

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 11-_____**
v. : **DATE FILED: August 11, 2011**
TERRY TRAPP : **VIOLATIONS:**
: **18 U.S.C. § 472 (uttering counterfeit currency-**
: **five counts)**
: **Notice of forfeiture**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about November 29, 2009, in Quakertown, in the Eastern District of Pennsylvania, defendant

TERRY TRAPP,

with intent to defraud, passed and uttered falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$600 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2009, at Wal-Mart, in Quakertown, in the Eastern District of Pennsylvania, and elsewhere, defendant

TERRY TRAPP,

with intent to defraud, passed and uttered falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$700 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2009, at Best Buy, in Quakertown, in the Eastern District of Pennsylvania, defendant

TERRY TRAPP,

with intent to defraud, passed and uttered falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$700 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 20, 2010, in West Hempfield Township, in the Eastern District of Pennsylvania, defendant

TERRY TRAPP,

with intent to defraud, passed and uttered falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$800 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 26, 2010, in Lancaster, in the Eastern District of Pennsylvania, defendant

TERRY TRAPP,

with intent to defraud, passed and uttered falsely made, forged, and counterfeited obligations of the United States, that is, approximately \$600 in counterfeit \$100 Federal Reserve Notes.

In violation of Title 18, United States Code, Section 472.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 472, set forth in this indictment, defendant

TERRY TRAPP

shall forfeit to the United States of America any and all property that constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the offenses, including, but not limited to, \$3,400 in currency, any property involved in such offenses, and any property traceable to such property.

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

- (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 18, United States Code, Section 982(b) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other

property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(B).

A TRUE BILL:

FOREPERSON

ZANE DAVID MEMEGER
United States Attorney