

THOMAS G. BRUTON CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA

v.

NOAH RANSOM

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

> 1:22-cr-00348 Judge Matthew F. Kennelly Magistrate Judge Maria Valdez

COUNT ONE

The SPECIAL APRIL 2021 GRAND JURY charges:

On or about April 9, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

NOAH RANSOM,

defendant herein, with intent to cause death and serious bodily harm, took a motor vehicle, namely a 2019 Lexus RX350, that had been transported, shipped, and received in interstate commerce from the person and presence of Victim A by force, violence, and intimidation;

In violation of Title 18, United States Code, Section 2119(1).

COUNT TWO

The SPECIAL APRIL 2021 GRAND JURY further charges:

On or about April 9, 2022, at Chicago, in the Northern District of Illinois, Eastern Division,

NOAH RANSOM,

defendant herein, did use, carry, and brandish a firearm, namely a Polymer80 9mm pistol, 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(1), as charged in Count One of this Indictment;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

FORFEITURE ALLEGATION

The SPECIAL APRIL 2021 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 2119(1), as set forth in Count One of this Indictment, or Title 18, United States Code, Section 924(c)(1)(A), as set forth in Count Two of this Indictment, defendant shall forfeit to the United States of America any firearm and ammunition involved in and used in the offense, as provided in Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).

2. The property to be forfeited includes, but is not limited to, a Polymer80 9mm pistol and associated ammunition.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY