

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

UNITED STATES	: CRIMINAL NO.
V.	: DATE FILED:
ROGER EICHENHOLTZ	: VIOLATION: 18 U.S.C. § 875(c) (threats – 1 count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times relevant to this Indictment, defendant ROGER EICHENHOLTZ resided in Westchester County, New York.
2. At all times material to this indictment defendant ROGER EICHENHOLTZ had been involved in civil litigation over control of a company named CMGN, which he had had established with T.E.
3. T.E. is a person whose identity is known to the grand jury. T.E. was one of the people on the other side of the litigation from the defendant. T.E. lived in the Eastern District of Pennsylvania.
4. T.E. and the others prevailed in the litigation and ROGER EICHENHOLTZ was the loser.
5. After the litigation ended, defendant ROGER EICHENHOLTZ sent numerous e-mail messages to T.E. and others claiming that they had defrauded him and threatening to bring both civil and criminal actions against them.

6. On or about September 24, 2013, defendant ROGER EICHENHOLTZ sent another such e-mail to T.E. and others, using his AOL account. At the end of the e-mail, after threatening both civil and criminal litigation, the defendant wrote the following:

PLAN B- if for some unforeseen miracle, you escape justice, I have access to a "Side Bolt 45.cal with 6 silver bullets that have your name on them.

7. Defendant was in Westchester County, New York when he sent this e-mail.

8. T.E. was in the Eastern District of Pennsylvania when he received the e-mail.

9. On or about September 24, 2013, in the Eastern District of Pennsylvania and elsewhere, defendant

ROGER EICHENHOLTZ

transmitted in interstate commerce, a communication containing a threat to injure T.E.

In violation of Title 18, United States Code, Section 875(c)

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney