

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
CHAD S. DODGE : **VIOLATIONS:**
: **18 U.S.C. § 844(i) (attempted arson – 1**
: **count)**
: **18 U.S.C. § 1001(a)(2) (false statement to**
: **federal law enforcement – 1 count)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 14, 2014, in the Eastern District of Pennsylvania, defendant

CHAD S. DODGE

attempted to maliciously damage and destroy, by means of fire and an explosive, a building and equipment contained therein, used in interstate commerce and in activities affecting interstate commerce, that is, the building located at 752 South 4th Street, Philadelphia, Pennsylvania.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 8, 2015, in the Eastern District of Pennsylvania, defendant

CHAD S. DODGE,

in a matter within the jurisdiction of the executive branch of the government of the United States, that is, the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”), knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, that is, falsely stating to a Special Agent of the ATF that he had never handled the timing device found at 752 South 4th Street, Philadelphia, Pennsylvania on or about April 14, 2014, when in fact he had handled the device, as he well knew.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney