

**JUDGE CROTTY**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA  
:  
- v. -  
:  
THEODORE SHULMAN,  
a/k/a "OperationCounterstrike," :  
a/k/a "Doctor Defense," :  
a/k/a "DD," :  
Defendant. :  
----- x

INDICTMENT

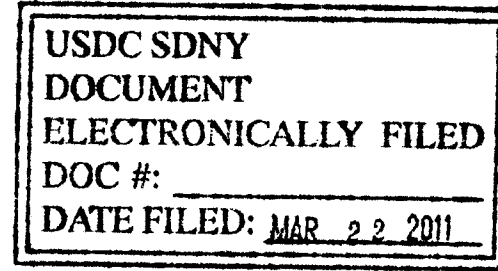
11 Cr.

**11 CRIM 264**

COUNT ONE

(Threat to Victim-1 - May 31, 2009)

The Grand Jury charges:



1. On or about May 31, 2009, in the Southern District of New York and elsewhere, THEODORE SHULMAN, a/k/a "OperationCounterstrike," a/k/a "Doctor Defense," a/k/a "DD," the defendant, unlawfully, knowingly and intentionally, did transmit in interstate and foreign commerce a communication containing a threat to kidnap a person and a threat to injure the person of another, to wit, SHULMAN, left the following voicemail message for Victim-1: "[Victim-1], I'm very worried . . . I'm worried that there's going to be counter-terror against people who symbolize right-to-life-ism, and I'm worried that you will be a natural target, because it can't be one-sided forever . . . it's just not possible that the right-to-lifers can go on killing the pro-choicers but no one's ever killed a right-to-lifer, I don't see how that can ever happen, I mean I don't see how that can go

on, so I strongly advise you to take a vacation somewhere outside the country, I'm really worried. Good luck, man."

(Title 18, United States Code, Section 875(c).)

COUNT TWO

(Threat to Victim-1 and Victim-2 - January 14, 2010)

The Grand Jury further charges:

2. On or about January 14, 2010, in the Southern District of New York and elsewhere, THEODORE SHULMAN, a/k/a "OperationCounterstrike," a/k/a "Doctor Defense," a/k/a "DD," the defendant, unlawfully, knowingly and intentionally, did transmit in interstate and foreign commerce a communication containing a threat to kidnap a person and a threat to injure the person of another, to wit, SHULMAN, submitted the following message for posting on a blog called "SecondHandSmoke" on the website "FirstThings.com": "If Roeder is acquitted, someone will respond by killing [Victim-1] of [the University] and [Victim-2] of PRIESTS FOR LIFE."

(Title 18, United States Code, Section 875(c).)

COUNT THREE

(Threat to Victim-2 - March 10, 2010)

The Grand Jury further charges:

3. On or about March 10, 2010, in the Southern District of New York and elsewhere, THEODORE SHULMAN, a/k/a "OperationCounterstrike," a/k/a "Doctor Defense," a/k/a "DD," the

defendant, unlawfully, knowingly and intentionally, did transmit in interstate and foreign commerce a communication containing a threat to kidnap a person and a threat to injure the person of another, to wit, SHULMAN, posted the following message on the website "PriestsForLife.Org": "Payback for Dr. Tiller coming soon. [Victim-2], you should write your will."

(Title 18, United States Code, Section 875(c).)

COUNT FOUR

(Threat to Victim-2 - March 23, 2010)

The Grand Jury further charges:

4. On or about March 23, 2010, in the Southern District of New York and elsewhere, THEODORE SHULMAN, a/k/a "OperationCounterstrike," a/k/a "Doctor Defense," a/k/a "DD," the defendant, unlawfully, knowingly and intentionally, did transmit in interstate and foreign commerce a communication containing a threat to kidnap a person and a threat to injure the person of another, to wit, SHULMAN, posted the following message on the website "PriestsForLife.Org": "I can't wait for someone to walk into your church and shoot you through an eye, [Victim-2]. I will celebrate for 48 hours without a break when that happens. And it WILL happen. Soon. Write your will, [Victim-2]."

COUNT FIVE

(Threat to Victim-2 - April 14, 2010)

The Grand Jury further charges:

5. On or about April 14, 2010, in the Southern District of New York and elsewhere, THEODORE SHULMAN, a/k/a "OperationCounterstrike," a/k/a "Doctor Defense," a/k/a "DD," the defendant, unlawfully, knowingly and intentionally, did transmit in interstate and foreign commerce a communication containing a threat to kidnap a person and a threat to injure the person of another, to wit, SHULMAN, posted the following a message on the website "PriestsForLife.Org": "I have reason to believe that there will soon be PAYBACK for Dr. Tiller. [Victim-2], write your will."

(Title 18, United States Code, Section 875(c).)

COUNT SIX

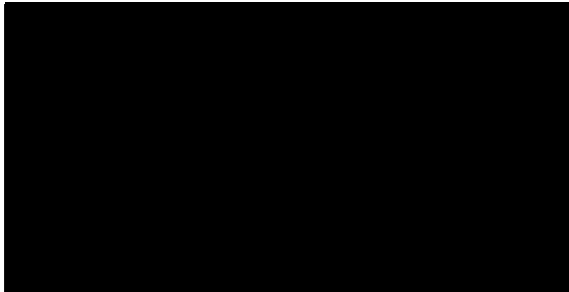
(Threat to Victim-1, January 28, 2011)

The Grand Jury further charges:

6. On or about January 28, 2011, in the Southern District of New York and elsewhere, THEODORE SHULMAN, a/k/a "OperationCounterstrike," a/k/a "Doctor Defense," a/k/a "DD," the defendant, unlawfully, knowingly and intentionally, did transmit in interstate and foreign commerce a communication containing a threat to kidnap a person and a threat to injure the person of another, to wit, SHULMAN, posted the following message on a blog called "RealChoice": "If anyone terrorizes Leroy Carhart, there

will be retaliation, in the form of murderous attacks against right-to-lifest [Victim-1] of [the University] and [Victim-1's] family . . . I won't do it myself, but someone will."

(Title 18, United States Code, Section 875(c).)



*Preet Bharara*  
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PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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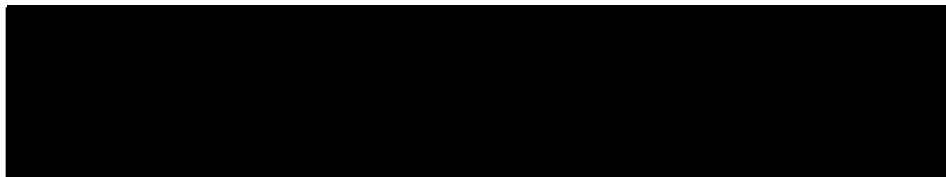
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(18 U.S.C. § 875(c))

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PREET BHARARA  
United States Attorney.



3-22-11  
vjb

Filed Indictment. Case assigned to J. Groff  
Francis  
U.S.M. J