

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DAVID THOMAS,	:	VIOLATIONS:
a/k/a "David Thompson,"		18 U.S.C. §§ 2113(a), (d) (armed bank
SHYMEKA MILLER,		robbery - 1 count)
a/k/a "Shymeka Wright,"		18 U.S.C. § 924(c)(1) (brandishing, using,
HEATHER LANE	:	and carrying a firearm during and in
		relation to a crime of violence - 1 count)
		18 U.S.C. § 922(g)(1) (convicted felon in
		possession of 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 July 15, 2015, in Philadelphia, in the Eastern District of
Pennsylvania, defendants

DAVID THOMAS,
a/k/a "David Thompson,"
SHYMEKA MILLER,
a/k/a "Shymeka Wright," and
HEATHER LANE

knowingly and unlawfully, by force and violence, and by intimidation, took and aided and
abetted the taking from employees of TD Bank, 5501 Ridge Avenue, Philadelphia, Pennsylvania,

lawful currency of the United States, that is, approximately \$7,000, belonging to, and in the care, custody, control, management and possession of TD Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of TD Bank, and other persons, by use of a dangerous weapon, that is, by brandishing a handgun at the bank employees.

In violation of Title 18, United States Code, Sections 2113(a), (d) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2015, in Philadelphia, in the Eastern District of Pennsylvania,
defendants

**DAVID THOMAS,
a/k/a “David Thompson,”
SHYMEKA MILLER,
a/k/a “Shymeka Wright,” and
HEATHER LANE**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a Walther Mod 8 semiautomatic firearm, serial number 6469, 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, armed bank robbery, in violation of Title 18, United States Code, Sections 2113(d) and 2, 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) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 15, 2015, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DAVID THOMAS,
a/k/a “David Thompson,”**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Walther Mod 8 semiautomatic firearm, serial number 6469, loaded with six live rounds of 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), set forth in this indictment, defendants

**DAVID THOMAS,
a/k/a “David Thompson,”
SHYMEKA MILLER,
a/k/a “Shymeka Wright,” and
HEATHER LANE**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of these offenses, including, but not limited to, a Walther Mod 8 semiautomatic firearm, serial number 6469, loaded with six live rounds of ammunition.

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

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney