

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

**FILED**  
CHARLOTTE, NC  
FEB 22 2017  
US DISTRICT COURT  
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA )  
 )  
 v. )  
 )  
 ANTONIO TERRELL BROWN )  
 )

DOCKET NO. 3:17-cr-47-RJC  
BILL OF INDICTMENT  
18 U.S.C. § 1708

THE GRAND JURY CHARGES:

1. From in or about the January 2015 to in or about March 2016, in Charlotte, North Carolina, ANTONIO TERRELL BROWN, stole and took packages from his mail routes.
2. From in or about 2005 to in or about June 2016, ANTONIO TERRELL BROWN was employed as a mail carrier with the United States Postal Service. BROWN delivered mail on a rural route in Charlotte, North Carolina.
3. In or about January 2015, BROWN was approached by an individual (hereinafter unindicted co-conspirator #1 or UCC #1) about the possibility of diverting packages from BROWN's route. BROWN agreed to do so, in exchange for cash, and provided UCC #1 with addresses to be used for the intercepted packages.
4. The intercepted packages contained both drugs and cash, which were the proceeds of a Jamaican lottery scam.
5. BROWN received text messages from UCC #1 alerting BROWN when a drug- or cash-laden package was placed in the mail for delivery to BROWN's route. These texts contained the Postal Service tracking number and delivery address for the package as well as instructions on how to deliver the packages to other individuals.
6. Thereafter, BROWN intercepted the packages and delivered the packages to various individuals who approached him on his route.
7. BROWN received approximately \$200-250 for each package that he intercepted on his mail route, for a total of in excess of \$10,000.
8. In or about January 2016, victim M.A. mailed four packages containing approximately \$41,000 in cash to Peter Brown at an address on Pinewood Drive in Charlotte. This

address was one of the addresses that BROWN provided to UCC #1 to be used for the intercepted packages. BROWN intercepted these packages and, on January 21, 2016, falsely marked one of the packages as delivered. Instead, BROWN stole this package from the mail and delivered to an individual pursuant to UCC #1's instructions. The \$41,000 mailed to BROWN's route was the proceeds of a Jamaican lottery sweepstakes scam.

**COUNT ONE**

9. On or about January 21, 2016, in Mecklenburg County, within the Western District of North Carolina, the defendant

ANTONIO TERRELL BROWN

did steal and take from a mail route in Charlotte, North Carolina, a package mailed by M.A. to Peter Brown at an address on Pinewood Drive, Charlotte, North Carolina.

All in violation of Title 18, United States Code, Section 1708.

**NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE**

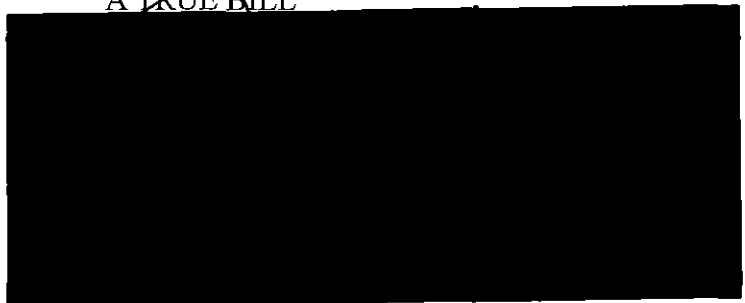
Notice is hereby given of 18 U.S.C. § 982 and 28 U.S.C. § 2461(c). Under Section 2461(c), criminal forfeiture is applicable to any offenses for which forfeiture is authorized by any other statute, including but not limited to 18 U.S.C. § 981 and all specified unlawful activities listed or referenced in 18 U.S.C. § 1956(c)(7), which are incorporated as to proceeds by Section 981(a)(1)(C). The following property is subject to forfeiture in accordance with Section 982 and/or 2461(c):

- a. All property which constitutes or is derived from proceeds of the violations of Count One set forth in this bill of indictment; and
- b. If, as set forth in 21 U.S.C. § 853(p), any property described in (a) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a).

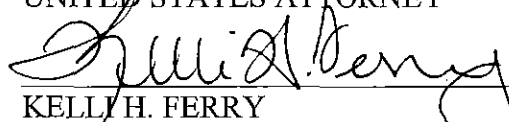
The grand jury finds probable cause that the following property is subject to forfeiture on one or more of the grounds stated above:

- a. A forfeiture money judgment in the amount of \$41,000 such amount constituting the proceeds of the violations set forth in Count One of this bill of indictment.

A TRUE BILL



JILL WESTMORELAND ROSE  
UNITED STATES ATTORNEY

  
KELLY H. FERRY  
ASSISTANT UNITED STATES ATTORNEY

# NEW CRIMINAL CASE COVER SHEET

# U. S. DISTRICT COURT

(To be used for all new Bills of Indictments and Bills of Information)

CASE SEALED:  YES  NO

DOCKET NUMBER:

If case is to be sealed, a Motion to Seal and proposed Order **must** be attached.)

CASE NAME

:US vs ANTONIO BROWN

COUNTY OF OFFENSE

: Mecklenburg

RELATED CASE INFORMATION

:

Magistrate Judge Case Number

:

Search Warrant Case Number

:

Miscellaneous Case Number

:

Rule 20b

:

SERVICE OF PROCESS

:

Warrant

U.S.C. CITATIONS (Mark offense carrying greatest weight):

Petty

Misdemeanor

Felony

18 U.S.C. 1709 - Theft by Postal Employee

JUVENILE:

Yes

No

ASSISTANT U. S. ATTORNEY

:

Kelli H. Ferry

VICTIM/WITNESS COORDINATORS:

shirley.rutledge@usdoj.gov /ulricia.kennedy@usdoj.gov

INTERPRETER NEEDED

:

LIST LANGUAGE AND/OR DIALECT:

REMARKS AND SPECIAL INSTRUCTIONS: