

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

**UNITED STATES OF AMERICA** : **CRIMINAL NO.** \_\_\_\_\_  
**v.** : **DATE FILED:** \_\_\_\_\_  
**BENJAMIN TWIGGS** : **VIOLATIONS:**  
: **18 U.S.C. § 1001(a)(3) (making or using a**  
: **materially false document – 1 count)**  
: **18 U.S.C. § 2314 (transporting stolen goods**  
: **in interstate commerce – 1 count)**  
: **Notice of Forfeiture**

**INDICTMENT**

**COUNT ONE**

**(Making or Using a Materially False Document)**

**THE GRAND JURY CHARGES THAT:**

On or about October 31, 2013, in Philadelphia in the Eastern District of Pennsylvania, defendant

**BENJAMIN TWIGGS,**

in a matter within the jurisdiction of the Department of Homeland Security, a department of the executive branch of the United States, did willfully and knowingly make and use a false writing and document, knowing the same to contain a materially false, fictitious, and fraudulent statement, by using and transmitting a letter from the Internal Revenue Service that had been falsified to state that Philadelphia Urban Technology Institute was recognized as a tax-exempt organization, when, in truth and in fact, as defendant TWIGGS well knew, Philadelphia Urban Technology Institute had not been so recognized by the Internal Revenue Service.

In violation of Title 18, United States Code, Section 1001(a)(3).

**COUNT TWO**

**(Transporting Stolen Goods in Interstate Commerce)**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about January 13, 2015, in Eastern District of Pennsylvania and elsewhere,  
the defendant,

**BENJAMIN TWIGGS,**

did unlawfully transport, transmit, and transfer in interstate commerce from Lorton, Virginia, to Philadelphia, Pennsylvania, stolen goods, wares and merchandise, that is, 96 LCD computer monitors, of the value of \$5,000 or more, knowing the same to have been stolen, converted, and taken by fraud.

In violation of Title 18, United States Code, Section 2314.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 2314, set forth in this indictment, defendant

**BENJAMIN TWIGGS**

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such violation, including, but not limited to 96 LCD computer monitors received in Lorton, Virginia on or about January 13, 2015.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**



**ZANE DAVID MEMEGER**  
United States Attorney