

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL C. PEARSON

Violations: Title 18, United States Code,
Sections 924(c)(1)(A) and 2119

COUNT ONE

The SPECIAL JANUARY 2020 GRAND JURY charges:

On or about July 28, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

MICHAEL C. PEARSON,

defendant herein, with intent to cause death and serious bodily harm, took a motor
vehicle, namely, a 2006 Buick Lucerne, that had been transported, shipped, and
received in interstate commerce from the person and presence of Victim A and Victim
B by force, violence, and intimidation;

In violation of Title 18, United States Code, Sections 2119 and 2.

COUNT TWO

The SPECIAL JANUARY 2020 GRAND JURY further charges:

On or about July 28, 2020, at Chicago, in the Northern District of Illinois,
Eastern Division,

MICHAEL C. PEARSON,

defendant herein, did use, carry, brandish, and discharge a firearm, namely a .22 caliber Glock semiautomatic pistol bearing serial number RV640US, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

FORFEITURE ALLEGATION

The SPECIAL JANUARY 2020 GRAND JURY further alleges:

1. The allegations contained in this Indictment are incorporated here by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. As a result of their violations of Title 18, United States Code, Section 924(c)(1)(A) as alleged in Count Two of the foregoing Indictment,

MICHAEL C. PEARSON,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any and all right, title, and interest he may have in any property involved in the charged offense.

3. The property to be forfeited includes but is not limited to a .22 caliber Glock semiautomatic pistol bearing serial number RV640US, and associated magazine and ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY