

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2016 OCT 12 PM 2:05

DEPUTY CLERK

CBJ

UNITED STATES OF AMERICA

v.

No. 2:16-CR-62-D

RAUL GARCIA (01)
LEONARD JOVON COULTER (02)
RICHARD CHARLES CUNNINGHAM JR. (03)

INDICTMENT

The Grand Jury Charges:

Count One

Credit Union Robbery and Aiding and Abetting
(Violation of 18 U.S.C. §§ 2113(a) and 2)

On or about September 23, 2016, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Raul Garcia, Leonard Jovon Coulter, and Richard Charles Cunningham Jr.**, defendants, by force and violence, and by intimidation, did take, and attempt to take, from the person and presence of employees of Education Credit Union, 1801 FM 2381, Amarillo, Texas, money belonging to, and in the care, custody, control, management, and possession of said Education Credit Union, a credit union whose accounts were then insured by the National Credit Union Administration Board.

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


Count Two

Using and Carrying a Firearm During and
in Relation to a Crime of Violence and Aiding and Abetting
(Violation of 18 U.S.C. §§ 924(c)(1)(A)(ii) and 2)

On or about September 23, 2016, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Raul Garcia, Leonard Jovon Coulter, and Richard Charles Cunningham Jr.**, defendants, did knowingly use and carry a firearm, to wit: unknown make, unknown model, unknown caliber, and unknown serial number, during and in relation to a crime of violence for which may be prosecuted in a court of the United States, that is, credit union robbery and aiding and abetting, in violation of Title 18, United States Code, Sections 2113(a) and 2, and in committing the violation, the defendants did brandish a firearm.


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

A TRUE BILL:



FOREPERSON

JOHN R. PARKER
UNITED STATES ATTORNEY



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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

THE UNITED STATES OF AMERICA

v.

RAUL GARCIA (01)
LEONARD JOVON COULTER (02)
RICHARD CHARLES CUNNINGHAM JR. (03)

INDICTMENT

COUNT 1: CREDIT UNION ROBBERY AND AIDING AND
ABETTING
Title 18, United States Code, Sections 2113(a) and 2.

COUNT 2: USING AND CARRYING A FIREARM DURING AND IN
RELATION TO A CRIME OF VIOLENCE AND AIDING
AND ABETTING
Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

(2 COUNTS)

A true bill rendered:

Amarillo Lubbock

Rail But

Foreperson

Filed in open court this 12th day of October A.D. 2016.

Clerk

SEALED ARREST WARRANT TO ISSUE AS TO EACH DEFENDANT

[Signature]
UNITED STATES MAGISTRATE JUDGE