

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
THOMAS DARDEN	:	VIOLATIONS:
ERIC G. TOWNES	:	18 U.S.C. § 2113(a) (bank robbery – 1
NICK K.K. FINKS	:	count)
NEISHA N. WOODSON	:	18 U.S.C § 924(c)(1)(A) (using and
		carrying a firearm during and in relation
		to a crime of violence, and brandishing
		the firearm - 1 count)
		18 U.S.C. § 922(g)(1) (convicted felon in
		possession of a firearm - 1 count)
		18 U.S.C § 2 (aiding and abetting)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 25, 2014, in Lancaster County, in the Eastern District of Pennsylvania, defendants

**THOMAS DARDEN,
ERIC G. TOWNES,
NICK K.K. FINKS, and
NEISHA N. WOODSON**

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the M&T Bank, 1847 Columbia Ave., Lancaster, PA, 17603, and aided and abetted the taking of, lawful currency of the United States, that is, \$20,426, 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, Sections 2113(a) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 25, 2014, in Lancaster County, in the Eastern District of Pennsylvania, defendants

**THOMAS DARDEN,
ERIC G. TOWNES,
NICK K.K. FINKS, and
NEISHA N. WOODSON**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a Cobra semiautomatic pistol, model FS380, serial number FS049426, loaded with seven rounds of .380mm ammunition, and an Intratec semiautomatic pistol, model Cat 9, 9mm Luger, serial number 07184, loaded with six rounds of 9mm 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, bank robbery in violation of Title 18, United States Code, Section 2113(a), as charged in Count One of this indictment, and brandished, and aided and abetted the brandishing of, that firearm.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 25, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

THOMAS DARDEN,

having been convicted in a court of the State of Maryland of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Cobra semiautomatic pistol, model FS380, serial number FS049426, loaded with seven rounds of .380mm ammunition, and an Intratec semiautomatic pistol, model Cat 9, 9mm Luger, serial number 07184, loaded with six rounds of 9mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 924(c)(1) and 922(g)(1), as set forth in this indictment, defendants

**THOMAS DARDEN,
ERIC G. TOWNES,
NICK K.K. FINKS, and
NEISHA N. WOODSON**

shall forfeit to the United States of America the firearms and ammunition involved in the commission of these offenses, that is,

- a. One Cobra semiautomatic pistol, model FS380, serial number FS049426;
- b. Seven rounds of .380mm ammunition;
- c. One Intratec semiautomatic pistol, Cat 9, 9mm Luger, SN 07184; and
- d. Six rounds of 9mm ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d)(1).

A TRUE BILL:

**_____
GRAND JURY FOREPERSON**

**_____
ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**