IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	**:**	
v.	**:**	**CRIMINAL NO. 25-425**
KASIM BROWN	**:**	

GOVERNMENT'S CHANGE OF PLEA MEMORANDUM

I. Background

Defendant Kasim Brown is charged in a one-count indictment with the possession of a firearm by a felon, in violation of 18 U.S.C. § 922(g)(1). The defendant expressed his intention to plead guilty to Count One. The government is also seeking criminal forfeiture of the firearm. A change of plea hearing has been scheduled before the Honorable Joel Harvey Slomsky on April 7, 2026.

II. Applicable Statute and Essential Elements of the Offense

Possession of a firearm by a felon, in violation of Title 18, United States Code, Section 922(g)(1)

Title 18, United States Code, Section 922(g)(1) provides, in pertinent part, "It shall be unlawful for any person . . . who has been convicted in any court of, a crime punishable by imprisonment for a term exceeding one year . . . to . . . possess in or affecting commerce, any firearm or ammunition."

To convict the defendant of possession of a firearm by a felon, the government must prove the following four elements:

1. The defendant knowingly possessed a firearm;

2. At the time of the charged act, the defendant had previously been

convicted in a court of a crime punishable by imprisonment for a term exceeding one year;

3. At the time of the charged act, the defendant knew that he had been convicted of such an offense; and

4. Such possession was in or affecting interstate commerce.

III. Maximum Penalties

Count One– Possession of ammunition by a felon – 18 U.S.C. § 922(g)(1):

The defendant faces a maximum sentence of fifteen years' imprisonment, a three-year term of supervised release, a $250,000 fine, and a $100 special assessment.

IV. Factual Basis for the Plea

Philadelphia police department ("PPD") detectives developed Kasim BROWN as a suspect in a July 9, 2025, robbery of N.D. at "Milkboy" music studio located on the 400 block of N. 7th Street. The robbery occurred at approximately 10:30 p.m. and is captured on video. The offenders produced handguns and utilized cell phones during the course of the robbery. Detectives identified BROWN as a suspect in that robbery and issued a warrant for his arrest.

Detectives additionally applied for and obtained a search warrant for BROWN's residence. When SWAT officers executed the warrant for Apartment 3C, they saw a black male throw an AR-style rifle out of the window of the building. The window belonged to an adjacent apartment. Members of Central Detectives knocked on the apartment door of 3D with no response. PPD officers then secured the door to the apartment while detectives obtained a search warrant for Apartment 3D. BROWN and two other individuals were located in the apartment. Officers called BROWN's cell phone number (which was previously provided by his probation

officer) and located an iPhone in the apartment.

Detectives applied for and obtained a search warrant for BROWN's cell phone. Federal investigators additionally obtained a federal search warrant for BROWN's cell phone. In the phone, investigators located a first-person video of BROWN with a handgun. The video was taken the night of the robbery, July 9, 2025, at 8:02 p.m. — approximately two-and-a-half-hours before the robbery. The video depicts the arm of a black male wearing a gray shirt and ripped jean pants opening a black book bag and retrieving two Glock pistols from the bag. A closer review of the video shows there is a tattoo on the left hand of the individual retrieving the firearms which reads "BEYOND BLESSED." BROWN has an identical tattoo on his hand. Additionally, the voice of the person taking the video is very distinctive. Investigators familiar with BROWN have identified the voice as belonging to BROWN.

The firearm was recovered from another individual on September 9, 2025, in West Philadelphia. The firearm was submitted to the Firearms Identification Unit for analysis; it was test fired and entered into NIBIN.

Special Agent Shiva Raja from the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), an expert in the field of interstate/foreign nexus of firearms analyzed the still image of the firearm. Special Agent Raja determined that the firearm was not manufactured in Pennsylvania and thus traveled through and affected interstate or foreign commerce.

On June 7, 2022, BROWN pled guilty to two violations of the Pennsylvania Criminal Code and signed a written guilty plea form acknowledging that his crimes were punishable by 2.5 – 5 years in prison each, for a total statutory maximum of 10 years' incarceration – therefore he was aware he had been convicted of a crime punishable by more than one year of

incarceration at the time of the commission of the instant offense.

V. Plea Agreement

The parties have executed a plea agreement that will be presented to the Court during a hearing regarding entry of the guilty plea. The agreement includes a supplement to be filed under seal.

VI. Conclusion

The United States requests that the Court conduct a hearing under Federal Rule of Criminal Procedure 11 and accept the defendant's plea of guilty.

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ *Ashley N. Martin*
ASHLEY N. MARTIN
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a true and correct copy of the foregoing to be served via electronic mail upon the following:

Shaka Johnson, Esquire
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/s/ *Ashley N. Martin*
ASHLEY N. MARTIN
Assistant United States Attorney

Dated: March 31, 2026