

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
TITUS KELLAM	:	VIOLATIONS:
KIMBERLY MONFORT	:	18 U.S.C. § 1951(a) (robbery which
	:	interferes with interstate commerce
	:	– 6 counts)
	:	18 U.S.C. § 924(c)(1) (using, carrying, and
	:	brandishing a firearm during and in
	:	relation to a crime of violence – 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this indictment, the Key Pizza restaurant, located at 1846 S. 12th Street, in Philadelphia, Pennsylvania (“Key Pizza”) was a business engaged in and affecting interstate commerce, by providing customers food, beverages, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about November 26, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**TITUS KELLAM and
KIMBERLY MONFORT**

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendants TITUS KELLAM and KIMBERLY MONFORT unlawfully took and

obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$500 United States currency and \$55 in food, belonging to Key Pizza, located at 1846 S. 12th Street, and a Samsung cell phone, belonging to an employee of Key Pizza, 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 weapon and demanding money from the employee of Key Pizza.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment , the Wolf Street Pizza restaurant, located at 2135 Wolf Street, in Philadelphia, Pennsylvania (“Wolf Street Pizza”) was a business engaged in and affecting interstate commerce, by providing customers food, beverages, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about December 6, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TITUS KELLAM

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TITUS unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$130 United States currency and food, belonging to Wolf Street Pizza, 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 weapon and demanding money from the employee of Wolf Street Pizza.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, he City Pizza restaurant, located at 100 Snyder Avenue, in Philadelphia, Pennsylvania ("City Pizza") was a business engaged in and affecting interstate commerce, by providing customers food, beverages, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about December 7, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TITUS KELLAM

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant TITUS KELLAM unlawfully took and obtained approximately \$800 United States currency and food, belonging to City Pizza, 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 weapon and demanding money from the employee of City Pizza.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 7, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TITUS KELLAM

knowingly used and carried a firearm 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, as charged in Count Three of this indictment, and brandished that firearm.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the Uncle Oogie's Pizzeria restaurant, located at 2119 W. Oregon Avenue, in Philadelphia, Pennsylvania ("Uncle Oogie's Pizza") was a business engaged in and affecting interstate commerce, by providing customers food, beverages, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about December 13, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants:

TITUS KELLAM

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TITUS KELLAM unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$215 United States currency and food, belonging to Uncle Oogie's Pizza, and a Samsung Galaxy Note II cell phone, belonging to the employee of Uncle Oogie's Pizza, 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 weapon and demanding money from the employee of Uncle Oogie's Pizza.

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

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the Not Just Pizza restaurant, located at 2240 S. 11th Street, in Philadelphia, Pennsylvania (“Not Just Pizza”) was a business engaged in and affecting interstate commerce, by providing customers food, beverages, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about December 17, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TITUS KELLAM

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, by robbery, in that defendant TITUS KELLAM unlawfully took and obtained, approximately \$300 United States currency and food, belonging to Not Just Pizza, and an Apple iPhone 6-Plus, belonging to the employee of that business, 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 weapon and demanding money from the employee of Not Just Pizza.

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

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 17, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

TITUS KELLAM

knowingly used and carried a firearm 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, as charged in Count Six of this indictment, and brandished that firearm.

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

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. At all times relevant to this indictment, the Isabella Pizza restaurant, located at 1824 East Passyunk, in Philadelphia, Pennsylvania (“Isabella Pizza”) was a business engaged in and affecting interstate commerce, by providing customers food, beverages, and other goods produced, purchased, and transported from other states to Pennsylvania.

2. On or about December 21, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant:

TITUS KELLAM

and others known and unknown to the grand jury, obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant TITUS KELLAM unlawfully took and obtained, and aided and abetted the unlawful taking and obtaining of, approximately \$25 United States currency, belonging to Isabella Pizza, and a wallet, driver’s license, and debit card, belonging to the employee of Isabella Pizza, 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 weapon and demanding money from the employee of Isabella Pizza.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(c) set forth in this indictment, defendants

**TITUS KELLAM and
KIMBERLY MONFORT**

shall forfeit to the United States of America any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense, including, but not limited to:

- (i). Any and all firearms used in the commission of the offense; and
- (ii). Any and all ammunition used in the commission of the offense.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney