

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>14-</u>
v.	:	DATE FILED: _____
DONTE CAMP	:	
CALVIN MAURICE CLARK	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (robbery which
	:	interferes with interstate commerce
	:	- 1 count)
	:	18 U.S.C. § 924(c) (using and carrying a
	:	firearm during a crime of violence - 1
	:	count)
	:	18 U.S.C. § 922(g)(1) (convicted felon in
	:	possession of a firearm – 2 counts)
	:	18 U.S.C. § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Center City Soft Pretzel Company, located at 816 Washington Avenue in Philadelphia, Pennsylvania, was a pretzel manufacturing company and retail store, which affected interstate commerce, and which sold, among other things, soft pretzels, which were produced by supplies, that is, yeast, that traveled in interstate commerce.

2. On or about October 29, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DONTE CAMP and
CALVIN MAURICE CLARK**

obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendants CAMP and CLARK unlawfully took and obtained approximately \$393 cash from an employee of the Center City Soft Pretzel Company and against his will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at, demanding money from, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a), (b)(1), and (b)(3).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DONTE CAMP and
CALVIN MAURICE CLARK**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is a .9 millimeter Taurus, Model PT92AF, semi-automatic handgun, serial number TKA77789, loaded with 15 live rounds of ammunition, and a .22 caliber Jennings, Model J-22, semi-automatic handgun, serial number 656142, during and in relation to a crime of violence for which the defendants 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(a), and brandished, and aided and abetted the brandishing of, that firearm.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

DONTE CAMP,

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 commerce a firearm, that is, a .9 millimeter Taurus, Model PT92AF, semi-automatic handgun, serial number TKA77789, loaded with 15 live rounds ammunition.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 29, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

CALVIN MAURICE CLARK,

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 commerce a firearm, that is, a .22 caliber Jennings, Model J-22, semi-automatic handgun, serial number 656142.

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, Section 924(c)(1) and 922(g)(1), as set forth in this indictment, defendants

**DONTE CAMP and
CALVIN MAURICE CLARK**

shall forfeit to the United States of America the firearms, and ammunition involved in the commission of these offenses, including, but not limited to:

- 1) a .9 millimeter Taurus, Model PT92AF, semi-automatic handgun, serial number TKA 77789;
- 2) a .22 caliber Jennings, Model J-22, semi-automatic handgun, serial number 656142; and
- 3) 15 rounds of ammunition.

Pursuant of Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1).

TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney