

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
LEROY TOWNSEND	:	VIOLATIONS:
	:	18 U.S.C. § 2113(a) (bank robbery -
	:	2 counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 23, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

LEROY TOWNSEND

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Republic Bank, 1601 Walnut Street, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$3,000, belonging to, and in the care, custody, control, management and possession of Republic Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 14, 2014, in Philadelphia, in the Eastern District of Pennsylvania, defendant

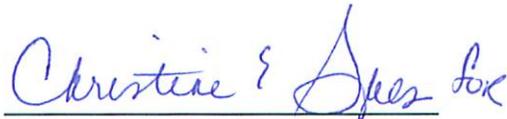
LEROY TOWNSEND

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Beneficial Bank, 5873 Ridge Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$4,000, belonging to, and in the care, custody, control, management and possession of Beneficial 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