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**United States District Court**  
**District of Kansas**

**UNITED STATES OF AMERICA,**  
**Plaintiff,**

vs.

No. **15-40\*\*\*-01-\*\*\***

15-40050-DDC

**MICHAEL ANDREW RYAN,**  
**a.k.a. “Brad Jones,”**  
**“Gunrunner,”**  
**Defendant.**

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**SEALED INDICTMENT**

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**The Grand Jury charges:**

**COUNT 1**

On or about June 21, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,**  
**a.k.a. “Brad Jones,”**  
**“Gunrunner,”**

knowingly made a false statement and representation to Flint Hills Gun Works, LLC, 1109 N. 3rd, Manhattan, Kansas, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be

kept in the records of Flint Hills Gun Works, LLC, in that the defendant did execute and cause to be executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that Marlo Martin was the actual buyer of a firearm, to wit: a Glock model 22, .40 caliber pistol, serial number UUB016, when in truth and in fact as he then and there well knew, the defendant was the actual buyer of said firearm, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**COUNT 2**

On or about July 24, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. “Brad Jones,”  
“Gunrunner,”**

knowingly made a false statement and representation to Santa Fe Enterprises Inc. (S.F.E.I.), 128 W. 18th Street, Manhattan, Kansas, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of S.F.E.I., in that the defendant did execute and cause to be executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the

effect that Allison Mitchell was the actual buyer of a firearm, to wit: a Glock 17, 9 millimeter pistol, bearing serial number SCY861, when in truth and in fact as he then and there well knew, the defendant was the actual buyer of said firearm, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**COUNT 3**

On or about July 24, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly made a false statement and representation to Santa Fe Enterprises Inc. (S.F.E.I.), 128 W. 18th Street, Manhattan, Kansas, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of S.F.E.I., in that the defendant did execute and cause to be executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that Allison Mitchell was the actual buyer of a firearm, to wit: a Glock 19, 9 millimeter pistol, bearing serial number VKY142, when in truth and in fact as he then and there well knew, the defendant was the actual buyer of said

firearm, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**COUNT 4**

On or about July 24, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. “Brad Jones,”  
“Gunrunner,”**

knowingly made a false statement and representation to Santa Fe Enterprises Inc. (S.F.E.I.), 128 W. 18th Street, Manhattan, Kansas, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of S.F.E.I., in that the defendant did execute and cause to be executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives form 4473, Firearms Transaction Record, to the effect that Allison Mitchell was the actual buyer of a firearm, to wit: a Glock 27, .40 caliber pistol, bearing serial number TZS-804, when in truth and in fact as he then and there well knew, the defendant was the actual buyer of said firearm, in violation of Title 18, United States Code, Sections 924(a)(1)(A) and 2.

**COUNT 5**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly possessed a firearm, that is, a Beretta 9 millimeter pistol, from which the manufacturer's serial number had been removed, altered and obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 6**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly possessed a firearm, that is, a Taurus .38 Special revolver, from which the manufacturer's serial number had been removed, altered and obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 7**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

did willfully and knowingly export and attempt to export and send FedEx AirWay Bill (AWB) 8982-9681-3440 containing a Beretta 9 millimeter pistol, from which the manufacturer's serial number had been removed, altered and obliterated; a Taurus .38 Special revolver, from which the manufacturer's serial number had been removed, altered and obliterated; a 15-round 9 millimeter magazine; 32 rounds of millimeter ammunition; one round of .380 ammunition; and 41 rounds of .40 caliber ammunition from the United States to Cork, Ireland, contrary to the laws and regulations of the United States, in violation of Title 18, United States Code, Section 554.

**COUNT 8**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly possessed a firearm, that is, a Glock model 17, 9 millimeter pistol, from which the manufacturer's serial number had been removed, altered and

obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 9**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly possessed a firearm, that is, a Glock model 19, 9 millimeter pistol, from which the manufacturer's serial number had been removed, altered and obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 10**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

did willfully and knowingly export and attempt to export and send FedEx AirWay Bill (AWB) 8982-9681-3439 containing a Glock model 17, 9 millimeter pistol, from which the manufacturer's serial number had been

removed, altered and obliterated; a Glock model 19, 9 millimeter pistol, from which the manufacturer's serial number had been removed, altered and obliterated; one 15-round 9 millimeter magazine; one 17-round 9 millimeter magazine; and 49 rounds of 9 millimeter ammunition, from the United States to Cork, Ireland, contrary to the laws and regulations of the United States, in violation of Title 18, United States Code, Section 554.

**COUNT 11**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly possessed a firearm, that is, an IWI .22 caliber, UZI, from which the manufacturer's serial number had been removed, altered and obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 12**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

did willfully and knowingly export and attempt to export and send FedEx



AirWay Bill (AWB) 8982-9681-3417 containing an IWI .22 caliber, UZI, from which the manufacturer's serial number had been removed, altered and obliterated; a .22 caliber magazine for the IWI UZI; 98 rounds of .22 caliber ammunition; and 89 rounds of .270 long ammunition, from the United States to Pinner, England, contrary to the laws and regulations of the United States, in violation of Title 18, United States Code, Section 554.

**COUNT 13**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly possessed a firearm, that is, a Highpoint, .45 caliber pistol, from which the manufacturer's serial number had been removed, altered and obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 14**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

did willfully and knowingly export and attempt to export and send FedEx AirWay Bill (AWB) 8982-9681-3428 containing a Highpoint .45 caliber pistol, from which the manufacturer's serial number had been removed, altered and obliterated; a .45 caliber magazine; and 19 rounds of .45 caliber ammunition, from the United States to Edinburgh, Scotland, contrary to the laws and regulations of the United States, in violation of Title 18, United States Code, Section 554.

**COUNT 15**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

knowingly possessed a firearm, that is, a Walther P22, .22 caliber pistol, from which the manufacturer's serial number had been removed, altered and obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 16**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,**

**a.k.a. “Brad Jones,”  
“Gunrunner,”**

did willfully and knowingly export and attempt to export and send FedEx AirWay Bill (AWB) 8982-9681-3391 containing a Walther P22, .22 caliber pistol, from which the manufacturer's serial number had been removed, altered and obliterated; and a .22 caliber magazine, from the United States to Victoria, Australia, contrary to the laws and regulations of the United States, in violation of Title 18, United States Code, Section 554.

**COUNT 17**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. “Brad Jones,”  
“Gunrunner,”**

knowingly possessed a firearm, that is, a Glock model 27, .40 caliber pistol, from which the manufacturer's serial number had been removed, altered and obliterated, which had been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

**COUNT 18**

On or about August 7, 2013, in the District of Kansas, the defendant,

**MICHAEL ANDREW RYAN,  
a.k.a. "Brad Jones,"  
"Gunrunner,"**

did willfully and knowingly export and attempt to export and send a FedEx AirWay Bill containing a Glock model 27, .40 caliber pistol, from which the manufacturer's serial number had been removed, altered and obliterated; a Glock model 22, .40 caliber pistol, from which the manufacturer's serial number had been removed, altered and obliterated; one 9-round, .40 caliber Glock magazine; one 10-round, .40 caliber, Glock magazine; 9 rounds of .40 caliber ammunition; and 10 rounds of 9 millimeter ammunition, from the United States to Mallow, Ireland, contrary to the laws and regulations of the United States, in violation of Title 18, United States Code, Section 554.

**A TRUE BILL.**

June 3, 2015  
Date

s/Foreperson  
FOREPERSON OF THE GRAND JURY

s/Gregory G. Hough, #12860 for  
Barry R. Grissom  
United States Attorney  
District of Kansas

[It is requested that trial be held in Topeka, Kansas]