

SUPERIOR COURT
OF THE DISTRICT OF COLUMBIA
DISTRICT OF COLUMBIA
Holding a Criminal Term

SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA
CRIMINAL DIVISION
JAN 14 PM 4 10
FILED

Grand Jury Sworn in on December 2, 2013

THE UNITED STATES OF AMERICA :

v. :

DEANDRE SHAHEED
Also Known As "Dre"
PDID: 624-052

LAFEYETTE ROBINSON
Also Known As "Lafo"
PDID: 664-668

FLOYD NEAL
Also Known As "Man Man"
PDID: 637-361

Criminal Nos: 2013 CF1 009411
2013 CF1 010268
2013 CF1 010267

Violations:
22 D.C. Code, Section 1805a;
22 D.C. Code, Sections 2801, 2802, 4502;
22 D.C. Code, Section 4504(b);
22 D.C. Code, Sections 2101, 4502,
2104.01(8);
22 D.C. Code, Sections 2101, 4502,
2104.01(8);
22 D.C. Code, Section 4503 (a)(6);
22 D.C. Code, Section 4504 (a-1) (2001 ed.)

(Conspiracy; Attempt To Commit Robbery While Armed; Possession Of a Firearm During Crime Of Violence Or Dangerous Offense; First Degree Murder While Armed - Felony Murder (with Aggravating Circumstances); First Degree Murder While Armed (Premeditated) (with Aggravating Circumstances); Unlawful Possession of a Firearm (Intrafamily Offense); Carrying A Rifle or Shotgun (Outside Home or Place of Business))

The Grand Jury charges:

FIRST COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," did knowingly and willfully combine, conspire, confederate and agree to rob a person while armed with a shotgun, in violation of Title 22, District of Columbia Code, Sections 1805a, 2801, 4502.

Object of the Conspiracy

The principle goal and purpose of this conspiracy were for the members of the conspiracy, including Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," to rob a person of his personal property.

Overt Acts

In furtherance of the conspiracy, and in order to effect the object thereof, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," in the District of Columbia, directly and indirectly, committed overt acts including, but not limited to, the following:

1. On March 14, 2013, Lafayette Robinson, also known as "Lafo," went to Floyd Neal's home to obtain Floyd Neal's participation in a robbery.
2. On March 14, 2013, Lafayette Robinson, also known as "Lafo," spoke with Floyd Neal, also known as "Man Man," and told Floyd Neal that "they were about to pull a move," or words to that effect.
3. On March 14, 2013, Floyd Neal, also known as "Man Man," agreed to participate in the robbery and left Neal's home with Robinson.
4. On March 14, 2013, Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," joined Deandre Shaheed, also known as "Dre," who loaded a shotgun with ammunition for use in committing the robbery.
5. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," walked to the Deanwood Metro Station to locate a person to rob.
6. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," having observed Akinwole Williams leave the Deanwood metro station, followed him for the purpose of robbing him.
7. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," followed Akinwole Williams to the

4000 block of Lee Street Northeast and walked through a parking lot in order to intercept Akinwole Williams.

8. On March 14, 2013, Deandre Shaheed, also known as "Dre," told Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," "I'm going to rob him," or words to that effect.

9. On March 14, 2013, Deandre Shaheed, also known as "Dre," retrieved the shotgun from his pants to use during the robbery of Akinwole Williams.

10. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," approached Akinwole Williams for the purpose of robbing him.

12. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," while pointing the shotgun at Akinwole Williams, ordered him to give up his property.

13. On March 14, 2013, after Akinwole Williams refused to turn over his property, Deandre Shaheed, also known as "Dre," shot Akinwole Williams with the shotgun.

14. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," fled the 1000 block of 44th Street Northeast.

(Conspiracy in violation of 22 D.C. Code, Section 1805a)

SECOND COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," while armed with a shotgun, did attempt, by force and violence, against resistance and by putting in fear, to steal and take property, from the person and from the immediate actual possession of Akinwole Williams. (Attempt To Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2801, 2802, 4502 (2001 ed.))

THIRD COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did possess a firearm, that is, a shotgun, while committing the crime of attempt to commit robbery while armed as set forth in the second count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FOURTH COUNT:

Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," within the District of Columbia, while armed with a firearm, in perpetrating and attempting to perpetrate the crime of robbery, as set forth in the second count of this indictment, killed Akinwole Williams by shooting him with a shotgun on or about March 14, 2013, thereby causing injuries from which Akinwole Williams died on or about March 15, 2013. (First Degree Murder While Armed - Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

The Grand Jury Further Charges that the murder was committed while committing or attempting to commit a robbery.

(First Degree Murder While Armed - Felony Murder (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 2101, 4502, 2104.01(8) (2001 ed.))

FIFTH COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did possess a firearm, that is, a shotgun, while committing the crime of first degree murder while armed (felony murder) as set forth in the fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SIXTH COUNT:

Deandre Shaheed, also known as "Dre", Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man", within the District of Columbia, while armed with a shotgun, purposely and with deliberate and premeditated malice, killed Akinwole Williams by shooting him with a shotgun on or about March 14, 2013, thereby causing injuries from which Akinwole Williams died on or about March 15, 2013. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

The Grand Jury Further Charges that the murder was committed while committing or attempting to commit a robbery.

(First Degree Murder While Armed (Premeditated) (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 2101, 4502, 2104.01(8) (2001 ed.))

SEVENTH COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did possess a firearm, that is, shotgun, while committing the crime of first degree murder while armed (premeditated) as set forth in the sixth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

EIGHTH COUNT:

On or about March 14, 2013, within the District of Columbia, Floyd Neal, also known as "Man Man," previously having been convicted of an intrafamily offense as defined in 16 D.C. Code, Section 1001 or a substantially similar offense in another jurisdiction, owned, kept, and had within his possession and control, a firearm. (Unlawful Possession of a Firearm (Intrafamily Offense), in violation of 22 D.C. Code, Section 4503 (a)(6) (2001 ed.))

NINTH COUNT:


On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did carry openly and concealed on or about their persons, in a place other than their dwelling place, place of business or on other land possessed by them, a shotgun. (Carrying A Rifle or Shotgun (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504 (a-1) (2001 ed.))

TENTH COUNT:

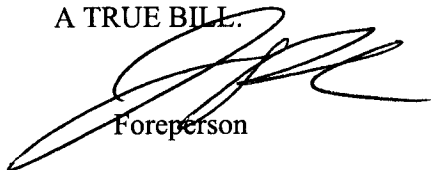
On or about March 28, 2013, within the District of Columbia, Floyd Neal, also known as "Man Man," previously having been convicted of an intrafamily offense as defined in 16 D.C. Code, Section 1001 or a substantially similar offense in another jurisdiction, owned, kept, and had within his possession and control, a firearm. (Unlawful Possession of a Firearm (Intrafamily Offense), in violation of 22 D.C. Code, Section 4503 (a)(6) (2001 ed.))

ELEVENTH COUNT:

On or about March 28, 2013, within the District of Columbia, Floyd Neal, also known as "Man Man," did carry openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a rifle or shotgun. (Carrying A Rifle or Shotgun (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504 (a-1) (2001 ed.))


RONALD C. MACHEN JR.
United States Attorney
in and for the District of Columbia

A TRUE BILL.


Foreperson

SUPERIOR COURT
OF THE
DISTRICT OF COLUMBIA

DEPT. OF THE
DISTRICT OF COLUMBIA
CLERK

DEC 14 00 4 10

Holding a Criminal Term

FILED

Grand Jury Sworn in on December 2, 2013

THE UNITED STATES OF AMERICA

v.

DEANDRE SHAHEED
Also Known As "Dre"
PDID: 624-052

LAFEYETTE ROBINSON ✓
Also Known As "Lafo"
PDID: 664-668

FLOYD NEAL
Also Known As "Man Man"
PDID: 637-361

Criminal Nos: 2013 CF1 009411
2013 CF1 010268 ✓
2013 CF1 010267

Violations:
22 D.C. Code, Section 1805a;
22 D.C. Code, Sections 2801, 2802, 4502;
22 D.C. Code, Section 4504(b);
22 D.C. Code, Sections 2101, 4502,
2104.01(8);
22 D.C. Code, Sections 2101, 4502,
2104.01(8);
22 D.C. Code, Section 4503 (a)(6);
22 D.C. Code, Section 4504 (a-1) (2001 ed.)

(Conspiracy; Attempt To Commit Robbery While Armed; Possession Of a Firearm During Crime Of Violence Or Dangerous Offense; First Degree Murder While Armed - Felony Murder (with Aggravating Circumstances); First Degree Murder While Armed (Premeditated) (with Aggravating Circumstances); Unlawful Possession of a Firearm (Intrafamily Offense); Carrying A Rifle or Shotgun (Outside Home or Place of Business))

The Grand Jury charges:

FIRST COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," did knowingly and willfully combine, conspire, confederate and agree to rob a person while armed with a shotgun, in violation of Title 22, District of Columbia Code, Sections 1805a, 2801, 4502.

Object of the Conspiracy

The principle goal and purpose of this conspiracy were for the members of the conspiracy, including Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," to rob a person of his personal property.

Overt Acts

In furtherance of the conspiracy, and in order to effect the object thereof, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," in the District of Columbia, directly and indirectly, committed overt acts including, but not limited to, the following:

1. On March 14, 2013, Lafayette Robinson, also known as "Lafo," went to Floyd Neal's home to obtain Floyd Neal's participation in a robbery.
2. On March 14, 2013, Lafayette Robinson, also known as "Lafo," spoke with Floyd Neal, also known as "Man Man," and told Floyd Neal that "they were about to pull a move," or words to that effect.
3. On March 14, 2013, Floyd Neal, also known as "Man Man," agreed to participate in the robbery and left Neal's home with Robinson.
4. On March 14, 2013, Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," joined Deandre Shaheed, also known as "Dre," who loaded a shotgun with ammunition for use in committing the robbery.
5. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," walked to the Deanwood Metro Station to locate a person to rob.
6. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," having observed Akinwale Williams leave the Deanwood metro station, followed him for the purpose of robbing him.
7. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," followed Akinwale Williams to the

4000 block of Lee Street Northeast and walked through a parking lot in order to intercept Akinwale Williams.

8. On March 14, 2013, Deandre Shaheed, also known as "Dre," told Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," "I'm going to rob him," or words to that effect.

9. On March 14, 2013, Deandre Shaheed, also known as "Dre," retrieved the shotgun from his pants to use during the robbery of Akinwale Williams.

10. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," approached Akinwale Williams for the purpose of robbing him.

12. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," while pointing the shotgun at Akinwale Williams, ordered him to give up his property.

13. On March 14, 2013, after Akinwale Williams refused to turn over his property, Deandre Shaheed, also known as "Dre," shot Akinwale Williams with the shotgun.

14. On March 14, 2013, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," fled the 1000 block of 44th Street Northeast.

(Conspiracy in violation of 22 D.C. Code, Section 1805a)

SECOND COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," while armed with a shotgun, did attempt, by force and violence, against resistance and by putting in fear, to steal and take property, from the person and from the immediate actual possession of Akinwole Williams. (Attempt To Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2801, 2802, 4502 (2001 ed.))

THIRD COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did possess a firearm, that is, a shotgun, while committing the crime of attempt to commit robbery while armed as set forth in the second count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FOURTH COUNT:

Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo," and Floyd Neal, also known as "Man Man," within the District of Columbia, while armed with a firearm, in perpetrating and attempting to perpetrate the crime of robbery, as set forth in the second count of this indictment, killed Akinwole Williams by shooting him with a shotgun on or about March 14, 2013, thereby causing injuries from which Akinwole Williams died on or about March 15, 2013. (First Degree Murder While Armed - Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

The Grand Jury Further Charges that the murder was committed while committing or attempting to commit a robbery.

(First Degree Murder While Armed - Felony Murder (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 2101, 4502, 2104.01(8) (2001 ed.))

FIFTH COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did possess a firearm, that is, a shotgun, while committing the crime of first degree murder while armed (felony murder) as set forth in the fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SIXTH COUNT:

Deandre Shaheed, also known as "Dre", Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man", within the District of Columbia, while armed with a shotgun, purposely and with deliberate and premeditated malice, killed Akinwole Williams by shooting him with a shotgun on or about March 14, 2013, thereby causing injuries from which Akinwole Williams died on or about March 15, 2013. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

The Grand Jury Further Charges that the murder was committed while committing or attempting to commit a robbery.

(First Degree Murder While Armed (Premeditated) (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 2101, 4502, 2104.01(8) (2001 ed.))

SEVENTH COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did possess a firearm, that is, shotgun, while committing the crime of first degree murder while armed (premeditated) as set forth in the sixth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

EIGHTH COUNT:

On or about March 14, 2013, within the District of Columbia, Floyd Neal, also known as "Man Man," previously having been convicted of an intrafamily offense as defined in 16 D.C. Code, Section 1001 or a substantially similar offense in another jurisdiction, owned, kept, and had within his possession and control, a firearm. (Unlawful Possession of a Firearm (Intrafamily Offense), in violation of 22 D.C. Code, Section 4503 (a)(6) (2001 ed.))

NINTH COUNT:

On or about March 14, 2013, within the District of Columbia, Deandre Shaheed, also known as "Dre," Lafayette Robinson, also known as "Lafo" and Floyd Neal, also known as "Man Man," did carry openly and concealed on or about their persons, in a place other than their dwelling place, place of business or on other land possessed by them, a shotgun. (Carrying A Rifle or Shotgun (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504 (a-1) (2001 ed.))

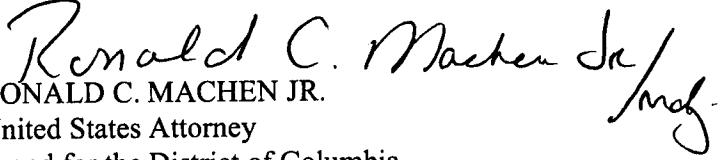
8

TENTH COUNT:

On or about March 28, 2013, within the District of Columbia, Floyd Neal, also known as "Man Man," previously having been convicted of an intrafamily offense as defined in 16 D.C. Code, Section 1001 or a substantially similar offense in another jurisdiction, owned, kept, and had within his possession and control, a firearm. (Unlawful Possession of a Firearm (Intrafamily Offense), in violation of 22 D.C. Code, Section 4503 (a)(6) (2001 ed.))

ELEVENTH COUNT:

On or about March 28, 2013, within the District of Columbia, Floyd Neal, also known as "Man Man," did carry openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a rifle or shotgun. (Carrying A Rifle or Shotgun (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504 (a-1) (2001 ed.))


RONALD C. MACHEN JR.
United States Attorney
in and for the District of Columbia

A TRUE BILL;


Foreperson