

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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ORIGINAL

UNITED STATES OF AMERICA

- v. -

HAROLD BROWN,

Defendant.

INFORMATION
12 CRIM 344

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COUNT ONE

(Conspiracy to Deal in Firearms without a License)

The United States Attorney charges:

1. From in or about May 2011 up to and including in or about August 2011, in the Southern District of New York and elsewhere, HAROLD BROWN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that HAROLD BROWN, the defendant, and others known and unknown, not being licensed importers, licensed manufacturers or licensed dealers, would and did engage in the business of dealing in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt act, among others,

Judge McMahon

was committed in the Southern District of New York and elsewhere:

a. On or about August 23, 2011, HAROLD BROWN, the defendant, purchased firearms from an individual in South Carolina and arranged for such firearms to be sold in New York, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Dealing in Firearms without a License)

The United States Attorney further charges:

4. From in or about May 2011 up to and including in or about August 2011, in the Southern District of New York and elsewhere, HAROLD BROWN, the defendant, not being a licensed importer, licensed manufacturer or licensed dealer, willfully and knowingly did engage in the business of dealing in firearms, to wit, BROWN sold or arranged for the sale of a total of at least 20 firearms on at least three separate occasions to an individual in New York, New York.

(Title 18, United States Code, Sections 922(a)(1)(A) & 2.)

COUNT THREE

(Possession of a Firearm By a Convicted Felon)

The United States Attorney further charges:

5. On or about September 23, 2011, in the Southern District of New York, HAROLD BROWN, the defendant, after having been previously convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess in and affecting commerce a firearm, to wit, a HiPoint model C9,

9mm pistol, which had previously been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Section 922(g).)

COUNT FOUR

(Possession with Intent to Distribute Narcotics)

The United States Attorney further charges:

6. From in or about January 1, 2006 up through and including in or about August 2011, in the District of South Carolina and elsewhere, HAROLD BROWN, the defendant, intentionally and knowingly did possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

7. The controlled substance involved in the offense was mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

(Title 21, United States Code, Sections 812, 841(a)(1) and 841(b)(1)(D).)

COUNT FIVE

(Making Counterfeit Currency)

The United States Attorney further charges:

8. In or about August 2011, in the District of South Carolina, HAROLD BROWN, the defendant, knowingly and with intent to defraud, did falsely make, forge, counterfeit, and alter an obligation of the United States, to wit, BROWN forged and

counterfeited ten-dollar and twenty-dollar bills of United States currency.

(Title 18, United States Code, Section 471.)



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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12 Cr.

(18 U.S.C. §§ 371, 471 & 922; 21 U.S.C. §§
812, 841(a)(1) & 841(b)(1)(D).)

PREET BHARARA

United States Attorney.

*4/30/12 - Filed Information.
- Filed Waiver of Indictment.*

*Judge Eizenstein
U.S.M.J.*