

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
 :
 - v. - :
 :
 RAKIM BROWN, :
 a/k/a "Ra," :
 :
 Defendant. :
 :
 - - - - - X

SEALED INDICTMENT
19 Cr. ____

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2016 up to and including at least in or about 2018, in the Southern District of New York and elsewhere, RAKIM BROWN, a/k/a "Ra," the defendant, and others known and unknown, intentionally and knowingly did combine conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.
2. It was a part and an object of the conspiracy that RAKIM BROWN, a/k/a "Ra," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).
3. The controlled substance that RAKIM BROWN, a/k/a "Ra," the defendant, conspired to distribute and possess with intent to distribute was mixtures and substances containing a detectable

amount of cocaine base, commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(C).

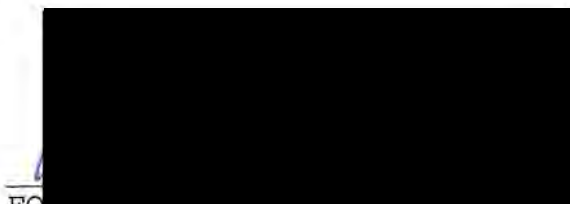
(Title 21, United States Code, Section 846.)

COUNT TWO

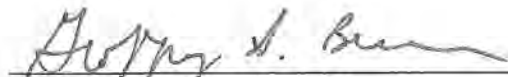
The Grand Jury further charges:

4. Between at least in or about April 2017 up to and including at least in or about 2018, in the Southern District of New York and elsewhere, RAKIM BROWN, a/k/a "Ra," the defendant, during and in relation to a narcotics trafficking crime for which they may be prosecuted in a court of the United States, namely the narcotics conspiracy charged in Count One of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished and discharged, to wit, BROWN used a firearm in connection with a dispute with a rival drug crew, including on or about January 28, 2018, when he shot a woman, causing injuries to her face and leg.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), (ii), (iii), and 2.)



FOR PERSON



GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
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- v. -

RAKIM BROWN,

Defendant.

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(18 U.S.C. § 924(c); 21 U.S.C. § 846.)

GEOFFREY S. BERMAN

United States Attorney

