

U.S. Department of Justice

Ronald C. Machen Jr.
United States Attorney

District of Columbia

Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530

November 13, 2013

Justin A. Okezie, Esquire

Bethesda, MD 20814

Re: UNITED STATES v. STEPHEN PAGE
2011CF1 13766

Dear Mr. Okezie:

If your client accepts the plea offer, terms and conditions set forth below, please have your client execute this document in the space provided below. Upon receipt of the executed document, this letter will become the agreement between your client and the Office of the United States Attorney for the District of Columbia. The terms of the plea offer are as follows:

1. If your client, Stephen Page, pleads guilty to Second Degree Murder While Armed (a lesser included of the sixth count of the indictment,) Conspiracy to Commit Robbery (first count of the indictment,) and Unlawful Possession of a Firearm (the twelfth count of the indictment,) the government will dismiss the greater charge of First Degree Murder While Armed-Felony Murder, and the remaining counts of the indictment, reserve step-back, reserve allocation, waive enhancement papers and not request consecutive sentences of those counts to each other. As part of the plea agreement, the government will not request for a sentence outside of the Voluntary Sentencing Guidelines, and defer to the Court as to where within those Guidelines the defendant is sentenced.

2. This letter sets forth the complete agreement between your client and the United States Attorney's Office for the District of Columbia. This agreement supersedes all prior understandings, promises, agreements or conditions, if any, between this office and your client.

No promises, agreements or conditions have been entered into other than those set forth in this letter. There can be no valid addition or alteration to this agreement unless the modification is made on the record in open Court or made in a writing signed by all of the parties.

Respectfully,

RONALD C. MACHEN JR.
UNITED STATES ATTORNEY

By: Gary M. Wheeler
GARY M. WHEELER
ASSISTANT U.S. ATTORNEY

DEFENDANT'S ACCEPTANCE

I have read or had read to me each of the 3 pages constituting this agreement and have discussed it with my attorney. I fully understand this agreement and agree to it, intending to be legally bound. I have not been threatened or coerced in any manner. I am not under the influence of anything that could interfere with my ability to understand this agreement fully.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to ~~cooperate~~ prosecute except those set forth in this written agreement. I am satisfied with the legal services provided to me by my attorney in connection with this agreement and matters related to it.

Date: 11/13/13

Stephen Page
STEPHEN PAGE

ATTORNEY'S ACKNOWLEDGMENT

I have read each of the three pages constituting this agreement. I have fully reviewed and discussed the provisions of the agreement with my client, Stephen Page, and I am satisfied that my client understands all of its terms and conditions. These pages accurately and completely set forth the entire agreement. I concur with my client's decision to ~~cooperate~~ prosecute with the government as set forth in this agreement.

Date: 11/13/13

Justin A. Okezie
JUSTIN A. OKEZIE, ESQ.
Attorney for Stephen Page

PROFFER OF FACTS

Had this case gone to trial the Government would prove beyond a reasonable doubt that, on June 27, 2011, at approximately 9:15 p.m., Anthony Thomas, James Brewer, Stephen Page, and Dwight Hicks walked into 2300 Good Hope Road, SE through the front lobby, gathered at the elevator door, then rode the elevator up to the 7th floor, where all four men exited the elevator.

Minutes later, Anthony Thomas, James Brewer and Stephen Page entered apartment # 829, in which Solomon Reese was seated. Solomon Reese was a seventy-one year old, retired Vietnam veteran, who supplemented his retirement by selling cigarettes to neighbors and around that apartment complex. He was known by many neighbors as the "cigarette man."

When Ericka Reese returned from the trash room to that same apartment, which she shared with her husband, the door was held shut from inside. Upon hearing scuffling inside, she began to scream. Then, James Brewer pulled her inside the apartment, and threw her toward the front room sofa. Then, as she continued to scream, Anthony Thomas placed a blanket over her mouth in an attempt to muffle her screams. When Solomon Reese, then, grabbed Anthony Thomas, Stephen Page, who was holding a pistol, shot him several times! Then, Thomas, Brewer and Page left the apartment, taking two bags, ran down the stairs to the basement level, and exited the rear of the building. The three men rode to 1738 Stanton Terrace, SE, the home of Brewer's mother. While at that location, James Brewer attempted to get someone to hold onto the cigarettes for him.

Police and paramedics arrived at apartment # 829, began treating Solomon Reese, and then transported him to Prince George's Hospital Center, where he succumbed to his injuries. On June 28, 2011, after performing an autopsy on Solomon Reese, the medical examiner concluded that the cause of death was multiple gunshot wounds, including two gunshot wounds to the chest, one gunshot wound to the abdomen, and one gunshot wound to the right thigh! Detectives obtained surveillance video footage showing Brewer, Page, Hicks and Thomas, entering the apartment building at 2300 Good Hope Road, gathering at the elevator bank, on the first floor, entering the elevator, and then seven minutes later, showing Thomas, Brewer and Page moving quickly out of the stairwell on the basement level, with Brewer carrying two bags, and all three men leaving through the rear of the building. When the footage of the four men entering the front lobby was shown to Ericka Reese, she immediately identified Stephen Page as the person who shot her husband, James Brewer as the one who pulled her inside the apartment, but was unable to pick which of the other two men entering the building had put the blanket over her mouth!

Detectives used still shot from the surveillance video to obtain identifications of the four men shown entering the building and gathering at the elevator bank on the first floor! Other witnesses will testify that Anthony Thomas admitted that when they entered the building that they had planned to make a move, i.e., to rob the cigarette man. He also admitted that he had been inside that apartment, when the decedent grabbed him and was shot by Stephen.

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Dt: CHAPROF

On July 14, 2011, DUSM Robert Hoffmaster pursuant to an arrest warrant for First Degree Murder while Armed, travelled to Newport News, VA., arrested James Brewer, obtained permission from a magistrate there to return him to Washington, D.C. , and Marshals transported to the District of Columbia. After being interviewed by homicide detectives , and while awaiting presentment, James Brewer, Switched armbands with Bradley Allen, stood before the magistrate representing himself as Bradley Allen, and after signing release papers in Bradley Allen's name, walked out of the courthouse into the street. Marshals searched for James Brewer , and arranged a meeting and surrender on the following day.