

FILED



2016 JUL 13 PM 3:42
UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

CLERK
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FL

UNITED STATES OF AMERICA

v.

CASE NO. 6:16-cr-128-ORL-37 KRS

18 U.S.C. § 922(g)(1)

RAMON TODD

18 U.S.C. § 924(d) – Forfeiture

a/k/a Ramone Heroin Todd

28 U.S.C. § 2461(c) – Forfeiture

a/k/a "Teddy Bear"

INDICTMENT

The Grand Jury charges:

COUNT ONE

On or about May 26, 2015, in Volusia County, Florida, in the Middle District of Florida, and elsewhere,

**RAMON TODD
a/k/a Ramone Heroin Todd
a/k/a "Teddy Bear"**

the defendant herein, having been convicted of a crime punishable by imprisonment for a term exceeding one year, that is:

1. On or about August 21, 2002, a conviction for Attempted Robbery without a Firearm, in the Circuit Court of the Seventh Judicial Circuit, in and for Volusia County, Florida, Case Number 00-31415CFAES;
2. On or about October 7, 2005, a conviction for Aggravated Battery by a Person Detained in a Detention Facility, in the Circuit Court of the Eighteenth Judicial Circuit, in and for Brevard County, Florida, Case Number 05-2003-CF-20866-Axxx-xx;

3. On or about October 22, 2009, a conviction for Possession of Cocaine, in the Circuit Court of the Seventh Judicial Circuit, in and for Volusia County, Florida, Case Number 2008-34180CFAES;
4. On or about June 6, 2011, a conviction for Driving While License Revoked in the Circuit Court of the Seventh Judicial Circuit, in and for Volusia County, Florida, Case Number 2010-36385CFAES;
5. On or about April 5, 2012, a conviction for Driving While License Revoked (Habitual) in the Circuit Court of the Seventh Judicial Circuit, in and for Volusia County, Florida, Case Number 2011-34444CFAES;
6. On or about April 5, 2012, a conviction for Driving While License Revoked (Habitual) in the Circuit Court of the Seventh Judicial Circuit, in and for Volusia County, Florida, Case Number 2011-35632CFAES; and
7. On or about February 26, 2013, a conviction for Driving While License Revoked (Habitual) in the Circuit Court of the Seventh Judicial Circuit, in and for Volusia County, Florida, Case Number 2012-34585CFAES.

did knowingly possess, in and affecting interstate and foreign commerce, two firearms, to wit: (1) a Glock, model 17, 9mm pistol, serial number ADD923US; and (2) a Taurus, model PT738 TCP, .380 caliber pistol, serial number 36878E.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to the provisions of Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the violation alleged in Count One of this Indictment, the defendant, **RAMON TODD, a/k/a Ramone Heroin Todd, a/k/a "Teddy Bear,"** shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in the commission of the offense.

3. If any of the property described above, 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 party;
- 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 divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A TRUE BILL,

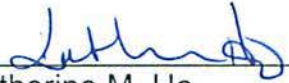


Foreperson

A. LEE BENTLEY, III
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By: 

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Assistant United States Attorney

By: 

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Assistant United States Attorney
Chief, Orlando Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Orlando Division

THE UNITED STATES OF AMERICA

vs.

RAMON TODD
a/k/a Ramone Heroin Todd
a/k/a "Teddy Bear"

INDICTMENT

Violations:

18 U.S.C. § 922(g)(1)

A true bill,



Foreperson

Filed in open court this 13th day of July, 2016.


Clerk

Bail \$ _____
