

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
SAMUEL ROBINSON	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (robbery which
	:	interferes with interstate commerce -2
	:	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. § 922(g)(1) (possession of a
	:	firearm by a convicted felon – 1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Metro PCS, 6443 Frankford Avenue, Philadelphia, Pennsylvania, was a cell phone retailer engaged in and affecting interstate commerce, by providing customers phones and other electronic merchandise produced, purchased, and transported from other states to Pennsylvania.

2. On or about October 28, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMUEL ROBINSON

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SAMUEL ROBINSON

unlawfully took and obtained approximately \$200 in United States currency, belonging to Metro PCS, 6443 Frankford Avenue, in Philadelphia, Pennsylvania, from an employee of that business, 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, forcing the employee to the ground, ordering the employee to open the cash register, and demanding money.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMUEL ROBINSON

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 One of this indictment, and brandished that firearm.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times relevant to this indictment:

1. Metro PCS, 4229 N. Broad Street, Philadelphia, Pennsylvania, was a cell phone retailer engaged in and affecting interstate commerce, by providing customers phones and other electronic merchandise produced, purchased, and transported from other states to Pennsylvania.

2. On or about October 28, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMUEL ROBINSON

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that defendant SAMUEL ROBINSON unlawfully took and obtained approximately \$400 in United States currency, belonging to Metro PCS, 4229 N. Broad Street, 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, racking the slide of the semi-automatic pistol to load it, pointing the gun at the employee and forcing him to the ground, ordering the employee to open the cash register, and demanding money.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMUEL ROBINSON

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, Sections 924(c)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 28, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

SAMUEL ROBINSON,

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a KEL-TEC, Model P-11, 9mm pistol, serial number AQK82, loaded with ten live rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 922(g)(1) and 924(c), set forth in this indictment, defendant

SAMUEL ROBINSON

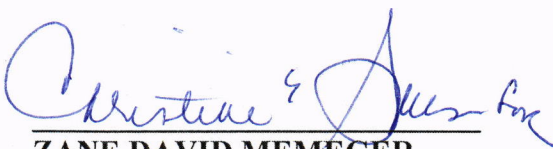
shall forfeit to the United States of America the firearms and any ammunition involved in the commission of this offense, that is,

1. KEL-TEC, Model P-11, 9mm pistol, serial number AQK82; and
2. Ten (10) rounds of 9mm ammunition.

All pursuant to Title 18, 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