.C. § 1951(a) (attempted robbery which interferes with interstate commerce - 1 count)
	:	18 U.S.C. § 1951(a) (robbery which interferes with interstate commerce - 2 counts) 18 U.S.C. § 924(c)(1) (brandishing, using, and carrying a firearm during and in relation to a crime of violence - 2 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, Family Dollar Store, located at 6337 North Broad Street, Philadelphia, Pennsylvania was a business engaged in and affecting interstate commerce, which sold merchandise produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about December 13, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TERRENCE HARPER

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant HARPER unlawfully attempted to take and obtain

property, that is, money, from an employee of Family Dollar Store, located at 6337 North Broad Street, Philadelphia, Pennsylvania, 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 using and brandishing a handgun at the Family Dollar Store employee and demanding money.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph one of Count One of this Indictment is incorporated here.
2. On or about December 15, 2013, in Philadelphia, in the Eastern District of

Pennsylvania, defendant

TERRENCE HARPER

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant HARPER unlawfully took and obtained property, that is, money in the amount of approximately \$160, from an employee of Family Dollar Store, located at 6337 North Broad Street, Philadelphia, Pennsylvania, 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 using and brandishing a handgun at the Family Dollar Store employee and demanding money.

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 15, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

TERRENCE HARPER

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of violence for which he 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(a), as charged in Count Two of this indictment, and brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times material to this indictment, Whisper Inn, located at 7610 Ogontz Avenue, Philadelphia, Pennsylvania was a business engaged in and affecting interstate commerce, which sold beverages and food produced in and transported from other states to the Commonwealth of Pennsylvania.

2. On or about December 18, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TERRENCE HARPER

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant HARPER unlawfully took and obtained property, that is, money in the amount of approximately \$575, from an employee of Whisper Inn, located at 7610 Ogontz Avenue, Philadelphia, Pennsylvania, 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 using and brandishing a handgun at the Whisper Inn employee and demanding money.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 18, 2013, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

TERRENCE HARPER

knowingly used and carried a firearm, that is, a handgun, during and in relation to a crime of violence for which he 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(a), as charged in Count Four of this indictment, and brandished and discharged that firearm.

In violation of Title 18, United States Code, Section 924(c)(1).

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney