

RECEIVED

FEB 22 2024

Clerk, U.S. District and
Bankruptcy Courts

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Holding a Criminal Term

Grand Jury Sworn in on September 15, 2023

UNITED STATES OF AMERICA	:	CRIMINAL NO.
	:	
v.	:	MAGISTRATE NO. 23-MJ-61 (ZMF)
	:	
MICHAEL ROBINSON,	:	VIOLATIONS:
KAMANYE WILLIAMS,	:	
GIANNI ROBINSON, and	:	18 U.S.C. § 1951(a)
LONDON TEETER,	:	(Conspiracy to Interfere with Commerce by
	:	Robbery)
Defendants.	:	18 U.S.C. § 1951(a)
	:	(Interference with Commerce by Robbery)
	:	18 U.S.C. § 924(c)(1)(A)(ii)
	:	(Using, Carrying, Possessing, and
	:	Brandishing a Firearm During and in
	:	Relation to a Crime of Violence)
	:	18 U.S.C. § 922(g)(1)
	:	(Unlawful Possession of a Firearm and
	:	Ammunition by a Person Convicted of a
	:	Crime Punishable by Imprisonment for a
	:	Term Exceeding One Year)
	:	18 U.S.C. § 2
	:	(Aiding and Abetting)
	:	
	:	FORFEITURE:
	:	18 U.S.C. §§ 924(d), 981(a)(1)(C); 21 U.S.C.
	:	§ 853(p); 28 U.S.C. § 2461(c)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

From on or about July 1, 2023, to February 12, 2024, within the District of Columbia and elsewhere, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, LONDON TEETER**, and others known and unknown to the Grand Jury, did knowingly combine,

conspire, confederate, and agree together to commit an offense against the United States, namely, to knowingly and unlawfully, obstruct, delay, and affect interstate commerce by robbery in violation of Title 18, United States Code, Section 1951, by agreeing to rob Walgreens, from the presence of a Walgreens employee, against the will of said person, by means of actual and threatened force, violence, and fear of injury, immediate and future, to said person, while the employee was engaged in commercial activities for Walgreens, a business that is engaged in and that affects interstate commerce, in violation of Title 18, United States Code, Section 1951(a).

Goal of the Conspiracy

It was the goal of the conspiracy that the conspirators would acquire money and items of value, by way of robbery, belonging to and in the care, custody, control, management, and possession of Walgreens, a company operating in interstate commerce, located at 801 7th Street Northwest, Washington D.C. 20001.

Manner and Means Used to Achieve the Objectives of the Conspiracy

The defendants and their co-conspirators used the following manner and means to accomplish the object of the conspiracy:

1. It was part of the conspiracy that the co-conspirators, both known and unknown to the Grand Jury, would conduct surveillance at Walgreens to determine when it was best to commit a robbery.
2. It was further part of the conspiracy that some participants maintained employment at Walgreens in order to aid their co-conspirators in committing robberies. Some of the actions carried out by the co-conspirators included, among others, obtaining information on how to gain access to an employee-only area locked by a door code (the "Manager's Office") and to further

obtain information as to when the daily cash proceeds from the business would be transferred to the Manager's Office so that the co-conspirators could more easily access it.

3. It was further part of the conspiracy that, during each robbery, one or more co-conspirators would enter the Walgreens wearing clothing designed to disguise their identities.

4. It was further part of the conspiracy that, during each robbery, one or more co-conspirators would brandish a firearm at an employee of Walgreens and demand business proceeds located in the Manager's Office.

5. It was further part of the conspiracy that a co-conspirator would pose as a victim during some of the robberies.

6. It was further part of the conspiracy that the co-conspirators would split the proceeds from each robbery.

Overt Acts in Furtherance of the Conspiracy

In furtherance of the conspiracy, and to affect the illegal objects thereof, the following overt acts, among others, were committed in District of Columbia and elsewhere:

July 1, 2023 – July 17, 2023

1. On July 1, 2023, **GIANNI ROBINSON** and **KAMANYE WILLIAMS** exchanged communications regarding when currency derived from business proceeds would be transferred from the store cash registers to the safe in the Manager's Office, and the amount of currency expected to be in the safe following the transfer.

2. On July 2, 2023, **GIANNI ROBINSON** sent **KAMANYE WILLIAMS** a text message and advised him to park his vehicle on the 600 block of I Street, Northwest, Washington D.C. during the robbery because there were no surveillance cameras in that area.

3. On July 3, 2023, **GIANNI ROBINSON**, **KAMANYE WILLIAMS**, and **LONDON TEETER** exchanged communications regarding how to access the Manager's Office, to include the code required to unlock the door to, and thereby access, the Manager's Office.

4. On July 3, 2023, **GIANNI ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating, "my girl said gotta go in there like u know exactly what u doing straight to da point so they think its somebody that work there bag the joint."

5. On July 4, 2023, **KAMANYE WILLIAMS** sent a text message to **GIANNI ROBINSON** stating, "I know what the blue print look like now."

6. On July 5, 2023, **GIANNI ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating, "We got a hella of a plan."

7. On July 12, 2023, **GIANNI ROBINSON** and **KAMANYE WILLIAMS** had the following exchange via text message:

Date	Time	From	To	Message
7/12/2023	12:20 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	15 min window
7/12/2023	12:21 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Talking to bae about it now
7/12/2023	12:22 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Soon as shit get off elevator u gotta be meeting her at office door & forcing her in the door where the safe & grab everything fast. Up on her & unc.
7/12/2023	12:22 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Make one of them open safe need book bag don't take mask off till u in car pulling off
7/12/2023	12:23 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	I already know how bag I just needed to know little shit like that 15 minutes shit
7/12/2023	12:23 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Bet

7/12/2023	12:23 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	& wtf n**** I ain't taking my shit off till I get home [laughing emoji]
7/12/2023	12:23 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	[laughing emoji]
7/12/2023	12:23 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Meet her in aisle 1 soon she get off elevator
7/12/2023	12:24 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Aight
7/12/2023	12:24 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	U know what she look like right
7/12/2023	12:24 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	What time you think she goi g be right there
7/12/2023	12:24 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Yeah she Spanish wit the glasses
7/12/2023	12:24 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	9 o'clock. U can just act like u looking at shit by the office if until she get off elevator
7/12/2023	12:37 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Aight bet
7/12/2023	12:38 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	& when u go through back on elevator it's level g
7/12/2023	12:39 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Shit that make sense [laughing emoji] aight
7/12/2023	12:39 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Shit all common sense fr

8. On July 13, 2023, **GIANNI ROBINSON** and **KAMANYE WILLIAMS** discussed over text message that they would rob the Walgreens on July 18, 2023, because their co-conspirator **LONDON TEETER** would be the manager on duty that day.

The July 18, 2023, Robbery

9. On July 18, 2023, **GIANNI ROBINSON** sent a text message to **KAMANYE WILLIAMS** advising that the Manager's Office would be loaded with cash around 8:45 p.m. that evening. Approximately twenty-five minutes later, **LONDON TEETER** sent a text message to **MICHAEL ROBINSON** advising which employees would be closing the Walgreens that evening.

10. On July 18, 2023, at 8:34 p.m., **GIANNI ROBINSON** and **KAMANYE WILLIAMS** had the following exchange via text message:

Date	Time	From	To	Message
7/18/2023	8:34 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Ok bae said at 9
7/18/2023	8:34 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Aight
7/18/2023	8:58 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Pulling up
7/18/2023	8:58 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Boutta see if she ready
7/18/2023	8:58 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Aight
7/18/2023	8:59 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	We can park in the back
7/18/2023	8:59 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	?
7/18/2023	9:02 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	What u going to walk around to get in
7/18/2023	9:02 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Yeah
7/18/2023	9:02 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	I'm bout to go in & have brah sit in the alley
7/18/2023	9:02 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Yeah then park in A space in the back
7/18/2023	9:02 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Once u leaving out back u go to elevator in back press g floor
7/18/2023	9:02 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	What she say ?
7/18/2023	9:03 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Her dumb ass ain't answering I'm boutta call unc
7/12/2023	9:04 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	[disappointed emoji]
7/18/2023	9:04 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Real blowing the shit out me
7/18/2023	9:05 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Issa go
7/18/2023	9:05 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	She said come on

11. On July 18, 2023, at approximately 9:07 p.m., **KAMANYE WILLIAMS** entered the Walgreens. **LONDON TEETER** and **MICHAEL ROBINSON** were working as employees

of the Walgreens at this time. **LONDON TEETER** was in the Manager's Office accounting for money derived from business proceeds and **MICHAEL ROBINSON** was at the front cash register. At 9:09 p.m., **KAMANYE WILLIAMS** sent a text message to **GIANNI ROBINSON** stating, "I just seen unc up stairs." **KAMANYE WILLIAMS** then approached a Walgreens employee who was entering an employee only area near the Manager's Office, brandished a firearm at the employee, and forced the employee to knock on the door to the Manager's Office. At approximately 9:24 p.m., **LONDON TEETER** opened the door to the Manager's Office and **KAMANYE WILLIAMS** robbed the Walgreens of approximately \$4,000.00 to \$5,000.00.

12. On July 18, 2023, at 11:01 p.m., **GIANNI ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating "Just bring 900 & u keep everything else."

July 24, 2023 – August 1, 2023

13. On July 24, 2023, and July 26, 2023, **GIANNI ROBINSON** and **KAMANYE WILLIAMS** exchanged communications regarding when currency would be transferred from the store cash registers to the safe in the Manager's Office, and the amount of currency expected to be in the safe following the transfer. They further discussed that their co-conspirator, **MICHAEL ROBINSON**, would be the manager on duty at Walgreens on the evening of July 24, 2023.

The August 2, 2023, Robbery

14. On August 2, 2023, **GIANNI ROBINSON** and **KAMANYE WILLIAMS** exchanged communications regarding when currency derived from business proceeds would be transferred from the store cash registers to the safe in the Manager's Office, and the amount of currency expected to be in the safe following the transfer. At around 6:54 p.m., **KAMANYE WILLIAMS** and **GIANNI ROBINSON** gathered at a residence shared by **GIANNI ROBINSON**

and **LONDON TEETER**. At around 8:55 p.m., **KAMANYE WILLIAMS** entered the Walgreens while his co-conspirator **MICHAEL ROBINSON** was the manager on duty. At approximately 8:55 p.m., **KAMANYE WILLIAMS** grabbed **MICHAEL ROBINSON** and brandished a firearm, and the two entered the Manager's Office. **MICHAEL ROBINSON** then opened the safe in the Manager's Office, which contained currency derived from business proceeds and placed approximately \$6,000.00 of that currency into a backpack belonging to **KAMANYE WILLIAMS**. As **MICHAEL ROBINSON** transferred the money from the safe into the backpack, **KAMANYE WILLIAMS** placed his firearm on a chair behind **MICHAEL ROBINSON**.

August 4, 2023 – September 1, 2023

15. On or about August 4, 2023, **LONDON TEETER** reviewed surveillance footage capturing the August 2, 2023, robbery. At 12:46 p.m., **LONDON TEETER** sent a text message to **MICHAEL ROBINSON** stating, "the vid looks so bad" and "idk why he put the gun down." At 12:58 p.m., **LONDON TEETER** sent a text message to **MICHAEL ROBINSON** stating, "he can't do it next time ngl."

16. On August 25, 2023, **GIANNI ROBINSON** and **KAMANYE WILLIAMS** had the following exchange via text message:

Date	Time	From	To	Message
8/25/2023	5:00 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Unc said it's 7 bands in there
8/25/2023	5:00 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	What we on
8/25/2023	5:00 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	He said do u wan do it

8/25/2023	5:00 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Bout to pick lil sis up
8/25/2023	5:00 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Type question is that [laughing emoji]
8/25/2023	5:00 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	lls I'm boutta tell him set everything up & ask him what time
8/25/2023	5:01 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Aight
8/25/2023	5:51 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Let me know my shit bout to go driving school get out at 9
8/25/2023	5:51 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	He said yeah but idk what time bout see
8/25/2023	5:51 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Aight
8/25/2023	5:52 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	It's 2 security guards but he said he going cause a diversion

17. On August 29, 2023, **GIANNI ROBINSON** and **KAMANYE WILLIAMS** exchanged communications regarding when currency derived from business proceeds would be transferred from the store cash registers to the safe in the Manager's Office, and the amount of currency expected to be in the safe following the transfer. Then, at 7:45 p.m. **GIANNI ROBINSON** and **KAMANYE WILLIAMS** had the following exchange via text message:

Date	Time	From	To	Message
8/29/2023	7:45 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Nvm We going wait another day cause bae doing it
8/29/2023	7:45 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Don't even want her to be the victim
8/29/2023	7:45 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Aight
8/29/2023	7:46 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Cause I don't want her to freeze up No unless u push her fake grab her hair n shit
8/29/2023	7:47 p.m.	KAMANYE WILLIAMS	GIANNI ROBINSON	Brodie only way I'm going in violently now I'm tired of this not hitting what we supposed to hit
8/29/2023	7:47 p.m.	GIANNI ROBINSON	KAMANYE WILLIAMS	Lmao bet I'm boutta see what unc talking

18. On August 30, 2023, **GIANNI ROBINSON** sent the following text message to **KAMANYE WILLIAMS**: “Unc said we can do it today you just gotta smack him out & shit.” **GIANNI ROBINSON** and **KAMANYE WILLIAMS** then exchanged communications regarding when currency derived from business proceeds would be transferred from the store cash registers to the safe in the Manager’s Office, and the amount of currency expected to be in the safe following the transfer.

19. On August 31, 2023, and September 1, 2023, **GIANNI ROBINSON**, **KAMANYE WILLIAMS**, and **MICHEL ROBINSON** exchanged communications regarding \$20,000.00 that was expected to be in the Manager’s Office at the close of business and when that money would be transferred from the store cash registers to the safe in the Manager’s Office. **GIANNI ROBINSON** and **KAMANYE WILLIAMS** then exchanged communications regarding the number of security guards in the Walgreens.

20. On September 1, 2023, **MICHAEL ROBINSON** sent **KAMANYE WILLIAMS** a text message stating that there was \$32,000.00 in the Manager’s Office on September 1, 2023, the day prior, and \$17,000.00 of that money had come from the front cash register. **MICHAEL ROBINSON** and **KAMANYE WILLIAMS** then exchanged communications regarding when money would be transferred from the store cash registers to the safe in the Manager’s Office, and the amount of currency expected to be in the safe following the transfer.

21. On September 2, 2023, **KAMANYE WILLIAMS** entered Walgreens at a time when **MICHAEL ROBINSON** was the manager on duty. **KAMANYE WILLIAMS** then grabbed **MICHAEL ROBINSON** while holding a firearm, then they both entered the Manager’s Office.

Another Walgreens employee was inside of Manager's Office accounting for store earnings. Once inside, **KAMANYE WILLIAMS** feigned an assault against **MICHAEL ROBINSON** using a firearm. **KAMANYE WILLIAMS** then robbed the Walgreens of approximately \$6,000.00.

November 10, 2023

22. On November 10, 2023, at 3:09 p.m., **MICHAEL ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating, "today is the day." At 3:16 p.m., **KAMANYE WILLIAMS** sent a text message to **GIANNI ROBINSON** stating, "Unc say that shit green light today [laughing emoji]." That evening, **MICHAEL ROBINSON** and **KAMANYE WILLIAMS** drove together towards the Walgreens in a White Mercedes that was registered to the romantic partner of **MICHAEL ROBINSON**. At around 8:30 p.m., **MICHAEL ROBINSON** and **KAMANYE WILLIAMS** parked the Mercedes at 901 3rd Street Northwest, Washington, D.C. At 8:34 p.m., **MICHAEL ROBINSON** rented a Lyft scooter and handed the scooter to **KAMANYE WILLIAMS**. **KAMANYE WILLIAMS** then rode the Lyft scooter to the Walgreens. At approximately 9:00 p.m., **KAMANYE WILLIAMS** entered the Walgreens. At 9:04 p.m., **KAMANYE WILLIAMS** sent a text message to **MICHAEL ROBINSON** stating, "Security by the door moe." At 9:05 p.m. **MICHAEL ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating, "Damn put the code in? like you work in that mafucka." At approximately 9:15 p.m., **KAMANYE WILLIAMS** put the door code into the Manager's Office and entered. Inside of the Manager's Office, a Walgreens employee was accounting for store earnings. **KAMANYE WILLIAMS** then brandished a firearm at the employee and robbed Walgreens of approximately \$7,000.00.

December 3, 2023 – December 4, 2023

23. On December 3, 2023, at around 8:30 p.m., **KAMANYE WILLIAMS** entered the Walgreens. Between 8:33 p.m. and 8:52 p.m., **KAMANYE WILLIAMS** and **MICHAEL ROBINSON** exchanged communications regarding the location of security guards in the Walgreens. At 8:51 p.m., **KAMANYE WILLIAMS** sent a text message to **MICHAEL ROBINSON** stating, "Fuck it what's the code." In response at 8:52 p.m., **MICHAEL ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating, "I don't know it" and "They change it on Friday."

24. On December 4, 2023, at 4:37 p.m., **MICHAEL ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating, "Yeah Brodie it's a go." At 6:38 p.m., **MICHAEL ROBINSON** sent a text message to **KAMANYE WILLIAMS** stating, "Everything in place brodie." At around 7:15 p.m. that same day, **KAMANYE WILLIAMS** and **GIANNI ROBINSON** met at a residence shared by **GIANNI ROBINSON** and **LONDON TEETER**. At around 7:40 p.m., **KAMANYE WILLIAMS** entered the Walgreens. At 7:41 p.m. and 7:43 p.m., **MICHAEL ROBINSON** sent text messages to **KAMANYE WILLIAMS** stating, "Ok" and "Go head." At approximately 7:43 p.m., an employee of the Walgreens and an armed security guard were transporting store earnings to the Manager's Office. At approximately 7:43 p.m., **KAMANYE WILLIAMS** grabbed the armed security guard's jacket and forced both the security guard and the employee into the Manager's Office. **KAMANYE WILLIAMS** then took the firearm belonging to the security guard, a Glock 19, and demanded the money. An employee already located in the Manager's Office placed approximately \$5,000.00 into a backpack belonging to **KAMANYE WILLIAMS**. Immediately after the robbery at approximately 7:54 p.m., **KAMANYE WILLIAMS** and **GIANNI ROBINSON** exchanged communications via

phone call and, at 8:13 p.m. **GIANNI ROBINSON** and **MICHAEL ROBINSON** exchanged communications via phone call. At approximately 9:02 p.m., **MICHAEL ROBINSON**, **GIANNI ROBINSON**, and **KAMANYE WILLIAMS** met at **KAMANYE WILLIAMS'** residence.

December 30, 2023 – January 9, 2024

25. On December 30 and 31, 2023, and January 1 and 4, 2024, **KAMANYE WILLIAMS** and **MICHAEL ROBINSON** exchanged communications regarding when currency derived from business proceeds would be transferred from the store cash registers to the safe in the Manager's Office, and the amount of currency expected to be in the safe following the transfer. They further discussed when Walgreens security guards would end their shift.

26. On January 9, 2024, at approximately 7:25 p.m., **KAMANYE WILLIAMS** and **GIANNI ROBINSON** left a residence shared by **GIANNI ROBINSON** and **LONDON TEETER**. Around this time, **LONDON TEETER** and another Walgreens employee were in the Manager's Office accounting for store earnings. **MICHAEL ROBINSON** was working at the front cash register. At 8:03 p.m., **KAMANYE WILLIAMS** entered the Walgreens, grabbed an employee stocking shelves, and brandished a firearm. **KAMANYE WILLIAMS** then forced the employee to knock on the door to the Manager's Office. **LONDON TEETER** opened the door to the Manager's Office and **KAMANYE WILLIAMS** entered. **KAMANYE WILLIAMS** then held employees of the Walgreens at gunpoint and demanded money. **LONDON TEETER** then placed approximately \$3,000.00 into a backpack belonging to **KAMANYE WILLIAMS**. After the robbery, **MICHAEL ROBINSON**, **KAMANYE WILLIAMS**, and **GIANNI ROBINSON** met at the shared residence of **LONDON TEETER** and **GIANNI ROBINSON**.

The February 11, 2024, Robbery

27. On February 11, 2024, at approximately 6:25 p.m., **KAMANYE WILLIAMS** entered the Walgreens. At approximately 6:28 p.m., an armed security guard escorted **MICHAEL ROBINSON** as he transported store earnings to the Manager's Office. **KAMANYE WILLIAMS** brandished a firearm, placed it against the armed security guard, and demanded entry into the Manager's Office. Once inside, **KAMANYE WILLIAMS** held **MICHAEL ROBINSON** and the armed security guard at gunpoint and robbed the Walgreens of currency. **KAMANYE WILLIAMS** further robbed the security guard of his Smith & Wesson M&P firearm.

(**Conspiracy to Interfere with Interstate Commerce by Robbery**, in violation of Title 18, United States Code, Section 1951(a))

COUNT TWO

On or about July 18, 2023, within the District of Columbia, **MICHAEL ROBINSON**, **KAMANYE WILLIAMS**, **GIANNI ROBINSON**, and **LONDON TEETER**, did unlawfully obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **MICHAEL ROBINSON**, **KAMANYE WILLIAMS**, **GIANNI ROBINSON**, and **LONDON TEETER**, did unlawfully take and obtain property consisting of United States currency from the Walgreens store located at 801 7th Street Northwest, Washington D.C. 20001, from the presence of a Walgreens employee, against the will of the employee by means of actual and threatened force, violence, and fear of injury, immediate and future, to said person, while the employee was engaged in commercial activities for Walgreens, a business that was engaged in and that affects interstate commerce, in violation of Title 18 United States Code, Section 1951(a).

(Interference with Interstate Commerce by Robbery and Aiding and Abetting,, in violation of Title 18, United States Code, Section 1951 and 2)

COUNT THREE

On or about July 18, 2023, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as charged in Count Two of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During and in Relation to a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2)

COUNT FOUR

On or about September 2, 2023, within the District of Columbia, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully take and obtain property consisting of United States currency from the Walgreens store located at 801 7th Street Northwest, Washington D.C. 20001, from the presence of a Walgreens employee, against the will of the employee by means of actual and threatened force, violence, and fear of injury, immediate and future, to said

person, while the employee was engaged in commercial activities for Walgreens, a business that was engaged in and that affects interstate commerce, in violation of Title 18 United States Code, Section 1951(a).

(Interference with Interstate Commerce by Robbery and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1951 and 2)

COUNT FIVE

On or about September 2, 2023, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as charged in Count Four of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During and in Relation to a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2)

COUNT SIX

On or about November 10, 2023, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully take and obtain property consisting of United States currency from the

Walgreens store located at 801 7th Street Northwest, Washington D.C. 20001, from the presence of a Walgreens employee, against the will of the employee by means of actual and threatened force, violence, and fear of injury, immediate and future, to said person, while the employee was engaged in commercial activities for Walgreens, a business that was engaged in and that affects interstate commerce, in violation of Title 18 United States Code, Section 1951(a).

(Interference with Interstate Commerce by Robbery and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1951 and 2)

COUNT SEVEN

On or about November 10, 2023, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as charged in Count Six of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During and in Relation to a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2)

COUNT EIGHT

On or about December 4, 2023, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants,

MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER, did unlawfully take and obtain property consisting of United States currency from the Walgreens store located at 801 7th Street Northwest, Washington D.C. 20001, from the presence of a Walgreens employee, against the will of the employee by means of actual and threatened force, violence, and fear of injury, immediate and future, to said person, while the employee was engaged in commercial activities for Walgreens, a business that was engaged in and that affects interstate commerce, in violation of Title 18 United States Code, Section 1951(a).

(Interference with Interstate Commerce by Robbery and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1951 and 2)

COUNT NINE

On or about December 4, 2023, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as charged in Count Eight of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During and in Relation to a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2)

COUNT TEN

On or about January 9, 2024, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully

obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully take and obtain property consisting of United States currency from the Walgreens store located at 801 7th Street Northwest, Washington D.C. 20001, from the presence of a Walgreens employee, against the will of the employee by means of actual and threatened force, violence, and fear of injury, immediate and future, to said person, while the employee was engaged in commercial activities for Walgreens, a business that was engaged in and that affects interstate commerce, in violation of Title 18 United States Code, Section 1951(a).

(Interference with Interstate Commerce by Robbery and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1951 and 2)

COUNT ELEVEN

On or about January 9, 2024, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as charged in Count Ten of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During and in Relation to a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) and 2)

COUNT TWELVE

On or about February 11, 2024, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully obstruct, delay and affect, commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully take and obtain property consisting of United States currency from the Walgreens store located at 801 7th Street Northwest, Washington D.C. 20001, from the presence of a Walgreens employee, against the will of the employee by means of actual and threatened force, violence, and fear of injury, immediate and future, to said person, while the employee was engaged in commercial activities for Walgreens, a business that was engaged in and that affects interstate commerce, in violation of Title 18 United States Code, Section 1951(a).

(Interference with Interstate Commerce by Robbery and Aiding and Abetting, in violation of Title 18, United States Code, Sections 1951 and 2)

COUNT THIRTEEN

On or about February 11, 2024, within the District of Columbia, **MICHAEL ROBINSON, KAMANYE WILLIAMS, GIANNI ROBINSON, and LONDON TEETER**, did unlawfully and knowingly use, carry, and brandish, during and in relation to, and did possess in furtherance of, a crime of violence, for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as charged in Count Twelve of this Indictment, which is incorporated herein, a firearm.

(Using, Carrying, Possessing, and Brandishing a Firearm During and in Relation to a Crime of Violence and Aiding and Abetting, in violation of Title 18, United States

Code, Section 924(c)(1)(A)(ii) and 2)

COUNT FOURTEEN

On or about December 4, 2023, within the District of Columbia, **KAMANYE WILLIAMS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court of the District of Columbia, Criminal Case Number 2021-CF2-3217, did unlawfully and knowingly receive and possess a firearm, that is, a Glock 19 firearm, which had been possessed, shipped and transported in and affecting interstate commerce.

(Unlawful Possession of a Firearm and Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1))

COUNT FIFTEEN

On or about February 11, 2024, within the District of Columbia, **KAMANYE WILLIAMS**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, in the Superior Court of the District of Columbia, Criminal Case Number 2021-CF2-3217, did unlawfully and knowingly receive and possess a firearm, that is, a Glock 43X firearm and a Smith & Wesson M&P firearm, which had been possessed, shipped and transported in and affecting interstate commerce.

(Unlawful Possession of a Firearm and Ammunition by a Person Convicted of a Crime Punishable by Imprisonment for a Term Exceeding One Year, in violation of Title 18, United States Code, Section 922(g)(1))

FORFEITURE ALLEGATIONS

1. Upon conviction of any of the offenses listed in Counts One, Two, Four, Six, Eight, Ten, and Twelve of this Indictment, the defendants shall forfeit to the United States any property,

real or personal, which constitutes or is derived from proceeds traceable to these offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). The United States will also seek a forfeiture money judgment against the defendant equal to the value of any property, real or personal, which constitutes or is derived from proceeds traceable to these offenses.

2. Upon conviction of any of the offenses alleged in Counts Fourteen, and Fifteen of this Indictment, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in or used in the knowing commission of the offenses, including but not limited to a Glock 43X with serial number BSSU181 and a Smith & Wesson M&P firearm with serial number NLD5582.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property that cannot be subdivided without difficulty;

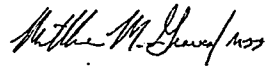
the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

(Criminal Forfeiture, pursuant to Title 18, United States Code, Sections 924(d), 981(a)(1)(C); Title 21, United States Code, Section 853(p); and Title 28, United States

Code, Section 2461(c))

A TRUE BILL:

FOREPERSON.

A handwritten signature in cursive script, appearing to read "Matthew M. Green".

Attorney of the United States in
and for the District of Columbia.