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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X

UNITED STATES OF AMERICA

- against -

DAVON BROWN,
also known as "Chico
Dinero," and
CHRISTIAN WILLIAMS,
also known as "Zonee Flocks,"

Defendants.

-----X

THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. **CR 20 293**
(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2),
924(d)(1) and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

BLOCK, J.

KUO, M.J.

COUNT ONE

(Felon in Possession of a Firearm)

1. On or about March 14, 2020, within the Eastern District of New York, the defendant DAVON BROWN, also known as "Chico Dinero," knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a North American Arms, model NAA-22MS, .22 Magnum caliber revolver with serial number E076347.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

COUNT TWO
(Felon in Possession of a Firearm)

2. On or about March 14, 2020, within the Eastern District of New York, the defendant CHRISTIAN WILLIAMS, also known as “Zonee Flocks,” knowing that he had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a North American Arms, model NAA-22MS, .22 Magnum caliber revolver with serial number E076347.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendants that, upon their conviction of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922, including but not limited to one North American Arms, model NAA-22MS, .22 Magnum caliber revolver, bearing serial number E076347, and ammunition contained therein, seized on or about March 14, 2020 in Brooklyn, New York.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (d) has been substantially diminished in value; or
- (e) has been comingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON



SETH D. DUCHARME
ACTING UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

DAVON BROWN and CHRISTIAN WILLIAMS,

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 922(g)(1), 924(a)(2), 924(d)(1) and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Jonathan Siegel, Assistant U.S. Attorney (718) 254-6293