

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA

vs.

EDWARD F. BACHNER IV

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No. _____

Violations: Title 18, United States Code,

Sections 175(a) and 175(b)

COUNT ONE

The NOVEMBER 2008 GRAND JURY charges:

On or about June 30, 2008, at Algonquin and elsewhere in the Northern District of Illinois,
Western Division,

EDWARD F. BACHNER IV,

defendant herein, did knowingly acquire, possess and retain, and attempt to do so, a biological agent,
toxin and delivery system, namely Tetrodotoxin, for use as a weapon;

In violation of Title 18, United States Code, Section 175(a).

COUNT TWO

The NOVEMBER 2008 GRAND JURY further charges:

On or about June 30, 2008, at Algonquin and elsewhere in the Northern District of Illinois,
Western Division,

EDWARD F. BACHNER IV,

defendant herein did knowingly possess a biological agent, toxin and delivery system, namely
Tetrodotoxin, of a type and in a quantity that, under the circumstances, was not reasonably justified
by a prophylactic, protective, bona fide research, or other peaceful purpose;

In violation of Title 18, United States Code, Section 175(b).

COUNT THREE

The NOVEMBER 2008 GRAND JURY further charges:

On or about March 19, 2008, at Algonquin, Lake in the Hills and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein, did knowingly acquire, possess and retain a biological agent, toxin and delivery system, namely Tetrodotoxin, for use as a weapon;

In violation of Title 18, United States Code, Section 175(a).

COUNT FOUR

The NOVEMBER 2008 GRAND JURY further charges:

On or about March 19, 2008, at Algonquin, Lake in the Hills and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein did knowingly possess a biological agent, toxin and delivery system, namely Tetrodotoxin, of a type and in a quantity that, under the circumstances, was not reasonably justified by a prophylactic, protective, bona fide research, or other peaceful purpose;

In violation of Title 18, United States Code, Section 175(b).

COUNT FIVE

The NOVEMBER 2008 GRAND JURY further charges:

On or about February 23, 2008, at Algonquin, Lake in the Hills, and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein, did knowingly acquire, possess, and retain a biological agent, toxin and delivery system, namely Tetrodotoxin, for use as a weapon;

In violation of Title 18, United States Code, Section 175(a).

COUNT SIX

The NOVEMBER 2008 GRAND JURY further charges:

On or about February 23, 2008, at Algonquin, Lake in the Hills, and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein did knowingly possess a biological agent, toxin and delivery system, namely Tetrodotoxin, of a type and in a quantity that, under the circumstances, was not reasonably justified by a prophylactic, protective, bona fide research, or other peaceful purpose;

In violation of Title 18, United States Code, Section 175(b).

COUNT SEVEN

The NOVEMBER 2008 GRAND JURY further charges:

On or about February 8, 2008, at Algonquin, Lake in the Hills, and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein, did knowingly acquire, possess, and retain a biological agent, toxin and delivery system, namely Tetrodotoxin, for use as a weapon;

In violation of Title 18, United States Code, Section 175(a).

COUNT EIGHT

The NOVEMBER 2008 GRAND JURY further charges:

On or about February 8, 2008, at Algonquin, Lake in the Hills, and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein did knowingly possess a biological agent, toxin and delivery system, namely Tetrodotoxin, of a type and in a quantity that, under the circumstances, was not reasonably justified by a prophylactic, protective, bona fide research, or other peaceful purpose;

In violation of Title 18, United States Code, Section 175(b).

COUNT NINE

The NOVEMBER 2008 GRAND JURY further charges:

On or about November 7, 2006, at Algonquin, Lake in the Hills, and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein, did knowingly acquire, possess and retain a biological agent, toxin and delivery system, namely Tetrodotoxin, for use as a weapon;

In violation of Title 18, United States Code, Section 175(a).

COUNT TEN

The NOVEMBER 2008 GRAND JURY further charges:

On or about November 7, 2006, at Algonquin, Lake in the Hills, and elsewhere in the Northern District of Illinois, Western Division,

EDWARD F. BACHNER IV,

defendant herein did knowingly possess a biological agent, toxin and delivery system, namely Tetrodotoxin, of a type and in a quantity that, under the circumstances, was not reasonably justified by a prophylactic, protective, bona fide research, or other peaceful purpose;

In violation of Title 18, United States Code, Section 175(b).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY