

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v. - :

BRYANT BROWN, : INDICTMENT
a/k/a "Trigga," :

Defendant. : 20 Cr. ____
:

COUNT ONE **20 CRIM 012**
(Attempted Robbery)

The Grand Jury charges:

1. On or about December 20, 2015, in the Southern District of New York, BRYANT BROWN, a/k/a "Trigga," the defendant, and others known and unknown, unlawfully and knowingly did attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), and did aid and abet the same, to wit, BROWN attempted to rob Albendris Nuñez, a marijuana dealer, in the vicinity of Devoe Park in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT TWO
(Murder Through the Use of a Firearm)

The Grand Jury further charges:

2. On or about December 20, 2015, in the Southern District of New York, BRYANT BROWN, a/k/a "Trigga," the defendant, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the attempted robbery charged in Count One of this Indictment, did use and carry a firearm, and in furtherance of such crime did possess a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), and did aid and abet the same, to wit, BROWN attempted to rob Albendris Nuñez, and in the course of that attempted robbery Nuñez was shot and killed.

(Title 18, United States Code, Sections 924(j)(1) and 2.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Indictment, BRYANT BROWN, a/k/a "Trigga," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to

a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

4. If any of the above-described forfeitable property, 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 person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

BRYANT BROWN, a/k/a "Trigga,"

Defendant.

INDICTMENT

20 Cr. ____

(18 U.S.C. §§ 924, 1951, and 2.)

GEOFFREY S. BERMAN

United States Attorney

[REDACTED]
Foreperson

Jan. 6. 2020

Filed Indictment. Case assigned to
Judge Engelmayer. U.S.M.J., Debra Freeman