

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

WENDALL KEMP

CASE NUMBER:  
**UNDER SEAL**

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

From on or about August 12, 2019 to on or about April 13, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant:

*Code Section*

Title 18, United States Code, Section  
922(a)(1)(A)

*Offense Description*

willfully engaged in the business of dealing in  
firearms while not being a licensed dealer within the  
meaning of Chapter 44, Title 18, United States Code.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

\_\_\_\_\_  
SHAMAR BAILEY  
Special Agent, Federal Bureau of Investigation  
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: July 24, 2020

\_\_\_\_\_  
*Judge's signature*

City and state: Chicago, Illinois

\_\_\_\_\_  
HEATHER MCSHAIN, U.S. Magistrate Judge  
*Printed name and title*

UNITED STATES DISTRICT COURT            )  
  )  
NORTHERN DISTRICT OF ILLINOIS        )        ss

**AFFIDAVIT**

I, Shamar Bailey, being duly sworn, state as follows:

1. I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation (“FBI”), and have been so employed since approximately March 2016. I am currently assigned to the FBI’s Chicago Field Division, Violent Gangs - South. As part of my duties as a FBI Special Agent, I investigate criminal violations of Federal and State firearms and controlled substance laws.

2. My responsibilities as a Special Agent include the investigation of violent crimes, criminal enterprises, violations relating to the illegal sale and transfer of narcotics and firearms, and violent criminal acts in furtherance of criminal enterprises. In addition, my official FBI duties include the investigation of drug and firearm trafficking organizations, and violations of federal narcotics and firearms laws, including, but not limited to offenses defined by 18 U.S.C. § 922.

3. This Affidavit is made in support of a complaint charging the defendant with violations of firearms offenses, in violation of Title 18, United States Code, Section 922. Because this Affidavit is being submitted for the limited purpose of establishing probable cause to support the criminal complaint, it contains only a summary of relevant facts. I have not included each and every fact known to me concerning the entities, individuals, and events described in this Affidavit. This

Affidavit is made in support of a Criminal Complaint charging Wendall KEMP with engaging in the business of dealing in firearms without being a licensed firearms dealer, in violation of 18 U.S.C. § 922(a)(1)(A).

4. The statements contained in this Affidavit are based in part on: (a) my personal participation in this investigation; (b) information provided by other federal law enforcement officers and Chicago Police Department officers; (c) surveillance reports; (d) information from confidential informants; and (e) my training and experience and the training and experience of other law enforcement agents with whom I have consulted.

5. Reference is made to recorded telephone and in-person conversations in this affidavit. In certain instances, these conversations are summarized and placed in context, and my interpretations are sometimes noted in brackets. My understanding of these conversations is aided by the contents and context of the conversations, my familiarity with the facts and circumstances of this investigation, my experience as a law enforcement officer, my discussions with other law enforcement officers, the experience of other law enforcement agents and officers in this investigation, and other evidence developed during the course of the investigation. The recorded conversations herein do not represent finalized transcripts. In addition, only portions of the recorded conversations are contained below.

## **I. FACTS SUPPORTING PROBABLE CAUSE**

### **A. Introduction and Summary**

6. Since early 2018, the Federal Bureau of Investigation (“FBI”), with support from the Drug Enforcement Administration (“DEA”), Bureau of Alcohol Tobacco and Firearms (“ATF”), Internal Revenue Service (“IRS”), and Chicago Police Department (“CPD”) have been investigating criminal activities being conducted by members and associates of the Black Disciples street gang. Based on information provided by a confidential source and law enforcement sources, and consensual recordings of Wendall KEMP, KEMP has been identified as a member of the Black Disciples who is involved in the distribution of firearms within the Black Disciples street gang.

7. In summary, and as set forth in more detail below, KEMP is 56 years old and is not a licensed firearms dealer. During the course of the investigation, KEMP brokered the sale of, or personally sold, the following three firearms to a confidential source (“CS-2”)<sup>1</sup> on or about the following dates:

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<sup>1</sup> CS-2 is a member of the Black Disciples gang. CS-2 has been arrested 13 times and has 6 criminal convictions, including for multiple prior narcotics offenses. In early 2018, CS-2 was arrested by Chicago Police for firearm and narcotics offenses. CS-2 started cooperating with law enforcement in hopes of receiving a more positive disposition relating to those charges. In approximately early 2019, CS-2 received probation for the narcotics offense, and the firearm offense was dismissed. Further, as of July 9, 2020, CS-2 has been paid a total of approximately \$40,490 in exchange for information and services provided in FBI investigations. Law enforcement believes CS-2 to be a reliable source of information because information provided by CS-2 has been corroborated by intercepted communications and surveillance and has led to the seizure of narcotics and firearms.

DATE	FIREARM
8/12/2019	Del-ton Inc. Model ATI-15, .556 Cal., AR-15
4/10/2020	Ruger AR-556
4/13/2020	Springfield Firearms Corp. SAINT Series Long Gun

**B. KEMP Sold CS-2 an Assault Rifle, Ammunition, and a Ballistic Vest on or about August 12, 2019.**

8. On or about August 11, 2019, at approximately 11:39 a.m., CS-2 received a text message from an individual using the phone number XXX-XXX-4715,<sup>2</sup> whom law enforcement subsequently identified as KEMP.<sup>3</sup> The following photograph is a screen shot showing the photograph CS-2 received from KEMP, which appears to depict an AR-15 assault rifle, multiple boxes of ammunition, magazines, and a bowl of ammunition:

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<sup>2</sup> Unless otherwise noted, all communications between CS-2 and KEMP referenced in this affidavit were captured pursuant to monitoring authorized by CS-2, and all telephone calls and texts involved KEMP's 4715 telephone number. In some instances, law enforcement was also present during the telephone communications referenced in this affidavit. In other instances—such as when telephone calls took place subsequent to CS-2 being equipped with audio/video recording equipment—law enforcement was able to listen in real-time to the communications between CS-2 and KEMP.

<sup>3</sup> The identification of KEMP as the user of the 4715 number is based on, among other things, the following: (1) agents compared a Secretary of State photograph of KEMP to the individual whom agents saw during surveillance and recorded video of the subsequent firearm transactions arranged between CS-2 and KEMP, using the 4715 number, and confirmed that the individual CS-2 met with is KEMP, and (2) agents are familiar with KEMP's voice from reviewing the covert video recordings of meetings between KEMP and CS-2, as set forth herein, and confirmed that KEMP's voice is the voice of the individual using the 4715 number.



9. According to CS-2, before this text exchange, KEMP placed an unrecorded call to CS-2. According to CS-2, KEMP was given CS-2's number by another member of the Black Disciples ("Individual 1") who KEMP had offered the gun to, but Individual 1 was not interested in purchasing the gun. When KEMP called CS-2, KEMP informed CS-2 that he (KEMP) was requesting \$800 for the above-depicted firearm.

10. On or about August 12, 2019, at approximately 3:52 p.m., CS-2 arrived at a predetermined meet location. There, CS-2 was searched by law enforcement, who found no contraband or excess U.S. currency.

11. On or about August 12, 2019, at approximately 4:09 p.m., while in the presence of law enforcement, CS-2 placed a recorded call to KEMP, using the 4715

number. KEMP asked, "Whattup man?" CS-2 responded, "Nothin' much. I was tryna see what, when you want me to come to you." KEMP replied, "Uhhhh, come to the crib." CS-2 replied, "Oh. Aight. You let me know when you get there. How long you talkin' about?" KEMP replied, "Aw yeah man, I'm about ten minutes away." CS-2 replied, "Aw, aight, just holler at me when you get there." KEMP replied, "Ok. Aight."

12. At approximately 4:19 p.m., CS-2 was provided with \$800 in FBI funds and equipped with audio/video recording devices, and left the predetermined meet location to travel to South Lowe Avenue in Chicago, Illinois.

13. At approximately 4:25 p.m., as heard on the covert video recording device,<sup>4</sup> CS-2 placed a call to KEMP, and stated, "I'm here . . . out back." KEMP responded, "By my car?" CS-2 replied, "Yeah." KEMP replied, "I'll be out in a minute."

14. At approximately 4:26 p.m., as seen on the covert video recording and as observed by law enforcement surveillance, CS-2 met KEMP outside of KEMP's residence:

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<sup>4</sup> Based on my review of the covert video recording device, the date stamp is 10 days behind the actual date of the recording (displaying "2019/08/02") and the time stamp is approximately one hour and 13 minutes ahead of the actual time the recording was started on August 12, 2019.



15. Before walking into the residence, as heard on the covert video recording, KEMP asked, “How you gonna move it [firearm]. Where’s your car?” CS-2 responded, “I’m parked on Union. . . You got a bag right?” KEMP replied, “Uh huh. Yea yeah.”

16. While walking in the residence, and before KEMP opened the door, KEMP stated to someone else in the residence, “Yeah, go outside.”<sup>5</sup> KEMP then opened the door and KEMP and CS-2 walked into a large closet or storage room area. KEMP stated, “Yeah man, I’m legit so I gotta get them muffuckin’ finger prints off this muffucka. . . . Yeah man, hear go baby boy. . . Go play wit him, go ahead.” CS-2 appeared to bend over at this point in the video, and then KEMP laughed and stated, “Aw yeah man. Yeah man, I get every muffuckin’ thing [firearm type] man. The whole fuckin’ park.” CS-2 responded, “Yeah? Lemme know. You run across a lot of that shit?” KEMP replied, “Yeah. Yeah.”

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<sup>5</sup> Soon after this, another female individual stated, “Let’s go.” And a third individual stated, “I’m hungry mom.” Based upon the context of the exchange and number of voices heard on the covert video recording, I believe KEMP directed one or more children to leave the residence, before completing the transaction with CS-2.



17. Based on my training and experience, the training and experience of other law enforcement officers involved in this investigation, and the content and context of the communication, I believe KEMP regularly obtains and sells firearms.

18. While still in the closet or storage room area, CS-2 asked, “You got a little bag? Cuz you know man, I’m on probation, I can’t be fuckin’ around like that.” KEMP replied, “Uh huh.” As heard on the covert video recording, KEMP began wiping or moving something around, and stated, “Yeah man, that’s how you clean the muffucka, clean it on. . . take off the finger prints.” CS-2 asked, “is that the WD 40?” KEMP replied, “Yes sir. On account of my touchin’ this muffucka here.” CS-2 replied, “It’s pretty . . .” KEMP replied, “Hell yeah man, I hate to let this muffucka go.” The below still photos taken from the covert video recording depict KEMP using a rag or towel during this conversation to clean the firearm:





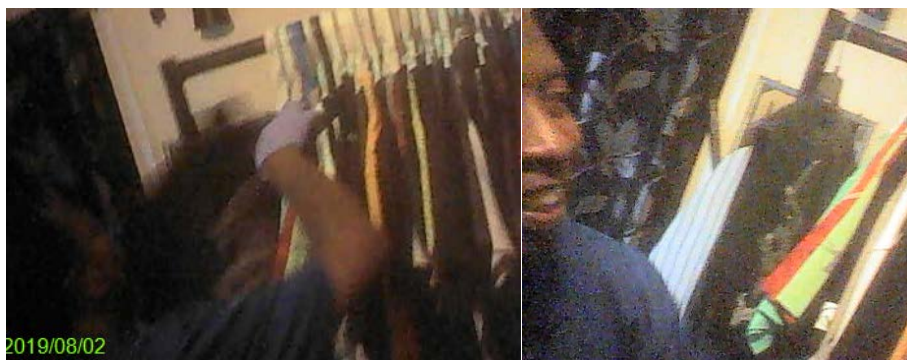
19. At approximately 4:29 p.m., as heard on the covert video recording, CS-2 asked, “You say you be runnin’ across a lot of this shit though?” KEMP responded, “Hell yeah.” CS-2 replied, “Hell yeah. Lemme know.” KEMP replied, “I got a vest, I got a level 3 vest.” CS-2 replied, “Yeah? How much you want for that?” KEMP replied, “I think I got, I paid 350 for that one.” CS-2 replied, “You still got it?” KEMP replied, “Yeah. Uh huh. Hell yeah. . . no, it’s upstairs.” CS-2 replied, “You don’t have to run upstairs. . . I’ll bring the change back if not today, tomorrow, you gonna bounce?” KEMP replied, “Nah nah. . .”

20. At approximately 4:30 p.m., as heard on the covert audio recording, paper or paper funds are counted. KEMP then stated, “Man we gotta find some tape man, we gotta wrap this muffucka up.” CS-2 responded, “You aint got no bag?” KEMP replied, “Uh, what kind of bag?” CS-2 replied, “A plastic bag. Garbage bag.” KEMP replied, “Yeah yeah. Imma get you one.” KEMP then exits the closet / storage room area.

21. At approximately 4:31 p.m., as heard on the covert audio recording, KEMP returned to the closet / storage room area with something plastic and stated,

“Yeah I wrap them muffuckas up, put tape on it. I wrap them bitches, them muffuckas up. . . What you gonna bring your car around and throw it in the trunk?” CS-2 replied, “Nah bro, I’m parked. My bitch right there on the corner.”

22. KEMP then asked, “Say man, you want that vest today?” CS-2 responded, “Hell yeah.” KEMP replied, “Come check it out.” CS-2 then followed KEMP up a set of stairs, and into a room. KEMP then grabbed the vest, which was hanging on a hanger on a rack with clothing, and handed it to CS-2:



23. CS-2 then set the vest down and KEMP stated, “Yes sir. I had to snatch these . . . off of there.” The vest, as depicted on the covert video recording is below:



24. At approximately 4:34 p.m., as seen on the covert video recording and by law enforcement surveillance, CS-2 and KEMP leave the residence, part ways, and CS-2 walked back to CS-2’s vehicle.

25. At approximately 4:36 p.m., CS-2 arrived at a prearranged meeting location, at which time, law enforcement took custody of a Del-ton Inc. Model ATI-15, .556 Cal., AR-15, wrapped in a black plastic garbage bag, bearing serial number R10315, along with: two magazines with numerous rifle rounds; five boxes of PMC Bronze Ammunition, 223 Remington; and one plastic container containing numerous live rounds, as depicted below:



26. At that time, law enforcement also provided CS-2 with \$350 in FBI funds for the purchase of the bullet-proof vest that KEMP offered to CS-2. CS-2 then left the meet location and walked back to KEMP's residence.

27. At approximately, 4:40 p.m., as seen on the covert video recording, CS-2 met with KEMP again at the back door to KEMP's residence, where CS-2 received the vest from KEMP and provided the funds to KEMP. As CS-2 walked away from KEMP's residence, KEMP stated, "Tried to wrap it up for ya'." CS-2 responded, "Looks nice. Straight out the cleaners." KEMP replied, "Ooooweeee. Look like it gonna be ugly now." CS-2 replied, "Rambo."

28. At approximately 4:43 p.m., CS-2 arrived at a prearranged meeting location, at which time, law enforcement took custody of a black Point Blank vest

cover, containing a ballistic vest bearing serial number 180000394975, as depicted below:



29. CS-2 was also searched for contraband or excess U.S. currency, with none found.

**C. KEMP Sold CS-2 a Ruger AR-556 on or about April 10, 2020.**

30. According to CS-2, on or about April 7, 2020, during an unrecorded communication, KEMP offered to sell CS-2 another rifle for \$700. On or about April 8, 2020, at approximately 2:18 p.m., CS-2 sent a text message to KEMP, using the 4715 number, which stated, “Sorry bout yesterday u still got it [the firearm] [?]”

31. On or about April 9, 2020, at approximately 2:01 p.m., CS-2 exchanged text messages with KEMP, using the 4715 number. CS-2 stated, “Would you be able to hold it [firearm] ‘til tomorrow?” KEMP responded, “Yes cool. . . 7:00.” CS-2 replied, “PM or a.m.” KEMP replied, “Am.” CS-2 replied, “Can’t be midday bout 1.” KEMP replied, “What time is good for you . . . Got to be at work at 8.” CS-2 replied, “Round the time u get off would be perfect.” KEMP replied, “Ok . . . I make it home about 2:30.” CS-2 replied, “Ok.”

32. On or about April 10, 2020, at approximately 2:03 p.m., CS-2 arrived at a predetermined meet location. There, CS-2 was searched by law enforcement, who found no contraband or excess U.S. currency. CS-2 was provided with \$700 in FBI funds and equipped with audio/video recording devices.

33. At approximately 2:16 p.m., CS-2 left the predetermined meet location to travel to South Lowe Avenue in Chicago, Illinois. Around this time, CS-2 and KEMP, using the 4715 number, exchanged text messages. CS-2 asked, "U made it yet [?]" KEMP responded, "Yes." CS-2 replied, "Omw [On my way.]"

34. At approximately 2:25 p.m., law enforcement surveillance observed CS-2 arrive at KEMP's residence on South Lowe Avenue in Chicago, Illinois.

35. At approximately 2:26, as seen on the covert video recording, CS-2 parked CS-2's vehicle and got out of the vehicle and began to walk toward KEMP's residence. Then, KEMP, standing near another vehicle parked in KEMP's driveway, stated, "Pull in here." CS-2 replied, "Oh." Then, CS-2 turned around, walked back into CS-2's vehicle and then re-parked CS-2's vehicle in KEMP's driveway.

36. At approximately 2:28 p.m., as seen on the covert video recording, CS-2 got out of CS-2's vehicle again, and walked into KEMP's garage where KEMP was waiting. KEMP then bent over to show CS-2 something, laughed, and stated, "Was brand new in the package":



CS-2 replied, "I see. . . You ain't got nothing else . . . you ain't ran across nothing?" KEMP replied, "Uh uh man my [supplier] he want 85 for his [another firearm]." CS-2 replied, "What's that 850. Well if he want it get from me and I'll get it." KEMP replied, "Oh ok." CS-2 replied, "Hell yeah. . . Get that mother fucker on deck." KEMP replied, "He got that uh he got that uh Saint."

37. At approximately 2:29 p.m., CS-2 asked, "You ain't got no bag I can put that in." KEMP responded, "Uh man that was the whole thing. . . I it wrapped." CS-2 replied, "Alright, wrap it back up in that towel shit." Then KEMP wrapped up the firearm and walked with the firearm wrapped in a towel toward the back of CS-2's vehicle:



38. After placing the firearm into the trunk of CS-2's vehicle, KEMP stated, "Hell yeah I got enough shit to shake the city" and then laughed. As CS-2 walked back into CS-2's vehicle, CS-2 responded, "You wanna get rid of it, let me know...as soon you put it together, as soon as your [supplier] come through with it." KEMP replied, "Ok uh I can have him drop that off tomorrow . . . Yeah he got that saint, that mother fucker way badder then that one." CS-2 replied, "Alright."

39. Based on my training and experience, the training and experience of other law enforcement officers involved in this investigation, and the content and context of the communication, I believe KEMP informed CS-2 that KEMP has access to a large supply of firearms ("enough shit to shake the city").

40. At approximately, 2:29 p.m., law enforcement surveillance observed CS-2 leave KEMP's driveway.

41. At approximately 2:39 p.m., CS-2 arrived at a prearranged meeting location, at which time, law enforcement took custody of a Ruger Model AR-556



Semiautomatic Rifle bearing Serial Number 857-86762, that was wrapped in plastic and in a towel, as depicted below:



42. CS-2 was also searched for contraband or excess U.S. currency, with none found.

**D. Between April 10, 2020 and April 13, 2020, KEMP and CS-2 Coordinate the Purchase of a Long Gun that KEMP Sold to CS-2 on or about April 13, 2020.**

43. On or about April 10, 2020, at approximately 2:34 p.m., as heard on the covert video recording from the April 10, 2020 transaction, CS-2 received a call from

KEMP. KEMP asked, "It's 85 tomorrow right?" CS-2 replied, "Yeah." KEMP replied, "Okay man it'll be here."

44. At approximately 2:34 p.m., as heard on the covert video recording from the April 10, 2020 transaction, CS-2 placed a call to KEMP. CS-2 stated, "Aye, you wasn't on no time frame so I could be on point." KEMP responded, "Oh ok a couple days." CS-2 replied, "Naw can you like tell me what time to be on point so I can be on point." KEMP replied, "Right ok fo sho fo sho." CS-2 replied, "Just let me know like a hour ahead of time before he coming or something." KEMP replied, "Ok alright will do . . . Ok I'm talking to him [KEMP's supplier] now."

45. At approximately 2:35 p.m., as heard on the covert video recording from the April 10, 2020 transaction, CS-2 placed a call to KEMP. CS-2 stated, "Aye see if he can try to have like a bag too cause you know I need." KEMP responded, "Oh on that one uh uh . . . bag" CS-2 replied, "Ok say less that's good then you know I'm on probation so that shit gotta be shit discrete as shit." KEMP replied, "oh aw yeah man its got the whole bag and everything to it."

46. On or about April 11, 2020, at approximately 3:00 p.m., CS-2 exchanged text messages with KEMP, using the 4715 number. CS-2 stated, "I'm busy right na but I will definitely be ready monday same time if possible." KEMP replied, "Ok sounds good."

47. On or about April 11, 2020, at approximately 3:00 p.m., CS-2 exchanged text messages with KEMP, using the 4715 number. CS-2 stated, "I'm busy right na

but I will definitely be ready monday same time if possible.” KEMP replied, “Ok sounds good.”

48. On or about April 12, 2020, at approximately 7:18 p.m., CS-2 exchanged text messages with KEMP, using the 4715 number. CS-2 asked, “We cool for tomorrow brother[?]” KEMP replied, “Yessir.” CS-2 asked, “Same time[?]” KEMP replied, “Yes. If you like today I have it [the firearm].” CS-2 replied, “Tomorrow.” KEMP replied, “Ok.”

49. Based on my training and experience, the training and experience of other law enforcement officers involved in this investigation, and the content and context of these communications, I believe KEMP confirmed he was ready to sell another assault rifle to CS-2 the following day, at the same time and place as the April 10, 2020 transaction.

50. On or about April 13, 2020, at approximately 1:29 p.m., CS-2 arrived at a predetermined meet location. There, CS-2 was searched by law enforcement, who found no contraband or excess U.S. currency. CS-2 was provided with \$850 in FBI funds and equipped with audio/video recording devices.

51. At approximately 1:51 p.m., law enforcement surveillance observed CS-2 arrive at KEMP’s residence on South Lowe Avenue in Chicago, Illinois. As seen on the covert video recording,<sup>6</sup> at this time, CS-2 pulled into the driveway of KEMP’s

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<sup>6</sup> Based on my review of the covert video recording, the time stamp on the video is approximately 2 hours and 41 minutes ahead of the actual time of the recording. The date stamp also indicates March 5, 2020, which is incorrect, because the video was recorded on April 13, 2020.

residence and got out of the vehicle. KEMP and CS-2 then walked into the garage and KEMP stated, “This mother fucker . . . way better then that other one.” KEMP then unzipped a bag and showed CS-2 the following:



52. KEMP then stated, “Uh-huh the clip and shit right there.” While KEMP loaded the firearm into the trunk of CS-2’s vehicle, KEMP asked, “That’s 85 [\$850]?” CS-2 responded, “Yes sir yes sir.”

53. CS-2 then stated, “I know you got some hand moves too man.” KEMP responded, “Uh uh.” CS-2 replied, “Nah?” KEMP replied, “My [firearms supplier] say . . . he probably if he do anything that probably what he gone get. . .” CS-2 replied, “Some big shit like that?” KEMP replied, “Naw . . . He scared he say he can’t fuck with them no more.” Based on my training and experience, information from CS-2, the training and experience of other law enforcement officers involved in this investigation, and the content and context of the communication, I believe CS-2 asked about whether KEMP had a supply of handguns available for sale (“hand moves”) and KEMP answered he did not, because his supplier of firearms only provided long guns,

or the type of firearms that CS-2 had already purchased from KEMP. KEMP stated his supplier was afraid of dealing in handguns (“He scared he say he can’t fuck with them no more”).

54. KEMP continued, “He [KEMP’s supplier of firearms] work at [delivery company]. He took the shit to the gun store. He was supposed to take 11 packages . . . he took 10 and oh boy signed for them.”

55. At approximately 1:57 p.m., as seen on the covert video recording, CS-2 is getting back into CS-2’s vehicle and KEMP asked, “Yeah man you still holding on the vest [the vest KEMP sold to CS-2 on or about August 12, 2019]?” CS-2 responded, “Hell yeah Ima miniature Rambo running through this bitch.”

56. After CS-2 sat in CS-2’s vehicle, KEMP stated, “I’ll talk to you alright man be safe.” CS-2 responded, “Yep.”

57. At approximately 1:57 p.m., law enforcement observed CS-2 leave the area of KEMP’s residence.

58. At approximately 2:06 p.m., CS-2 arrived at a prearranged meeting location, at which time, law enforcement took custody of a Springfield Firearms Corporation Saint Model Long Gun bearing serial number SE74088 and a magazine, that was provided in a gun bag, as depicted below:



59. CS-2 was also searched for contraband or excess U.S. currency, with none found.

**E. KEMP is Not a Licensed Dealer.**

60. A Federal Firearms License is a license in the United States that enables an individual or a company to engage in a business pertaining to the manufacture or importation of firearms and ammunition, or the interstate and intrastate sale of firearms.

61. On or about July 9, 2020, an ATF Industry Operations Investigator confirmed that at the time of the above-described firearms transactions, KEMP did not possess a Federal Firearms License.

## II. CONCLUSION

62. Based on the foregoing, I submit that there is probable cause to believe that from on or about August 12, 2019 until on or about April 13, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant, Wendall KEMP, did willfully engage in the business of dealing in firearms without being a licensed firearms dealer, in violation of 18 U.S.C. § 922(a)(1)(A).

FURTHER AFFIANT SAYETH NOT.

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SHAMAR BAILEY  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED AND SWORN to  
telephonically on July 24, 2020.

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HEATHER MCSHAIN  
United States Magistrate Judge