

2022R00187/BL

FILED

JUN 26 2023

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

AT 8:30 9:54 PM
CLERK, U.S. DISTRICT COURT - DNJ

UNITED STATES OF AMERICA	:	Hon. Claire C. Cecchi
	:	
v.	:	Crim. No. 23- 510
	:	
RAMEL HARRIS, a/k/a	:	18 U.S.C. § 1951(a)
"Ramel Harrison," and	:	18 U.S.C. § 924(c)(1)(A)(ii)
NEVILLE BROWN	:	18 U.S.C. § 2

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE

(Hobbs Act Conspiracy)

1. From on or about January 2, 2021 through on or about September 3, 2022, in Morris, Middlesex and Warren Counties in the District of New Jersey, in the Bronx, Rockland and Westchester Counties in the Southern District of New York, in Kings County in the Eastern District of New York, in Chester and Lehigh Counties in the Eastern District of Pennsylvania, and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a "Ramel Harrison," and
NEVILLE BROWN,**

did knowingly and willfully conspire and agree to obstruct, delay, and affect, and attempt to obstruct, delay and affect, commerce, and the movement of articles and commodities in such commerce, by robbery, and did commit and threaten physical violence to the person and property of another in furtherance thereof.

2. It was the object of the conspiracy for defendants RAMEL HARRIS, a/k/a "Ramel Harrison," and NEVILLE BROWN to commit robbery upon several check cashing locations in the District of New Jersey, the Southern District of New York and the Eastern District of Pennsylvania, all businesses engaged in commerce, and to take the businesses' proceeds.

3. It was part of the conspiracy that RAMEL HARRIS, a/k/a "Ramel Harrison," and NEVILLE BROWN, would enter the commercial business with a firearm to commit the robbery.

4. It was further part of the conspiracy that once inside the commercial business, the individual with the firearm would point the firearm at the check cashing employee therein, while the second individual would proceed to the cash register and safe to remove the business' proceeds from therein.

5. Prior to the commission of each robbery, RAMEL HARRIS, a/k/a "Ramel Harrison," and NEVILLE BROWN agreed to use and carry a firearm during and in relation to the commission of each robbery.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO
(Hobbs Act Robbery)

On or about April 10, 2021, in Morris County, in the District of New Jersey and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

did knowingly and willfully obstruct, delay, and affect, and attempt and conspire to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT THREE

(Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about April 10, 2021, in Morris County, in the District of New Jersey,
and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a "Ramel Harrison," and
NEVILLE BROWN,**

during and in relation to a crime of violence for which the defendants may be
prosecuted in a court of the United States, namely, the Hobbs Act Robbery
charged in Count Two of this Indictment, did knowingly use and carry a firearm,
which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOUR
(Hobbs Act Robbery)

On or about November 6, 2021, in Middlesex County, in the District of New Jersey and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

did knowingly and willfully obstruct, delay, and affect, and attempt and conspire to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT FIVE

(Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about November 6, 2021, in Middlesex County, in the District of
New Jersey, and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

during and in relation to a crime of violence for which the defendants may be
prosecuted in a court of the United States, namely, the Hobbs Act Robbery
charged in Count Four of this Indictment, did knowingly use and carry a firearm,
which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT SIX
(Hobbs Act Robbery)

On or about January 29, 2022, in Warren County, in the District of New Jersey and elsewhere, the defendants,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

did knowingly and willfully obstruct, delay, and affect, and attempt and conspire to obstruct, delay, and affect, commerce and the movement of articles and commodities in such commerce, by robbery, by means of actual and threatened force, and violence, and fear of injury, immediate and future, to the person and property of another.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVEN

(Using, Carrying, and Brandishing a Firearm
During and in Relation to a Crime of Violence)

On or about January 29, 2022, in Warren County, in the District of New Jersey, and elsewhere, the defendant,

**RAMEL HARRIS,
a/k/a “Ramel Harrison,” and
NEVILLE BROWN,**

during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, namely, the Hobbs Act Robbery charged in Count Six of this Indictment, did knowingly use and carry a firearm, which was brandished.

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

FORFEITURE ALLEGATION AS TO COUNTS ONE, TWO, FOUR AND SIX

As a result of committing the Hobbs Act Robbery offenses in violation of 18 U.S.C. § 1951(a), as charged in Counts One, Two, Four and Six of this Indictment, the defendants, RAMEL HARRIS, a/k/a "Ramel Harrison," and NEVILLE BROWN shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of such offenses.

FORFEITURE ALLEGATION AS TO COUNTS THREE, FIVE AND SEVEN

As a result of committing the firearm offenses in violation of 18 U.S.C. § 924(c), as charged in Counts Three, Five and Seven of this Indictment, the defendants, RAMEL HARRIS, a/k/a "Ramel Harrison," and NEVILLE BROWN, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm and ammunition involved in or used in the commission of such offenses.

SUBSTITUTE ASSETS PROVISION
(Applicable to All Forfeiture Allegations)

If any of the above described forfeitable property, 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 person;
- (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 subdivided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the above described forfeitable property.

A TRUE BILL

FOREPERSON

Philip R. Sellinger
PHILIP R. SELLINGER
United States Attorney

CASE NUMBER: 23-510 (CCC)

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

**RAMEL HARRIS,
a/k/a "Ramel Harrison," and
NEVILLE BROWN**

INDICTMENT FOR

**18 U.S.C. § 1951(a)
18 U.S.C. § 924(c)(1)(A)(ii)
18 U.S.C. § 2**

A True Bill,

Foreperson

**PHILIP R. SELLINGER
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY**

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ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2762**
