

**FILED**

**MAR 19 2019**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

|                          |   |  |
|--------------------------|---|--|
| UNITED STATES OF AMERICA | ) |  |
|                          | ) | No. 19 CR 50016                            |
| vs.                      | ) | Violations: Title 18, United States Code,  |
|                          | ) | Sections 1111, 1114, 922(g)(1), and 922(k) |
|                          | ) |  |
| FLOYD E. BROWN           | ) |  |

**COUNT ONE**

The MAY 2018 GRAND JURY charges:

On or about March 7, 2019, at Rockford, in the Northern District of Illinois,  
Western Division,

FLOYD E. BROWN,

defendant herein, with malice aforethought, did, unlawfully, willfully, deliberately,  
maliciously and with premeditation, kill Special Deputy United States Marshal Jacob  
Keltner, an officer of the United States Marshals Service, an agency of the United  
States Government, while such officer was engaged in and on account of the  
performance of his official duties;

In violation of title 18, United States Code, Sections 1111 and 1114.

**NOTICE OF SPECIAL FINDINGS**

1. The grand jury repeats and realleges the allegations of Count 1 of this indictment.
2. As to Count 1, the defendant FLOYD E. BROWN
  - a. was 18 years of age or older at the time of the offense;
  - b. intentionally killed Jacob Keltner (18 U.S.C. § 3591(a)(2)(A));
  - c. intentionally inflicted serious bodily injury that resulted in the death of Jacob Keltner (18 U.S.C. § 3591(a)(2)(B));
  - d. intentionally participated in an act, contemplating that the life of a person would be taken and intending that lethal force would be used in connection with Jacob Keltner, and Jacob Keltner died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C));
  - e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to Jacob Keltner, such that participation in the act constituted a reckless disregard for human life and Jacob Keltner died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D); and
  - f. committed the offense against a federal public servant who was a law enforcement officer while he was engaged in the performance of his official duties. (18 U.S.C. § 3592(c)(14)(D)(i)).

**COUNT TWO**

The MAY 2018 GRAND JURY further charges:

On or about March 7, 2019, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

FLOYD E. BROWN,

defendant herein, previously having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate or foreign commerce a firearm, namely:

a loaded Smith & Wesson, model 5906, 9mm pistol, serial number obliterated;

a loaded Smith & Wesson, model 5906, 9mm pistol, serial number obliterated;

a loaded Ruger, model Mini-14, .223 caliber rifle, serial number obliterated; and

a loaded ROMARM, model WASR-10, 7.62x39mm rifle, serial number obliterated;

which firearm had traveled in interstate or foreign commerce;

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THREE**

The MAY 2018 GRAND JURY further charges:

On or about March 7, 2019, at Rockford, in the Northern District of Illinois, Western Division, and elsewhere,

FLOYD E. BROWN,

defendant herein, did knowingly possess a firearm, namely:

a loaded Smith & Wesson, model 5906, 9mm pistol;

a loaded Smith & Wesson, model 5906, 9mm pistol;

a loaded Ruger, model Mini-14, .223 caliber rifle; and

a loaded ROMARM, model WASR-10, 7.62x39mm rifle;

from which the manufacturer's serial number had been removed, altered and obliterated, which firearm had been shipped and transported in interstate or foreign commerce;

In violation of Title 18, United States Code, Section 922(k).

**FORFEITURE ALLEGATION**

The MAY 2018 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1114, 922(g), or 922(k), as set forth in this Indictment, defendant shall forfeit to the United States of America, any firearm and ammunition:

a. involved in and used in any offense of conviction, as provided in Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c); and

b. found in the possession and under the immediate control of the defendant at the time of arrest, upon conviction of any offense for committing and attempting to commit any felony involving the use of threats, force, and violence, and perpetrated in whole or in part by the use of firearms, as provided in 18 U.S.C. § 3665.

[Remainder of page left blank.]

2. The property to be forfeited includes, but is not limited to, a loaded Smith & Wesson, model 5906, 9mm pistol, serial number obliterated and associated ammunition; a loaded Smith & Wesson, model 5906, 9mm pistol, serial number obliterated and associated ammunition; a loaded Ruger, model Mini-14, .223 caliber rifle, serial number obliterated and associated ammunition; a loaded ROMARM, model WASR-10, 7.62x39mm rifle, serial number obliterated and associated ammunition; and 142 rounds of .223 caliber ammunition, 383 rounds of 7.62x39 mm ammunition, 537 rounds of 9mm ammunition, and 88 rounds of rifle cartridges.

A TRUE BILL: 



FOREPERSON

  
UNITED STATES ATTORNEY