



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

EMR
F. #2025R00708

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 18, 2026

By ECF and E-Mail

The Honorable Lara K. Eshkenazi
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Michael Brown
Criminal Docket No. 26-267 (NCM)

Dear Judge Eshkenazi:

The government respectfully submits this letter in support of its request for a permanent order of detention as to the defendant Michael Brown, who was arrested earlier this morning.

As set forth below, Brown sex trafficked women to work in prostitution at an open-air sex trafficking market along a stretch of Pennsylvania Avenue in Brooklyn, New York (the "Penn Track"), as well as other locations and at least one other state. Given the nature of the crimes charged, there is a statutory presumption of detention, and the defendant poses a significant danger to the community and risk of flight if released on bail. Accordingly, the Court should detain the defendant pending trial.

I. Background

A. The Instant Charges

On September 17, 2026, a grand jury sitting in the Eastern District of New York returned an indictment charging the defendant with two counts of sex trafficking, in violation of 18 U.S.C. § 1591; one count of interstate prostitution, in violation of 18 U.S.C. § 2422(a); and promotion of prostitution, in violation of 18 U.S.C. § 1952(a)(3)(A). The sex trafficking counts each carry a mandatory minimum sentence of 15 years' imprisonment and the potential for life imprisonment.

B. Offense Conduct

i. Overview

Between March 2025 and the present, the defendant had numerous women working in prostitution for him on the Penn Track and other locations, and he trafficked at least two of those women—Jane Does 1 and 2—using force, fraud and coercion. Specifically, evidence obtained pursuant to the investigation reflects that the defendant regularly required his female victims to solicit customers on the Penn Track and other locations, including in at least one other state, and to engage in commercial sex acts with those customers. The defendant collected the proceeds earned by these women after they engaged in commercial sex acts with customers, and he used violence and emotional manipulation to discipline and control them.

The investigation has revealed that the defendant trafficked Jane Doe 1 on and off at least between March 2025 and March 2026, and trafficked Jane Doe 2 between January 2026 and the present. During that time, the defendant sent numerous messages describing his use of coercion, threats and violence to control Jane Does 1 and 2. The government has also obtained significant additional evidence—including but not limited to phone records, financial records, travel records, prostitution advertisements and law enforcement records—that the defendant consistently promoted and profited from the prostitution of numerous women.

i. Messages and Other Records Reflecting the Defendant's Trafficking of Jane Does 1 and 2

Law enforcement have reviewed numerous messages sent by the defendant confirming his use of coercion, threats and physical and verbal abuse to control Jane Does 1 and 2. Further, in numerous additional text messages, the defendant and others discuss the women working for the defendant as prostitutes on the Penn Track and the defendant's control of those women—including through violence and coercion. For example, in several communications, women working for the defendant call him "daddy," discuss giving money from "dates," i.e., paid sexual encounters, to the defendant, posting advertisements for prostitution and tips on how to increase making money in prostitution. The defendant also has messages discussing the best methods to discipline the women working in prostitution for him. In a message sent in or about September 2025, the defendant talks about insubordination from a woman working for him and stated in substance and in part that he "need[s] something more creative than the gut punch for this one..." and decides he "[m]ight put that Hoe on her knees on rice."

By way of example, some of the defendant's messages with Jane Does 1 and 2 are described in more detail below.

a. Jane Doe 1

In or about March 2025, the defendant messaged Jane Doe 1 about her work for him on the Penn Track, which he referred to as "the blade," saying in substance and in part, "I knew that when you told me I broke you for the Hoe first money you ever made on the blade. . . [Jane Doe 1] you know that's the universe telling you something. . . . You belong to me bitch." Later that day, the defendant messaged Jane Doe 1 about using violence against another woman who worked in prostitution for him, saying in substance and in part, "I was whipping the hell out

that Hoe. On the got damn regular smh. And she couldn't get enough She left when I stopped hitting her. Real shit I started making her stay down when she act up. No more hands. And she left me.” When Jane Doe 1 later said that she didn’t want to go to the Penn Track, the defendant told her in substance and in part, “You can't just say no to everything bitch. If you don't wanna get smacked...Then you gotta get down.”

In or about October 2025, the defendant and Jane Doe 1 exchanged the following messages, in substance and in part:

Jane Doe 1: So why you saying imma get hurt.

Brown: As fucking usual. Bitch cuz you are. You playing with the game. And deliberately. . . It's GOING to spank you. Yeah you are. You still seeing tricks. You not reporting to a Pimp. You playing Hoe games on purpose. Not following instructions. Bitches like you deserve whatever they get and I told you this already. So when you end up fucked just know you the reason why no one else. . . . If I came over there to that shelter top of the morning and choked you and dragged you bitch you'd cum in your panties and go get my money happily . . . Your fear of me is justified. Cuz you done did so much that I could always rightfully whip your ass.

On or about October 23, 2025, Jane Doe 1 called 911, stating in substance and in part, “I’m being chased by a guy in a brown jacket . . . he’s chasing me . . . he already hit me . . . my face is swollen” During the call, Jane Doe 1 screamed out in substance and in part, “Stop fucking chasing me! Get away from me!” Law enforcement officers responded to the call and located both Jane Doe 1—who was disheveled and had a swollen lip—and the defendant on a sidewalk not far from the defendant’s apartment. Ultimately, however, both the defendant and Jane Doe 1 returned to the defendant’s residence in Brooklyn.

In the days following this incident, Jane Doe 1 reached out to law enforcement via a text-based 911 operator on several occasions. For example, on October 25, 2025, Jane Doe 1 texted 911, in substance and in part, “Help me...Michael Brown...Pimp...He will kill me...He might catch me texting...” On October 30, 2025, Jane Doe 1 texted 911, in substance and in part, “He is abusing me...not letting me leave...”

In or about November 2025, Jane Doe 1 and the defendant again messaged about the defendant’s violence against her, in substance and in part:

Jane Doe 1: Pimps don’t beat bitches for fun

Brown: You right but it was never for fun. In Manhattan you drank on my program and got beat. And here you went and did coke on my program. And Hoe you got beat. No regrets

In or about January 2026, the defendant messaged Jane Doe 1 in substance and in part:

You've fucked up yet again and this times the last cuz you not even capable of making up for it. I want a good trap and I don't wanna see you until you got it and I want it to involve some blade action since you wanna tell the world you If I said come post then come postYou just gonna make me wanna hurt you I see. . . . The uber is 1 minute away. Get in and come post You have to cuz if not I'm coming over there wilding bitch. I'm not playin about my money and you shouldn't either. Leave there now. It's outside.

Similarly, in or about March 2026, the defendant messaged Jane Doe 1, in substance and in part, “Every time I instructed you to bring my money outside you didn't. Last few times I said bring my shit out when you come and you dead didn't on purpose. I coulda punched you for that each time and didn't.”

In or about July 2026, the defendant messaged Jane Doe 1, in substance and in part, “You not even following orders, doin what you want not answering, I’m ready to fuck you up for real in all honesty you don’t even respect me Bitch I will dead ass murder you[.]”

b. Jane Doe 2

In or about December 2025, the defendant began attempting to recruit Jane Doe 2 to work for him in prostitution, saying in substance and in part, “Hey, [Jane Doe 2]. Yeah, its me Mack Bill\$. It’s he who lives to put purpose behind every pair of your heels. He who removes all obstacles and stress from the game then adds happiness and thrill.”

Other records reflect that Jane Doe 2 began working for the defendant in or around January 2026. For example, in or about January 2026, the defendant messaged Jane Doe 1 in substance and in part, “I knocked [Jane Doe 2] last night. She came wit 8 and we went out immediately we still out here...I believe yall should be a good match on some 304 shit she tall but tall both very slim.” “304” is typically a reference to a woman working in prostitution.

In or about April 2022, the defendant messaged Jane Doe 2 in substance and in part:

Cuz ima punch you in your fuckin stomach . . . Well don’t say you wasn’t warned. Cuz you not welcome here without my trap. I promise that on my kids and my dead bitch . . . The game god got me. . . And if a bitch come here broke and get checked . . . I’m well within regulation[.]

In or about May 2026, the defendant and Jane Doe 2 exchanged the following messages, in substance and in part:

Brown: I don't know who the fuck you think you been playin with lately but you've showed me enough. I already told you what I been through and what I expect and I warned you this shit don't get no softer now your drunk faggot disobedient ass keep mentioning protections police and escorts. You're DONE here. The locksmith is on the way.

...

Jane Doe 2: I don't give a fuck what you're talking about you don't respect me. You beat me up for a little things like me telling you that a bitch asked about an umbrella. You said you wasn't gonna hit me no more and you still hit me when I don't want to have sex, you still forced me too. I fucking hate this shit.

...

Brown: You the one scared

Jane Doe 2: Yes u gave me a black eye

In or about August 2026, the defendant threatened Jane Doe 2 and referred to injuring her face, saying in substance and in part:

Brown: Bring me a big trap we'll be blessed if not you will never see me again. And trust me I catch you on that blade you getting your ass beat. Other than that good luck faggot, don't call or text me no more, and now that you think this is some sort of game bitch you can't get none of this stuff either, you faggots be outta pocket then think yall owed something fuck outta here stupid ass bitch that's why your face like that now. . . . Your face? I'm glad I did it hoe.

ii. The Defendant's August 29, 2026 Arrest on the Penn Track

On or about August 29, 2026, the defendant was arrested on the Penn Track after woman told law enforcement officers that the defendant threw urine on her and brandished a weapon. Law enforcement officers subsequently performed a car stop and located the defendant nearby in a White Jeep with a North Carolina registration plate number WBC7108, where they recovered brass knuckles and a taser. The defendant was charged with misdemeanor charges including driving with a suspended license, menacing in the second degree, criminal possession of a weapon in the fourth degree, and harassment in the second degree in connection with Kings County Docket Number CR-042001-26KN.

i. The Instant Arrest

Earlier today, federal agents arrested the defendant at his residence in Brooklyn. At the time of his arrest, the agents also recovered a loaded firearm from the residence.

C. The Defendant's Criminal History

The defendant has a prior felony conviction for attempted criminal possession of a weapon for possessing a loaded firearm, in violation of New York Penal Law section 265.03(3), for which he was sentenced to two years in custody in 2019. He also has two prior misdemeanor convictions for criminal contempt in the second degree for violating orders of protection, in violation of New York Penal Law section 215.0(3) from 2019.

The defendant also has a prior felony conviction for conspiracy from California in violation of Section 182(A)(1), for which he was sentenced to 196 days in jail and three years of probation in 2013.

II. The Bail Reform Act

Under the Bail Reform Act, federal courts “shall” order a defendant’s detention pending trial upon a determination that “no condition or combination of conditions would reasonably assure the appearance of the person as required and the safety of any other person and the community[.]” 18 U.S.C. § 3142(e). A finding of risk of dangerousness must be supported by clear and convincing evidence, and a finding of risk of flight must be supported by a preponderance of the evidence. See United States v. Chimurenga, 760 F.2d 400, 405 (2d Cir. 1985).

In cases like this one, charging an offense under 18 U.S.C. § 1591, “it shall be presumed,” subject to rebuttal by the defendant, “that no condition or combination of conditions will reasonably assure the appearance of the person as required and the safety of the community.” 18 U.S.C. § 3142(e)(3)(D). The presumption means that the Court must initially assume there is “no condition or combination of conditions that will reasonably assure the appearance of the person as required and the safety of any other person and the community.” Id. The defendant must come “forward with evidence that he does not pose a danger to the community or a risk of flight.” United States v. Mercedes, 254 F.3d 433, 436 (2d Cir. 2001). Even if the defendant were to meet his burden of production, “the presumption favoring detention does not disappear entirely, but remains a factor to be considered among those weighed by the district court.” Id.

The Bail Reform Act lists four factors to be considered in the detention analysis: (1) the nature and circumstances of the crimes charged, including whether the offense involved a controlled substance or a firearm; (2) the weight of the evidence against the defendant; (3) the history and characteristics of the defendant; and (4) the seriousness of the danger posed by the defendant’s release. See 18 U.S.C. § 3142(g).

In evaluating dangerousness, courts consider not only the effect of a defendant’s release on the safety of identifiable individuals, such as victims and witnesses, but also “the danger that the defendant might engage in criminal activity to the detriment of the community.” United States v. Millan, 4 F.3d 1038, 1048 (2d Cir. 1993) (quoting legislative history).

Where the evidence of guilt is strong, it provides “a considerable incentive to flee.”¹ United States v. Millan, 4 F.3d 1038, 1046 (2d Cir. 1993); see also United States v. Palmer-Contreras, 835 F.2d 15, 18 (1st Cir. 1987) (per curiam) (where “the evidence against defendants is strong, the incentive for relocation is increased”). Additionally, the possibility of a severe sentence is an important factor in assessing a defendant’s likelihood of flight. See Jackson, 823 F.2d at 7; United States v. Martir, 782 F.2d 1141, 1147 (2d Cir. 1986) (defendants charged with serious offenses whose maximum combined terms created potent incentives to flee).

III. Argument

Due to the charges filed against the defendant, there is a presumption that there are no conditions of release that would reasonably assure the defendant’s appearance and the safety of the community. See 18 U.S.C. § 3142(e)(3)(D). The defendant cannot rebut that presumption, regardless of any bail package that may be proposed, because the relevant considerations under the Bail Reform Act clearly support a finding of dangerousness and risk of flight.

First, the charged offenses are extremely serious. 18 U.S.C. § 3142(g)(1). The defendant trafficked at least two female victim for his own financial benefit. He berated and beat his victims—actions that were part of a pattern of regularly threatening women to control and extract more money from them. The first § 3142(g) factor therefore weighs strongly in favor of detention.

Moreover, the charged offenses carry significant penalties that give the defendant a strong incentive to flee. Specifically, the defendant faces a mandatory minimum sentence of 15 years’ imprisonment and up to life imprisonment on the sex trafficking counts. These penalties give the defendant an overwhelming incentive to flee and to obstruct justice. See United States v. Jackson, 823 F.2d 4, 7 (2d Cir. 1987); Martir, 782 F.2d at 1147 (defendants charged with serious offenses whose maximum combined terms created potent incentives to flee); United States v. Cisneros, 328 F.3d 610, 618 (10th Cir. 2003) (defendant was a flight risk because her knowledge of the seriousness of the charges against her gave her a strong incentive to abscond); United States v. Townsend, 897 F.2d 989, 995 (9th Cir. 1990) (“Facing the much graver penalties possible under the present indictment, the defendants have an even greater incentive to consider flight.”); United States v. Dodge, 846 F. Supp. 181, 184-85 (D. Conn. 1994) (possibility of a “severe sentence” heightens the risk of flight).

Second, the weight of the evidence against the defendant is strong. The government intends to prove the defendant’s guilt at trial through, among other things, (1) witness testimony, (2) messages, photographs, videos and other materials recovered from cellular telephones and iCloud accounts belonging to the defendant and his victims; (3) travel records; (4) financial records; (5) online prostitution advertisements; and (6) law enforcement records.

¹ The government may proceed by proffer in a detention hearing. United States v. Abuhamra, 389 F.3d 309, 320 n.7 (2d Cir. 2004); United States v. LaFontaine, 210 F.3d 125, 130-31 (2d Cir. 2000); United States v. Martir, 782 F.2d 1141, 1145 (2d Cir. 1986).

Third, the defendant's history and characteristics weigh heavily in favor of detention and show the seriousness of danger posed by the defendant were he to be released. In addition to his use of violence against sex trafficking victims in the instant case, the defendant has a prior felony conviction for attempted criminal possession of a loaded firearm, and he was arrested less than a month ago in possession of brass knuckles and a taser after menacing a woman on the Penn Track. Federal agents also recovered a loaded firearm from the defendant's residence today. Finally, the defendant has a history of ignoring court orders, and has two prior convictions for criminal contempt in the second degree for failing to comply with a protective order.

In sum, the defendant before this Court today cannot overcome the presumption of detention and cannot be released without risking the safety of the community and the likelihood that he will not return to court as required. The defendant should, therefore, be detained.

IV. Conclusion

For the reasons set forth above, the government respectfully submits that no condition or combination of conditions will properly assure the safety of the community or the defendant's return to court if the defendant is released on bail, and therefore requests that the Court order that the defendant be detained.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/
Erin Reid
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of the Court (by ECF)
Counsel of Record (by ECF)