

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 09-188
v.	:	DATE FILED: October 19, 2010
KEITH CANYON	:	VIOLATIONS:
	:	18 U.S.C. § 2113(d) (armed bank
	:	robbery - 2 counts)
	:	18 U.S.C. § 924(c) (using and carrying
	:	a firearm during a crime of violence - 2
	:	counts)
	:	18 U.S.C. § 1503(a) (obstruction of
	:	justice - 1 count)
	:	18 U.S.C. § 1512(b)(3) (witness
	:	tampering - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

SECOND SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 27, 2007, in Reading, in the Eastern District of Pennsylvania, defendant

KEITH CANYON

knowingly and unlawfully, by force and violence, and by intimidation, took, from employees of Fulton Bank, located at 210 N. 5th Street, lawful currency of the United States, that is, approximately \$3,781 belonging to, and in the care, custody, control, management, and possession of Fulton Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant CANYON knowingly and unlawfully assaulted and put

in jeopardy the lives of the employees of Fulton Bank, and other persons, by use of a semi-automatic firearm.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 27, 2007, in Reading, in the Eastern District of Pennsylvania, defendant

KEITH CANYON

knowingly used and carried a firearm, that is, a semi-automatic firearm, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 19, 2008, in Reading, in the Eastern District of Pennsylvania,
defendant

KEITH CANYON

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking of, from employees of Fulton Bank, located at 210 N. 5th Street, lawful currency of the United States, that is, approximately \$5,151 belonging to, and in the care, custody, control, management, and possession of Fulton Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant CANYON knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Fulton Bank, and other persons, by use of a semi-automatic firearm and a revolver.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 19, 2008, in Reading, in the Eastern District of Pennsylvania,
defendant

KEITH CANYON

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a semi-automatic firearm and a revolver, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KEITH CANYON

did, by a threatening letter or communication, influence, obstruct and impede and endeavor to influence, obstruct and impede the due administration of justice, by mailing a letter to T.M.L., a person known to the grand jury, in which he threatened T.M.L. in order to induce T.M.L. to refuse to cooperate with law enforcement authorities in an ongoing investigation.

In violation of Title 18, United States Code, Section 1503(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 29, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

KEITH CANYON

did knowingly threaten, and attempt to threaten, T.M.L., a person known to the grand jury, by sending a threatening letter to T.M.L., with the intent to prevent the communication to law enforcement officers of information relating to the commission of a federal offense, that is, armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

All in violation of Title 18, United States Code, Section 1512(b)(3).

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney