

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 13-60**

v. : **DATE FILED: September 5, 2013**

MARCUS AKIEM RICKETTS : **VIOLATIONS:**
: **18 U.S.C. § 2113(d) (armed bank**
: **robbery - 4 counts)**
: **18 U.S.C. § 924(c)(1) (using and**
: **carrying a firearm during a crime of**
: **violence – 4 counts)**
: **Notice of forfeiture**

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about June 8, 2010, in Pottstown, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Sovereign Bank, located at 258 East High Street, Pottstown, Pennsylvania, lawful currency of the United States, that is, approximately \$7,463, 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, defendant RICKETTS 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 silver and black semi-automatic handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 8, 2010, in Pottstown, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly used and carried a firearm, that is, a silver and black semi-automatic handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, as charged in Count One, in violation of Title 18, United States Code, Section 2113(d), and brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2012, in Devon, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Citizens Bank, located at 209 Lancaster Avenue, Devon, Pennsylvania, lawful currency of the United States, that is, approximately \$11,687, belonging to, and in the care, custody, control, management and possession of the Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant MARCUS AKIEM RICKETTS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Citizens Bank, and other persons, by use of a dangerous weapon, that is, a black and silver semi-automatic handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2012, in Devon, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly used and carried a firearm, that is, a black and silver semi-automatic handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, as charged in Count Three, in violation of Title 18, United States Code, Section 2113(d), and brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 12, 2012, in Emmaus, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the First Niagara Bank, located at 502 State Avenue, Emmaus, Pennsylvania, lawful currency of the United States, that is, approximately \$25,627, belonging to, and in the care, custody, control, management and possession of the First Niagara Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant MARCUS AKIEM RICKETTS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the First Niagara Bank, and other persons, by use of a dangerous weapon, that is, a black and silver semi-automatic handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 12, 2012, in Emmaus, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly used and carried a firearm, that is, a black and silver semi-automatic handgun, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, as charged in Count Five, in violation of Title 18, United States Code, Section 2113(d), and brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 2, 2012, in Exton, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Manufacturers and Traders Trust Company ("M&T Bank"), formerly located at 760 North Pottstown Pike, Exton, Pennsylvania, lawful currency of the United States, that is, approximately \$27,906, 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, and, in so doing, defendant MARCUS AKIEM RICKETTS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of M&T Bank, and other persons, by use of a dangerous weapon, that is, a Beretta, Px4, .40 caliber pistol, serial number PZ40261.

In violation of Title 18, United States Code, Section 2113(d).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 2, 2012, in Exton, in the Eastern District of Pennsylvania,
defendant

MARCUS AKIEM RICKETTS

knowingly used and carried a firearm, that is, a Beretta, Px4, .40 caliber pistol, serial number PZ40261, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, armed bank robbery, as charged in Count Seven, in violation of Title 18, United States Code, Section 2113(d), and brandished that firearm.

In violation of Title 18, United States Code, Section 924(c)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Section 924(c) set forth in the superseding indictment, defendant

MARCUS AKIEM RICKETTS

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

- a) one Beretta, Px4, .40 caliber pistol, serial number PZ40261;
- b) one Beretta, Model 92FS, 9mm pistol, serial number BER389800;
and
- c) any and all ammunition and magazines.

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

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**