

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION**

UNITED STATES OF AMERICA

v.

INDICTMENT

MICHAEL GILBERT BROWN
_____ /

4:19cr69 mw

THE GRAND JURY CHARGES:

COUNT ONE

At all times material to this Indictment:

1. The defendant, **MICHAEL GILBERT BROWN**, was convicted of Criminal Sex Conduct – 3rd Degree (Victim 13-15 Actor >24m older) in the State of Minnesota on or about April 24, 2012.
2. Subsequent to his conviction in the State of Minnesota, and after on or about May 3, 2018, the defendant, **MICHAEL GILBERT BROWN**, traveled in interstate commerce.
3. The defendant, **MICHAEL GILBERT BROWN**, was required to register, and keep said registration current, with the States of Minnesota and

Florida, under the Sex Offender Registration and Notification Act (“SORNA”), Title 42, United States Code, Section 16901, *et seq.*, because the defendant was a sex offender as defined for purposes of the SORNA.

Between on or about May 3, 2018, and on or about July 11, 2018, in the Northern District of Florida and elsewhere, the defendant,

MICHAEL GILBERT BROWN,

did knowingly and unlawfully fail to register and update a registration as required by the SORNA.

In violation of Title 18, United States Code, Section 2250(a).

A TRUE BILL:



FOREPERSON

DATE

7 / 9 / 2019



LAWRENCE KEEFE
United States Attorney



JUSTIN M. KEEN
Assistant United States Attorney