

**FILED**

NOV 10 2020

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOHN FEENEY

No.

**20CR 794**Violations: Title 18, United States  
Code, Sections 922(g)(1), 842(i)(1), and  
844(h)(2); and Title 26, United States  
Code, Section 5861(d)**JUDGE ALONSO****COUNT ONE****MAGISTRATE JUDGE GILBERT**

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

On or about January 25, 2020, at Morris, in the Northern District of Illinois,  
Eastern Division,

JOHN FEENEY,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely a loaded Glock 21 .45 caliber pistol, bearing serial number SPS689, and a loaded Beretta PX4 Storm 9 millimeter pistol, bearing serial number PX112351, which firearm had traveled in interstate and foreign commerce prior to defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about January 25, 2020, at Morris, in the Northern District of Illinois,  
Eastern Division,

JOHN FEENEY,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, an explosive, namely a 4-inch diameter cardboard aerial shell containing a quantity of a mixture containing perchlorate explosives and black powder, fused by a length of pyrotechnic fuse and a quick match, which explosive had traveled in interstate and foreign commerce prior to defendant's possession of the explosive;

In violation of Title 18, United States Code, Section 842(i)(1).

**COUNT THREE**

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about January 25, 2020, at Morris, in the Northern District of Illinois,  
Eastern Division,

JOHN FEENEY,

defendant herein, did knowingly possess a destructive device as that term is defined in Title 26, United States Code, Section 5845(a)(8) and (f), namely a 2-inch diameter cardboard aerial shell secured to a plastic cup, containing a quantity of a mixture containing metal Phillips head bits, cut copper wire, and perchlorate explosives, fused with a length of pyrotechnic, which destructive device was not then registered to him in the National Firearms Registration and Transfer Record;

In violation of Title 26, United States Code, Section 5861(d).

**COUNT FOUR**

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about January 25, 2020, at Morris, in the Northern District of Illinois,  
Eastern Division,

JOHN FEENEY,

defendant herein, did knowingly carry explosives, namely a 4-inch diameter cardboard aerial shell containing a quantity of a mixture containing perchlorate explosives and black powder, fused by a length of pyrotechnic fuse and a quick match; a 2-inch diameter cardboard aerial shell containing a quantity of a mixture containing perchlorate explosives, fused by a length of pyrotechnic fuse; and a 2-inch diameter cardboard aerial shell secured to a plastic cup, containing a quantity of a mixture containing metal Phillips head bits, cut copper wire, and perchlorate explosives, fused with a length of pyrotechnic fuse; during the commission of a felony prosecutable in a court of the United States, namely, possession of a firearm by a convicted felon, in violation of Title 18, United States Code, Section 922(g);

In violation of Title 18, United States Code, Section 844(h)(2).

**FORFEITURE ALLEGATION**

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of offenses in violation of Title 18, United States Code, Section 922(g)(1), as set forth in Counts One and Two of this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c). The property to be forfeited includes, but is not limited to, a Glock 21 .45 caliber pistol, bearing serial number SPS689, and a Beretta PX4 Storm 9 millimeter pistol, bearing serial number PX112351, and associated ammunition.

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 842 and 844, as set forth in Count Three and Count Five of this Indictment, defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 844(c) and Title 28, United States Code, Section 2461(c), any explosive materials involved or used or intended to be used in the violation. The property to be forfeited includes, but is not limited to, a 4-inch diameter cardboard aerial shell containing a quantity of a mixture containing perchlorate explosives and black powder, fused by a length of pyrotechnic fuse and a quick match; a 2-inch diameter cardboard aerial shell containing a quantity of a mixture containing perchlorate explosives, fused by a length of pyrotechnic fuse; and a 2-inch diameter cardboard aerial shell secured to a plastic cup, containing a quantity of a

mixture containing metal Phillips head bits, cut copper wire, and perchlorate explosives, fused with a length of pyrotechnic fuse.

A TRUE BILL:

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FOREPERSON

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Signed by Timothy J. Storino on behalf of the  
UNITED STATES ATTORNEY