

UNITED STATES OF AMERICA )  
 )  
 v. ) No. \_\_\_\_\_  
 )  
 KYLAND WILLIS, ) Violations: Title 18, United States Code,  
 also known as “k4” ) Sections 371, 922(j), and 922(u)  
 )

The MAY 2018 GRAND JURY charges:

- KYLAND WILLIS,  
also known as “k4,”

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shipped and transported in interstate and foreign commerce, knowing and having reasonable cause to believe that the firearm was stolen, in violation of Title 18, United States Code, Section 922(j).

4. It was part of the conspiracy that defendant and Coconspirator A agreed to steal and unlawfully take and carry away from the premises of Company A a firearm in Company A's business inventory.

5. It was further part of the conspiracy that defendant and Coconspirator A agreed to steal and unlawfully take and carry away, and did steal and unlawfully take and carry away, from the premises of Company B a firearm in Company B's business inventory, which firearm had been shipped and transported in interstate and foreign commerce.

6. It was further part of the conspiracy that defendant and Coconspirator A agreed to possess, and did possess, a firearm stolen from Company B, which firearm had been shipped and transported in interstate and foreign commerce, knowing and having reasonable cause to believe that the firearm was stolen.

### **Overt Acts**

7. In furtherance of the conspiracy and to accomplish its objectives, defendant and Coconspirator A committed and caused to be committed the following overt acts in the Northern District of Illinois:

a. On or about December 26, 2017, defendant and Coconspirator A drove a vehicle into the premises of Company A;

b. On or about December 26, 2017, defendant and Coconspirator A unlawfully entered the premises of Company A;

c. On or about December 27, 2017, defendant and Coconspirator A broke into and unlawfully entered the premises of Company B;

d. On or about December 27, 2017, defendant and Coconspirator A stole and unlawfully took and carried away from the premises of Company B a firearm in Company B's business inventory, namely:

- a Smith & Wesson model M&P 40, .40 caliber pistol with serial number NBF3341,
- a Browning Arms model Buck Mark, .22 caliber pistol with serial number 515ZY30558,
- a STI model DVC Limited, .40 caliber pistol with serial number TG29636,
- a STI model Tactical 4.0, .40 caliber pistol with serial number TC5226,
- a STI model Tactical 4.0, .40 caliber pistol with serial number TC5227,
- a Glock GMBH model 35 Gen 4, .40 caliber pistol with serial number XWB764,
- a Sig Sauer model P320, .40 caliber pistol with serial number 58B119266,
- a FNH USA model FNS-40, .40 caliber pistol with serial number GKU0017432,
- an UTAS model XTR-12, 12-gauge shotgun with serial number XTR00207,
- an UTAS model XTR-12, 12-gauge shotgun with serial number XTR00211,
- an Izhmash model Saiga-12, 12-gauge shotgun with serial number 01414977,
- a Molot model VEPR-12, 12-gauge shotgun with serial number 15VAT1105, and
- a FNH USA model FNS-40, .40 caliber pistol with serial number GKU0072783;

which firearm had been shipped and transported in interstate and foreign commerce;

e. On or about December 27, 2017, defendant and Coconspirator A possessed a stolen firearm, which previously had been shipped and transported in interstate and foreign commerce, namely the firearms listed in paragraph 7(d), knowing and having reasonable cause to believe that the firearm was stolen;

All in violation of Title 18, United States Code, Section 371.

## **COUNT TWO**

The MAY 2018 GRAND JURY further charges:

1. Paragraph 2 of Count One of this indictment is incorporated here.
2. On or about December 27, 2017, in Loves Park, in the Northern District of Illinois,

Western Division,

KYLAND WILLIS,  
also known as “k4,”

defendant herein, did steal and unlawfully take and carry away from the premises of a person who is licensed to engage in the business of dealing in firearms, namely Company B, a firearm in the licensee’s business inventory, namely:

a Smith & Wesson model M&P 40, .40 caliber pistol with serial number NBF3341,  
a Browning Arms model Buck Mark, .22 caliber pistol with serial number 515ZY30558,  
a STI model DVC Limited, .40 caliber pistol with serial number TG29636,  
a STI model Tactical 4.0, .40 caliber pistol with serial number TC5226,  
a STI model Tactical 4.0, .40 caliber pistol with serial number TC5227,  
a Glock GMBH model 35 Gen 4, .40 caliber pistol with serial number XWB764,  
a Sig Sauer model P320, .40 caliber pistol with serial number 58B119266,  
a FNH USA model FNS-40, .40 caliber pistol with serial number GKU0017432,  
an UTAS model XTR-12, 12-gauge shotgun with serial number XTR00207,  
an UTAS model XTR-12, 12-gauge shotgun with serial number XTR00211,  
an Izhmash model Saiga-12, 12-gauge shotgun with serial number 01414977,  
a Molot model VEPR-12, 12-gauge shotgun with serial number 15VAT1105, and  
a FNH USA model FNS-40, .40 caliber pistol with serial number GKU0072783;

which firearm previously had been shipped and transported in interstate and foreign commerce;

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

### **COUNT THREE**

The MAY 2018 GRAND JURY further charges:

On or about December 27, 2017, in Loves Park, in the Northern District of Illinois, Western Division, and elsewhere,

KYLAND WILLIS,  
also known as “k4,”

defendants herein, did knowingly possess a stolen firearm, which previously had been shipped and transported in interstate and foreign commerce, namely:

- a Smith & Wesson model M&P 40, .40 caliber pistol with serial number NBF3341,
- a Browning Arms model Buck Mark, .22 caliber pistol with serial number 515ZY30558,
- a STI model DVC Limited, .40 caliber pistol with serial number TG29636,
- a STI model Tactical 4.0, .40 caliber pistol with serial number TC5226,
- a STI model Tactical 4.0, .40 caliber pistol with serial number TC5227,
- a Glock GMBH model 35 Gen 4, .40 caliber pistol with serial number XWB764,
- a Sig Sauer model P320, .40 caliber pistol with serial number 58B119266,
- a FNH USA model FNS-40, .40 caliber pistol with serial number GKU0017432,
- an UTAS model XTR-12, 12-gauge shotgun with serial number XTR00207,
- an UTAS model XTR-12, 12-gauge shotgun with serial number XTR00211,
- an Izhmash model Saiga-12, 12-gauge shotgun with serial number 01414977,
- a Molot model VEPR-12, 12-gauge shotgun with serial number 15VAT1105, and
- a FNH USA model FNS-40, .40 caliber pistol with serial number GKU0072783;

knowing and having reasonable cause to believe that the firearm was stolen;

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

## **COUNT FOUR**

The MAY 2018 GRAND JURY further charges:

1. Paragraph 2 of Count One of this indictment is incorporated here.
2. On or about December 15, 2017, in Loves Park, in the Northern District of Illinois,

Western Division,

KYLAND WILLIS,  
also known as “k4,”

defendant herein, did steal and unlawfully take and carry away from the premises of a person who is licensed to engage in the business of dealing in firearms, namely Company B, a firearm in the licensee’s business inventory, namely:

- a HS Produkt model XDS, .40 caliber pistol with serial number S3503504,
- a Smith & Wesson model M&P M2.0, .40 caliber pistol with serial number HWN0834,
- a STI model Tactical 3.0, .40 caliber pistol with serial number TC4580,
- a STI model Duty One 3.0, .40 caliber pistol with serial number NE8488,
- a STI model Shadow, .40 caliber pistol with serial number NC3479,
- a Sig Sauer model P320, .40 caliber pistol with serial number 58A072933,
- a Tanfoglio model Witness Limited Pro, .40 caliber pistol with serial number MT23819,
- a STI model DVC Limited, .40 caliber pistol with serial number TG27432,
- a Sig Sauer, model P320, .40 caliber pistol with serial number 58A083943,
- a STI model Edge, .40 caliber pistol with serial number TG29349, and
- a HS Produkt model XDM, .40 caliber pistol with serial number MG346289;

which firearm previously had been shipped and transported in interstate and foreign commerce;

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

**COUNT FIVE**

The MAY 2018 GRAND JURY further charges:

On or about December 15, 2017, in Loves Park, in the Northern District of Illinois, Western Division, and elsewhere,

KYLAND WILLIS,  
also known as “k4,”

defendants herein, did knowingly possess a stolen firearm, which previously had been shipped and transported in interstate and foreign commerce, namely:

- a HS Produkt model XDS, .40 caliber pistol with serial number S3503504,
- a Smith & Wesson model M&P M2.0, .40 caliber pistol with serial number HWN0834,
- a STI model Tactical 3.0, .40 caliber pistol with serial number TC4580,
- a STI model Duty One 3.0, .40 caliber pistol with serial number NE8488,
- a STI model Shadow, .40 caliber pistol with serial number NC3479,
- a Sig Sauer model P320, .40 caliber pistol with serial number 58A072933,
- a Tanfoglio model Witness Limited Pro, .40 caliber pistol with serial number MT23819,
- a STI model DVC Limited, .40 caliber pistol with serial number TG27432,
- a Sig Sauer, model P320, .40 caliber pistol with serial number 58A083943,
- a STI model Edge, .40 caliber pistol with serial number TG29349, and
- a HS Produkt model XDM, .40 caliber pistol with serial number MG346289;

knowing and having reasonable cause to believe that the firearm was stolen;

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

A TRUE BILL:

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FOREPERSON

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UNITED STATES ATTORNEY