

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO.**  
v. : **DATE FILED:** \_\_\_\_\_  
**SHAWN LASALLE HARRIS** : **VIOLATIONS:**  
: **18 U.S.C. § 2113(d) (armed bank robbery – 1**  
: **count)**  
: **18 U.S.C. § 924(c)(1) (using and carrying a**  
: **firearm during a crime of violence – 1 count)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about June 3, 2015, at Plymouth Meeting, Montgomery County, in the Eastern District of Pennsylvania, defendant

**SHAWN LASALLE HARRIS**

knowingly and unlawfully by force and violence, and by intimidation, took from employees of Bank of America, 420 Plymouth Road, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of, Bank of America, the deposits of which were insured by the Federal Deposit Insurance Corporation, and in so doing, knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Bank of America by brandishing and discharging a dangerous weapon, that is, a .380 caliber Ruger handgun, serial number 37857004.

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

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 3, 2015, at Plymouth Meeting, Montgomery County, in the Eastern District of Pennsylvania, defendant

**SHAWN LASALLE HARRIS**

knowingly used and carried a firearm, that is, a black .380 caliber Ruger LCP handgun, serial number 37857004, with an affixed red laser sight, 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 of this Indictment, and brandished and discharged that firearm.

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

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 924(c)(1), set forth in Count Two of this indictment, the defendant

**SHAWN LASALLE HARRIS**

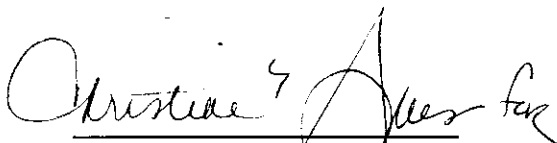
shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of this offense, including, but not limited to:

- A. One black .380 caliber Ruger LCP handgun, bearing serial number 37857004, with an affixed red laser sight;

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

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

  
**ZANE DAVID MEMEGER**  
*United States Attorney*