



U.S. Department of Justice

Ronald C. Machen Jr.
United States Attorney

District of Columbia

*Judiciary Center
555 Fourth St., N.W.
Washington, D.C. 20530*

Wednesday, February 12, 2014

VIA EMAIL: dmaxted@pdsdc.org

David Maxted, Esq.
Public Defender Service for the District of Columbia
633 Indiana Avenue NW
Washington, DC 20004

Re: United States v. Stephanie Lawson, 2011-CF1-019618

Dear Counsel:

This letter is to confirm plea offer to your client, Stephanie Lawson. This plea offer will remain open until the close of business on Tuesday, February 18, 2014. However, the Government reserves the right to revoke this plea offer at any time before your client enters a guilty plea in this case. If your client accepts the terms and conditions set forth below, please have your client execute this document in the space provided. Upon receipt of the executed document, this letter will become the plea agreement between your client and the Office of the United States Attorney for the District of Columbia. The terms of the offer are as follows:

1. Your client, Stephanie Lawson, agrees to admit guilt and enter a plea of guilty to the lesser included offense of Count One of the indictment, that is, to the offense of Voluntary Manslaughter, in violation of 22 D.C. Code § 2105. Your client understands that the offense of Voluntary Manslaughter carries a potential maximum penalty of 30 years' incarceration.
2. Your client understands that the Government will waive step-back pending sentencing, will waive the filing of any sentencing enhancement papers, and will reserve allocation at sentencing, subject to the terms set forth in Paragraph 5 of this agreement.
3. Your client understands that the Government agrees that it will abandon all other charges arising from the facts in the above-referenced case.
4. The parties further agree that your client, after taking an oath to tell the truth, shall agree to the attached factual proffer in open court on the date of the plea.



5. Your client understands that the Court may utilize the District of Columbia Sentencing Commission's Voluntary Sentencing Guidelines in imposing the sentence in this case. The Government agrees that as is further set forth below, that it will limit its allocation at sentencing to a maximum period of imprisonment of four years (48 months). Both the Government and the defendant further agree as set forth below, that the defendant will retain its full right of allocution, that includes the right to request a split sentence with all incarceration suspended with a period of probation. The parties further agree that the defendant may request a downward departure, as contemplated by Section 5.2.3(1) of the Voluntary Sentencing Guidelines. That is, that the victim in this case acted as "an aggressor, initiator, willing participant in, or provoker of the incident to such a degree that the defendant's culpability is substantially less than that typically associated with the offense." Your client and the Government further agree, pursuant to Rule 11(e)(1)(C) of the Superior Court Rules of Criminal Procedure, to present this plea agreement to the Court for its approval. If the Court accepts the plea agreement and the specific sentencing range agreed upon by the parties, then the Court will embody in the judgment and sentence the disposition provided for in this plea agreement, pursuant to Rule 11(e)(3) of the Superior Court Rules of Criminal Procedure. The parties understand, however, that in light of other factors the Court may not agree that such a sentence is an appropriate one and may reject the plea agreement pursuant to Rule 11(e)(4) of the Superior Court Rules of Criminal Procedure. Upon such a rejection, pursuant to Rule 11(e)(4), neither party would then be bound by this plea agreement. Your client understands that if this happens, the Court, in accordance with the requirements of Rule 11(e)(4), will inform the parties of its rejection of the plea agreement, and will afford your client an opportunity to withdraw the plea, or if your client persists in the guilty plea will inform her that a final disposition may be less favorable to her than that contemplated by this agreement.

6. Your client also agrees that if any illegal contraband was seized by any law enforcement agency from the possession of or the direct or indirect control of her, then your client consents to the administrative forfeiture, official use and/or destruction of said contraband by any law enforcement agency involved in the seizure of it.

7. In entering this plea of guilty, your client understands and agrees to waive certain rights afforded to her by the Constitution of the United States and/or by statute. In particular, your client knowingly and voluntarily waives or gives up her right against self-incrimination with respect to the offense to which your client is pleading guilty before the Court which accepts her plea. Your client also understands that she is waiving or giving up her right to be tried by a jury or by a judge sitting without a jury, the right to be assisted by an attorney at trial and the right to confront and cross-examine witnesses.

8. This letter sets forth the entire understanding between the parties and constitutes the complete plea agreement between your client and the Office of the United States Attorney for the District of Columbia. This agreement supersedes all prior understandings, promises, agreements, or conditions, if any, between this Office and your client.

Yours very truly,

RONALD C. MACHEN JR.
UNITED STATES ATTORNEY

By:



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ASSISTANT UNITED STATES ATTORNEY
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DEFENDANT'S ACCEPTANCE

I have read this plea agreement and factual proffer and have discussed it with my attorney, David Maxted, Esq. I fully understand this agreement and agree to it without reservation. I do this voluntarily and of my own free will, intending to be legally bound. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this agreement fully. I am pleading guilty because I am in fact guilty of the offense set forth herein.

I reaffirm that absolutely no promises, agreements, understandings, or conditions have been made or entered into in connection with my decision to plead guilty except those set forth in this plea agreement. I am satisfied with the legal services provided by my attorney in connection with this plea agreement and matters related to it.

Date: 2/14/14

Stephanie Lawson
Stephanie Lawson
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read each of the pages constituting this plea agreement, reviewed them with my client, Stephanie Lawson, and discussed the provisions of the agreement with my client, fully. These pages accurately and completely set forth the entire plea agreement.

Date: 2-14-14

David Maxted
David Maxted, Esq.
Attorney for Defendant Stephanie Lawson

PROFFER OF FACTS

On Saturday, August 27, 2011, at approximately 9:40 p.m., the defendant, Stephanie Lawson, was in her home at 4 ■ 16th Street NE, Apartment, ■ in Washington, DC. On that night, the defendant was at her apartment with her boyfriend and an eye witness, who was in a romantic relationship with the decedent, Karen Jordan. The group was playing cards and drinking alcohol.

At some point, the decedent came into the defendant's apartment to join the group. While the group was in the living and dining room area of the apartment, the defendant and the decedent became engaged in an argument. The decedent was a willing participant in the argument, and the argument became heated. During the course of the argument, as the defendant later told police, the defendant felt threatened and picked up a knife. The defendant stabbed the decedent, who was unarmed, once in the neck. The decedent fell to the floor, lost consciousness and died. The decedent was later taken by ambulance to the Washington Hospital Center where at 10:25 p.m. she was pronounced dead. The decedent's body was later taken to the Office of the Chief Medical Examiner where an autopsy was conducted determining her cause of death to be a single stab wound to the neck, and the manner of death to be homicide.

A 911 call was made and police arrived to the apartment. During an interview by the police, the defendant admitted that she stabbed and killed the decedent, because the decedent threatened to kill her and came towards the defendant in a menacing manner. Although the defendant believed she was in danger at the time she stabbed the decedent, she acknowledges that the use of knife in the stabbing was excessive under the circumstances.

DEFENDANT'S ACKNOWLEDGMENT

I have read and discussed the Government's Proffer of Facts with my attorney, David Maxted, Esq. I agree, and acknowledge by my signature that this Proffer of Facts is true and correct.

Date: 2-10-14

Stephanie Lawson
Stephanie Lawson
Defendant

Date: 2-10-14

David Maxted
David Maxted, Esq.
Attorney for Defendant Stephanie Lawson