

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
 :  
 **v.** : **DATE FILED:** \_\_\_\_\_  
 :  
 **DYLAN CAPONE** : **VIOLATIONS:**  
 **MICHAEL YOUNG** : **18 U.S.C. § 1951(a) (robbery which**  
 : **interferes with interstate commerce – 1 count)**  
 : **18 U.S.C. § 924(c) (use of a firearm during and**  
 : **in relation to a crime of violence -1 count)**  
 : **18 U.S.C. § 2 (aiding and abetting)**  
 : **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. The Chuen Hing Grocery, located at 1414 South 6th Street, Philadelphia, Pennsylvania (the “Chuen Hing Store”) was a business engaged in and affecting interstate commerce, including by providing to customers cigarettes produced, purchased, and transported from West Virginia and New York to Pennsylvania.

2. On or about January 28, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DYLAN CAPONE and  
MICHAEL YOUNG**

obstructed, delayed and affected commerce and the movement of articles and commodities in

commerce, and attempted to do so, by robbery, in that, defendants DYLAN CAPONE and MICHAEL YOUNG unlawfully took and obtained, attempted to take and obtain, and aided and abetted the unlawful taking and attempting to take and to obtain, United States currency from the person and presence of another and against her will, by means of actual and threatened force, violence, and fear of injury to her person and to the person of another, that is, by pointing a firearm at an employee of the Chuen Hing Store and at a patron of that store and demanding money.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 28, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**DYLAN CAPONE and  
MICHAEL YOUNG**

knowingly used and carried a firearm, and aided and abetted the use and carrying of a firearm, that is, a silver FIE .25 caliber, Titan semi-automatic handgun, serial number D800027, loaded with six live rounds of ammunition, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, robbery which interferes with interstate commerce, in violation of Title 18, U.S.C. § 1951, as charged in Count One of the indictment, and brandished, and aided and abetted the brandishing of, that firearm.

In violation of Title 18, United States Code, Sections 924(c)(1) 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 this indictment, defendants

**DYLAN CAPONE and  
MICHAEL YOUNG**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to:

1. .25 caliber, FIE, Titan semiautomatic handgun, serial number D800027; and
2. Six rounds of .25 caliber CBC ammunition.

All pursuant to Title 18, United States Code, Section 924 and Title 28, United States Code, Section 2461.

**A TRUE BILL:**

\_\_\_\_\_  
**FOREPERSON**

\_\_\_\_\_  
**ZANE DAVID MEMEGER**  
United States Attorney