

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

UNITED STATES OF AMERICA : **CRIMINAL NO. 11-_____**
v. : **DATE FILED: _____**
ELESHA SEARS : **VIOLATION:**
: **18 U.S.C. § 844(i) (attempt to destroy a**
: **building by fire - 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Transitional Work Corporation was a company that offered job training and vocational rehabilitation services in and affecting interstate commerce.
2. The Land Title Building, located at 100 South Broad Street, Philadelphia, Pennsylvania, is a commercial high-rise office building, the tenants of which include businesses engaged in and affecting interstate commerce, by providing legal, medical, and other services to residents of the Commonwealth of Pennsylvania and out-of-state residents.
3. On or about March 21, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

ELESHA SEARS

maliciously damaged and destroyed, and attempted to damage and destroy, by means of fire, a building and equipment contained therein, used in interstate commerce and in activities affecting interstate commerce, that is, the premises of Transitional Work Corporation located in the Land

Title Building, 7th floor, 100 South Broad Street, Philadelphia, Pennsylvania.

In violation of Title 18, United States Code, Section 844(i).

A TRUE BILL:

GRAND JURY FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**