

SUPERIOR COURT OF
THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION - FELONY BRANCH

UNITED STATES OF AMERICA

2012 APR 17 A 055

Case No. 2010CF1019304

v.

FILED

Judge Thomas J. Motley

MEEKO S. CARRAWAY

:

Sentencing: April 18, 2012

UNITED STATES'S SENTENCING MEMORANDUM

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully offers the following information and argument in connection with the sentencing in the above-captioned case. On February 9, 2012, defendant Meeko S. Carraway pleaded guilty to Second Degree Murder While Armed. As set forth in the Presentence Report ("PSR"), the defendant's voluntary sentencing guideline range for Second Degree Murder While Armed is thirteen to twenty-five years of incarceration. As part of the plea agreement, the parties agreed to a sentencing range of twenty-five years or his maximum potential sentence under the applicable guidelines, whichever is greater. For the reasons set forth below, the government respectfully requests that the Court accept the plea agreed to by the parties and sentence the defendant to twenty-five years of incarceration, which is his maximum potential sentence under the applicable guidelines.

I. Nature of the Offense.

The government asks the Court to rely on the sealed plea proffer it obtained from the defendant at the bench with respect to the nature of the offense.

II. Impact on Victims and Community.

The completely unnecessary and senseless loss of Darrel Hendy's life at the young age of 29 has been devastating to his parents, brother, sister, daughter, aunts and uncles. His father has

attended nearly every court proceeding of this case on behalf of the family. His father is completely distraught over the loss of his oldest son and first child. He has experienced every parent's worst nightmare – his own child pre-deceasing him. Moreover, the cold-natured, premeditated, and extremely violent nature his son's murder has been overwhelming and traumatizing for him. He took a month off of work after the murder just to grieve. It is all he can do to stay calm and focused and be an example of stability to the rest of his family, who have also been destroyed by the loss of their son, father, brother, and nephew. Darrel Hendy was very involved in his daughter's life. Although she was only two years old when he died, she still remembers her father and misses him very much. Of course, she will never have the opportunity to really know her father.

III. Defendant's Criminal History.

The defendant was eighteen years old at the time of this offense. Less than one year before he killed Darrel Hendy, he was arrested in Maryland for possessing a handgun, and pled guilty to that offense in March of 2010. In fact, he was on probation for that gun offense when he used the nine millimeter pistol in this case to shoot Darrel Hendy eight to nine times. The government's investigation has shown that the defendant has a propensity for brandishing weapons and engaging in criminal behavior. For example, just one week before the murder, when his codefendant Chamontae Walker was having a problem with his girlfriend, he called the defendant and the defendant immediately came to his aid armed with a gun. Approximately two days before the murder, in the presence of Walker, he fired a .45 caliber pistol in the air in front of the high rise building at 800 Southern Avenue, S.E. In the summer before the murder, along with Walker and his codefendant Corey Yates, he packaged and distributed narcotics in and

around the high rise building. In addition, he and Yates looted an apartment at 1500 V Street, S.E. (his own mother's apartment), stealing almost all of the items therein, including money, furniture and televisions.

IV. Defendant's Personal Characteristics.

The defendant's criminal lifestyle, affinity for guns, admitted drug abuse, and ultimate decision to murder Darrel Hendy in cold blood out of loyalty of his friends is sadly unsurprising given his personal background. The government's investigation shows that when he was a very young boy in California, his father was abusive toward him. Then in 1999, when the defendant was seven years old, his father strangled his mistress to death and cut off her head with a box cutter in the defendant's Californian childhood home. Upon information and belief, the defendant and his mother came home during this process, as his father was cleaning up the bathroom. In short, his paternal role model is an abusive cold-blooded killer. News reports demonstrate that his mother acted as the star witness in a prosecution against his father, who was convicted and is now serving fifty years to life in state prison.

Under all of these circumstances, it is not difficult to imagine how or why the defendant began abusing drugs at age twelve and then began to associate with criminal peers and lead a criminal lifestyle. None of this excuses his behavior on September 25, 2010, which he clearly understood was wrong. He cut off all of his hair, lied to police during his initial statement, and then fled to North Carolina.

V. Defendant's Acceptance of Responsibility and Lack of Remorse

The defendant deserves credit for accepting responsibility and for fully admitting his own role in this murder. His moral acceptance of responsibility and actual sense remorse is


questionable given the PSR writer's description of his nonchalant attitude and his statement to the PSR writer about the offense. It could be inferred from that statement that he acted over an old beef he had with the decedent, which is quite different from what he admitted during his actual plea proffer.

CONCLUSION

WHEREFORE, the government respectfully requests that the Court sentence the defendant to twenty-five years of incarceration.

Respectfully submitted,
RONALD C. MACHEN JR.
UNITED STATES ATTORNEY

By:




EMILY A. MILLER
SHARON K. DONOVAN
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CERTIFICATE OF SERVICE

I hereby certify that, on the 16th day of April, 2012, a copy of the foregoing was served by email upon the following:

Kia Sears, Esq.
The Public Defender Service
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By:



EMILY A. MILLER
Assistant United States Attorney