

SUPERIOR COURT
OF THE
DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on August 16, 2024

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| THE UNITED STATES OF AMERICA | : | Criminal Nos: | 2023 CF1 006342 |
| | : | | 2023 CF1 006343 |
| v. | : | | 2023 CF1 006360 |
| | : | | 2023 CF1 009650 |
| KESHAWN LAVENDER | : | | |
| PDID: 714-397 | : | | |
| DE'ANDRE L. SAMS | : | Violations: | |
| PDID: 648-879 | : | 22 D.C. Code, Section 1805a; | |
| | : | 22 D.C. Code, Sections 2801, 4502, 1803; | |
| RAYMOND MATHIS | : | 22 D.C. Code, Section 4504(b); | |
| Also Known As Raymond Jenkins | : | 22 D.C. Code, Sections 2101, 4502; | |
| PDID: 535-159 | : | 22 D.C. Code, Sections 401, 4502 (2001 ed.) | |
| DEANDRE S. CHRISTIAN | : | (Conspiracy; Attempted Robbery While Armed; | |
| PDID: 673-963 | : | Possession Of a Firearm During Crime Of Violence Or | |
| | : | Dangerous Offense; First Degree Murder While Armed - | |
| | : | Felony Murder; Assault With Intent To Kill While | |
| | : | Armed) | |
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The Grand Jury charges:

FIRST COUNT:

On or about September 5, 2023, within the District of Columbia, Keshawn Lavender, Raymond Mathis, also known as Raymond Jenkins, and De'Andre L. Sams, and others whose identities are both known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate and agree together to rob the occupants of 222 M Street SW, Apartment 524, Washington, D.C., including Deandre S. Christian and Matthew Miller, in violation of Title 22, District of Columbia Code, Sections 1805a, 2801.

I. OBJECT OF THE CONSPIRACY

The primary object of this conspiracy was to enter Apartment 524 at 222 M Street, SW, Washington, D.C., to rob the occupants of the apartment, including Deandre S. Christian and Matthew Miller, of narcotics and other valuables. After stealing the property, the conspirators intended to sell or otherwise dispose of the stolen property to their personal benefit, to conceal their identities, and to make good their escape from the scene of the robbery.

II. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

During the course of and in furtherance of the conspiracy and to effect the object thereof, the

co-conspirators Keshawn Lavender, Raymond Mathis, also known as Raymond Jenkins, and De'Andre L. Sams, alone and in combination, in the District of Columbia, and elsewhere, directly or indirectly, on September 5, 2023, committed overt acts including, but not limited to, the following:

- (1) On September 5, 2023, Defendant De'Andre L. Sams called Defendant Raymond Mathis four times between 1 pm and 3:15 pm. Defendant Mathis called Defendant Sams at approximately 3:57 pm.
- (2) At approximately 4 pm on September 5, 2023, Defendants Lavender, Sams, and Mathis traveled to 222 M Street SW, in Defendant Mathis's Ford Fusion. They arrived shortly after 4 pm and parked in the parking lot on the west side of the building.
- (3) Defendant Sams walked to the front door of the apartment building and attempted to gain entry while Defendants Lavender and Mathis waited nearby, within sight of the front door.
- (4) Defendant Sams called Deandre S. Christian at 4:10 pm in order to be let into the locked apartment building.
- (5) Shortly after the 4:10 pm phone call to Deandre S. Christian, Defendant Sams opened the front door of the apartment building and walked inside, followed immediately by Defendants Lavender and Mathis.
- (6) Defendants Mathis and Lavender wore COVID masks to conceal their identities.
- (7) Defendants Lavender, Sams, and Mathis took the elevator together to Apartment 524.
- (8) When Matthew Miller, who was inside Apartment 524, answered the apartment door, the co-conspirators rushed into the apartment brandishing firearms.
- (9) The co-conspirators, alone and in combination, placed zip ties around the wrists of Matthew Miller to immobilize him.
- (10) The co-conspirators, alone and in combination, attempted to tie up Deandre S. Christian at gunpoint but failed to do so, and Deandre S. Christian took the gun from one of the Defendants.
- (11) The co-conspirators, alone and in combination, shot Matthew Miller, killing him.
- (12) The co-conspirators, alone and in combination, shot Deandre S. Christian, injuring him.
- (13) Defendant Lavender was shot during the robbery. At approximately 4:16 pm, he left Apartment 524, took the elevator to the first floor, left 222 M Street SW through the front door, and went on foot to the parking lot on the west side of the building. When he left the building, he

was wearing a ski mask or balaclava partially covering his face to further conceal his identity.

(14) Defendant Lavender carried \$1815 in various denominations of currency, some of which he stuffed into his pants legs.

(15) Defendants Sams and Mathis left apartment 524 at approximately the same time, took the stairs to the first floor, and exited 222 M Street SW through a side door into the building's courtyard. Defendant Mathis and Defendant Sams were shot either during the robbery or as they were fleeing the building.

(16) Defendant Mathis was carrying unknown items that he had not been carrying when he entered the building.

(17) Defendant Sams carried one or more bags of a green substance that appeared to be marijuana and approximately \$780 in 20-dollar bills.

(18) When they left the building, Defendants Sams and Mathis were wearing sweatshirt hoods over their heads despite the extremely warm weather to further conceal their identities.

(19) Defendants Sams and Mathis climbed over the fence surrounding the courtyard and went on foot to the parking lot on the west side of the building.

(20) Defendant Lavender entered Defendant Mathis's Ford Fusion and began driving toward M Street SW. He paused to allow Defendant Mathis and Defendant Sams to get into the car, and then drove out of the parking lot.

(21) Defendant Lavender drove with Defendant Mathis and Defendant Sams to Children's Hospital. He parked the car near the hospital in the 2900 block of 1st Street, NW, and all three Defendants entered the hospital.

(Conspiracy in violation of 22 D.C. Code, Section 1805a (2001 ed.))

SECOND COUNT:

On or about September 5, 2023, within the District of Columbia, Keshawn Lavender, De'Andre L. Sams and Raymond Mathis, also known as Raymond Jenkins, while armed with and having readily available a firearm, did attempt to, by force and violence, against resistance and by putting in fear, steal and take from the person and from the immediate actual possession of Deandre S. Christian and Matthew Miller, property of value belonging to Deandre S. Christian and Matthew Miller consisting of U.S. Currency. (Attempted Robbery While Armed, in violation of 22 D.C. Code, Section 2801, 1803, 4502 (2001 ed.))

THIRD COUNT:

On or about September 5, 2023, within the District of Columbia, Keshawn Lavender, De'Andre L. Sams and Raymond Mathis, also known as Raymond Jenkins, did possess a firearm while committing the crime of Attempted Robbery While Armed as set forth in the Second Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FOURTH COUNT:

Keshawn Lavender, De'Andre L. Sams and Raymond Mathis, also known as Raymond Jenkins, within the District of Columbia, while armed with a firearm, in perpetrating and attempting to perpetrate the crime of Attempted Robbery While Armed, as set forth in the Second Count of this indictment, killed Matthew Miller by shooting him with a firearm on or about September 5, 2023, thereby causing injuries from which Matthew Miller died on or about September 5, 2023. (First Degree Murder While Armed - Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

FIFTH COUNT:

On or about September 5, 2023, within the District of Columbia, Keshawn Lavender, De'Andre L. Sams and Raymond Mathis, also known as Raymond Jenkins, did possess a firearm while committing the crime of First Degree Murder While Armed (Felony Murder) as set forth in the Fourth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SIXTH COUNT:

On or about September 5, 2023, within the District of Columbia, Keshawn Lavender, De'Andre L. Sams, and Raymond Mathis, also known as Raymond Jenkins, while armed with a firearm, assaulted Deandre S. Christian with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

SEVENTH COUNT:

On or about September 5, 2023, within the District of Columbia, Keshawn Lavender, De'Andre L. Sams and Raymond Mathis, also known as Raymond Jenkins, did possess a firearm while committing the crime of Assault with Intent to Kill While Armed as set forth in the Sixth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

EIGHTH COUNT:

On or about September 5, 2023, within the District of Columbia, Deandre S. Christian, while armed with a firearm, assaulted De'Andre L. Sams and Raymond Mathis with intent to kill them. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

NINTH COUNT:

On or about September 5, 2023, within the District of Columbia, Deandre S. Christian did possess a firearm while committing the crime of Assault with Intent to Kill While Armed as set forth in the Eighth Count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

Matthew M. Graves
MATTHEW M. GRAVES
United States Attorney
in and for the District of Columbia

A TRUE BILL:

Foreperson

