

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2006, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

VICTOR CRUZ

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wachovia Bank, 2 West Girard Avenue, lawful currency of the United States, that is, approximately \$1,013, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2006, in Philadelphia, in the Eastern District of Pennsylvania,
defendant

VICTOR CRUZ

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Citizens Bank, 3711 Germantown Avenue, lawful currency of the United States, that is, approximately \$1,572, belonging to, and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney