

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

UNITED STATES OF AMERICA	:	CRIMINAL NO.
v.	:	DATE FILED:
JAMES PICKUP SHAWN WORKMAN	:	VIOLATIONS:
	:	18 U.S.C. § 371 (conspiracy to commit malicious damage by means of fire - 1 count)
	:	18 U.S.C. § 844(i) (malicious damage by means of fire of a building used in interstate commerce – 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this indictment:

1. Arco Sales Company, located at 2211 Wakeling Street, in Philadelphia, Pennsylvania, manufactured and sold renewable and non-renewable aircraft, missile components and other naval items, to the United States Navy and other federal agencies throughout the United States which items traveled in interstate commerce.

2. On or about December 16, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JAMES PICKUP and
SHAWN WORKMAN**

conspired and agreed to maliciously 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, Arco Sales Company located at 2211 Wakeling Street, Philadelphia, Pennsylvania (“Arco factory building”), in violation of Title 18, United States Code, Section 844(i).

MANNER AND MEANS

It was part of the conspiracy that:

3. Earlier in the evening of on or about December 16, 2012, defendant JAMES PICKUP, his brother K.P., and defendant SHAWN WORKMAN forcibly entered the Arco factory building after gaining access to the building by removing an air conditioner from the wall.

Defendants PICKUP and WORKMAN, and K.P., stole approximately 100 bottles of liquor and computer equipment from the premises, and transported the stolen goods back to their residence, approximately 50 yards from the factory building.

4. After learning that K.P. had not worn gloves during the burglary, as K.P. had been instructed to do, defendant JAMES PICKUP planned to set fire to the Arco factory building in an effort to destroy any fingerprint evidence inadvertently left behind.

5. Defendant JAMES PICKUP recruited defendant SHAWN WORKMAN, who agreed to help carry out the plan to use the stolen liquor and matches to set a fire inside the Arco factory building.

OVERT ACTS

On or about December 16, 2012, in furtherance of the arson conspiracy and to accomplish its objects, defendants JAMES PICKUP and SHAWN WORKMAN committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania:

1. Defendant JAMES PICKUP requested that defendant SHAWN WORKMAN return with defendant PICKUP to the Arco factory building to set it on fire to destroy

fingerprint evidence left by K.P. during he earlier burglary.

2. Defendant SHAWN WORKMAN agreed to help defendant JAMES PICKUP destroy evidence by starting a fire at Arco factory building.

3. Defendants JAMES PICKUP and SHAWN WORKMAN walked to Arco factory building, each carrying approximately three bottles of liquor that had been stolen from the Arco factory building.

4. Defendant SHAWN WORKMAN served as a look-out at the corner of the building, facing Wakeling Street, to alert defendant JAMES PICKUP of police presence.

5. Defendant JAMES PICKUP entered the Arco factory building through a hole in the wall previously created by removing an air conditioner. Once inside, defendant PICKUP threw the bottles of liquor onto the floor of the office, smashing them as they hit the floor.

6. Defendant JAMES PICKUP threw a lit book of matches in the area where the bottles of liquor had been thrown, starting a fire in the building that went to 4-alarms and completely destroyed the building before being brought under control.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1, 3, and 4, and Overt Acts 1 through 6 of Count One of this indictment are incorporated here.

2. On or about December 16, 2012, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**JAMES PICKUP and
SHAWN WORKMAN**

maliciously damaged and destroyed, and aided and abetted the malicious damaging and destruction of, by means of fire the building and equipment contained therein, used in interstate and foreign commerce, and in activities affecting interstate commerce, that is Arco Sales Company, located at 2211 Wakeling Street, Philadelphia, Pennsylvania.

In violation of Title 18, United States Code, Sections 844(i) and 2.

A TRUE BILL:

FOREPERSON

**ZANE DAVID MEMEGER
UNITED STATES ATTORNEY**