LNE 2.7.23
JG USAO# 2022R00698

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	*	
	*	
v.	*	**CRIMINAL NO.** JKB-23-049
	*	
KWAME BROWN,	*	**(Possession of a Firearm and Ammunition by a Prohibited Person, 18 U.S.C. § 922(g)(1); Forfeiture, 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c))**
	*	
Defendant	*	
	*	
	*	
	*******	

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INDICTMENT

COUNT ONE
(Possession of a Firearm and Ammunition by a Prohibited Person)

The Grand Jury for the District of Maryland charges that:

On or about June 28, 2022, in the District of Maryland, the defendant,

KWAME BROWN,

knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, that is, a Glock model 43 semi-automatic pistol, bearing serial number ADCN275 and 15 rounds of 9mm ammunition, and the firearm and ammunition were in and affecting commerce.

18 U.S.C. § 922(g)

FORFEITURE

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the Defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), in the event of the Defendant's conviction.

Firearms and Ammunition Forfeiture

2. Upon conviction of the offense alleged in Count One, the Defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in that offense, including but not limited to:

a. One a Glock model 43 semi-automatic pistol, bearing serial number ADCN275; and

b. Approximately 15 rounds of 9mm ammunition.

Substitute Assets

1. Pursuant to 21 U.S.C. § 853(p) as incorporated by 28 U.S.C. § 2461(c), if any of the property described above as being subject to forfeiture, as a result of any act or omission by the Defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been comingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States to seek forfeiture of any other property of the Defendant up to the value of the forfeitable property described above.

18 U.S.C. § 924(d)
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)

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Erek Barron

Erek L. Barron
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

2/8/2023

Date