IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : DATE FILED: January 8, 2008

:

v. : CRIMINAL NO.:

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ANTHONY RANDALL : VIOLATIONS:

: 18 U.S.C. § 1951(a) (interference with

interstate commerce by robbery - 6 counts)
18 U.S.C. § 924(c)(1) (using and carrying a firearm during a crime of violence

: - 2 counts)

: Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

- 1. The 7-Eleven convenience store located at 1820 Stenton Avenue in Philadelphia, Pennsylvania was a business engaged in interstate commerce.
- 2. On or about June 6, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant RANDALL unlawfully took and obtained United States currency from the 7-Eleven convenience store, located at 1820 Stenton Avenue in Philadelphia, Pennsylvania, in the presence of an employee of the 7-Eleven convenience store and against his

will, by means of actual and threatened force, violence, and fear of injury, immediate or future to the employee of the 7-Eleven convenience store, that is, by brandishing, demanding money from, and threatening the employee of the 7-Eleven convenience store.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

- 1. Paragraph 1 of Count One of this indictment is incorporated here.
- 2. On or about June 24, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant RANDALL unlawfully took and obtained United States currency from the 7-Eleven convenience store, located at 1820 Stenton Avenue in Philadelphia, Pennsylvania, in the presence of an employee of the 7-Eleven convenience store and against his will, by means of actual and threatened force, violence, and fear of injury, immediate or future to the employee of the 7-Eleven convenience store, that is, by brandishing, demanding money from, and threatening the employee of the 7-Eleven convenience store.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

- 1. Paragraph 1 of Count One of this indictment is incorporated here.
- 2. On or about July 14, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant RANDALL unlawfully took and obtained United States currency from the 7-Eleven convenience store, located at 1820 Stenton Avenue in Philadelphia, Pennsylvania, in the presence of an employee of the 7-Eleven convenience store and against his will, by means of actual and threatened force, violence, and fear of injury, immediate or future to the employee of the 7-Eleven convenience store, that is, by brandishing, demanding money from, and threatening the employee of the 7-Eleven convenience store.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

- 1. Paragraph 1 of Count One of this indictment is incorporated here.
- 2. On or about August 24, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant RANDALL unlawfully took and obtained United States currency from the 7-Eleven convenience store, located at 1820 Stenton Avenue in Philadelphia, Pennsylvania, in the presence of an employee of the 7-Eleven convenience store and against his will, by means of actual and threatened force, violence, and fear of injury, immediate or future to the employee of the 7-Eleven convenience store, that is, by brandishing, demanding money from, and threatening the employee of the 7-Eleven convenience store.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

- 1. Paragraph 1 of Count One of this indictment is incorporated here.
- 2. On or about August 27, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant RANDALL unlawfully took and obtained United States currency from the 7-Eleven convenience store, located at 1820 Stenton Avenue in Philadelphia, Pennsylvania, in the presence of an employee of the 7-Eleven convenience store and against her will, by means of actual and threatened force, violence, and fear of injury, immediate or future to the employee of the 7-Eleven convenience store, that is, by brandishing, demanding money from, and threatening the employee of the 7-Eleven convenience store.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 27, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

knowingly used and carried a firearm, that is a Raven Arms model P-25 semi-automatic pistol with serial number 399541, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

- 1. Paragraph 1 of Count One of this indictment is incorporated here.
- 2. On or about September 1, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

obstructed, delayed and affected commerce, and the movement of articles and commodities in commerce, by robbery, in that, defendant RANDALL unlawfully took and obtained United States currency from the 7-Eleven convenience store, located at 1820 Stenton Avenue in Philadelphia, Pennsylvania, in the presence of the owner of the 7-Eleven convenience store and against his will, by means of actual and threatened force, violence, and fear of injury, immediate or future to the owner of the 7-Eleven convenience store, that is, by brandishing, demanding money from, and threatening the owner of the 7-Eleven convenience store.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 1, 2006, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ANTHONY RANDALL

knowingly used and carried a firearm, that is a Raven Arms model P-25 semi-automatic pistol with serial number 399541, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, that is, interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951(a).

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, defendant
ANTHONY RANDALL
shall forfeit to the United States of America the firearm involved in the commission of these
offenses, including, but not limited to a Raven Arms model P-25, .25 caliber, semi-automatic
pistol with serial number 399541.
Pursuant to Title 18, United States Code, Section 924(d).
A TRUE BILL:
FOREPERSON
FOREFERSON
DATIDACK A MEDIKAN
PATRICK L. MEEHAN UNITED STATES ATTORNEY