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3/10/2025

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

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

KYLER REESE, a/k/a "Klay," and
CHAUN ALLEN

No.

1:25-cr-00134

Judge John Robert Blakey

Magistrate Judge Young B. Kim

RANDOM / Cat. 2

Violations: Title 18, United States
Code, Sections 371, 2114(a) and 2,
2114(b), and 924(c)(1)(A)(ii)

~~UNDER SEAL~~

COUNT ONE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

1. Beginning on or about November 14, 2022 and continuing through on or about November 16, 2022, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KYLER REESE, a/k/a "Klay," and
CHAUN ALLEN

defendants herein, did conspire with each other, and others known and unknown to the grand jury, to knowingly and unlawfully assault a person having lawful charge, custody, and control of United States mail matter and other property of the United States, with intent to rob, steal and purloin said mail matter and other property of the United States, in violation of Title 18, United States Code, Section 2114(a), and to receive, possess, conceal, and dispose of money and other property, knowing the same was unlawfully obtained, in violation of Title 18, United States Code, Section 2114(b).

2. It was part of the conspiracy that defendants KYLER REESE and CHAUN ALLEN agreed to assault a person having lawful charge, custody, and control of United States mail matter and other property of the United States, with the intent to steal that mail matter and other property.

3. It was further part of the conspiracy that defendants KYLER REESE and CHAUN ALLEN committed a robbery of a United States Postal Service (“USPS”) mail carrier (“Individual A”) while Individual A was delivering mail.

4. It was further part of the conspiracy that, during the robbery, defendant KYLER REESE pointed a firearm at Individual A and demanded that Individual A give REESE Individual A’s USPS keys and USPS mail bag.

5. It was further part of the conspiracy that defendants CHAUN ALLEN and KYLER REESE used a stolen vehicle to commit the robbery of Individual A.

OVERT ACTS

6. In furtherance of the conspiracy and to accomplish the objectives of the conspiracy, defendants committed at least one overt act in the Northern District of Illinois, and elsewhere, such overt acts including but not limited to the following:

a. On or before November 15, 2022, defendants CHAUN ALLEN and KYLER REESE obtained a stolen vehicle;

b. On or before November 16, 2022, defendant KYLER REESE obtained a firearm;

c. On or about November 16, 2022, in Chicago, defendant CHAUN ALLEN drove the stolen vehicle, in which defendant KYLER REESE was a passenger;

d. On or about November 16, 2022, in Chicago, defendant KYLER REESE, carrying a firearm, approached Individual A and pointed the firearm at Individual A;

e. On or about November 16, 2022, in Chicago, defendant KYLER REESE, carrying a firearm, robbed Individual A;

f. On or about November 16, 2022, in Chicago, defendant KYLER REESE placed items taken from Individual A in the stolen vehicle;

g. On or about November 16, 2022, in Chicago, defendants CHAUN ALLEN and KYLER REESE left the scene of the robbery in the stolen vehicle;

In violation of Title 18, United States Code, Section 371.

COUNT TWO

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

On or about November 16, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

KYLER REESE, a/k/a “Klay,” and
CHAUN ALLEN

defendants herein, did assault Individual A, a person having lawful charge, custody,
and control of United States mail matter and other property of the United States,
with intent to rob, steal and purloin said mail matter and other property of the United
States, and robbed Individual A of property of the United States; and in effecting such
robbery, put the life of Individual A in jeopardy by use of a dangerous weapon;

In violation of Title 18, United States Code, Sections 2114(a) and 2.

COUNT THREE

The SPECIAL NOVEMBER 2023 GRAND JURY charges:

On or about November 16, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division, and elsewhere,

KYLER REESE, a/k/a “Klay,” and
CHAUN ALLEN

defendants herein, did use, carry, and brandish a firearm during and in relation to a
crime of violence for which they may be prosecuted in a court of the United States,
namely robbery of property of the United States, in violation of Title 18, United States
Code, Section 2114(a), as charged in Count Two of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL:

FOREPERSON

ACTING UNITED STATES ATTORNEY