

JTW: 10.22.20
JWS: USAO#2020R00697

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

ANTHONY JASON YOUNG, JR.,

Defendant.

*

* Criminal no. ELH-20-0371

* (Interference with Commerce by
Robbery, 18 U.S.C. § 1951(a); Bank
* Robbery, 18 U.S.C. §§ 2113(a), (d) & (f);
Using, Carrying, and Brandishing a
* Firearm During and in Relation to a
Crime of Violence, 18 U.S.C. 924(c);
* Possession of a Firearm and Ammunition
by a Prohibited Person, 18 U.S.C. 922(g);
* Aiding and Abetting, 18 U.S.C. § 2;
Forfeiture, 18 U.S.C. § 924(d), 18 U.S.C.
* § 981, and 28 U.S.C. § 2461(c))

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INDICTMENT

COUNT ONE

(Interference with Commerce by Robbery)

The Grand Jury for the District of Maryland charges that:

1. At all times material to this Indictment, the American Legion, Francis Scott Key Post, located at 1450 Taney Avenue, Frederick, Maryland 21702, was engaged in the retail sale of alcoholic beverages, food items, and other consumer products in interstate commerce and the business of the American Legion Post affected interstate commerce.

2. On or about November 18, 2019, in the District of Maryland, the defendant,

ANTHONY JASON YOUNG, JR.,

did knowingly, obstruct, delay and affect commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by

robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendant did unlawfully take and obtain money and property belonging to the American Legion, Francis Scott Key Post, from the person of and in the presence of an employee of the American Legion, Francis Scott Key Post, against the employee's will by means of actual and threatened force, violence, and fear of injury, immediate and future, to the employee's person and property in the employee's custody and possession.

18 U.S.C. §1951(a)

18 U.S.C. § 2

COUNT TWO
**(Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about November 18, 2019, in the District of Maryland, the defendant,

ANTHONY JASON YOUNG, JR.,

did knowingly and intentionally use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Interference with Commerce by Robbery, as set forth in Count One of this Indictment, which is incorporated herein by reference.

18 U.S.C. § 924(c)(1)(a)(ii)

18 U.S.C. § 2

COUNT THREE
(Armed Bank Robbery)

The Grand Jury for the District of Maryland further charges that:

On or about December 5, 2019, in the District of Maryland, the defendant,

ANTHONY JASON YOUNG, JR.

did by force, violence and intimidation, take from the person and presence of employees of Woodsboro Bank, located at 900 N. East Street, Frederick, Maryland 21701, a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation, money in the amount of \$1,297.00 more or less, belonging to and in the care, custody, control, management and possession of said bank, and did, in committing this offense, put in jeopardy the life of a person by the use of a dangerous weapon, to wit, a firearm.

18 U.S.C. §§ 2113(a), (d) & (f)

18 U.S.C. § 2

COUNT FOUR
**(Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)**

The Grand Jury for the District of Maryland further charges that:

On or about December 5, 2019, in the District of Maryland, the defendant,

ANTHONY JASON YOUNG, JR.

did knowingly and intentionally use, carry, and brandish a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Armed Bank Robbery, as set forth in Count Three of this Indictment, which is incorporated herein by reference.

18 U.S.C. § 924(c)(1)(a)(ii)
18 U.S.C. § 2

COUNT FIVE

(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland further charges that:

On or about December 16, 2019, in the District of Maryland, the defendant,

ANTHONY JASON YOUNG, JR.,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, an Armi-Galesi-Brescia-Brevetto, Model 503, .22 caliber handgun, serial number 118696, and multiple rounds of .22 caliber ammunition; and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 924(d), Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 981, as a result of the defendant's conviction(s).

Robbery Forfeiture

2. Upon conviction of the offenses set forth in the Robbery Count(s), the defendant convicted of such offense(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(c) and 28 U.S.C. § 2461(c), all property, real and personal, that constitutes, or is derived from, proceeds traceable to the commission of the offense(s).

Firearms and Ammunition Forfeiture

3. Pursuant to 18 U.S.C. § 924(d), upon conviction of an offense alleged in the Firearms Count of this Indictment, the defendant convicted of such offense shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in that offense.

Property Subject to Forfeiture

4. The property to be forfeited includes, but is not limited to, the following:
- a. an Armi-Galesi-Brescia-Brevetto, Model 503, .22 caliber handgun, serial number 118696; and
 - b. multiple rounds of .22 caliber ammunition.

18 U.S.C. § 924(d)
18 U.S.C. § 981
28 U.S.C. § 2461(c)

Robert K. Hur/jws

Robert K. Hur
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

10/28/20

Date