

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

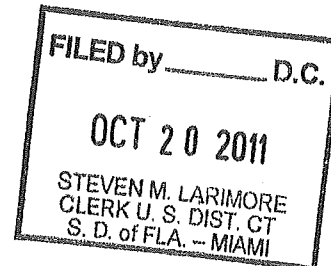
CASE NO.

11-20743

CR-MOORE

/TORRES

18 U.S.C. § 371
18 U.S.C. § 922(a)(1)(A)
18 U.S.C. § 922(g)(1)
21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(d)(1)
21 U.S.C. § 853



UNITED STATES OF AMERICA

v.

TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"

Defendants.

INDICTMENT

The Grand Jury charges that:

COUNT 1

1. Beginning at least as early as in or around April 2010, the exact date being unknown to the Grand Jury, and continuing through on or about June 25, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"

did knowingly and willfully combine, conspire, confederate, and agree with each other and others unknown to the Grand Jury to commit an offense against the United States, that is, willfully engage

in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Section 922(a)(1)(A).

PURPOSE OF THE CONSPIRACY

2. It was the purpose and object of the conspiracy for the defendants to unlawfully enrich themselves by illegally possessing and selling firearms.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants sought to accomplish the purpose of this conspiracy included, among other things, the following:

3. **WILLIAMS** and **BROWN** acquired several firearms from individuals unknown to the Grand Jury.

4. **WILLIAMS** and **BROWN** sold these firearms in the Southern District of Florida to an individual known to the Grand Jury for a profit.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish the purposes and object thereof, at least one of the defendants committed and caused to be committed, in the Southern District of Florida, at least one of the following over acts, among others:

5. On or about April 29, 2010, **WILLIAMS** and **BROWN** maintained in their possession one (1) Glock 9mm firearm.

6. On or about April 29, 2010, **WILLIAMS** and **BROWN** sold one (1) Glock 9mm firearm to an individual known to the Grand Jury.

7. On or about June 11, 2010, **WILLIAMS** and **BROWN** maintained in their possession one (1) MAB 9mm pistol.

8. On or about June 11, 2010, **WILLIAMS** and **BROWN** sold one (1) MAB 9mm pistol to an individual known to the Grand Jury.

9. On or about June 18, 2010, **WILLIAMS** and **BROWN** maintained in their possession one (1) ROMARM/CUGIR 7.62 rifle.

10. On or about June 18, 2010, **WILLIAMS** and **BROWN** sold one (1) ROMARM/CUGIR 7.62 rifle to an individual known to the Grand Jury.

11. On or about June 25, 2010, **WILLIAMS** and **BROWN** maintained in their possession one (1) Glock 9mm firearm.

12. On or about June 25, 2010, **WILLIAMS** and **BROWN** sold one (1) Glock 9mm firearm to an individual known to the Grand Jury.

All in violation of Title 18, United States Code, Section 371.

COUNT 2

Beginning at least as early as in or around April 2010, the exact date being unknown to the Grand Jury, and continuing through on or about June 25, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"

did willfully engage in the business of dealing in firearms without a license, in violation of Title 18, United States Code, Sections 922(a)(1)(A) and 2.

COUNT 3

On or about March 23, 2010, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine."

COUNT 4

On or about April 1, 2010, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine base, commonly referred to as "crack cocaine."

COUNT 5

On or about April 1, 2010, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

It is further alleged that the firearms is one (1) Smith & Wesson .38 revolver.

COUNT 6

On or about April 9, 2010, in Miami-Dade County, in the Southern District of Florida, the defendant,

**MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

It is further alleged that the firearms is one (1) Rossi .357 revolver.

COUNT 7

On or about April 23, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

**TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

did knowingly and intentionally distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

Pursuant to Title 21, United States Code, Section 841(b)(1)(C), it is further alleged that this violation involved a mixture and substance containing a detectable amount of cocaine.

COUNT 8

On or about April 29, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

**TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

It is further alleged that the firearm is one (1) Glock 9mm firearm.

COUNT 9

On or about June 11, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

**TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

It is further alleged that the firearm and ammunition are:

1. one (1) MAB 9mm pistol; and
2. fifteen (15) rounds of 9mm ammunition.

COUNT10

On or about June 18, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

**TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

It is further alleged that the firearm and ammunition are:

1. one (1) ROMARM/CUGIR 7.62 rifle; and
2. ten (10) 7.62 rounds of ammunition.

COUNT 11

On or about June 25, 2010, in Miami-Dade County, in the Southern District of Florida, the defendants,

**TRAVIS WILLIAMS,
a/k/a/ "Quarter," and
MARKEITH BROWN,
a/k/a/ "Teddy Bear,"**

having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 2.

It is further alleged that the firearm is one (1) Glock 9mm firearm.

FORFEITURE ALLEGATIONS

a. The allegations of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant has an interest.

b. Upon conviction of the violation alleged in this Indictment, the defendant shall forfeit to the United States all of his right, title and interest in any firearm and ammunition involved in or used in the commission of such violation pursuant to Title 18, United States Code, Section 924(d)(1), as made applicable by Title 28, United States Code, Section 2461(c).

c. Upon conviction of the violation alleged in counts seven, eight, or nine of this Indictment, the defendant shall forfeit to the United States any property constituting or derived from any proceeds which the defendant obtained, directly or indirectly, as the result of such violations, and any property which the defendant used or intended to be used to facilitate the commission of such offense.

All pursuant to Title 18 United States Code, Section 924, Title 28, United States Code, Section 2461, and the procedures set forth at Title 21, United States Code, Section 853.

A TRUE BILL

FOREPERSON



WIFREDO A. FERRER
UNITED STATES ATTORNEY



AMANDA PERWIN
ASSISTANT UNITED STATES ATTORNEY