

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 20, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

THEODORE R. YOUNG

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the United Bank of Philadelphia, located at 1501 N. Broad Street in Philadelphia, lawful currency of the United States, that is, approximately \$4,647, belonging to, and in the care, custody, control, management, and possession of the United Bank of Philadelphia, 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 April 2, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

THEODORE R. YOUNG

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the M&T Bank, located at 3351 Aramingo Avenue in Philadelphia, lawful currency of the United States, that is, approximately \$1,420, belonging to, and in the care, custody, control, management, and possession of the M&T 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:

GRAND JURY FOREPERSON

MICHAEL L. LEVY
United States Attorney