

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TIMOTHY P. O'DONNELL

No.

Violations: Title 18, United States Code,  
Section 844(e)

**COUNT ONE**

The SPECIAL FEBRUARY 2011-2 GRAND JURY charges:

On or about March 18, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Individual A in Nashville, Tennessee, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

**COUNT TWO**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 18, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Individual B in Miami, Florida, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

**COUNT THREE**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 18, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to School A in Villanova, Pennsylvania, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

**COUNT FOUR**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to School B in Boise, Idaho, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

**COUNT FIVE**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to the Dubuque Fire Department in Dubuque, Iowa, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

**COUNT SIX**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to the Ames Police Department in Ames, Iowa, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

**COUNT SEVEN**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 19, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Business A in Boise, Idaho, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

**COUNT EIGHT**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 22, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Business B in Chicago, Illinois, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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



**COUNT NINE**

The SPECIAL FEBRUARY 2011-2 GRAND JURY further charges:

On or about March 22, 2011, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

TIMOTHY P. O'DONNELL,

defendant herein, through the use of the United States Mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, to Business C in Chicago, Illinois, concerning an alleged attempt being made, and to be made, to kill, injure, and intimidate individuals and unlawfully to damage and destroy buildings and other real and personal property, namely, schools, churches, hospitals, financial institutions, and government buildings located throughout the United States, by means of an explosive;

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY