

FILED
6/29/2022 EY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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

UNITED STATES OF AMERICA

v.

ALLEN CLAY and
NARONN CAIN

1:22-CR-333

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

COUNT ONE

The SPECIAL APRIL 2021 GRAND JURY charges:

On or about April 25, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division,

ALLEN CLAY and
NARONN CAIN,

defendants herein, with intent to cause death and serious bodily harm, took by force,
violence, and intimidation a motor vehicle, namely a 2011 Kia Optima, that had been
transported, shipped, and received in interstate commerce from the person and
presence of Victim A and Victim B;

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

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about April 25, 2022, at Chicago, in the Northern District of Illinois,
Eastern Division,

ALLEN CLAY and
NARONN CAIN,

defendants herein, did use, carry, and brandish a firearm, namely a 9-millimeter PF940C Polymer 80 semiautomatic pistol, with no identifiable serial number and an Anderson AM-15 5.56mm semiautomatic rifle bearing serial number 20098611, during and in relation to a crime of violence for which they each 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 APRIL 2021 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 the violation of Title 18, United States Code, Sections 2119 and 924(c)(1)(A) as alleged in the foregoing Indictment,

ALLEN CLAY and
NARONN CAIN,

defendants 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 9-millimeter PF940C Polymer 80 semiautomatic firearm, with no identifiable serial number, an Anderson AM-15 5.56mm semiautomatic rifle bearing serial number 20098611, and associated magazines and ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY