

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TIMOTHY O'DONNELL

CASE NUMBER:

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about May 30, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant(s) violated:

*Code Section*

Title 18, United States Code, Section  
844(i)

*Offense Description*

did knowingly, intentionally, and maliciously damage, and attempt to damage and destroy, by means of fire, a vehicle and other real property used in interstate commerce and in an activity affecting interstate commerce, specifically, a Chicago Police Department vehicle.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

/s/ Ryan Furman

RYAN FURMAN

Special Agent, Federal Bureau of Investigation  
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: June 2, 2020

*Judge's signature*

City and state: Chicago, Illinois

MATTHEW F. KENNELLY, U.S. District Judge

*Printed name and title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, Ryan Furman, being duly sworn, state as follows:

**BACKGROUND**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed for more than four years. I am currently assigned to the Chicago Field Office, West Resident Agency Squad CT-2. As part of my duties as a FBI Special Agent, I investigate criminal violations related to domestic terrorism and violent crime. I have been involved with various electronic surveillance methods, the debriefing of subjects, informants, and witnesses.

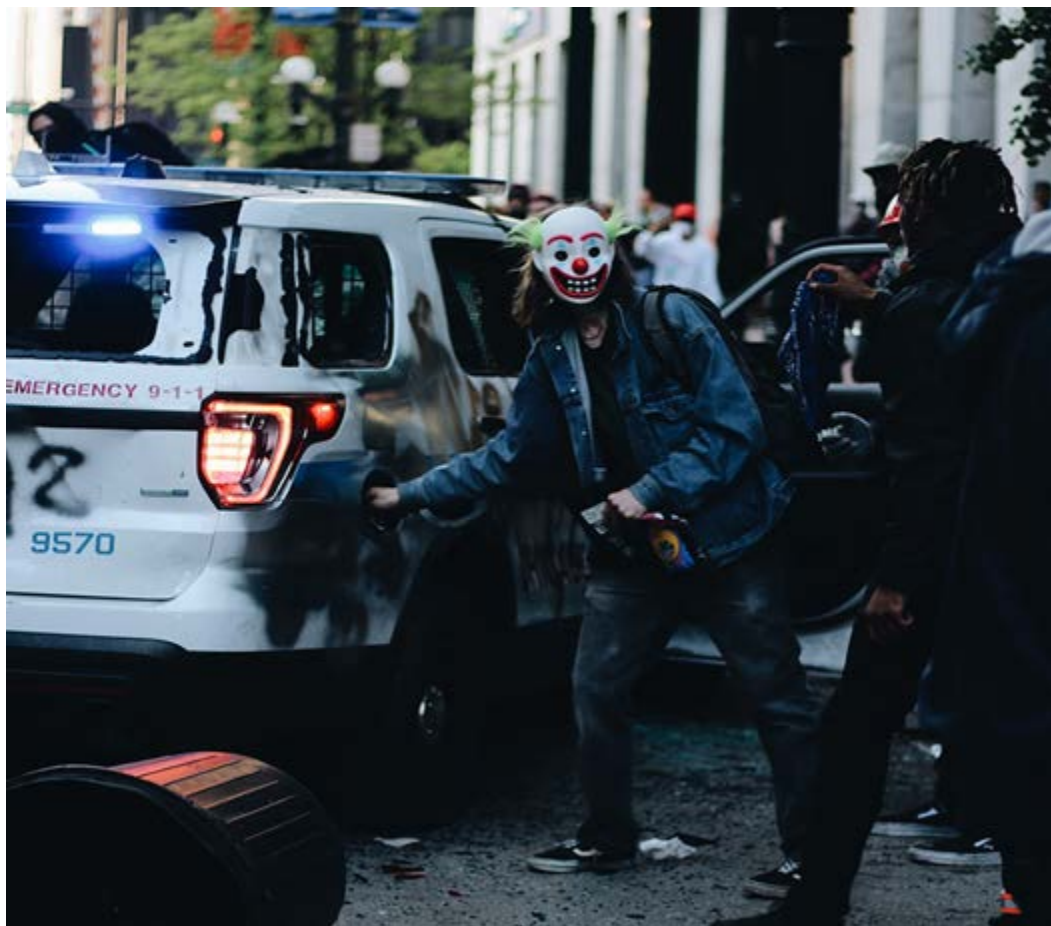
2. This affidavit is submitted in support of a criminal complaint alleging that TIMOTHY O'DONNELL has violated Title 18, United States Code, Section 844(i). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging O'DONNELL with causing damage by fire to a Chicago Police Department vehicle used in interstate commerce and in an activity affecting interstate commerce, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, my review of records, interviews conducted by law enforcement agents and officers, my review of

photographs and video recordings, and information provided to me by other law enforcement agents and from persons with knowledge regarding relevant facts.

**FACTS ESTABLISHING PROBABLE CAUSE**

4. On or about May 30, 2020, an individual, later identified as defendant TIMOTHY O'DONNELL, approached a Chicago Police Department ("CPD") vehicle parked on the 200 block of North State Street in Chicago. A video provided to law enforcement by a witness captured the events described below. The video initially shows O'DONNELL, who was wearing a "joker" mask that partially covered his face, hold a lit object and place it in the gas tank of the CPD vehicle. A photograph below taken by a witness shows O'DONNELL handling the CPD vehicle's gas tank.



5. Based on my review of the video, as a result of O'Donnell's actions, the CPD vehicle ignited in flames. A photograph taken by a witness depicts the vehicle in flames:



6. Another photograph taken from the scene shows O'Donnell posing in front of the burning CPD vehicle. In the photograph, a distinct tattoo of the word "PRETTY" is visible on the front of O'DONNELL's neck.



7. A CPD photo of O'DONNELL, shown below, depicts the same tattoo of "PRETTY" in capital letters across the front of his neck.



8. On or about June 1, 2020, law enforcement officers spoke with a family member of O'DONNELL's, who confirmed that he/she paid rent for an apartment on the 700 block of 19th Place in Chicago, where O'DONNELL lives in a room inside the residence.

9. On or about June 2, 2020, law enforcement obtained a search warrant for the apartment and subsequently conducted a search of the apartment. While the physical location to be searched was correctly described in writing as part of



Attachment A to the search warrant, Attachment A mistakenly contained a photograph that depicted a different residence. Pursuant to the search, law enforcement recovered a “joker” mask from a bedroom inside the apartment that is consistent with the mask shown in the photographs above. Law enforcement placed O’DONNELL under arrest at the apartment.

10. After his arrest on June 2, 2020, O’DONNELL waived his Miranda rights and agreed to an interview with law enforcement. During the interview, O’DONNELL admitted that he was the person wearing the “joker” mask in the photos depicted above.

11. Based on information provided to me by CPD, the CPD vehicle is the property of the City of Chicago government, which is self-insured. Both the CPD and City of Chicago government conduct business in interstate commerce, for instance by purchasing vehicles and other equipment and supplies in interstate commerce. The activities of the CPD and the City of Chicago government in enforcing laws also affect interstate commerce.

**CONCLUSION**

12. Based on the above information, I respectfully submit that there is probable cause to believe that TIMOTHY O'DONNELL committed the offense of causing damage by fire to a Chicago Police Department vehicle used in interstate commerce and in an activity affecting interstate commerce, in violation of Title 18, United States Code, Section 844(i).

FURTHER AFFIANT SAYETH NOT.

/s/ Ryan Furman  
RYAN FURMAN  
Special Agent, Federal Bureau of  
Investigation

SUBSCRIBED AND SWORN to before me on June 2, 2020.

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Honorable MATTHEW F. KENNELLY  
United States District Judge