

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

UNITED STATES OF AMERICA : **CRIMINAL NO.** _____
v. : **DATE FILED:** _____
ANTHONY DOUGLAS ELONIS : **VIOLATIONS:**
: **18 U.S.C. § 875(c) (interstate**
: **communication of threats - 5 counts)**

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about October 19, 2010, through on or about October 22, 2010, in
Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANTHONY DOUGLAS ELONIS

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the
Internet, a threatening communication to others, that is, a communication containing a threat to
injure the person of another, specifically, a threat to injure patrons and employees of Dorney
Park and Wildwater Kingdom, located in Allentown, Pennsylvania.

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

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 6, 2010, through on or about November 15, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANTHONY DOUGLAS ELONIS

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure and kill T.E., a person known to the grand jury.

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

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 15, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANTHONY DOUGLAS ELONIS

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure employees of the Pennsylvania State Police and the Berks County Sheriff's Department.

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

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 16, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANTHONY DOUGLAS ELONIS

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure a kindergarten class of elementary school children.

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

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 30, 2010, in Bethlehem, in the Eastern District of Pennsylvania, and elsewhere, the defendant

ANTHONY DOUGLAS ELONIS

knowingly and willfully transmitted in interstate and foreign commerce, via a computer and the Internet, a threatening communication to others, that is, a communication containing a threat to injure the person of another, specifically, a threat to injure an agent of the Federal Bureau of Investigation.

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

A TRUE BILL:

GRAND JURY FOREPERSON

ZANE DAVID MEMEGER
United States Attorney