

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

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FILED

UNITED STATES OF AMERICA

v.

ROBERT CARTER

: Case No. 2010-CF1-20951
:
: Judge Thomas Motley
:
: Trial: November 5, 2012

**GOVERNMENT'S NOTICE OF INTENT TO
SEEK LIFE IMPRISONMENT WITHOUT RELEASE**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, respectfully notifies the Court and the defendant that upon conviction in this case, the government intends to seek a penalty of life imprisonment without release.

On October 29, 2010, the defendant, Robert Carter, shot Angel Morse once in the head, killing her. Angel Morse was the defendant's thirteen-year-old daughter. The defendant shot Angel in the family home located at [REDACTED] in Northwest, Washington, D.C. The defendant then went on a crime spree that included kidnapping several people, shooting two additional people, stealing a car, carjacking another car, then leading the police on a high-speed chase. The defendant was captured and subsequently charged with the murder of Angel Morse. Later, the defendant was indicted on the following charges: First Degree Murder While Armed (Premeditated), with aggravating circumstances (especially vulnerable victim), Kidnapping While Armed (seven counts), Assault With Intent to Kill While Armed (two counts), Possession of a Firearm During a Crime of Violence (11 counts), First Degree Theft, Unauthorized Use of a Vehicle, and Armed Carjacking.

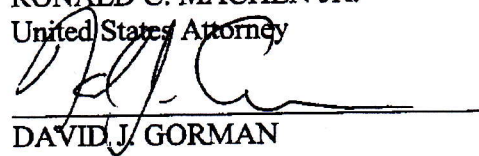
Pursuant to 22 D.C. Code §§ 2104 and 2104.01, and upon conviction in this case, the Court may impose a prison sentence in excess of 60 years, up to and including life imprisonment

without the possibility of release. Pursuant to 22 D.C. Code § 2104(a), such a sentence must be preceded by the prosecution having notified the defendant in writing, at least 30 days prior to trial, that it intends to seek a sentence of life imprisonment without release.

WHEREFORE, with this pleading, the government hereby notifies the Court and the defendant of its intention to seek life imprisonment without the possibility of release.

Respectfully submitted,

RONALD C. MACHEN JR.
United States Attorney



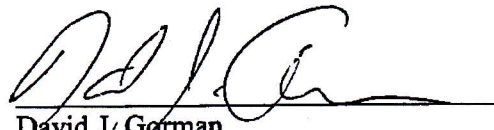
DAVID J. GORMAN

ERIN LYONS

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Certificate of Service

I hereby certify that I caused a copy of the foregoing to be served by e-mail and first-class mail upon counsel for the defendant, Steven Kiersh, 5335 Wisconsin Ave., NW Suite 440, Washington, D.C. 20015 and skiersh@aol.com this 5th day of October, 2012.



David J. Gorman
Assistant United States Attorney