

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
VICTOR BECKWITH	:	VIOLATIONS:
DURRELL BROWN	:	18 U.S.C. § 371 (conspiracy to
LAWRENCE BROWN	:	commit armed bank robbery - 1 count)
	:	18 U.S.C. § 2113(d) (armed bank
	:	robbery - 2 counts)
	:	18 U.S.C. § 924(c) (carrying and
	:	using a firearm during and in
	:	relation to a crime of violence - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)
	:	Notice of forfeiture

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about May 31, 2011 through and until June 16, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**VICTOR BECKWITH,
DURRELL BROWN, and
LAWRENCE BROWN**

conspired and agreed to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the Sovereign Bank, located at 8623 Germantown Avenue, Philadelphia, Pennsylvania (hereafter Sovereign Bank); and the PNC Bank, located at 2200 Cottman Avenue in Philadelphia, Pennsylvania (hereafter PNC Bank), the deposits both of which were and are insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that on or about May 31, 2011, defendants VICTOR BECKWITH and LAWRENCE BROWN committed a robbery of the Sovereign Bank located at 8623 Germantown Avenue, Philadelphia, Pennsylvania, while armed with a firearm, that is, a shotgun.

3. It was also part of the conspiracy that on or about June 16, 2011, defendants VICTOR BECKWITH, DURRELL BROWN, and LAWRENCE BROWN, committed a robbery of the PNC Bank, located at 2200 Cottman Avenue, Philadelphia, Pennsylvania, while armed with dangerous weapons, that is, three semi-automatic style BB guns.

OVERT ACTS

In furtherance of the conspiracy, defendants VICTOR BECKWITH, DURRELL BROWN, and LAWRENCE BROWN committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about May 31, 2011:

1. Defendants VICTOR BECKWITH and LAWRENCE BROWN drove together to Sovereign Bank.
2. Defendant VICTOR BECKWITH and LAWRENCE BROWN entered the Sovereign Bank at approximately 1:00 p.m., wearing masks to conceal their identities and carrying a shotgun. Once inside the Sovereign Bank, defendant BECKWITH pointed the shotgun at employees and patrons, demanded that everyone get on the ground, and defendants BECKWITH and LAWRENCE BROWN stole approximately \$32,000 from Sovereign Bank's cash drawers.

3. Defendants VICTOR BECKWITH and LAWRENCE BROWN fled from the Bank on foot.

On or about June 16, 2011:

4. Defendants VICTOR BECKWITH, DURRELL BROWN, and LAWRENCE BROWN, drove together to the PNC Bank.

5. Defendant VICTOR BECKWITH, DURRELL BROWN, and LAWRENCE BROWN, entered the PNC Bank at approximately 1:10 p.m., wearing masks to conceal their identities and carrying semi-automatic type BB guns. Once inside the PNC Bank, the defendants pointed their guns at employees and patrons, demanded that everyone get on the ground, and stole approximately \$17,000 from PNC Bank's cash drawers.

6. Defendants VICTOR BECKWITH, DURRELL BROWN, and LAWRENCE BROWN, fled from the PNC Bank on foot.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 2 and Overt Acts 1 through 3 of Count One of this Superseding Indictment are incorporated here.
2. On or about May 31, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**VICTOR BECKWITH and
LAWRENCE BROWN**

knowingly and unlawfully, by force and violence, and by intimidation, took, and attempted to take, and aided and abetted the unlawful taking of, from employees of the Sovereign Bank located at 8623 Germantown Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, belonging to, and in the care, custody, control, management, and possession of the Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants VICTOR BECKWITH and LAWRENCE BROWN knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Sovereign Bank, and other persons, by use of a dangerous weapon, that is, a shotgun.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 31, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**VICTOR BECKWITH and
LAWRENCE BROWN**

knowingly carried and used, and aided and abetted the carrying and use of, a firearm, that is, a Mossberg 500 shotgun, serial number L173844, during and in relation to a crime of violence for which each may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery, in violation of Title 18, United States Code, Sections 371, and armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 3 and Overt Acts 4 through 6 of Count One of this Superseding Indictment are incorporated here.
2. On or about June 16, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**VICTOR BECKWITH,
DURRELL BROWN, and
LAWRENCE BROWN,**

knowingly and unlawfully, by force and violence, and by intimidation, took, and attempted to take, and aided and abetted the unlawful taking of, from employees of the PNC Bank, located at 2200 Cottman Avenue in Philadelphia, lawful currency of the United States, belonging to, and in the care, custody, control, management, and possession of the PNC Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants VICTOR BECKWITH, DURRELL BROWN, and LAWRENCE BROWN knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the PNC Bank, and other persons, by use of dangerous weapons, that is, BB guns.

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

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

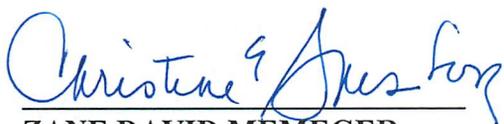
As a result of the violation of Title 18, United States Code, Section 924(c), set forth in Count Three of this superseding indictment, defendants

**VICTOR BECKWITH and
LAWRENCE BROWN**

shall forfeit to the United States of America, the firearms and ammunition involved in the commission of these offenses, including a Mossberg 500 shotgun, serial number L173844.

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:



ZANE DAVID MEMEGER
United States Attorney

GRAND JURY FOREPERSON