

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

SCOTT TREECE and KYLE HALL

No. 21 CR 66

Violations: Title 18, United States
Code, Sections 2, 922(a)(1)(A),
922(g)(1), 922(d)(1), and 1512(b)(3)

COUNT ONE

The SPECIAL NOVEMBER 2019 GRAND JURY charges:

From no later than November 17, 2020, and continuing until on or about
January 25, 2021, in the Northern District of Illinois, Eastern Division, and
elsewhere,

SCOTT TREECE and
KYLE HALL,

defendants herein, not being licensed importers, manufacturers, or dealers, willfully
engaged in the business of dealing in firearms;

In violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

COUNT TWO

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about January 25, 2021, at Addison, in the Northern District of Illinois,
Eastern Division,

SCOTT TREECE,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm, namely, a loaded Springfield Arms, Model XD40, .40 caliber pistol bearing serial number BY446017, which firearm had traveled in interstate and foreign commerce prior to the defendant's possession of the firearm;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about February 3, 2021, at Rockford, in the Northern District of Illinois,

SCOTT TREECE,

defendant herein, knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess, in and affecting interstate commerce, a firearm and ammunition, namely, a loaded Glock Inc. Model 23 Generation 5, .40 caliber semi-automatic handgun bearing serial number BRZE555; and fifteen rounds of Glock, Inc. 9 millimeter caliber ammunition; which firearm and ammunition had traveled in interstate commerce prior to the defendant's possession of the firearm and ammunition;

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about January 25, 2021, in the Northern District of Illinois, and elsewhere,

KYLE HALL,

defendant herein, did knowingly sell and otherwise dispose of a firearm, namely, a Springfield Arms, Model XD40, .40 caliber pistol bearing serial number BY446017, to Scott Treece, knowing and having reasonable cause to believe that Scott Treece had been convicted of a crime punishable by a term of imprisonment exceeding one year;

In violation of Title 18, United States Code, Section 922(d)(1).

COUNT FIVE

The SPECIAL NOVEMBER 2019 GRAND JURY further charges:

On or about February 19, 2021, at Rockford, in the Northern District of Illinois,

SCOTT TREECE,

defendant herein, knowingly attempted to intimidate, threaten, and corruptly persuade Individual A with the intent to hinder, delay, and prevent the communication to a law enforcement officer and judge of the United States of information relating to the commission and possible commission of a Federal offense, namely, the unlicensed dealing of firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A), and possession of a firearm by a prohibited person, in violation of Title 18, United States Code, Section 922(g)(1), by, among other things:

- a. Instructing Individual A not to speak to law enforcement officers; and
- b. Instructing Individual A to tell Individual B not to speak to law enforcement officers;

All in violation of Title 18, United States Code, Section 1512(b)(3).

FORFEITURE ALLEGATION

The SPECIAL NOVEMBER 2019 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 922, as set forth in this Indictment, defendants shall forfeit to the United States of America any firearm and ammunition involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to,

a. a Springfield Arms, Model XD40, .40 caliber pistol bearing serial number BY446017, and associated ammunition;

b. a Glock Inc., Model 23 Generation 5, .40 caliber semi-automatic handgun bearing serial number BRZE555, and associated ammunition;

c. an extended Glock .40 caliber magazine, and associated ammunition;

d. a .40 caliber drum magazine, and associated ammunition;

e. a Glock .40 caliber magazine, and associated ammunition; and

f. two 9mm Glock magazines, and associated ammunition.

A TRUE BILL.

FOREPERSON

signed by Timothy J. Storino on behalf of the
UNITED STATES ATTORNEY