

FILED

JUL 29 2020

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

v.

KENDALL GUYTON, and
GREGORY INGRAM

Case No. **20 CR 426**

Violations: Title 18, United States Code,
Sections 1591(a),(b)(1), (b)(2), and
1594(c)

JUDGE ELLIS

MAGISTRATE JUDGE FUENTES

COUNT ONE

The SPECIAL JANUARY 2019 GRAND JURY charges:

Beginning no later than in or about November 2017 and continuing until in or about March 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENDALL GUYTON, and
GREGORY INGRAM,

defendants herein, did conspire with each other and with others known and unknown to the Grand Jury, in and affecting interstate commerce, to knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely Individual A, Individual B, and Minor A, and to benefit financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means a person, namely Individual A and Minor A, having had a reasonable opportunity to observe Minor A, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act, and (2) the person had not attained the age of 18 years and would be caused to engage in a

commercial sex act, in violation of Title 18, United States Code, Section 1591(a),
(b)(1), (b)(2), and (c);

All in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Beginning no later than in or about November 2017 and continuing until in or about March 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENDALL GUYTON, and
GREGORY INGRAM,

defendants herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Individual A, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Individual A, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Individual A to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(1).

COUNT THREE

The SPECIAL JANUARY 2019 GRAND JURY further charges:

Beginning no later than in or about November 2017 and continuing until in or about February 2018, in the Northern District of Illinois, Eastern Division, and elsewhere,

**KENDALL GUYTON, and
GREGORY INGRAM,**

defendants herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Minor A, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Minor A, having had a reasonable opportunity to observe Minor A, and knowing, and in reckless disregard of the fact that (1) means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor A to engage in a commercial sex act, and (2) Minor A had not attained the age of 18 years and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a), (b)(1), (b)(2) and (c).

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1591, as set forth in this Indictment, defendants shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used, and intended to be used, in any manner and part, to commit and facilitate commission of the offense, as provided in Title 18, United States Code, Section 1594(d)(1) & (2).

2. The property to be forfeited includes, but is not limited to: a personal money judgment in the amount of \$55,000.

3. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

signed by Erika Csicsila on behalf of the
UNITED STATES ATTORNEY