



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*

February 19, 2014

Matthew Davies
Public Defender Service
Counsel for Defendant Lamonte Hill

Andrea Antonelli
Counsel for Defendant Taquia Allen

Re: United States v. Lamonte Hill 2012-CF1-15272
United States v. Taquia Allen 2009-CF1-24214

2013-CF1-9055

Dear Counsel:

This letter is to confirm the plea offer for your clients, Lamonte Hill and Taquia Allen. This plea offer is wired and will expire at 5:00 p.m. on February 24, 2014. However, the Government reserves the right to revoke this plea offer at any time before your client enters a guilty plea in this case. If your client accepts the 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 plea agreement between your client and the Office of the United States Attorney for the District of Columbia. The terms of the offer are as follows:

1. Defendant Lamonte Hill agrees to admit guilt and enter a plea of guilty to the following offenses: Voluntary Manslaughter While Armed, in violation of 22 D.C. Code §§ 2105, 4502. Defendant Hill understands that the offense of Voluntary Manslaughter While Armed carries a potential maximum penalty of 30 years in jail.

Defendant Hill and the Government have agreed to request that the court accept this plea under Rule 11(e)(1)(C) of the D.C. Superior Court Rules of Criminal Procedure and that the Government and Defendant Hill have agreed to request a sentence for the defendant within the range of 5-9 years.

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Defendant Taquia Allen agrees to admit guilt and enter a plea of guilty to the following offenses: Conspiracy to Obstruct Justice, in violation 22 D.C. Code §§ 722 and 1805a. Defendant Allen understands that the offense of Conspiracy to Obstruct Justice carries a potential maximum penalty of 5 years in jail and/or a fine of up to \$10,000.

2. Defendant Hill understands that the Government will reserve stepback pending sentencing, will waive/withdraw any sentencing enhancement papers, and will reserve allocation at sentencing, subject to the terms set forth in paragraph 6 of this agreement.

Defendant Allen understands that the Government will not ask that she be held pending sentencing, will waive/withdraw any sentencing enhancement papers, and will reserve allocation at sentencing, subject to the terms set forth in paragraph 6 of this agreement.

3. Your clients understand that the Government agrees that it will dismiss all remaining charges and counts in the indictment at the time of sentencing.

4. The parties further agree that your clients, after taking an oath to tell the truth, shall agree to the attached factual proffer in open court on the date of the plea.

5. Your clients understand and acknowledge that this agreement and any plea of guilty which your clients may enter pursuant to this plea agreement are contingent upon the entry of guilty pleas by both defendants in this case, Lamonte Hill and Taquia Allen. If either defendant fails to enter a guilty plea, this agreement and any proceedings pursuant to this agreement shall be withdrawn or voided.

6. Defendant Hill understands that the Court **will** utilize the District of Columbia Sentencing Commission's Voluntary Sentencing Guidelines in imposing the sentence in this case under Rule 11(e)(1)(C) of the D.C. Superior Court Rules of Criminal Procedure. The Government and Defendant Hill have agreed to request a sentence for the defendant within the range of 5-9 years. Under this agreement, neither party is permitted to seek a sentence outside of this range.

Defendant Allen understands that the Court **may** utilize the District of Columbia Sentencing Commission's Voluntary Sentencing Guidelines in imposing the sentence in this case. The Government and your client agree that neither party will seek an upward or downward departure outside of your client's applicable guideline range. In addition, the Government agrees to not oppose a sentence of probation for Defendant Allen.

7. Defendant Hill agrees and understands that this letter and agreement is binding on the parties and subsequently binding on the Court, once it is accepted by the Court at the time of sentencing. Defendant Hill understands that he cannot withdraw this plea at a later date because of the harshness of any sentence imposed by the Court within the range of 5-9 years. The

Government understands that Defendant Hill is not bound by the Government's allocution, but that he may only request a sentence between 5-9 years.

Defendant Allen agrees and understands that this letter is binding on the Government, but not binding on the Court, and that she cannot withdraw this plea at a later date because of the harshness of any sentence imposed by the Court. The Government understands that Defendant Allen is not bound by the Government's allocution, and may request a lesser sentence, subject to the terms set forth in paragraph 6, above.

8. Your clients acknowledge and have been made aware that, pursuant to the Innocence Protection Act, there may be physical evidence which was seized from the victim, crime scene or from your clients or from some other source that can be tied to your clients that could contain probative biological material. Your clients understand and agree that in order to plead guilty in this case, your clients must waive and give up DNA testing in this case and must execute the attached written waiver of DNA testing. Your clients further understand that should he/she waive and give up DNA testing now, it is unlikely that he/she will have another opportunity to have the DNA tested in this case.

9. In entering this plea of guilty, your clients understand and agree to waive certain rights afforded to your clients by the Constitution of the United States and/or by statute. In particular, your clients knowingly and voluntarily waive or give up his/her right against self-incrimination with respect to the offense(s) to which your clients are pleading guilty before the Court which accepts your clients' pleas. Your clients also understand that by pleading guilty your clients is waiving or giving up his/her right to be tried by a jury or by a judge sitting without a jury, the right to be assisted by an attorney at trial and the right to confront and cross-examine witnesses.

10. This letter sets forth the entire understanding between the parties and constitutes the complete plea agreement between your clients 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 clients.

Respectfully,

RONALD C. MACHEN JR.
UNITED STATES ATTORNEY

By:



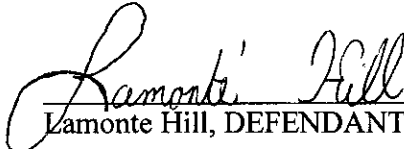
DAVID J. GORMAN
ASSISTANT UNITED STATES ATTORNEY

DEFENDANT'S ACCEPTANCE

I have read this plea agreement and factual proffer and have discussed it with my attorney, **Matthew Davies // Andrea Antonelli**. I fully understand this agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this agreement fully. I am pleading guilty because I am in fact guilty of the offenses set forth herein.

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

Date: 2-23-14


Lamonte Hill, DEFENDANT


Date: _____

Taquia Allen

ATTORNEY'S ACKNOWLEDGMENT

I have read each of the pages constituting this plea agreement, reviewed them with my client, **Lamonte Hill // Taquia Allen**, and discussed the provisions of the agreement with my client, fully. These pages accurately and completely set forth the entire plea agreement.

Date: 2-23-14



Matthew Davies
Attorney for Lamonte Hill

Date: _____

Andrea Antonelli
Attorney for Taquia Allen

PROFFER OF FACTS

Had this case gone to trial the Government's evidence would have shown beyond a reasonable doubt that . . .

On June 11, 2012, at approximately 7:15 pm, Brian Bloomfield was found unconscious in the rear of 34 ■ 13th Place, SE, Washington, D.C. Mr. Bloomfield had obviously lost a lot of blood, having suffered significant trauma to his upper body. A subsequent autopsy of Mr. Bloomfield found that he died of a gunshot wound to the chest and multiple stab wounds to the right torso and right thigh. The manner of death was ruled a homicide.

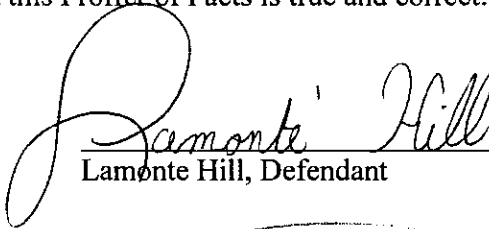
A short time before, Mr. Bloomfield walked into the rear door of 34 ■ 13th Place, Southeast, followed soon after by two males (one of whom was Defendant Lamonte Hill) – both of whom went into the building through the same door. Within a few minutes, Mr. Bloomfield exited that door, closely followed by the two males (one of whom was Defendant Lamonte Hill). Defendant Hill and the other male assaulted Mr. Bloomfield and, during the assault, Mr. Bloomfield reached for a gun that was located near a railing. Mr. Bloomfield was able to grab the gun, but could not hold on to it, as he was too severely injured at that point. During the course of the assault, Mr. Bloomfield was stabbed several times and shot one time. The defendant and the other male left the scene with the gun and knife used to assault Mr. Bloomfield.

Subsequently, during the course of the grand jury investigation into the murder of Mr. Bloomfield, Defendant Taquia Allen made false statements in the grand jury for the purpose of obstructing justice and to thwart the grand jury investigation. Among other things, Defendant Allen denied communicating with Defendant Hill between her birthday barbecue on June 3 and when he was arrested in August 2012.

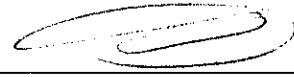
DEFENDANT'S ACKNOWLEDGMENT

I have read and discussed the Government's Proffer of Facts with my attorney. I agree, and acknowledge by my signature that this Proffer of Facts is true and correct.

Date: 2-23-14


Lamonte Hill, Defendant

Date: 2-23-14


Matthew Davies
Attorney for Defendant Lamonte Hill

Date: _____

Taquia Allen, Defendant

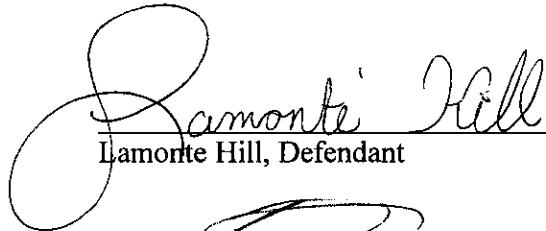
Date: _____

Andrea Antonelli
Attorney for Defendant Taquia Allen

DEFENDANT'S AGREEMENT TO WAIVE DNA TESTING

My attorney has discussed the contents of this plea agreement with me, including the fact that I may request or waive DNA testing (or independent DNA testing, if applicable). I understand the conditions of the plea and agree to them. I knowingly, intentionally, and voluntarily waive and give up DNA testing (or independent DNA testing, if applicable) of any biological materials in this case. I further state that I am fully satisfied with the services my attorney has provided to me and am fully satisfied with the explanation my attorney has provided me concerning the terms of the plea offer, the potential evidentiary value of DNA evidence in this case, and the consequences of waiving and giving up DNA testing in this case and pleading guilty.

Date: 2-23-14


Lamonte Hill, Defendant

Date: 2-23-14


Matthew Davies
Attorney for Lamonte Hill

Date: _____

Taquia Allen, Defendant

Date: _____

Andrea Antonelli
Attorney for Taquia Allen