

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.	_____
v.	:	DATE FILED	_____
IAN GOLDEN, a/k/a "Richard Sams"	:	VIOLATIONS:	
	:	18 U.S.C. § 371 (conspiracy to commit bank robbery - 1 count)	
	:	18 U.S.C. § 2113(b) (bank robbery - 1 count)	
	:	18 U.S.C. § 2 (aiding and abetting - 1 count)	

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

1. On or about September 7, 2009, in Drexel Hill, in the Eastern District of Pennsylvania, defendant

**IAN GOLDEN,
a/k/a "Richard Sams,"**

and persons unknown to the United States Attorney, conspired and agreed together to commit an offense against the United States, that is, to knowingly and unlawfully commit a robbery of the Franklin Mint Federal Credit Union (hereafter "the credit union"), the deposits of which were insured by the National Credit Union Association, in violation of Title 18, United States Code, Section 2113(b).

MANNER AND MEANS

2. It was part of the conspiracy that defendant IAN GOLDEN, and persons unknown to the United States Attorney, committed a robbery of the Franklin Mint Federal Credit

Union Automatic Teller Machine (ATM) which was located at Delaware County Memorial Hospital, 501 Lansdowne Avenue, Drexel Hill, Pennsylvania, and stole approximately \$96,430.

OVERT ACTS

In furtherance of the conspiracy, the defendant and others unknown to the United States Attorney committed the following overt acts in the Eastern District of Pennsylvania:

1. On or about September 7, 2009, defendant IAN GOLDEN and another person unknown to the United States Attorney (“Person #1”) entered the Delaware County Memorial Hospital at approximately 8:20 p.m. posing as repairmen and approached the ATM machine outside of the New Day Café inside of the hospital.

2. Defendant IAN GOLDEN and another pPerson unknown to the United States Attorney#1 cut the electric cord and, lifted the ATM machine onto a dolly and removed it from the hospital,; they placed it inside an awaiting van, and drove away from the area.

3. Defendant IAN GOLDEN and another pPerson unknown to the United States Attorney#1 later removed the cash from the ATM machine, parked the van with the ATM machine inside, lit the van on fire, and fled the area.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about September 9, 2009, in Drexel Hill, in the Eastern District of Pennsylvania, defendant

**IAN GOLDEN,
a/k/a "Richard Sams,"**

and others unknown to the United States Attorney, knowingly and unlawfully took and carried away, and aided and abetted the taking and carrying away of, with the intent to steal, property and money exceeding \$1,000, that is, approximately \$96,400 in United States currency, belonging to and in the care, custody, control, management, and possession of the Franklin Mint Federal Credit Union, the deposits of which were insured by the National Credit Union Association.

All in violation of Title 18, United States Code, Sections 2113(b) and 2.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 2113(b), set forth in this information, defendant

**IAN GOLDEN,
a/k/a "Richard Sams,"**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offense(s), including, but not limited to, the sum of \$67,190.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981(a)(1)(C).



ZANE DAVID MEMEGER
United States Attorney