

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

FILED
IN COURT
CHARLOTTE, N. C.

JUL 27 2006

U. S. DISTRICT COURT
W. DIST. OF N. C.

UNITED STATES OF AMERICA)
)
 v.)
)
)
)
(01) JOSIAH PIERRE WELCH)
(02) RAYMOND DUANE JONES)
(03) JAMELL LASHON ALEXANDER)
 a.k.a. JAMEL LASHON ALEXANDER)
_____)

DOCKET NO. 3:06CR199-C

BILL OF INDICTMENT

- Violations:
- 18 U.S.C. § 1951
 - 18 U.S.C. § 2
 - 18 U.S.C. § 924(c)
 - 18 U.S.C. § 922(g)(1)
 - 18 U.S.C. § 922(g)(8)

THE GRAND JURY CHARGES:

At all times material to this Bill of Indictment, the following business was engaged in commercial activities within the Western District of North Carolina, and elsewhere, all of which said activities were in and affected interstate commerce:

1. Bobbies Convenience Store, 5432 Pageland Highway, Monroe, Union County, North Carolina, which sold gasoline and was in the business of selling gasoline. Bobbies Convenience Store sold gasoline that traveled in interstate commerce. Bobbies Convenience Store received its inventory of gasoline through the Colonial Pipeline from Houston, Texas. Bobbies Convenience Store's sale of gasoline was in and affecting interstate commerce.

2. The Food Lion Grocery Store, 602 Park Street, Belmont, Gaston County, North Carolina, ("Food Lion") which sold food and groceries and was in the business of selling food and groceries. Food Lion sold food and groceries that traveled in interstate commerce. Food Lion received its inventory of food and groceries from Florida, Georgia, South Carolina, Tennessee, Virginia and Maryland. Food Lion's sale of food and groceries was in and affecting interstate commerce.

COUNT ONE

1. The Grand Jury re-alleges and incorporates herein the Introduction to this Bill of Indictment.

2. On or about February 11, 2006, in Union County, within the Western District of North Carolina, and elsewhere,

(01) JOSIAH PIERRE WELCH
(02) RAYMOND DUANE JONES

knowingly and unlawfully did conspire with each other and others, known and unknown to the Grand Jury, to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), of business engaged in the sale of gasoline in the Western District of North Carolina, and elsewhere, affecting interstate commerce.

OVERT ACT

1. On or about February 11, 2006, **Josiah Pierre Welch** and **Raymond Duane Jones**, and others known and unknown to the Grand Jury, robbed Bobbies Convenience Store, 5432 Pageland Highway, Monroe, Union County, North Carolina, of United States currency by means of threatening an employee with a handgun and demanding and receiving money.

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

COUNT TWO

1. The Grand Jury realleges and incorporates herein the Introduction to the Bill of Indictment.

2. On or about February 11, 2006, in Union County, within the Western District of North Carolina, and elsewhere,

(01) JOSIAH PIERRE WELCH
(02) RAYMOND DUANE JONES

did knowingly and unlawfully, obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, in that they took the personal property of Bobbies Convenience Store, 5432 Pageland Highway, Monroe, Union County, North Carolina, that is, United States money, from the person and presence of persons, against their will and by means of actual and threatened force, violence, and fear of immediate and future injury, and did aid and abet each other, and others known and unknown to the Grand Jury, in the commission of that offense, in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT THREE

On or about February 11, 2006, in Union County, North Carolina, within the Western District of North Carolina, and elsewhere,

(01) JOSIAH PIERRE WELCH
(02) RAYMOND DUANE JONES

during and in relation to a crime of violence, that is, a Hobbes Act robbery, Title 18, United States Code, Section 1951, which may be prosecuted in a court of the United States, did knowingly and unlawfully use and carry and did brandish and discharge a firearm, and in furtherance of such crime of violence, did possess, brandish and discharge said firearm: a handgun, and did aid and abet each other and others, known and unknown to the Grand Jury, in commission of that offense, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR

1. The Grand Jury re-alleges and incorporates herein the Introduction to this Bill of Indictment.

2. On or about February 12, 2006, in Gaston County, within the Western District of North Carolina, and elsewhere,

(01) JOSIAH PIERRE WELCH
(02) RAYMOND DUANE JONES
(03) JAMELL LASHON ALEXANDER
a.k.a. JAMEL LASHON ALEXANDER

knowingly and unlawfully did conspire with each other and others, known and unknown to the Grand Jury, to obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), of business engaged in the sale of food and groceries in the Western District of North Carolina, and elsewhere, affecting interstate commerce.

OVERT ACT

1. On or about February 12, 2006, **Josiah Pierre Welch, Raymond Duane Jones, and Jamell Lashon Alexander a.k.a. Jamel Lashon Alexander** and others known and unknown to the Grand Jury, robbed the Food Lion Grocery Store, 602 Park Street, Belmont,

Gaston County, North Carolina of United States currency by means of threatening employees with handguns and demanding and receiving money.

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

COUNT FIVE

1. The Grand Jury realleges and incorporates herein the Introduction to the Bill of Indictment.

2. On or about February 12, 2006, in Gaston County, within the Western District of North Carolina, and elsewhere,

(01) JOSIAH PIERRE WELCH
(02) RAYMOND DUANE JONES
(03) JAMELL LASHON ALEXANDER
a.k.a. JAMEL LASHON ALEXANDER

did knowingly and unlawfully, obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in commerce, by robbery, in that they took the personal property of the Food Lion Grocery Store, 602 Park Street, Belmont, Gaston County, North Carolina, that is, United States money, from the person and presence of persons, against their will and by means of actual and threatened force, violence, and fear of immediate and future injury, and did aid and abet each other, and others known and unknown to the Grand Jury, in the commission of that offense, in violation of Title 18, United States Code, Sections 1951 and 2.

COUNT SIX

On or about February 12, 2006, in Gaston County, North Carolina, within the Western District of North Carolina, and elsewhere,

(01) JOSIAH PIERRE WELCH
(02) RAYMOND DUANE JONES
(03) JAMELL LASHON ALEXANDER
a.k.a. JAMEL LASHON ALEXANDER

during and in relation to a crime of violence, that is, a Hobbes Act robbery, Title 18, United States Code, Section 1951, which may be prosecuted in a court of the United States, did

knowingly and unlawfully use and carry and did brandish a firearm, and in furtherance of such crime of violence, did possess and brandish said firearms: handguns, and did aid and abet each other, and others, known and unknown to the Grand Jury, in commission of that offense, in violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT SEVEN

On or about February 12, 2006, in Gaston County, within the Western District of North Carolina, and elsewhere,

(01) JOSIAH PIERRE WELCH

being subject to a domestic violence protective court order, issued after a hearing at which he had actual notice and an opportunity to participate; and which order restrained him from harassing, stalking and threatening an intimate partner, and from engaging in other conduct that would place an intimate partner in reasonable fear of bodily injury; and which court order includes a finding that he represented a credible threat to the physical safety of an intimate partner; and which court order by its terms explicitly prohibits the use, attempted use, or threatened use of physical force against an intimate partner that would reasonably be expected to cause bodily injury, did knowingly possess one or more firearms, in and affecting interstate commerce, to wit: a Taurus, Model 94, .22 caliber revolver; a Davis Industries, Model P380, .380 caliber pistol; and a Smith & Wesson, Model 6904, 9mm pistol, in violation of Title 18, United States Code, Section 922(g)(8).

COUNT EIGHT

On or about February 12, 2006, in Gaston County, within the Western District of North Carolina, and elsewhere,

(02) RAYMOND DUANE JONES

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: Robbery With a Dangerous Weapon, in the Superior Court of Mecklenburg County, on or about November 15, 1999, did knowingly possess one or more firearms, in and affecting interstate commerce, to wit: a Taurus, Model 94, .22 caliber revolver; a Davis Industries, Model P380, .380 caliber pistol; and a Smith & Wesson, Model 6904, 9mm pistol, in violation of Title 18, United States Code, Section 922(g)(1).

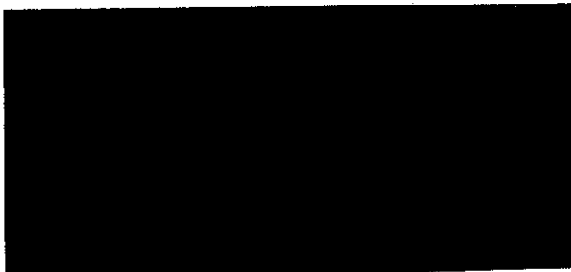
COUNT NINE

On or about February 12, 2006, in Gaston County, within the Western District of North Carolina, and elsewhere,

(03) JAMELL LASHON ALEXANDER
a.k.a. JAMEL LASHON ALEXANDER

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: Robbery With a Dangerous Weapon and Assault With a Deadly Weapon Inflicting Serious Injury, in the Superior Court of Mecklenburg County, on or about December 18, 1996, did knowingly possess one or more firearms, in and affecting interstate commerce, to wit: a Taurus, Model 94, .22 caliber revolver; a Davis Industries, Model P380, .380 caliber pistol; and a Smith & Wesson, Model 6904, 9mm pistol, in violation of Title 18, United States Code, Section 922(g)(1).

A TRUE BILL:



GRETCHEN C.F. SHAPPERT
UNITED STATES ATTORNEY


ROBERT J. MASON
ASSISTANT UNITED STATES ATTORNEY