

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
KYLE COSTELLO	:	VIOLATIONS:
MATTHEW HILL	:	18 U.S.C. § 371 (conspiracy to
	:	commit bank robbery - 1 count)
	:	18 U.S.C. § 2113(a) (armed bank
	:	robbery - 1 count)
	:	18 U.S.C. § 2113(d) (attempted
	:	bank robbery - 1 count)
	:	18 U.S.C. § 924(c) (carrying and
	:	using a firearm during and in
	:	relation to a crime of violence – 1
	:	count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about November 7, 2013, in Shillington and elsewhere, in the Eastern District of Pennsylvania, defendants

**KYLE COSTELLO and
MATTHEW HILL**

conspired and agreed to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the National Penn Bank in Shillington, Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that defendants KYLE COSTELLO and MATTHEW HILL committed an armed robbery of the National Penn Bank, located at 2246 Lancaster Pike, Shillington, Pennsylvania, on or about November 7, 2013, and stole approximately \$4,314.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, defendants KYLE COSTELLO and MATTHEW HILL committed the following overt acts, among others, in the Eastern District of Pennsylvania:

On or about November 7, 2013:

1. Defendants KYLE COSTELLO and MATTHEW HILL discussed their plan to rob the National Penn Bank together.
2. Defendants KYLE COSTELLO and MATTHEW HILL drove together to the National Penn Bank.
3. Defendants KYLE COSTELLO and MATTHEW HILL entered the National Penn Bank at approximately 2:00 p.m.
4. Upon entering the bank, defendant MATTHEW HILL approached a teller counter and, as a diversion, inquired about opening a checking account.
5. While defendant MATTHEW HILL diverted the teller, defendant KYLE COSTELLO pulled a firearm from his waistband.
6. Defendant KYLE COSTELLO accosted a second teller and demanded money, stating, "I want all the f***** money," as he pointed the firearm at the teller.
7. Defendant KYLE COSTELLO took \$4,314 from the teller at gunpoint.

8. Defendants KYLE COSTELLO and MATTHEW HILL ran from the bank into an awaiting getaway car and fled the area.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 2 and Overt Acts 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about November 7, 2013, in Shillington, in the Eastern District of Pennsylvania, defendants

**KYLE COSTELLO and
MATTHEW HILL**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the unlawful taking, from employees of National Penn Bank, located at 2246 Lancaster Pike, Shillington, Pennsylvania, lawful currency of the United States, that is, approximately \$4,314, belonging to, and in the care, custody, control, management, and possession of the National Penn Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants COSTELLO and HILL knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the National Penn Bank, and other persons, by use of a dangerous weapon, that is, a semiautomatic pistol.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraph 2 and Overt Acts 1 through 8 of Count One of this Indictment are incorporated here.
2. On or about November 7, 2013, in Shillington, in the Eastern District of Pennsylvania, defendants

**KYLE COSTELLO and
MATTHEW HILL**

knowingly used and carried, and aided and abetted the use and carrying of, a firearm, that is, a semiautomatic pistol, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit armed bank robbery and armed bank robbery, as charged in Counts One and Two of this indictment, during which the firearm was brandished.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 6, 2013, in York, in the Eastern District of Pennsylvania, defendant

MATTHEW HILL

knowingly and unlawfully by force and violence, and by intimidation, attempted to take from employees of the Susquehanna Bank, located at 1 E. Market Street, York, Pennsylvania, lawful currency of the United States, belonging to, and in the care, custody, control, management, and possession of the Susquehanna Bank Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

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

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
United States Attorney