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**ORIGINAL**

SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA  
CRIMINAL DIVISION

Criminal Division

2013 JUN 19 P 4:06

UNITED STATES OF AMERICA	)	
	)	No. 2012 CF1 020477
v.	)	The Hon. Robert Morin, J.
	)	Sentencing: June 21, 2013
STEVEN WILLIAMS,	)	
	)	
Defendant.	)	

Government's Memorandum In Aid Of Sentencing

The United States of America, by and through the United States Attorney for the District of Columbia, hereby submits this memorandum in aid of the sentencing of defendant Steven Williams.

Introduction

On Thursday, June 14, 2012, at about 5:24 a.m., Hae Soon Lim, the 64-year-old owner of Grace's Deli, a carry-out located at 701 H Street, N.E., Washington, D.C., pulled up next to the carry-out to begin another day of business. She exited her car, walked to the carry-out door, and began to open the lock.

At about the same time, the defendant Steven Williams, a career criminal, a parole violator, and an occasional customer at the store who had met Ms. Lim, rushed across H Street, confronted Ms. Lim, and by force or threats, entered the store with her. His plan was robbery. Within a few minutes, Ms. Lim lay dead on the floor from a single gunshot wound to the back of her neck, and the defendant had fled the scene.

The ATM inside the small store would be found later that morning open and empty. Similarly, two cash register drawers,

one used for the store's general transactions and one for lottery sales, would be found lying on the counter, empty. Ms. Lim's handbag, which she used on a daily basis to carry hundreds of dollars in cash from her home to the store each morning, in order to replenish the ATM and the registers, was never found at all.

The store never opened that morning and has been shuttered ever since. And since then Ms. Lim's husband, daughter, and son, her extended family members, her numerous friends, and the members of the community that frequented the carry-out, have tried to live with the unbearable loss.

The defendant was charged with second degree murder while armed and arrested on November 28, 2012. Pursuant to a plea agreement, he waived indictment and pled guilty to that charge, with the government agreeing not to ask for more than 28 years in prison and the defendant agreeing not to ask for less than 20.

The Court is not bound by the agreement.

The Statutory Maximum And Applicable Guideline Range

Under D.C. Code §§ 22-2103, and 22-4502, the defendant faces a maximum penalty of 70 years in prison, and a mandatory minimum term of 5 years. He must also serve a period of supervised release following incarceration of 5 years. See D.C. Code § 24-403.01(b).

The defendant has a criminal history score of more than 6 points. Under the D.C. Voluntary Sentencing Guidelines Manual he

faces a prison only guideline term of imprisonment ranging from 192 months (16 years) to the statutory maximum 70 years.

#### The Appropriate Sentence

For any felony offense, the Court must impose a sentence that reflects the seriousness of the offense and the criminal history of the offender, provides for just punishment and affords adequate deterrence, and provides the offender with needed educational or vocational training, medical care, and other correctional treatment D.C. Code § 24-403.01.

The government submits that the guideline minimum sentence hear is woefully inadequate, and that the minimum the defense may allocute for, 20 years, barely does justice. Although even 28 years in prison would generally be too lenient for the robbery-murder of a defenseless senior citizen by a career criminal and a parole violator, the government recognizes that the defendant's decision to waive indictment and plead guilty must be acknowledged.


The defendant's criminal history includes violent crime convictions for assault with a deadly weapon- gun, armed robbery (gun), and two instances of robbery with a deadly weapon, at least one of which involved a firearm. He has also been convicted for carrying a pistol without a license (felony), and contempt of court. His first felony conviction, at age 17, made him ineligible to lawfully possess a firearm, yet he continued to

possess and then violently employ them against innocent victims.  
The community needs to be protected from this defendant.

The government therefore requests a sentence of 28 years in  
prison, followed by a 5 year period of supervised release.

Respectfully submitted,

RONALD C. MACHEN JR.  
UNITED STATES ATTORNEY

by:   
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CERTIFICATE OF SERVICE

I, Michael C. Liebman, an Assistant U.S. Attorney, hereby certify that the foregoing, with proposed Order, was served on defendant Steven Williams by sending a true and correct copy of the same by e-mail with pdf attachment to his counsel of record, Chris Roberts, Esquire, of the Public Defender Service for the District of Columbia, at [croberts@pdsdc.org](mailto:croberts@pdsdc.org), on June 18, 2013.



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Michael C. Liebman