

2019R00969/CC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA	:	Hon. John Michael Vazquez
	:	
v.	:	Crim. No. 20-1005
	:	
KALIL BRYANT	:	18 U.S.C. §§ 875(c), 922(g)(1)
	:	18 U.S.C. §§ 1513(a)(1)(B), 1513(b)(2)

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE

(Possession of Ammunition by a Convicted Felon)

On or about August 24, 2019, in Essex County, in the District of New
Jersey and elsewhere, the defendant,

KALIL BRYANT,

knowing that he had been previously convicted of a crime punishable by a term
of imprisonment exceeding one year in the United States District Court for the
Western District of Missouri, did knowingly possess in and affecting interstate
commerce ammunition, namely a Remington 9mm Luger round of ammunition.

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

COUNT TWO

(Retaliating Against a Witness, Victim, or an Informant)

On or about August 24, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

KALIL BRYANT,

did attempt to kill Victim-1 with the intent to retaliate against Victim-1 for providing to a law enforcement officer information relating to the commission of a Federal offense.

In violation of Title 18, United States Code, Section 1513(a)(1)(B).

COUNT THREE

(Transmitting Threats In Interstate Commerce)

On or about September 18, 2019, in the District of New Jersey and elsewhere, the defendant,

KALIL BRYANT,

did knowingly and willfully transmit in interstate commerce text message communications to Victim-1's mother containing a threat to injure Victim-1, specifically, BRYANT texted Victim-1's mother the following: "Tell [Victim-1] he gonna Die soon for being a rat . . . Mush friends is looking for Him . . . Prepare to bury Him soon . . . Get your. Black dress ready . . . If you want to tell the cops go ahead I'm not scared of anything but my Lord (Allah)[,]" with the knowledge that these communications would be viewed as a threat.

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

COUNT FOUR

(Retaliating Against a Witness, Victim, or an Informant)

On or about September 18, 2019, in the District of New Jersey and elsewhere, the defendant,

KALIL BRYANT,

did knowingly threaten to engage in conduct to cause bodily injury to Victim-1 with the intent to retaliate against Victim-1 for providing to a law enforcement officer information relating to the commission of a Federal offense.

In violation of Title 18, United States Code, Section 1513(b)(2).

FORFEITURE ALLEGATION AS TO COUNT ONE

1. As a result of committing the firearms offense in violation of 18 U.S.C. § 922(g)(1), charged in Count One of this Indictment, the defendant,

KALIL BRYANT,

shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in or used in the commission of such offense.

Substitute Assets Provision
(Applicable to All Forfeiture Allegations)

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c), to seek forfeiture of any other property of

the defendant up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON


CRAIG CARPENITO
United States Attorney

CASE NUMBER: 20-1005 (JMV)_____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

KALIL BRYANT

INDICTMENT FOR

**18 U.S.C. §§ 875(c), 922(g)(1)
18 U.S.C. §§ 1513(a)(1)(B), 1513(b)(2)**



Foreperson

CRAIG CARPENITO
*UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY*

CASSYE COLE
*ASSISTANT U.S. ATTORNEY
NEWARK, NJ
973-297-2023*
