IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)	Criminal No. 22-55
)	1
V.)	(18 U.S.C. §§ 2423(c), (e) and § 3238)
,)	
CORRIGAN CLAY)	[UNDER SEAL]

INDICTMENT

COUNT ONE

The grand jury charges:

Between in and around January 2014, and in and around December 2017, the defendant, CORRIGAN CLAY, a United States citizen whose last known residence in the United States is in the Western District of Pennsylvania, traveled in foreign commerce, from the United States to Haiti, and resided temporarily and permanently in Haiti, a foreign country, and engaged in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with Minor 1, a person whose identity is known to the Grand Jury and is under 18 years of age, and attempted to do so.

In violation of Title 18, United States Code, Sections 2423(c) and (e), and Section 3238.

FILED

MAR 09 2022

CLERK U.S. DISTRICT COURT WEST. DIST. OF PENNSYLVANIA

NOTICE OF FORFEITURE

The grand jury further charges:

- 1. As a result of a violation of Title 18, United States Code, Sections 2423(c) and (e), and Section 3238, as set forth in this Indictment, defendant, CORRIGAN CLAY, shall forfeit to the United States of America:
 - (a) any property, real or personal, used or intended to be used to commit or to facilitate the commission of such violations.
 - (b) Any property, real or personal, that constitutes or is derived from proceeds traceable to any such violations.
- 2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
 - (a) cannot be located upon the exercise of due diligence;
 - (b) has been transferred or sold to, or deposited with, a third party;
 - (c) has been placed beyond the jurisdiction of the Court;
 - (d) has been substantially diminished in value; or
 - (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 2428(b)(2), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property

of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 2428.

A True Bill,

FOREPERSON

/s/ Steven J. Grocki STEVEN GROCKI Chief

/s/ Alicia A. Bove ALICIA A. BOVE Trial Attorney NY ID No. 4930970

/s/ Jessica L. Urban JESSICA L. URBAN Trial Attorney PA ID No. 309638

Child Exploitation and Obscenity Section U.S. Department of Justice