

SUPERIOR COURT
OF THE
DISTRICT OF COLUMBIA
Holding a Criminal Term

Grand Jury Sworn in on October 25, 2024

THE UNITED STATES OF AMERICA	:	Criminal Nos:	2022 CF1 003590
	:		2023 CF1 001950
	:		2023 CF1 008614
	:		2024 CF1 006114
v.	:		GJO
DERRICKO JOHNSON	:		
Also Known As Maxxo	:		
Also Known As Rico	:		
Also Known As Diddy	:		
PDID: 746-359	:	Violations:	
	:	22 D.C. Code, Section 1805a;	
RONALD HENDERSON	:	22 D.C. Code, Sections 2101, 4502;	
Also Known As Day Day	:	22 D.C. Code, Section 4504(b);	
Also Known As Rondon	:	22 D.C. Code, Sections 401, 4502;	
Also Known As gbgililactive	:	22 D.C. Code, Section 4504(a)(1);	
Also Known As gbgililact	:	22 D.C. Code, Sections 403, 2103, 4502;	
PDID: 752-510	:	22 D.C. Code, Section 4504 (a)(1), (a-1);	
	:	50 D.C. Code, Section 2201.05b (b) (2). 23 D.C. Code,	
DAVEON ROBINSON	:	Section 1328 (a)(1);	
Also Known As Sosa	:	22 D.C. Code, Section 4504(a)(1), 23 D.C. Code, Section	
Also Known As Sowap	:	1328 (a)(1) (2001 ed.)	
PDID: 759-868	:		
DCTN: U23027940	:	(Conspiracy; First Degree Murder While Armed	
	:	(Premeditated); Possession Of A Firearm During Crime Of	
DEMARCO ROBINSON	:	Violence Or Dangerous Offense; Assault With Intent To	
Also Known As Dirt	:	Kill While Armed; Carrying a Pistol Without a License	
Also Known As Dirty	:	(Outside Home or Place of Business); Assault With Intent	
PDID: 749-066	:	To Murder While Armed; Carrying a Rifle or Shotgun	
	:	(Outside Home or Place of Business); Fleeing a Law	
DIONZAI PARKER	:	Enforcement Officer, Offenses Committed During	
Also Known As Moneybag Jefe	:	Release; Carrying a Pistol Without a License (Outside	
Also Known As Jefe	:	Home or Place of Business), Offenses Committed During	
Also Known As Jef	:	Release)	
Also Known As Mook	:		
PDID: 727-724	:		
DCTN: U24029884	:		

The Grand Jury charges:

FIRST COUNT:

The Conspiracy

Between on or about April 6, 2022 and on or about July 12, 2023, within the District of Columbia and elsewhere, Derricko Johnson, also known as "Maxxo," also known as "Rico," also known as "Diddy," Ronald Henderson, also known as "Rondon," also known as "Day Day," also known as "gbgililactive," also known as "gbgililact," Daveon Robinson, also known as "Sosa," also known as "Sowap," Demarco Robinson, also known as "Dirt," also known as "Dirty," and Dionzai

Parker, also known as "Moneybag Jefe," also known as "Jefe," also known as "Jef," also known as "Mook," and other persons whose identities are known and unknown to the grand jury, who are members of a criminal organization or crew referred to by many names, to include "the Z" and/or "Get Back Gang," which is affiliated with a larger criminal organization or crew referred to as "Fox 5 Gang," and/or "YGA," did knowingly and willfully combine, conspire, confederate, and agree together to assault and kill anyone whose interests were contrary to those of the defendants and their associates, to include members and associates of rival crews and groups, in violation of 22 D.C. Code Sections 401, 402, 2101, 2103, and 4502.

Objects

The principal goals and purposes of this conspiracy were for the co-conspirators, including Derrick Johnson, Ronald Henderson, Daveon Robinson, Demarco Robinson, and Dionzai Parker, and other persons whose identities are known and unknown to the grand jury, to: (1) assault and kill anyone whose interests were contrary to those of Get Back Gang members and their associates, particularly members and associates of rival crews and groups to include "Deuce Deuce," 23rd and Savannah Terrace SE, and 3500 Stanton Road SE; (2) safeguard and protect their members and their turf and base of operations, which encompasses an area north of Alabama Avenue SE, east of 15th Place SE, and south and west of Bruce Place SE, Washington, D.C. known as "Henson Ridge," "the Z," and "the 5," within which area the crew engaged in illegal activities including the trading and sale of firearms and distribution of narcotics; and (3) hinder and prevent efforts by law enforcement to investigate, arrest, and prosecute, for their illegal activities, members and associates of Get Back Gang.

Manner and Means

The ways, manner, and means by which members of Get Back Gang, to include Derrick Johnson, Ronald Henderson, Daveon Robinson, Demarco Robinson, and Dionzai Parker, and other persons whose identities are known and unknown to the grand jury, acted in order to assault and kill individuals with contrary interests, to safeguard and protect their turf and base of operations, and to prevent apprehension and prosecution by law enforcement include but are

not limited to:

1. Members and associates of Get Back Gang promoted and enhanced their status and reputation within the crew and throughout the Washington, D.C. area through the use of social media, including but not limited to YouTube, Instagram, and TikTok.
2. Members and associates of Get Back Gang sought to discourage rivals and those with contrary interests from retaliating against them by promoting the violent nature of the Get Back Gang on social media, including but not limited to YouTube, Instagram, and TikTok.
3. Members and associates of Get Back Gang often possessed and carried firearms and also shared in the possession of firearms, in part, so that they were always ready to launch an attack against rivals or others with contrary interests.
4. Members and associates of Get Back Gang would assist one another in their efforts to evade detection by law enforcement by, for example, attempting to remove various incriminating postings from social media, by warning one another of the presence of law enforcement, and by attempting to hide firearms and other illegal contraband, in an effort to evade detection by law enforcement and to obstruct the due administration of justice.

Overt Acts

In furtherance of the conspiracy, and in order to affect the objects thereof, members and associates of Get Back Gang, to include Derricko Johnson, Ronald Henderson, Daveon Robinson, Demarco Robinson, and Dionzai Parker, and other persons whose identities are known and unknown to the grand jury, alone and in various combinations, in the District of Columbia and elsewhere, directly and indirectly committed overt acts including, but not limited to, the following:

1. On April 6, 2022, Daveon Robinson and Derricko Johnson, and other individuals whose identities are known and unknown to the grand jury, communicated regarding the purchase of a firearm.
2. On April 9, 2022, Daveon Robinson, and others whose identities are known and unknown to the grand jury, communicated regarding the purchase of a firearm.

3. On April 9, 2022, at approximately 8:39 pm, Demarco Robinson sent a message to a group of individuals that included Derricko Johnson, Ronald Henderson, Daveon Robinson, and others whose identities are known and unknown to the grand jury, that included a screenshot of an Instagram post tagging an individual known to be associated with "Deuce Deuce" and the message "They in Frontline Men."
4. On April 9, 2022, Derricko Johnson and Ronald Henderson responded to the group message, informing the group that they possessed firearms and asking what car to use.
5. On April 11, 2022, Daveon Robinson messaged a group of individuals that included Derricko Johnson, Ronald Henderson, Demarco Robinson, and others whose identities are known and unknown to the grand jury regarding the location of a firearm.
6. On April 11, 2022, at approximately 1:27 pm, Daveon Robinson obtained a firearm from inside of a house associated with a person with the nickname "Money" whose identity is known to the grand jury.
7. On April 11, 2022, at approximately 2:31 pm, Ronald Henderson asked the group "[h]ow it look" and messaged the group "I got a factory 19 wit 30 ima show ya when I get back a Nigga gave it to me for free."
8. On April 11, 2022, a white Honda HR-V was stolen by persons whose identities are known and unknown to the grand jury.
9. On April 12, 2022, at approximately 9:00 am, Derricko Johnson asked an individual with the nickname "Bone" whose identity is known to the grand jury to "[t]ell the young Niggas take me rq."
10. On April 12, 2022, at approximately 10:21 am, Daveon Robinson warned Derricko Johnson that "the fed on bikes."
11. On April 12, 2022, beginning at approximately 10:22 am, Daveon Robinson and Derricko Johnson discussed the location of an "ap" firearm that belonged to Demarco Robinson.
12. On April 12, 2022, beginning at approximately 11:46 am, Derricko Johnson messaged Demarco Robinson "on the way" and "[h]e not out there nm."
13. On April 12, 2022, prior to 12:21 pm, Derricko Johnson armed himself with a firearm.
14. On April 12, 2022, prior to 12:21 pm, Derricko Johnson and other persons whose identities are known and unknown to the grand jury entered a white Honda.
15. On April 12, 2022, at approximately 12:21 pm, Derricko Johnson exited the white Honda

and fired a firearm in the direction of businesses located in the 2200 block of Savannah Street, S.E.

16. On April 12, 2022, as Derricko Johnson was firing his weapon in the general direction of the decedent, Clayton Marshall, Mr. Marshall was shot and killed.

17. On April 12, 2022, as Derricko Johnson was firing his weapon in the general direction of the victim, James Jackson, Mr. Jackson was shot and injured.

18. On April 12, 2022 at approximately 12:27 pm, Derricko Johnson sent a message to an individual with the nickname "Bone" whose identity is known to the grand jury "[t]ell them get my phone from out the car."

19. On April 12, 2022, at approximately 12:28 pm, Derricko Johnson sent two messages to the individual with the nickname "Bone" whose identity is known to the grand jury "[h]urry up bruh" and "[m]y phone."

20. On April 12, 2022, at approximately 12:30 pm, Derricko Johnson asked Demarco Robinson for "Bone's" number, and said "[h]urry up and send it to me."

21. On April 12, 2022, at approximately 12:33 pm, Demarco Robinson sent Derricko Johnson a message with a number that is associated with an individual with the nickname "Bone" whose identity is known to the grand jury.

22. On April 12, 2022, at approximately 6:08 pm, Derricko Johnson sent a text message to an individual whose identity is unknown to the Grand Jury stating he was "[t]ryna swap my 17."

23. On April 13, 2022, at approximately 5:30 pm, Derricko Johnson traded a firearm with an individual whose identity is unknown to the grand jury in exchange for another firearm.

24. On May 1, 2022, Derricko Johnson communicated with another individual whose identity is known to the grand jury about the purchase and sale of ammunition.

25. On May 26, 2022, at approximately 7:46 am, Derricko Johnson sent two messages to Ronald Henderson "[w]hat your man say about the eggs" and "[c]ause u can grab the joint from bone."

26. On May 26, 2022, at approximately 7:46 am, Ronald Henderson sent two messages to Derricko Johnson "I got 11" and "[f]rom the yungins."

27. On May 26, 2022, at approximately 7:50 am, Derricko Johnson sent an individual whose identity is known to the grand jury two messages "[y]a used em rq" and "[d]id ya use em?"

28. On May 26, 2022, at approximately 7:51 am, the same individual whose identity is

known to the grand jury sent a message to Derricko Johnson "[n]ah we gave dem to rondon last night."

29. On May 26, 2022, at approximately 7:55 am, the same individual whose identity is known to the grand jury sent a message to Derricko Johnson "[n]vm he tryna get em now but Melly not answering."

30. On May 26, 2022, at approximately 7:55 am, Ronald Henderson sent two messages to Derricko Johnson "[a]t melly house but he ain't answering I'm trn get the 11" and "[h]e live across from Jefe alley."

31. On May 26, 2022, at approximately 8:00 am, Ronald Henderson sent two messages to Derricko Johnson "I got the eggs" and "11."

32. On May 26, 2022, at approximately 8:37 am, an individual whose identity is known to the grand jury sent two messages to a group including Derricko Johnson, Ronald Henderson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury, "[m]y man just text me" and "[h]e said it's 20 feds around the z."

33. On May 26, 2022, at approximately 8:43 am, Ronald Henderson sent two messages to a group including Derricko Johnson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury, "[f]uck them" and "[t]hey gone."

34. On May 26, 2022, at approximately 8:49 am, Derricko Johnson sent a message to a group that included Ronald Henderson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury, "Rondon wya.?"

35. On May 26, 2022, prior to 11:22 am, Derricko Johnson armed himself with a firearm.

36. On May 26, 2022, prior to 11:22 am, Ronald Henderson armed himself with a firearm.

37. On May 26, 2022, as Derricko Johnson was firing his weapon in the general direction of the decedent, Justin Johnson, Mr. Johnson was shot and killed.

38. On May 26, 2022, as Ronald Henderson was firing his weapon in the general direction of the decedent, Justin Johnson, Mr. Johnson was shot and killed.

39. On May 26, 2022, at approximately 11:28 am, Derricko Johnson yelled to Ronald Henderson and another individual whose identity is unknown to the grand jury, "[w]alk! Oh my god, if I get locked because of you brah... Stop runnin!" "Fuck, you throwin' me off. This why I don't do shit with you, brah."

40. On May 28, 2022, at approximately 11:55 am, Ronald Henderson sent a message to a

group that included Derricko Johnson, Daveon Robinson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury, "[t]he only person name that's coming up is max fr."

41. On May 28, 2022, at approximately 12:19 pm, Daveon Robinson sent two messages to a group that included Derricko Johnson, Ronald Henderson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury "[t]hey don't know" and "[a]ll he said was the streets talking."

42. On May 28, 2022, at approximately 1:03 pm, Ronald Henderson sent three messages to a group that included Derricko Johnson, Daveon Robinson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury, "[t]hey do know," "[t]hey said max name come up," and "[f]or it."

43. On June 7, 2022, at approximately 4:16 pm, Ronald Henderson sent a message to a group including Derricko Johnson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury "[e]verybody leave the gc #wop."

44. On August 30, 2022, Ronald Henderson posted a music video to YouTube titled "Tappn Dat Nugget" in which Ronald Henderson references "Get Back Gang" and depicts several objects that appear to be consistent with real firearms.

45. On September 28, 2022, Ronald Henderson posted a music video to YouTube titled "Walkin Wit 50," in which Ronald Henderson references "Get Back Gang" and depicts several objects that appear to be consistent with real firearms.

46. On October 12, 2022, Ronald Henderson posted a music video to YouTube titled "Dawg Shit (drag)," in which Ronald Henderson references "Get Back Gang" and depicts several objects that appear to be consistent with real firearms.

47. On October 12, 2022, Derricko Johnson, Daveon Robinson, and Demarco Robinson appear in the YouTube video titled "Dawg Shit (drag)," around the time that several objects appearing to be consistent with real firearms are depicted.

48. On January 1, 2023, Ronald Henderson posted a music video to YouTube titled "GBGLILACTIVE 'Last Diss' (Official Music Video) Dir. @waxbando" in which Ronald Henderson references "Get Back Gang," the "opps," and depicts several objects that appear to be consistent with real firearms.

49. On January 1, 2023, at approximately 11:50 am, Daveon Robinson sent two messages to

a group that included Ronald Henderson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury "[w]e done shooting in the air" and "[l]et's put up on some cars."

50. On January 1, 2023, at approximately 11:51 am, Ronald Henderson "[l]iked a message" in a group that included Daveon Robinson, Demarco Robinson, and other individuals whose identities are known and unknown to the grand jury.

51. On January 1, 2023, at approximately 6:03 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[w]e going give them what they want."

52. On January 2, 2023, at approximately 9:24 am, Daveon Robinson sent a message to an individual whose identity is known to the grand jury "[t]ake me throw."

53. On January 2, 2023, at approximately 9:32 am, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[t]ell k3 take me throw."

54. On January 2, 2023, at approximately 10:04 am, Daveon Robinson sent two messages to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "I'm going" and "[t]hey doing Tomuchb."

55. On January 2, 2023, at approximately 11:09 am, an individual whose identity is known to the grand jury sent two messages to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[d]ey outside up 23rd" and "Mare standin still lookin in da sky."

56. On January 2, 2023, at approximately 11:10 am, Daveon Robinson sent two messages to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[w]here k3 at" and "[w]ith the car."

57. On January 2, 2023, at approximately 11:13 am, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[i]f u go to da store lemme come wit u."

58. On January 2, 2023, at approximately 11:14 am, Daveon Robinson sent two messages to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "K3 driving" and "[w]here your iron."

59. On January 2, 2023, at approximately 12:10 pm, Ronald Henderson sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[b]ra we beefing to hard we don't even know all our opps."

60. On January 2, 2023, at approximately 12:13 pm, Ronald Henderson sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "I was loading my joint."

61. On January 2, 2023, at approximately 12:18 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[w]hy iron you got 1."

62. On January 2, 2023, at approximately 12:18 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[h]e gon have jef g30."

63. On January 2, 2023, at approximately 12:23 pm, an individual whose identity is known to the grand jury sent two messages to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[w]hat is da plan" and "[w]ya sowap."

64. On January 2, 2023, at approximately 12:31 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[l]eaving out."

65. On January 2, 2023, at approximately 12:46 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[f]ya @lilsosagbg5."

66. On January 2, 2023, at approximately 1:30 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "@lilsosagbg5."

67. On January 2, 2023, at approximately 1:33 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[o]n lil slime I'm coming brah."

68. On January 2, 2023, at approximately 2:09 pm, Daveon Robinson sent two messages to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[t]hey at the store in a crowd" and "[l]et's hurry up."
69. On January 2, 2023, at approximately 2:10 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[t]ell k3 come out front."
70. On January 2, 2023, at approximately 2:10 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "Bouta Get Da Other Key."
71. On January 2, 2023, at approximately 2:10 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "I forgot the iron."
72. On January 2, 2023, at approximately 2:13 pm, Derrick Johnson sent a message to a group that included Daveon Robinson and other individuals whose identities are known and unknown to the grand jury "K3 u boutta be my driver."
73. On January 2, 2023, at approximately 2:21 pm, Daveon Robinson sent a message to an individual whose identity is known to the grand jury "[b]ring a hoodie."
74. On January 2, 2023, at approximately 2:21 pm, an individual whose identity is known to the grand jury sent a message to Daveon Robinson "Ight Take Me To Get Da Key."
75. On January 2, 2023, at approximately 2:29 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[y]all got 556 bullets."
76. On January 2, 2023, at approximately 2:30 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "Why Would We Have It If Y'all Da Ones W Da Heavy Artillery."
77. On January 2, 2023, at approximately 2:30 pm, Dionzai Parker sent a message to Ronald Henderson "Send Your #."
78. On January 2, 2023, at approximately 2:32 pm, Derrick Johnson sent a message to a group that included Daveon Robinson and other individuals whose identities are known and

unknown to the grand jury "Kane got some."

79. On January 2, 2023, at approximately 2:33 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[t]ell him we need some tell him hurry up rq."

80. On January 2, 2023, at approximately 2:34 pm, Derrick Johnson sent a message to a group that included Daveon Robinson and other individuals whose identities are known and unknown to the grand jury "Im bouta call him now."

81. On January 2, 2023, at approximately 2:37 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "K3 send somebody to get the key."

82. On January 2, 2023, at approximately 2:43 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[w]e waiting on some bullets."

83. On January 2, 2023, at approximately 2:45 pm, Daveon Robinson sent a message to an individual whose identity is unknown to the grand jury "[y]all got 556s."

84. On January 2, 2023, at approximately 2:57 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[w]ya k3."

85. On January 2, 2023, at approximately 2:58 pm, Derrick Johnson sent a message to a group that included Daveon Robinson and other individuals whose identities are known and unknown to the grand jury "[t]hey keep dissing us dey need to get back for they dead ass men!"

86. On January 2, 2023, at approximately 3:03 pm, Derrick Johnson sent a message to a group that included Daveon Robinson and other individuals whose identities are known and unknown to the grand jury "[y]a can go anytime they gon be surprised just gotta go before 5."

87. On January 2, 2023, at approximately 3:05 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[w]e picking up the bullets."

88. On January 2, 2023, at approximately 3:07 pm, Daveon Robinson sent two messages to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "[w]e fishing in my car" and "[t]his shit sweet."

89. On January 2, 2023, at approximately 3:07 pm, an individual whose identity is known to

the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[w]here."

90. On January 2, 2023, at approximately 3:08 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "Borda and 23."

91. On January 2, 2023, at approximately 3:08 pm, Derrick Johnson sent two messages to a group that included Daveon Robinson and other individuals whose identities are known and unknown to the grand jury "Ik ya ain't talking about the sto" and "[o]h they put there up there to."

92. On January 2, 2023, at approximately 3:09 pm, Daveon Robinson sent two messages to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "We Ona Way Back K3" and "Get Ready."

93. On January 2, 2023, at approximately 3:09 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "Ight I Got Da Key."

94. On January 2, 2023, at approximately 3:14 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "Babybro got the iron."

95. On January 2, 2023, at approximately 3:16 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "Kill Y'all Fucked Up Our Plan."

96. On January 2, 2023, at approximately 3:18 pm, Derrick Johnson started a video chat with an individual whose identity is known to the grand jury.

97. On January 2, 2023, at approximately 3:33 pm, Daveon Robinson sent a message to a group that included Derrick Johnson and other individuals whose identities are known and unknown to the grand jury "I hope you ready k3 it's me yu jef and rondon."

98. On January 2, 2023, at approximately 3:34 pm, an individual whose identity is known to the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "Waiting On You."

99. On January 2, 2023, at approximately 3:39 pm, an individual whose identity is known to

the grand jury sent a message to a group that included Derrick Johnson, Daveon Robinson, and other individuals whose identities are known and unknown to the grand jury "[w]ya @lilsosagbg5."

100. On January 2, 2023, prior to 4:48 pm, Ronald Henderson armed himself with a firearm.

101. On January 2, 2023, prior to 4:48 pm, Daveon Robinson armed himself with a firearm.

102. On January 2, 2023, prior to 4:48 pm, Ronald Henderson, Daveon Robinson, Dionzai Parker, and another individual whose identity is known to the grand jury entered a light-colored sedan.

103. On January 2, 2023, prior to 4:48, an individual whose identity is known to the grand jury drove Ronald Henderson, Daveon Robinson, and Dionzai Parker towards Alabama Convenience Store.

104. On January 2, 2023, at approximately 4:48 pm, Ronald Henderson fired a firearm in the direction of Alabama Convenience Store.

105. On January 2, 2023, at approximately 4:48 pm, Daveon Robinson fired a firearm in the direction of Alabama Convenience Store.

106. On February 11, 2023, Daveon Robinson and Dionzai Parker communicated about the location of a firearm.

107. On February 11, 2023, at approximately 2:26 pm, Dionzai Parker sent a message to Daveon Robinson "Bouta Buy A Micro" and "Soon As I Buy My Joint Ima Give It To You."

108. On February 22, 2023, prior to 6:49 pm, multiple individuals whose identities are known and unknown to the grand jury entered a stolen black Jeep.

109. On February 22, 2023, at approximately 6:49 pm, multiple individuals whose identities are known and unknown to the grand jury fired a 9mm handgun and a .357 caliber handgun in the direction of Alabama Convenience Store.

110. On February 24, 2023, at approximately 11:53 am, Daveon Robinson messaged the group "I got 2 cars."

111. On February 24, 2023, at approximately 12:53 pm, an individual whose identity is known to the grand jury messaged the group "Jef got one car."

112. On February 24, 2023, at approximately 2:47 pm, an individual whose identity is known to the grand jury messaged the group "I'm going wit drac."

113. On February 24, 2023, at approximately 2:47 pm, Daveon Robinson responded to the

group "Nah let me get it."

114. On February 24, 2023, at approximately 3:48 pm, Demarco Robinson messaged the group "Let Me Use Drac."

115. On February 24, 2023, at approximately 3:52 pm, an individual whose identity is known to the grand jury messaged the group "That drac need clip" and "60 don't work."

116. On February 25, 2023, at approximately 10:04 am, Daveon Robinson messaged the group "Where 3" and "Or make jefe drive."

117. On February 25, 2023, at approximately 10:05 am, an individual whose identity is known to the grand jury messaged the group "I'll drive if I got to."

118. On February 25, 2023, at approximately 10:06 am, Daveon Robinson messaged the group "Where the car we gone . . . I'm going drive . . . 1 time though . . . I'm going hop to since we sitting."

119. On February 25, 2023, prior to 3:00pm, Dionzai Parker armed himself with a firearm.

120. On February 25, 2023, prior to 3:00 pm, Dionzai Parker and other individuals whose identities are unknown to the grand jury entered a stolen black Jeep.

121. On February 25, 2023, at approximately 3:00 pm, Dionzai Parker exited the black Jeep and fired a firearm in the direction of businesses located in the 2200 block of Savannah Street, S.E.

122. On February 25, 2023, as Dionzai Parker was firing his weapon in the general direction of the decedent, Brice Djembissi, Mr. Djembissi was shot and killed.

123. On February 25, 2023, as Dionzai Parker was firing his weapon in the general direction of the victim, Linwood Weaver, Mr. Weaver was shot and injured.

124. On February 25, 2023, as Dionzai Parker was firing his weapon in the general direction of the victim, Ashley Gardner, Ms. Gardner was shot and injured.

125. On March 19, 2023, Ronald Henderson posted a music video to YouTube titled "Catch Me a 3," in which Ronald Henderson references "Get Back Gang" and depicts several objects that appear to be consistent with real firearms.

126. On March 31, 2023, Ronald Henderson possessed a 40-caliber handgun.

127. On April 4, 2023 Derricko Johnson fled from law enforcement in a stolen vehicle.

128. On April 4, 2023 Derricko Johnson possessed a Core 15 AR pistol.

129. On April 4, 2023 Derricko Johnson possessed a handgun with an automatic switch.

130. On April 23, 2023, at approximately 9:22 pm, Daveon Robinson and Dionzai Parker communicated about a shared firearm.
131. On July 12, 2023, Daveon Robinson possessed a .357 caliber handgun.
132. On July 12, 2023, Demarco Robinson possessed a Polymer 80 9mm handgun with a Glock 31 slide.

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

SECOND COUNT:

Derricko Johnson, within the District of Columbia, while armed with a firearm, purposely and with deliberate and premeditated malice, killed Clayton Marshall by shooting him with a firearm on or about April 12, 2022, thereby causing injuries from which Clayton Marshall died on or about April 12, 2022. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

THIRD COUNT:

On or about April 12, 2022, within the District of Columbia, Derricko Johnson did possess a firearm while committing the crime of first degree murder 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:

On or about April 12, 2022, within the District of Columbia, Derricko Johnson, while armed with and having readily available a dangerous and deadly weapon that is a firearm, assaulted James Jackson with intent to kill him and another. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

FIFTH COUNT:

On or about April 12, 2022, within the District of Columbia, Derricko Johnson did possess a firearm while committing the crime of assault with intent to kill while armed 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 April 12, 2022, within the District of Columbia, Derricko Johnson did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a)(1) (2001 ed.))

SEVENTH COUNT:

Derricko Johnson and Ronald Henderson, within the District of Columbia, while armed with a firearm, purposely and with deliberate and premeditated malice, killed Justin Johnson by shooting him with a firearm on or about May 26, 2022, thereby causing injuries from which Justin Johnson died on or about May 26, 2022. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

EIGHTH COUNT:

On or about May 26, 2022, within the District of Columbia, Derricko Johnson and Ronald Henderson did possess a firearm while committing the crime of first degree murder while armed as set forth in the Seventh 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.))

NINTH COUNT:

On or about May 26, 2022, within the District of Columbia, Derricko Johnson and Ronald Henderson, while armed with and having readily available a dangerous and deadly weapon that is a firearm, assaulted Jane Doe with intent to kill her and another. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

TENTH COUNT:

On or about May 26, 2022, within the District of Columbia, Derricko Johnson and Ronald Henderson did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the Ninth 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.))

ELEVENTH COUNT:

On or about May 26, 2022, within the District of Columbia, Derricko Johnson and Ronald Henderson, while armed with and having readily available a dangerous and deadly weapon that is a firearm, assaulted Jane Doe (a minor) with intent to kill her and another. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

TWELFTH COUNT:

On or about May 26, 2022, within the District of Columbia, Derricko Johnson and Ronald Henderson did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the Eleventh 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.))

THIRTEENTH COUNT:

On or about May 26, 2022, within the District of Columbia, Derricko Johnson did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a)(1) (2001 ed.))

FOURTEENTH COUNT:

On or about May 26, 2022, within the District of Columbia, Ronald Henderson did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a)(1) (2001 ed.))

FIFTEENTH COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson, while armed with a firearm, assaulted Davon Brown with intent to murder him. (Assault With Intent To Murder While Armed, in violation of 22 D.C. Code, Sections 403, 2103, 4502 (2001 ed.))

SIXTEENTH COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson did possess a firearm while committing the crime of assault with intent to murder while armed as set forth in the Fifteenth 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.))

SEVENTEENTH COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson, while armed with and having readily available a dangerous and deadly weapon that is a firearm, assaulted Davon Brown with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

EIGHTEENTH COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the Seventeenth 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.))

NINETEENTH COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson, while armed with a firearm, assaulted Bryant Robinson with intent to murder him. (Assault With Intent To Murder While Armed, in violation of 22 D.C. Code, Sections 403, 2103, 4502 (2001 ed.))

TWENTIETH COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson did possess a firearm while committing the crime of assault with intent to murder while armed as set forth in the Nineteenth 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.))

TWENTY-FIRST COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson, while armed with and having readily available a dangerous and deadly weapon that is a firearm, assaulted Bryant Robinson with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

TWENTY-SECOND COUNT:

On or about January 2, 2023, within the District of Columbia, Ronald Henderson and Daveon Robinson did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the Twenty-First 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.))

TWENTY-THIRD COUNT:

Dionzai Parker, within the District of Columbia, while armed with a firearm, purposely and with deliberate and premeditated malice, killed Brice Djembissi by shooting him with a firearm on or about February 25, 2023, thereby causing injuries from which Brice Djembissi died on or about March 3, 2023. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

TWENTY-FOURTH COUNT:

On or about February 25, 2023, within the District of Columbia, Dionzai Parker did possess a firearm while committing the crime of first degree murder while armed as set forth in the Twenty-Third 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.))

TWENTY-FIFTH COUNT:

On or about February 25, 2023, within the District of Columbia, Dionzai Parker, while armed with and having readily available a dangerous and deadly weapon that is a firearm, assaulted Linwood Weaver with intent to kill him and another. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

TWENTY-SIXTH COUNT:

On or about February 25, 2023, within the District of Columbia, Dionzai Parker did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the Twenty-Fifth 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.))

TWENTY-SEVENTH COUNT:

On or about February 25, 2023, within the District of Columbia, Dionzai Parker, while armed with and having readily available a dangerous and deadly weapon that is a firearm, assaulted Ashley Gardner with intent to kill her and another. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.))

TWENTY-EIGHTH COUNT:

On or about February 25, 2023, within the District of Columbia, Dionzai Parker did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the Twenty-Seventh 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.))

TWENTY-NINTH COUNT:

On or about February 25, 2023, within the District of Columbia, Dionzai Parker did carry openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a rifle or shotgun. (Carrying a Rifle or Shotgun (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a)(1), (a-1) (2001 ed.))

THIRTIETH COUNT:

On or about March 31, 2023, within the District of Columbia, Ronald Henderson did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a)(1) (2001 ed.))

THIRTY-FIRST COUNT:

On or about April 4, 2023, within the District of Columbia, Derricko Johnson, while operating a motor vehicle, did knowingly fail and refuse to bring that motor vehicle to an immediate stop, and did attempt to elude a law enforcement officer, following a law enforcement officer's signal to bring the motor vehicle to a stop and operated the motor vehicle in a manner that would constitute reckless driving and damaged property belonging to Anesu Nyawata. (Fleeing a Law Enforcement Officer, in violation of 50 D.C. Code, Section 2201.05b (b) (2) (2001 ed.))

The Grand Jury Further Charges that at the time the crime set forth in this Count was committed, Derricko Johnson, was on release pursuant to the provisions of Title 23 of the District of Columbia Code in Superior Court Case Number 2022CF1003590. (Offenses Committed During Release, in violation of 23 D.C. Code, Section 1328 (a)(1) (2001 ed.))

(Fleeing a Law Enforcement Officer, Offenses Committed During Release, in violation of 50 D.C. Code, Section 2201.05b (b) (2), 23 D.C. Code, Section 1328 (a)(1) (2001 ed.))

THIRTY-SECOND COUNT:

On or about April 4, 2023, within the District of Columbia, Derricko Johnson did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a)(1) (2001 ed.))

The Grand Jury Further Charges that at the time the crime set forth in this Count was committed, Derricko Johnson, was on release pursuant to the provisions of Title 23 of the District of Columbia Code in Superior Court Case Number 2022CF103590. (Offenses Committed During Release, in violation of 23 D.C. Code, Section 1328 (a)(1) (2001 ed.))

(Carrying a Pistol Without a License (Outside Home or Place of Business), Offenses Committed During Release, in violation of 22 D.C. Code, Section 4504(a)(1), 23 D.C. Code, Section 1328 (a)(1) (2001 ed.))

THIRTY-THIRD COUNT:

On or about April 4, 2023, within the District of Columbia, Derricko Johnson did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a)(1) (2001 ed.))

The Grand Jury Further Charges that at the time the crime set forth in this Count was committed, Derricko Johnson, was on release pursuant to the provisions of Title 23 of the District of Columbia Code in Superior Court Case Number 2022CF103590. (Offenses Committed During Release, in violation of 23 D.C. Code, Section 1328 (a)(1) (2001 ed.))

(Carrying a Pistol Without a License (Outside Home or Place of Business), Offenses Committed During Release, in violation of 22 D.C. Code, Section 4504(a)(1), 23 D.C. Code, Section 1328 (a)(1) (2001 ed.))

Matthew M. Graves / Seal

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

A TRUE BILL:

Foreperson