

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 13-\_\_\_\_\_**

**v.** : **DATE FILED:\_\_\_\_\_**

**DARNELL THOMAS** : **VIOLATIONS:**  
**18 U.S.C. § 2113(a)**  
: **(bank robbery - 3 counts)**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about January 24, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DARNELL THOMAS**

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Citizens Bank, 6324 Stenton 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 Citizens Bank, the deposits of which were and are 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 April 20, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DARNELL THOMAS**

knowingly and unlawfully, by force and violence, and by intimidation, attempted to take from employees of PNC Bank, 3244 N. Broad St., Philadelphia, Pennsylvania, lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of PNC Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

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

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about April 22, 2013, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**DARNELL THOMAS**

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Citizens Bank, 6324 Stenton Ave, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$1,425, belonging to, and in the care, custody, control, management and possession of Citizens Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

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

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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