

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

APR - 9 2009

FOR THE DISTRICT OF NEW MEXICO

**MATTHEW J. DYKMAN**

CLERK

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

**THOMAS BERNARD ELDER, aka  
YOUNGSTER,** )

Defendant. )

CRIMINAL NO. 09-869

18 U.S.C. §§ 922(g)(1) and 924(a)(2):  
Felon in Possession of a Firearm and  
Ammunition.

INDICTMENT

The Grand Jury charges:

On or about November 4, 2008, in Bernalillo County, in the District of New Mexico, the defendant, **THOMAS BERNARD ELDER, aka YOUNGSTER**, having been convicted of crimes punishable by imprisonment for a term exceeding one year, that being one count of Armed Robbery (Firearm Enhancement) and one count of Conspiracy to Commit Armed Robbery in Cause No. CR 06-01737, in the Second Judicial District Court in Bernalillo County, in the State of New Mexico, did knowingly possess in and affecting interstate commerce a firearm, a Bryco Arms, Model 38, .380 caliber pistol, bearing the serial number 1293596 and five (5) rounds of R\*P brand of .380 caliber cartridge ammunition, said firearm having been shipped and transported in interstate commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

FORFEITURE ALLEGATIONS

Upon conviction of any of the offenses alleged in this Indictment, defendant, **THOMAS BERNARD ELDER, aka YOUNGSTER**, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c):

