

**FILED**

**AUG 18 2006**

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA, )  
)  
Plaintiff, )  
)  
vs. )  
)  
MICAHA A. AKUMU, )  
a/k/a "Micah Oriaro," )  
Defendant. )

CRIMINAL NO. 05-30157-MJR  
Title 18  
United States Code,  
Section 2332a(a)(2)(D) and  
2332a(a)(3)

**THIRD SUPERSEDING INDICTMENT**

**THE GRAND JURY CHARGES:**

**COUNT 1**

On or about September 2, 2005, in Madison County, within the Southern District of Illinois,

**MICAH A. AKUMU,**

defendant herein, knowingly and intentionally threatened the use of a weapon of mass destruction which would have affected interstate commerce, by stating to Collinsville Police Sgt. Todd Link that he had "placed two bombs, each the size of a cell phone, at the Adams Mark Hotel" in St. Louis, Missouri; all in violation of Title 18, United States Code, Section 2332a(a)(2)(D).

**COUNT 2**

On or about September 2, 2005, in Madison County, within the Southern District of Illinois,

**MICAH A. AKUMU,**

defendant herein, knowingly and intentionally threatened the use of a weapon of mass destruction against property owned by the United States, by stating to Collinsville Police Sgt. Todd Link that he had been "sent here to bring weapons to people here to use in blowing up the Arch," i.e., the

Gateway Memorial Arch in St. Louis, Missouri; all in violation of Title 18, United States Code, Section 2332a(a)(3).

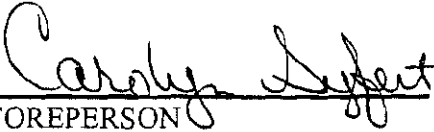
**COUNT 3**

On or about September 2, 2005, in Madison County, within the Southern District of Illinois,

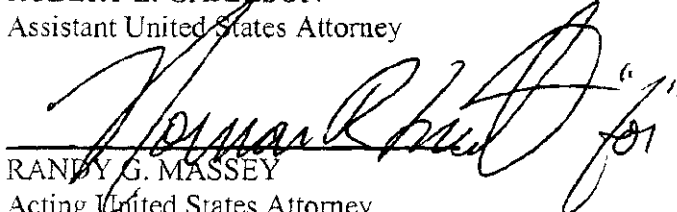
**MICAH A. AKUMU,**

defendant herein, knowingly and intentionally threatened the use of a weapon of mass destruction which would have affected interstate commerce, by stating to FBI Special Agents Matthew Iskrzycki and Jonathan Kelly that he "brought six bombs from California," and that "one week ago, I gave four of the bombs to a guy who came to see me at the Adam's Mark Hotel," in St. Louis, Missouri; all in violation of Title 18, United States Code, Section 2332a(a)(2)(D).

**A TRUE BILL**

  
FOREPERSON

  
ROBERT L. GARRISON  
Assistant United States Attorney

  
RANBY G. MASSEY  
Acting United States Attorney

Recommended Bond: Detention