

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
) No.
) v.)
))
) Violations: Title 18, United States
KEVIN JOHNSON,) Code, Section 43
 also known as Kevin Olliff, and)
TYLER LANG)

COUNT ONE

The SPECIAL JANUARY 2014 GRAND JURY charges:

1. At times material to this indictment:

a. Mink Farm A was located in Morris, Illinois, and was in the business of breeding, raising, and selling mink to fur manufacturers.

b. Fox Farm A was located in Roanoke, Illinois, and was in the business of breeding, raising, and selling foxes to fur manufacturers.

c. Defendants KEVIN JOHNSON and TYLER LANG were residents of Los Angeles, California, who traveled by car throughout the United States, including, but not limited to, travel through Iowa, Wisconsin, and Illinois.

2. Beginning no later than on or about August 5, 2013, and continuing until on or about August 15, 2013, in the Northern District of Illinois, and elsewhere,

KEVIN JOHNSON,
also known as Kevin Olliff, and
TYLER LANG,

defendants herein, conspired with each other, and with others known and unknown to the Grand Jury, to travel in interstate commerce, and to use and cause to be used a

facility of interstate and foreign commerce, for the purpose of damaging and interfering with the operations of an animal enterprise, including Mink Farm A and Fox Farm A, and in connection with that purpose, intentionally damaged and caused the loss of real and personal property (including animals and records) used by an animal enterprise, and real and personal property of a person having a connection to and relationship with an animal enterprise, which offense resulted in economic damage exceeding \$10,000, in violation of Title 18, United States Code, Sections 43(a) and 43(b)(2)(A);

All in violation of Title 18, United States Code, Section 43(a)(2)(C).

COUNT TWO

The SPECIAL JANUARY 2014 GRAND JURY further charges:

On or about August 14, 2013, at Morris, in the Northern District of Illinois,
and elsewhere,

KEVIN JOHNSON,
also known as Kevin Olliff, and
TYLER LANG,

defendants herein, traveled in interstate commerce, and used and caused to be used a facility of interstate and foreign commerce, for the purpose of damaging and interfering with the operations of Mink Farm A, an animal enterprise, and in connection with that purpose, intentionally damaged and caused the loss of real and personal property (including animals and records) used by an animal enterprise, and real and personal property of a person having a connection to and relationship with an animal enterprise, which offense resulted in economic damage exceeding \$10,000;

In violation of Title 18, United States Code, Sections 43(a) and 43(b)(2)(A).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY