



circumstances, to possess and deal in machine guns regulated by the National Firearms Act, Title 26, United States Code, Section 5801 et seq. and the Gun Control Act, Title 18, United States Code, Section 921 et. seq.<sup>1</sup>

3. Since approximately July 2018, WENDT has exploited his position as the Adair Chief of Police to obtain and possess machine guns not lawfully available to the public. As detailed below, WENDT has done so by providing “law letters” to the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) in which WENDT falsely stated, among other things, that: (1) the machine gun(s) were being purchased for the official use of the Adair Police Department; or (2) the machine guns were being demonstrated to the Adair Police Department to evaluate them for potential future purchase by the Adair Police Department.

4. By making these and other false statements to the ATF, WENDT has obtained 10 machine guns for the Adair Police Department and 13 machine guns for BW Outfitters. WENDT has also written approximately 22 additional demonstration law letters to other FFL-SOTs requesting a demonstration of 52 total machine guns to the Adair Police Department for potential future purchase. Of those 52 machine guns requested by WENDT for demonstration to the Adair Police Department, approximately 27 were in fact transferred and acquired by FFL-SOTs (other than BW

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<sup>1</sup> The FFL licensee name for the Anita location is BW Outfitters, Inc., and the FFL licensee name for the Denison location is B Wout Fitters, Inc. However, B Wout Fitters, Inc. is not a recognized corporation in the state of Iowa. In public representations and law letters, WENDT does not differentiate between these two entities and refers to them individually and collectively as BW Outfitters. Subsequent references to BW Outfitters in this Indictment are to the FFL-SOT identified as B Wout Fitters, Inc.

Outfitters) purportedly for demonstration to the Adair Police Department. In total, WENDT has purchased 10 machine guns for the Adair Police Department, attempted to purchase 15 additional machine guns for the Adair Police Department, and requested the demonstration of 65 machine guns to the Adair Police Department. WENDT sold several machine guns registered to the Adair Police Department at a profit; rented out machine guns registered to the Adair Police Department and BW Outfitters to the public in exchange for money; and intended to later sell the machine guns registered to BW Outfitters at a significant personal profit.

5. The defendant, ROBERT ALLEN WILLIAMS, owns and operates Williams Contracting LLC (Williams Contracting), based in Manning, Iowa. WENDT and WILLIAMS are friends. In August 2020, Williams Contracting became an FFL-SOT, authorized, in certain circumstances, to deal in machine guns. In September 2020, Williams Contracting began to obtain machine guns through false demonstration law letters signed by WENDT, in his capacity as the Adair Chief of Police. WILLIAMS has obtained seven false demonstration law letters from WENDT, acquiring a total of 10 machine guns for Williams Contracting, each purportedly for demonstration to the Adair Police Department. WILLIAMS intended to later sell these machine guns at a significant personal profit.

#### **Federal Law on Machine Guns**

6. Federal law generally prohibits the possession, transfer, and importation of fully automatic machine guns manufactured after May 19, 1986 (machine guns).



7. The ATF administers and enforces federal machine gun laws. Any purchase, sale, transfer, or importation of a machine gun must be approved by the ATF's National Firearms Act Division (NFA Division). As material to this Indictment, there are two exceptions to the general prohibition on the possession, transfer, and importation of machine guns:

8. First, machine guns may be purchased, possessed, and imported directly by federal, state, and local law enforcement agencies.

9. Second, machine guns may be purchased, possessed, and imported by an FFL-SOT for use as a sample for demonstration to potential law enforcement agency purchasers.

10. Pursuant to ATF regulations, both exceptions require the law enforcement agency who is either purchasing the machine gun or requesting a demonstration of the machine gun to submit a "law letter." "Law letter" is an industry term that refers to a letter drafted by a law enforcement official, in their official capacity as a law enforcement officer, requesting either the purchase of a machine gun by the agency (purchase law letter) or demonstration of a machine gun to the agency for potential future purchase (demonstration law letter).

11. In a purchase law letter, the agency typically identifies the quantity, make, model, and cost of the machine gun it seeks to purchase. The agency further represents the machine gun is being acquired for the agency's official use and not for the purpose of resale or transfer.

12. To obtain a machine gun as a sample for demonstration to a potential law enforcement agency purchaser, an FFL-SOT must provide the NFA Division with an application containing, among other things, a demonstration law letter from the law enforcement agency. This demonstration law letter must express a need for a particular machine gun or an interest in seeing a demonstration of a particular machine gun for potential future purchase.

13. Transfers of machine guns between FFL-SOTs typically require a demonstration law letter from a law enforcement agency seeking a demonstration of the machine gun for future potential purchase. However, if an FFL-SOT surrenders its SOT – its authorization to possess and deal in machine guns – the FFL may sell and transfer machine guns to any licensed FFL-SOT without a law letter.

14. Federal law further requires FFL-SOTs who purchase, sell, transfer, import, or possess machine guns to keep and maintain records related to their acquisition and disposition of machine guns.

**COUNT 1**

**(Conspiracy to Make False Statements to and Defraud the ATF)**

15. The introductory allegations of this Indictment, paragraphs 1 through 14, are incorporated as if set forth fully herein.

16. Beginning in or about July 2018, and continuing through and including August 2022, in the Southern District of Iowa and elsewhere, the defendants, BRADLEY EUGENE WENDT and ROBERT ALLEN WILLIAMS, knowingly and willfully conspired with each other and other persons known and unknown to the Grand Jury, to commit offenses against the United States and any agency thereof

and to defraud the United States and any agency thereof. Specifically, the defendants, BRADLEY EUGENE WENDT and ROBERT ALLEN WILLIAMS, conspired with each other and other persons known and unknown to the Grand Jury, to knowingly and willfully make and cause to be made, and use and cause to be used, in a matter within the jurisdiction of a department or agency of the United States, namely, the ATF, a materially false, fictitious, and fraudulent statement and representation, namely, law letters purportedly requesting the purchase or demonstration of machine guns, in violation of Title 18, United States Code, Section 1001(a)(2). The defendants, BRADLEY EUGENE WENDT and ROBERT ALLEN WILLIAMS, further conspired with each other and other persons known and unknown to the Grand Jury, to defraud the United States, namely, the ATF, by impairing, impeding, obstructing, and defeating the lawful government functions of the ATF in the administration of the law and regulations of the National Firearms Act and Gun Control Act pertaining to machine guns.

**Purpose of the Conspiracy**

17. It was the purpose and object of the conspiracy of the defendants, BRADLEY EUGENE WENDT and ROBERT ALLEN WILLIAMS, to:
- a. unlawfully obtain and acquire machine guns for the defendants' use and enjoyment;
  - b. unlawfully obtain and acquire machine guns for the purpose of selling or transferring the machine guns for the defendants' personal profit;
  - c. unlawfully obtain and acquire machine guns for the purpose of renting the machine guns to private citizens in exchange for money;



- d. allow private citizens to possess and shoot machine guns that were not otherwise available to the public; and
- e. as to the defendant, BRADLEY EUGENE WENDT, facilitate the transfer of machine guns to other FFL-SOTs.

**Manner and Means**

18. The defendants, BRADLEY EUGENE WENDT and ROBERT ALLEN WILLIAMS, and their co-conspirators, used the following manner and means, among others, to accomplish the goals of their conspiracy:

19. The defendant, BRADLEY EUGENE WENDT, signed and transmitted purchase law letters in which he falsely stated: (1) that the Adair Police Department was purchasing machine guns for the official responsibilities and duties of the Adair Police Department; (2) that the machine guns would be the property of the Adair Police Department; and (3) that the machine guns were not being acquired for the purpose of resale or transfer. In fact, WENDT acquired and sold machine guns registered to the Adair Police Department for his own personal profit and gain.

20. The defendant, BRADLEY EUGENE WENDT, obtained and acquired machine guns for his own FFL-SOT, BW Outfitters, by signing and transmitting demonstration law letters. In these letters, which WENDT wrote from himself as the Adair Chief of Police to himself as the owner of BW Outfitters, WENDT falsely stated that the Adair Police Department wanted a demonstration of the machine guns for potential future purchase. In fact, the Adair Police Department was not interested in and was not considering purchasing the machine guns identified in the

demonstration law letters. Rather, the true purpose of the demonstration law letters was for WENDT to acquire machine guns for his personal use, enjoyment, profit, and gain. In addition to acquiring the machine guns for his personal use and enjoyment, WENDT intended to stockpile machine guns so that he could later surrender his FFL-SOT and sell the machine guns at a profit.

21. The defendant, BRADLEY EUGENE WENDT, signed and transmitted demonstration law letters to other FFL-SOTs to facilitate the transfer of machine guns by falsely stating that the Adair Police Department wanted a demonstration of the machine guns for potential future purchase.

22. The defendant, ROBERT ALLEN WILLIAMS, solicited false demonstration law letters from BRADLEY EUGENE WENDT, in which WENDT falsely stated that the Adair Police Department wanted a demonstration of machine guns for potential future purchase. In fact, the Adair Police Department was not interested in and was not considering purchasing the machine guns identified in the demonstration law letters solicited by WILLIAMS and signed by WENDT. Rather, the true purpose of the demonstration law letters was to facilitate WILLIAMS' acquisition of machine guns for his personal use, enjoyment, profit, and gain. In addition to acquiring the machine guns for his personal use and enjoyment, WILLIAMS intended to stockpile machine guns so that he could later surrender his FFL-SOT and sell the machine guns at a profit.

23. The defendants, BRADLEY EUGENE WENDT and ROBERT ALLEN WILLIAMS, made machine guns registered to the Adair Police Department, BW



Outfitters, and Williams Contracting available at public events for private citizens to possess and shoot. WENDT and WILLIAMS charged patrons money to shoot these machine guns. WENDT and WILLIAMS charged a variable rate to shoot the machine guns, depending on the type of machine gun or ammunition required.

24. The defendant, BRADLEY EUGENE WENDT, made machine guns registered to the Adair Police Department and BW Outfitters available at the BW Outfitter's Denison location for private citizens to possess and shoot. WENDT charged patrons money to shoot these machine guns at a variable rate, depending on the type of machine gun or ammunition required.

#### Overt Acts

25. In furtherance of the conspiracy and to accomplish the goals of the conspiracy, at least one of the co-conspirators committed and caused to be committed, in the Southern District of Iowa and elsewhere, at least one overt act, including, but not limited to:

#### *Purchases for the Adair Police Department*

26. Between approximately October 2019 and August 2021, WENDT submitted purchase law letters resulting in the acquisition of 10 total machine guns purportedly for the official use of the Adair Police Department, and not for resale or transfer. WENDT has sold six of those machine guns. WENDT posted one or more of these machine guns for sale on GunBroker.com, an auction website, advertising the machine gun(s) as "NEW IN BOX."

27. In or about December 2020, via purchase law letter, WENDT purchased (with his own funds) three H&K, MP7A2 machine guns for \$2,080 each, purportedly for the official duties and responsibilities of the Adair Police Department, and not for the purpose of resale or transfer. In or about July 2021, eight months after acquiring the three MP7A2 machine guns, WENDT began to sell them. In or about July 2021, WENDT sold two of the MP7A2 machine guns to a Florida-based buyer for \$50,000. WENDT received a wire of \$50,000 to his personal bank account. WENDT personally profited \$45,840 from the sale of these two machine guns registered to the Adair Police Department. In or about August 2021, WENDT submitted an application to ATF to transfer these machine guns. WENDT signed the application as the Adair Chief of Police, and the machine guns were transferred to the Florida-based buyer.

28. In or about October 2021, WENDT posted the remaining MP7A2 for sale on GunBroker.com, advertising it as “NEW IN BOX.” In or about February 2022, WENDT sold that MP7A2 to an Alabama-based buyer. During the same transaction, WENDT also sold an H&K, MP5SD3 machine gun, which WENDT had acquired for \$3,300 (of his own funds) in April 2019, again purportedly for the Adair Police Department. WENDT sold these two machine guns to the Alabama-based buyer for a total price of \$34,500. The check for the machine guns was addressed to “Brad Wendt,” sent to WENDT’s personal residence, and deposited into the BW Outfitters bank account. WENDT personally profited \$29,120 from the sale of these two machine guns registered to the Adair Police Department. On or about March 3, 2022,

WENDT submitted the application to ATF to transfer these two machine guns to the Alabama-based buyer.

29. On or about March 3, 2022, simultaneous to the transaction identified in paragraph 28, WENDT signed a purchase law letter requesting the purchase of three more H&K, MP7A2 machine guns purportedly for the Adair Police Department. These machine guns were the identical make and model of the H&K, MP7A2 machine guns that WENDT sold and sought to transfer to the Alabama-based buyer that same date, March 3, 2022, and that he had previously sold and transferred to the Florida-based buyer in August 2021.

30. On or about February 22, 2022, while the sale of the H&K, MP7A2 to the Alabama-based buyer was being negotiated, WENDT allowed his significant other to possess and shoot the H&K, MP7A2, which was registered to the Adair Police Department. WENDT's significant other was at no time a sworn officer with the Adair Police Department. WENDT posted a video of his significant other shooting the machine gun to his Facebook account and captioned it "come shoot mp7 😊 April 16th."

31. On April 16, 2022, WENDT and WILLIAMS hosted a public machine gun shoot in Woodbine, Iowa. WENDT and WILLIAMS advertised this machine gun shoot on their Facebook pages. At that machine gun shoot, WENDT and WILLIAMS allowed patrons to shoot a number of machine guns registered to the Adair Police Department, BW Outfitters, and Williams Contracting. WENDT and WILLIAMS



charged a fee per round of ammunition fired through the machine guns, which varied depending on the type of machine gun and ammunition.

32. Among the machine guns available to the public to shoot was a U.S. Ordnance, M60, belt-fed machine gun. This machine gun was registered to the Adair Police Department and had been acquired by WENDT on a purchase law letter dated August 19, 2021, purportedly for the official use and responsibilities of the Adair Police Department.

*Machine guns obtained for BW Outfitters*

33. Between July 2018 and August 2022, WENDT obtained and acquired 13 different machine guns for BW Outfitters, each purportedly for demonstration to the Adair Police Department. The Adair Police Department never purchased any of the machine guns WENDT obtained for demonstration.

34. In or about October 2020, WENDT acquired an FN, M2HB, .50 caliber, belt-fed machine gun purportedly for demonstration to the Adair Police Department. In the demonstration law letter, dated July 19, 2020, WENDT stated the belt-fed machine gun was “ideal” for the Adair Police Department “based on its price and availability.” WENDT paid \$17,896 for the machine gun. Shortly after BW Outfitters obtained the FN, M2HB machine gun, WENDT mounted it to his personally-owned, armored Humvee. At the machine gun shoot on April 16, 2022, WENDT charged patrons \$5 per round of ammunition to shoot this machine gun.

35. In or about November 2020, WENDT contacted a machine gun manufacturer via email. WENDT identified himself as the Adair Chief of Police and

inquired about purchasing an M134D machine gun. The M134D machine gun, also known as a minigun, is an electric motor driven gatling gun designed for speed and accuracy. The M134D machine gun has a magazine capacity of 4,000 rounds and a fixed firing rate of 3,000 rounds per minute (50 rounds per second). The M134D machine gun is utilized by the United States military and is typically mounted to a helicopter. The Adair Police Department does not own a helicopter. The manufacturer refused WENDT's request for a quote because it was "highly improbable" that ATF would approve the transfer of an M134D machine gun to local law enforcement.

36. In January 2021, WENDT obtained a quote of \$80,000 from a different manufacturer to build him an M134 minigun. In February 2021, WENDT paid a \$40,000 deposit for the M134 build. On November 29, 2021, WENDT wrote a letter from himself as the Adair Chief of Police to himself as the owner of BW Outfitters, purportedly requesting a demonstration of the M134 minigun that WENDT had already commissioned and partially paid for. In that letter, WENDT stated the Adair Police Department wanted a demonstration of the machine gun "for possible future purchase and use of our officers in the performance of their official duties" because the minigun was "suitable for engagements and suppressive fire." WENDT then sent the demonstration law letter to the manufacturer, which submitted the letter with an application to the ATF to transfer the minigun to WENDT. The ATF disapproved the transfer because the minigun was "not suitable for law enforcement use."

*Machine guns obtained for Williams Contracting*

37. Between September 2020 and August 2021, WENDT signed demonstration law letters that resulted in the acquisition of 10 different machine guns for WILLIAMS' FFL-SOT, Williams Contracting, each purportedly for demonstration to the Adair Police Department. The Adair Police Department never purchased any of the machine guns WILLIAMS obtained purportedly for demonstration to the Adair Police Department.

38. In or about April 2021, WILLIAMS purchased a CCARM, PPSH-41, 7.62x25 machine gun on GunBroker.com. After the purchase, WILLIAMS then contacted WENDT and solicited a demonstration law letter to facilitate the transfer of the machine gun that WILLIAMS had already purchased to Williams Contracting.

39. In or about August 2021, WILLIAMS purchased a Grain Sporting Goods LLC, Sporter, 7.62x39mm machine gun. After the purchase, WILLIAMS then contacted WENDT and solicited a demonstration law letter to facilitate the transfer of the machine gun that WILLIAMS had already purchased to Williams Contracting.

40. In or about September 2021, WILLIAMS purchased a One Shot Inc., LAR15, 5.56mm machine gun on GunBroker.com. After the purchase, WILLIAMS then contacted WENDT and solicited a demonstration law letter to facilitate the transfer of the machine gun that WILLIAMS had already purchased to Williams Contracting.



*Machine gun transfers facilitated for other FFL-SOTs*

41. On or about January 18, 2021, WENDT signed a demonstration law letter as the Adair Chief of Police to an FFL-SOT in Las Vegas, Nevada, purportedly requesting the demonstration of a U.S. Ordnance, M2A2, .50 caliber machine gun for possible future purchase by the Adair Police Department. In that letter, WENDT stated the machine gun was “particularly suitable for our officers while conducting special operations and high-risk prisoner transportation details.” The Adair Police Department does not conduct high-risk prisoner transportation details. WENDT signed this letter approximately three months after BW Outfitters obtained its own M2, .50 caliber machine gun, also purportedly for demonstration for future potential purchase by the Adair Police Department. WENDT did not want or need a demonstration of another M2, .50 caliber machine gun, and the purpose of this law letter was instead to facilitate the transfer of this machine gun to the Las Vegas-based FFL-SOT, with whom WENDT had a close business relationship.

42. On or about August 2, 2021, WENDT signed demonstration law letters as the Adair Chief of Police to an FFL-SOT in Florida, purportedly requesting the demonstration of three machine guns for potential future purchase by the Adair Police Department. These machine guns, purportedly requested to be demonstrated for the Adair Police Department, included an H&K, HK416. At the time WENDT wrote these demonstration law letters, the Adair Police Department already had an H&K, HK416 machine gun registered to it. The Adair Police Department had no need to demonstrate a machine gun already registered to it; rather, the purpose of

these demonstration law letters was to facilitate the resale of the machine guns for WENDT's close, personal friend at a substantial profit.

43. In or about February 2022, WENDT sold two machine guns registered to the Adair Police Department to an FFL-SOT in Alabama, at a substantial profit. To facilitate the transfer, WENDT signed two demonstration law letters, dated March 1, 2022. In those demonstration law letters, WENDT, as the Adair Chief of Police, purportedly requested formal demonstrations of the H&K, MP7A2 and H&K, MP5SD3 machine guns to determine if those weapons were suitable for future purchase by the Adair Police Department. These were, however, the same machine guns the Adair Police Department already owned. The Adair Police Department had no need for the Alabama-based FFL-SOT to demonstrate machine guns the Adair Police Department already had. Rather, WENDT wrote these demonstration letters to complete the transfer of these machine guns to the Alabama-based buyer, after WENDT profited from their sale.

44. Each of the allegations in Counts 2 through 20 hereinafter are incorporated and re-alleged herein as further overt acts.

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

**THE GRAND JURY FURTHER CHARGES:****COUNTS 2 – 3****(False Statements to the ATF – Purchase Law Letters)**

45. The introductory allegations of this Indictment, paragraphs 1 through 14, are incorporated as if set forth fully herein.

46. On or about each of the following dates, within the Southern District of Iowa and elsewhere, the defendant, BRADLEY EUGENE WENDT, knowingly and willfully made and caused to be made, and used and caused to be used, in a matter within the jurisdiction of a department or agency of the United States, namely, the ATF, a materially false, fictitious, and fraudulent statement and representation. Specifically, WENDT stated on purchase law letters: (1) that the machine guns would be used to carry out the official duties and responsibilities of the Adair Police Department; and (2) that the machine guns were not being acquired for the purpose of resale or transfer, when in fact WENDT was acquiring the machine guns for his personal gain and profit:

<b>Count</b>	<b>Letter Date</b>	<b>Machine guns purchased for official use of Adair Police Department and not for resale</b>
<b>2</b>	October 9, 2019	3 H&K MP7A2, 4.6x30mm, at \$2,080.00 each 1 H&K G36K (SF), 5.56x45mm, at \$1,625.00 each 1 H&K 416, 5.56 14.5", at \$1,795.00 each
<b>3</b>	March 3, 2022	3 H&K MP7A2, 4.6x30mm, at \$2,405.97 each

Each of which is a violation of Title 18, United States Code, Section 1001(a)(2).



**THE GRAND JURY FURTHER CHARGES:**

**COUNTS 4 – 16**

**(False Statements to the ATF – Demonstration Law Letters)**

47. The introductory allegations of this Indictment, paragraphs 1 through 14, are incorporated as if set forth fully herein.

48. On or about each of the following dates, within the Southern District of Iowa and elsewhere, the defendant, BRADLEY EUGENE WENDT, knowingly and willfully made and caused to be made, and used and caused to be used, in a matter within the jurisdiction of a department or agency of the United States, namely, the ATF, a materially false, fictitious, and fraudulent statement and representation. Specifically, WENDT stated on demonstration law letters that the machine gun(s) were requested for demonstration for future potential purchase by the Adair Police Department, when in fact WENDT was acquiring the machine guns for his personal gain and profit and / or to facilitate the transfer of machine guns to other FFL-SOTs:

Count	Letter Date / FFL-SOT	Machine guns requested for demonstration to Adair Police Department for future purchase
4	October 31, 2018 / Marcum MFG LLC	1 H&K, MP5SD3, 9mm 1 H&K, G36C, 5.56mm 1 H&K,UMP45, 45 ACP 1 H&K, G36KE, 5.56mm 1 H&K, MP7A2, 4.6x30mm 1 H&K, G36KE1, 5.56mm

Count	Letter Date / FFL-SOT	Machine guns requested for demonstration to Adair Police Department for future purchase
5	October 31, 2018 / Marcum MFG LLC	1 FN, P90 Tactical, 5.7x28mm 1 FN, P90 Standard Selective Fire, 5.7x28mm 1 FN, P90 TR Selective Fire, 5.7x28mm 1 FN, P90 USG Blk Sight, 5.7x28mm 1 FN, SCAR-SC, 5.56x45mm 1 FN, SCAR 17, 7.62x51mm FDE 16 in LE 1 FN, SCAR 17 CQC, 7.62x51mm FDE 13 in LE 1 FN, SCAR 16, 5.56x45mm FDE 10-in CQC 30-Rnd 1 FN, SCAR 16, 5.56x45mm FDE 14-in 30-RND LE 1 FN, M249 SAW, 5.56mm 1 FN, M249 PARA, 5.56mm
6	January 15, 2019 / Marcum MFG LLC	1 H&K, MP5SD2, 9mm 1 H&K, UMP40, 40 S&W 1 H&K, MP5/40A3, 40 S&W 1 H&K, MP5A2, 9mm 1 SIG, 516, 5.56mm 1 SIG, SG 551-2P SWAT, 223/5.56mm
7	March 28, 2019 / BW Outfitters	1 FN, M-249 Para, 5.56mm
8	July 19, 2020 / BW Outfitters	1 FN, M2 HB-QCB, 12.7mmx99mm (Full Auto)
9	January 18, 2021 / Arms Unlimited, Inc.	1 US Ordnance, M2A2, .50 caliber
10	August 2, 2021 / Objectiv Solutions LLC	1 H&K, MP7 (Full Auto), 4.6x30mm
11	August 2, 2021 / Objectiv Solutions LLC	1 H&K, HK416 (Full Auto), 5.56mm
12	August 2, 2021 / Objectiv Solutions LLC	1 H&K, G36C (Full Auto), 5.56mm
13	November 29, 2021 / BW Outfitters	1 DeGroat Tactical Armaments, GAU-2B/A, 7.62mm
14	March 1, 2022 / TM Firearms LLC	1 H&K, MP5SD3 (Full Auto), 9mm

Count	Letter Date / FFL-SOT	Machine guns requested for demonstration to Adair Police Department for future purchase
15	March 1, 2022 / TM Firearms LLC	1 H&K, MP7A2 (Full Auto), 4.6x30mm
16	July 1, 2022 / Palm Beach Shooting Organization LLC	1 H&K, G36C (Full Auto), 5.56mm

Each of which is a violation of Title 18, United States Code, Sections 1001(a)(2) and 2.



**THE GRAND JURY FURTHER CHARGES:****COUNTS 17 – 19****(False Statements to the ATF – Demonstration Law Letters)**

49. The introductory allegations of this Indictment, paragraphs 1 through 14, are incorporated as if set forth fully herein.

50. On or about each of the following dates, within the Southern District of Iowa and elsewhere, the defendants, BRADLEY EUGENE WENDT and ROBERT ALLEN WILLIAMS, knowingly and willfully made and caused to be made, and used and caused to be used, in a matter within the jurisdiction of a department or agency of the United States, namely, the ATF, a materially false, fictitious, and fraudulent statement and representation. Specifically, WENDT stated on demonstration law letters that the machine gun(s) were requested for demonstration for future potential purchase by the Adair Police Department, when in fact the machine guns were being acquired for WILLIAMS' personal gain and profit:

<b>Count</b>	<b>Letter Date / FFL-SOT</b>	<b>Machine guns requested for demonstration to Adair Police Department for future purchase</b>
<b>17</b>	April 19, 2021 / Williams Contracting	1 CCARM, PPSH-41 (Full Auto), 7.62x25mm
<b>18</b>	August 28, 2021 / Williams Contracting	1 Grain Sporting Goods LLC, Sporter, 7.62x39mm
<b>19</b>	August 28, 2021 / Williams Contracting	1 One Shot, Inc., LAR-15, 5.56mm

Each of which is a violation of Title 18, United States Code, Sections 1001(a)(2) and 2.

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 20**  
**(Illegal Possession of Machine Gun)**

51. On or about April 16, 2022, in the Southern District of Iowa, the defendant, BRADLEY EUGENE WENDT, in and affecting commerce, knowingly possessed a machine gun, namely: a U.S. Ordnance, Model M60, 7.62 caliber machine gun, with serial number 12413, and aided and abetted the same.

This is a violation of Title 18, United States Code, Sections 922(o), 924(a)(2), and 2.

**THE GRAND JURY FINDS:**

**NOTICE OF FORFEITURE**

Upon conviction for the offense(s) alleged in Counts 1 through 20 of this Indictment, the defendant, BRADLEY EUGENE WENDT, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms, magazines, and ammunition involved in the commission of said offenses, including, but not limited to:

Registered Owner	Manufacturer	Model	Caliber	Serial Number
Adair Police Department	US Ordnance	M60	7.62	12413
	FN	SCAR-SC	5.56	SC000387
	H&K	HK416	5.56	88070103
	H&K	G36K	5.56	84054530
	H&K	MP7A2	4.6	164029336
	H&K	MP5SD3	9	63106832
BW Outfitters	FN	F2000	5.56	002596
	Steyr Mannlicher AG	AUG A1	223	127517
	Thompson [Imported NFA Firearm]	M1A1	45	282230
	Steyr Arms	AUG A3	5.56	3198863
	FN	M2HB QCB	50	36923
	Kriss USA	Vector SMG	45	45S000903
	Colt	M4	5.56	A0199523
	FN	MK46	5.56	C14122
	FN	M-249 PARA	5.56	C14266
	FN	P90 Tactical	5.7	FN079567



Registered Owner	Manufacturer	Model	Caliber	Serial Number
BW Outfitters	FN	SCAR 16QC	5.56	L055189
	FN	MK48	7.62	NV484905
	H&K [Imported NFA Firearm]	MP5SD3	9	S98044
Williams Contracting	Grain Sporting Goods LLC	Sporter	7.62	S033554
	One Shot Inc	LAR15	5.56	CM64429
	John's Guns	FSL	308	X00967
	H&K	HK33KA3	223	11387
	CCARM	PPSH-41	7.62x25	0006
	[Imported NFA Firearm]	1950	9	5100018
	H&K	UMP40	40	162001006
	CCARM	1919-A4	30.06	015
	2A Armament	Balios-Lite	5.56	BC00836
	John's Guns	M60E3	308	PSXMGM60E3001
Objectiv Solutions	H&K	HK416	5.56	88073918
	H&K	MP7	4.6	164021752
	H&K	G36C	5.56	85043773

Registered Owner	Manufacturer	Model	Caliber	Serial Number
Arms Unlimited	US Ordnance	M2	50	DS7000
	US Ordnance	M60	7.62	12494
	Ruger	AC556	223	192-03073

This is pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

**THE GRAND JURY FURTHER FINDS:****NOTICE OF FORFEITURE**

Upon conviction for the offense(s) alleged in Counts 1, 17, 18, and 19 of this Indictment, the defendant, ROBERT ALLEN WILLIAMS, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), all firearms, magazines, and ammunition involved in the commission of said offenses, including, but not limited to:

Registered Owner	Manufacturer	Model	Caliber	Serial Number
Williams Contracting	Grain Sporting Goods LLC	Sporter	7.62	S033554
	One Shot Inc	LAR15	5.56	CM64429
	John's Guns	FSL	308	X00967
	H&K	HK33KA3	223	11387
	CCARM	PPSH-41	7.62x25	0006
	[Imported NFA Firearm]	1950	9	5100018
	H&K	UMP40	40	162001006
	CCARM	1919-A4	30.06	015
	2A Armament	Balios-Lite	5.56	BC00836
	John's Guns	M60E3	308	PSXMGM60E3001



This is pursuant to Title 18, United States Code, Section 924(d) and Title 28,  
United States Code, Section 2461(c).

**A TRUE BILL.**

FOREPERSON

Richard D. Westphal  
United States Attorney

By:

  
Mikaela J. Shotwell  
Assistant United States Attorney

  
Ryan W. Leemkuil  
Assistant United States Attorney