

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

ZELDRICK NANCE

Criminal No. 17- \_\_\_\_\_

18 U.S.C. § 1951(a)

INFORMATION

The defendant having waived in open Court prosecution by Indictment, and any objection based on venue, the Acting United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
  - a. Defendant ZELDRICK NANCE resided in New Jersey.
  - b. Rodney Day, who is named as a co-conspirator but not as a defendant herein, resided in New Jersey.
  - c. Lisa Anderson, who is named as a co-conspirator but not as a defendant herein, resided in New Jersey.
  - d. Metro PCS maintained retail stores in multiple locations, including Willingboro, New Jersey (the "Willingboro Store"), Lumberton, New Jersey (the "Lumberton Store"), and Levittown, Pennsylvania (the "Levittown Store"). Those Metro PCS stores sold cellular telephones and other electronic devices purchased from outside the State of New Jersey and outside the Commonwealth of Pennsylvania. As such, Metro PCS was a business engaged in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3).

2. From in or about September 2016 to in or about October 2016, in the District of New Jersey, in the Commonwealth of Pennsylvania, and elsewhere, defendant

**ZELDRICK NANCE**

did knowingly and intentionally conspire and agree with Rodney Day, Lisa Anderson, and others to obstruct, delay, and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce by robbery, as that term is defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence upon individuals in furtherance of a plan and purpose to obstruct, delay, and affect interstate commerce and the movement of articles in commerce by robbery, that is, to commit the armed robberies of employees of the Willingboro Store, the Lumberton Store, and the Levittown Store.

**OBJECT OF THE CONSPIRACY**

3. The object of the conspiracy was to rob Metro PCS Stores in New Jersey and Pennsylvania and to sell stolen merchandise, namely cellular telephones, in New Jersey.

**MANNER AND MEANS OF THE CONSPIRACY**

4. To further the conspiracy, defendant ZELDRICK NANCE and co-conspirators Rodney Day and Lisa Anderson engaged in the following conduct:

- a. On or about September 29, 2016, defendant ZELDRICK NANCE and co-conspirators Rodney Day and Lisa Anderson drove to the Willingboro Store.
- b. Upon arrival at the Willingboro Store, defendant ZELDRICK NANCE and co-conspirators Rodney Day and Lisa Anderson entered the store; Rodney Day carried, brandished, and otherwise used a handgun; and defendant ZELDRICK


NANCE duct taped the victims inside the store and placed the victims into a store bathroom.

- c. While inside the Willingboro Store, co-conspirator Lisa Anderson stole cellular telephones and money from the cash registers, and co-conspirator Rodney Day demanded the keys to a vehicle owned by one of the victims.
- d. Upon leaving the Willingboro Store, defendant ZELDRICK NANCE and co-conspirators Rodney Day and Lisa Anderson fled with the stolen cellular telephones and money in the stolen vehicle.
- e. On or about October 7, 2016, defendant ZELDRICK NANCE and co-conspirators Rodney Day and Lisa Anderson drove to the Lumberton Store.
- f. Upon arrival at the Lumberton Store, defendant ZELDRICK NANCE and co-conspirators Rodney Day and Lisa Anderson entered the store; co-conspirator Rodney Day carried, brandished, and otherwise used a handgun; and defendant ZELDRICK NANCE duct taped the victim inside the store, placed the victim into a storage room, and took the victim's wallet and keys from the victim's person.
- g. While inside the Lumberton Store, co-conspirator Lisa Anderson stole cellular telephones and money from the cash registers.
- h. On or about October 12, 2016, defendant ZELDRICK NANCE and co-conspirators Rodney Day and Lisa Anderson drove to the Levittown Store.
- i. Upon arrival at the Levittown Store, defendant ZELDRICK NANCE and co-conspirator Rodney Day entered the store; co-conspirator Rodney Day carried, brandished, and otherwise used a handgun; and defendant ZELDRICK

NANCE duct taped the victims inside the store and placed the victims into a store bathroom.

- j. While inside the Levittown Store, co-conspirator Lisa Anderson stole cellular telephones and money from the cash registers, and co-conspirator Rodney Day demanded the keys to a vehicle owned by one of the victims.
- k. In an effort to profit from the robberies, co-conspirator Rodney Day attempted to sell stolen cellular telephones obtained during the robberies to others.

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

  
WILLIAM E. FITZPATRICK  
Acting United States Attorney