## IN THE UNITED STATES DISTRICT COURT

## FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| UNITED STATES OF AMERICA | : | DATE FILED:    |
|--------------------------|---|----------------|
| v.                       | : | CRIMINAL NO. : |

DRAGOS UNGUREAN : VIOLATION:

: 18 U.S.C. § 2113(a) (attempted bank

robbery - 1 count)

# **INDICTMENT**

## **COUNT ONE**

## THE GRAND JURY CHARGES THAT:

On or about March 19, 2012, at Wyomissing, in the Eastern District of Pennsylvania, defendant

## **DRAGOS UNGUREAN**

attempted to enter the M & T Bank (the bank), located at 800 Penn Avenue in Wyomissing, Pennsylvania, with intent to commit in the bank, a felony affecting the bank, that is, to knowingly and unlawfully by force and violence, and by intimidation, take, from employees of the

M & T Bank, currency of the United States, 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: |
|---|--------------|
|   | FOREPERSON   |
| ZANE DAVID MEMEGER United States Attorney |              |