

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

UNITED STATES OF AMERICA	: CRIMINAL NO. _____
v.	: DATE FILED: _____
CURTIS BRABHAM	: VIOLATION: 18 U.S.C. § 2113(a) (bank robbery – 4 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about September 7, 2007, in the Eastern District of Pennsylvania, defendant

CURTIS BRABHAM

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of Sovereign Bank, 1 Belmont Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$3,120, belonging to, and in the care, custody, control, management and possession of Sovereign 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 TWO

THE GRAND JURY CHARGES THAT:

On or about September 12, 2007, in the Eastern District of Pennsylvania, defendant

CURTIS BRABHAM

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of Sovereign Bank, 1 Belmont Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$3,198, belonging to, and in the care, custody, control, management and possession of Sovereign 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 CHARGES THAT:

On or about September 21, 2007, in the Eastern District of Pennsylvania, defendant

CURTIS BRABHAM

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of Citizens Bank, 2001 Market Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$3,726, 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).

COUNT FOUR

THE GRAND JURY CHARGES THAT:

On or about September 24, 2007, in the Eastern District of Pennsylvania, defendant

CURTIS BRABHAM

knowingly and unlawfully by force and violence, and by intimidation, took from an employee of Citizens Bank, 2942 North 22nd Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,160, 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