

**FILED**  
12/20/2023

**MCP**

**JUDGE BLAKEY**  
**MAGISTRATE JUDGE KIM**

**RANDOM/ CAT 2**

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

Dec 20, 2023

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**1:23CR652**

UNITED STATES OF AMERICA

Case No.

v.

Violations: Title 18, United States Code,  
Sections 1594(c), 1591(a)(1), (b)(2), and  
(c)

KENNARD CAMERON,  
also known as "Black"

**~~UNDER SEAL~~**

COUNT ONE

The SPECIAL OCTOBER 2022 GRAND JURY charges:

From on or about March 17, 2023, and continuing through on or about March 21, 2023, at Lansing, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENNARD CAMERON,  
also known as "Black,"

defendant herein, did conspire with Coconspirator A and with others unknown to the Grand Jury, in and affecting interstate commerce, to knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, and solicit, by any means, a person, having had a reasonable opportunity to observe the person, and knowing and in reckless disregard of the fact that the person had not attained the age of 18 years old and would be caused to engage in a commercial sex act; in violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c);

In violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

The SPECIAL OCTOBER 2022 GRAND JURY further charges:

From on or about March 17, 2023, and continuing through on or about March 21, 2023, at Lansing, in the Northern District of Illinois, Eastern Division, and elsewhere,

KENNARD CAMERON,  
also known as "Black,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, maintained, patronized, and solicited by any means a person, namely, Minor A, having had a reasonable opportunity to observe Minor A, and knowing and in reckless disregard of the fact that Minor A had not attained the age of 18 years old and would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1), (b)(2), and (c);

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
ACTING UNITED STATES ATTORNEY