

IN THE CIRCUIT COURT OF THE SEVENTH JUDICIAL CIRCUIT
IN AND FOR FLAGLER COUNTY, FLORIDA

STATE OF FLORIDA

CASE NO.: 2008 - CF - 1177

Plaintiff,

vs.

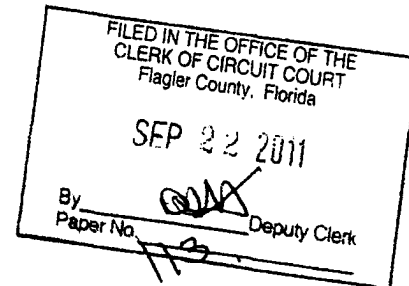
BRANDON WASHINGTON,

Defendant.

Fourth

AMENDED INFORMATION FOR:

- COUNT 1:** RACKETEER INFLUENCE AND CORRUPT ORGANIZATION ACT (RICO)
F.S. §§ 895.03(3) and 874.04(2)(c)
Life Felony
- COUNT 2:** CONSPIRACY TO COMMIT RICO
F.S. §§ 895.03(4) and 874.04(2)(c)
Life Felony
- COUNT 3:** SECOND DEGREE FELONY MURDER
Florida Statutes §§ 782.04(3) & 777.011
1st Degree Felony Punishable by Life
- COUNT 4:** BURGLARY OF DWELLING ~~WHILE ARMED~~
Florida Statutes §§ 810.02(1) & (2)(b) & 777.011
1st Degree Felony Punishable by Life
- COUNT 5:** ATTEMPTED HOME INVASION ROBBERY
Florida Statutes §§ 812.135(1) & (2)(a), & 777.011 & 777.04(1)
2nd Degree Felony



R.J. LARIZZA, State Attorney for the Seventh Judicial Circuit of the State of Florida and as such prosecuting attorney for this Court, in the name of and by the authority of the State of Florida charges that:

COUNT 1

RACKETEERING

IN THAT BRANDON WASHINGTON, on or about January 1, 2004, and continuing through and including October 28, 2008, in the County of Flagler and the State of Florida, while employed by or associated with an enterprise as defined in Section 895.02(3), Florida Statutes, to-wit: a group of individuals associated in fact although not a legal entity, known as the Bloods Gang, aka "nine-tec grenades" aka "Brick Mafia" did conduct or participate in such enterprise, directly or indirectly, through a continuous pattern of racketeering activity, as defined in Section 895.02(4), Florida Statutes, by engaging in at least two incidents of racketeering activity which had similar intents, results, accomplices, victims, or methods of commission, or were otherwise related by distinguishing characteristics and were not isolated incidents, including at least two of the following predicate incidents, and Brandon Washington committed the charged offense for the purpose of benefiting, promoting, or furthering the interests of a criminal gang, contrary to Sections 895.03(3) and 874.04(2)(c), Florida Statutes.

Predicate Incident 1

On or about August 4, 2004, in Flagler County, **BRANDON WASHINGTON** did after being found guilty of a felony or being found to have committed a delinquent act that would be a felony if committed by an adult in the courts of this State, another State, the United States, a territory, or other country pursuant to Florida Statute 790.23(1)(c) or (d), unlawfully owned or had care, custody, possession, or control, of a firearm or an electric weapon or device, or carried a concealed weapon, including any tear gas gun or chemical weapon or device, contrary to Florida Statute 790.23(1).

Predicate Incident 2

2A

On or about October 11, 2005, in Flagler County, **BRANDON WASHINGTON** was unlawfully and knowingly in actual or constructive possession of marijuana or cannabis, including any salt, isomers, and salts of isomers, compound, derivative or preparation of marijuana or cannabis, a controlled substance, contrary to Florida Statutes 893.13(6)(b) and 893.03(1)(c)7.

2B

On or about October 11, 2005, in Flagler County, **BRANDON WASHINGTON** did unlawfully resist, obstruct or oppose Deputy G. Ditolla, a law enforcement officer of the Flagler County Sheriff's Office, in the execution of a legal process or in the lawful execution of a legal duty, without offering or doing violence to the person of such officer, contrary to Florida Statute 843.02.

Predicate Incident 3

On or between May 29, 2006 and May 30, 2006, in Flagler County, **BRANDON WASHINGTON** did knowingly obtain or use, or endeavor to obtain or use an automobile which was the property of Catherine Combs, with the intent to permanently or temporarily deprive Catherine Combs of the property or a benefit therefrom or to appropriate the property to the use of **BRANDON WASHINGTON** or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1)(a).

Predicate Incident 4

4A

On or about March 12, 2008, in Flagler County, **BRANDON WASHINGTON** did actually and intentionally touch or strike Ritchy Bien-Aime against the will of Ritchy Bien-Aime or did intentionally cause bodily harm to Ritchy Bien-Aime, contrary to Florida Statute 784.03(1).

AND

4B

On or about March 12, 2008, in Flagler County, **BRANDON WASHINGTON** did intentionally cause, encourage, solicit, or recruit another person to become a criminal gang member where a condition of membership or continued membership is the commission of any crime or did commit such crime by aiding, abetting, counseling, hiring, or otherwise procuring such offense to be committed, contrary to Florida Statute 874.05(1) and 777.011.

Predicate Incident 5

On or about March 15, 2008, in Flagler County, **BRANDON WASHINGTON** did by force, violence, assault, or putting in fear, knowingly take away personal property, of some value, from the presence or custody of William Tinsley, with the intent to permanently or temporarily deprive William Tinsley or any other person not the defendant of the property, or did commit such crime by aiding, abetting, counseling, hiring, or otherwise procuring such offense to be committed, contrary to Florida Statutes 812.13(1)2c and 777.011.

Predicate Incident 6

On or about March 15, 2008, in Flagler County, **BRANDON WASHINGTON** did knowingly obtain or use, or endeavor to obtain or use money or U.S. Currency, which was the property of Sub Base and/or Christina Ratliff or any other person not the defendant(s), with the intent to permanently or temporarily deprive Sub Base and/or Christina Ratliff or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to

the use of BRANDON WASHINGTON or to the use of any person not entitled thereto, or did commit such crime by aiding, abetting, counseling, hiring, or otherwise procuring such offense to be committed, contrary to Florida Statutes 812.014(1) and (3)(A) and 777.011.

Predicate Incident 7

On or between January 1, 2006, and March 19, 2008, in St. Johns County, BRANDON WASHINGTON did, after having been convicted of a felony in the courts of Florida, unlawfully own or have care, custody, possession, or control of a firearm, contrary to Florida Statute 775.087(2) and 790.23(1)(a), (c), (d), and (e).

Predicate Incident 8

8A

On or about August 7, 2006, in Flagler County, BRANDON WASHINGTON did unlawfully threaten by word or act to do violence to the person of BRADLEY SANGUINETTI, coupled with an apparent ability to do so which created a well founded fear in BRADLEY SANGUINETTI that such violence was imminent, contrary to Florida Statute 784.011.

AND

8B

On or about August 7, 2006, in Flagler County, BRANDON WASHINGTON, did unlawfully and knowingly enter or remain in a dwelling, the property of BRADLEY SANGUINETTI, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and 777.011, Florida Statutes.

AND

8C

On or about August 7, 2006, in Flagler County, BRANDON WASHINGTON by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of BRADLEY SANGUINETTI, with the intent to permanently or temporarily deprive BRADLEY SANGUINETTI or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 9

9A

On or about December 18, 2007, in Flagler County, **BRANDON WASHINGTON** did unlawfully perpetrate or attempt to perpetrate a BURGLARY and/or ROBBERY, and in the course of perpetrating or attempting to perpetrate said BURGLARY and/or ROBBERY, RASHAUN PUGH, a human being, was killed by a person other than BRANDON WASHINGTON, or did commit such crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 782.04(3) and 777.011, Florida Statutes.

AND

9B

On or about December 18, 2007, in Flagler County, **BRANDON WASHINGTON**, did unlawfully and knowingly enter or remain in a dwelling, the property of SEAN CHRISTOPHER ADAMS, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and (2)(a) and 777.011, Florida Statutes.

AND

9C

On or about December 18, 2007, in Flagler County, **BRANDON WASHINGTON** by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of SEAN CHRISTOPHER ADAMS, with the intent to permanently or temporarily deprive SEAN CHRISTOPHER ADAMS or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 10

10A

On or between October 1, 2005 and February 24, 2006, in Flagler County, **BRANDON WASHINGTON** did unlawfully threaten by word or act to do violence to the person of JOSHUA FORTNEY AND/OR MEAGAN GANEM, coupled with an apparent ability to do so which created a well founded fear in JOSHUA FORTNEY AND/OR MEAGAN GANEM that such violence was imminent, contrary to Florida Statute 784.011.

AND

10B

On or between October 1, 2005 and February 24, 2006, in Flagler County, **BRANDON WASHINGTON**, did unlawfully and knowingly enter or remain in a dwelling, the property of JOSHUA FORTNEY AND/OR MEAGAN GANEM, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and 777.011, Florida Statutes.

AND

10C

On or between October 1, 2005 and February 24, 2006, in Flagler County, **BRANDON WASHINGTON** by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of JOSHUA FORTNEY AND/OR MEAGAN, with the intent to permanently or temporarily deprive JOSHUA FORTNEY AND/OR MEAGAN or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 11

11A

On or between December 13, 2007 and December 15, 2007, in Flagler County, **BRANDON WASHINGTON** did unlawfully threaten by word or act to do violence to the person of SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA, coupled with an apparent ability to do so which created a well founded fear in SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA that such violence was imminent or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statute 784.011 and 777.011.

AND

11B

On or between December 13, 2007 and December 15, 2007, in Flagler County, **BRANDON WASHINGTON**, did unlawfully and knowingly enter or remain in a dwelling, the property of SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and 777.011, Florida Statutes.

AND

11C

On or between December 13, 2007 and December 15, 2007, in Flagler County, **BRANDON WASHINGTON** by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of **SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA**, with the intent to permanently or temporarily deprive **SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA** or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 12

On or about November 4, 2005, in Flagler County, **BRANDON WASHINGTON** was unlawfully and knowingly in actual or constructive possession of marijuana or cannabis, including any salt, isomers, and salts of isomers, compound, derivative or preparation of marijuana or cannabis, a controlled substance, contrary to Florida Statutes 893.13(6)(b) and 893.03(1)(c)7.

Predicate Incident 13

On or about March 5, 2008, in Flagler County, **BRANDON WASHINGTON** did unlawfully resist, obstruct or oppose Deputy J. Welker, a law enforcement officer of the Flagler County Sheriff's Office, in the execution of a legal process or in the lawful execution of a legal duty, without offering or doing violence to the person of such officer, contrary to Florida Statute 843.02.

COUNT 2

CONSPIRACY TO COMMIT RACKETEERING

IN THAT **BRANDON WASHINGTON**, on or about January 1, 2004, and continuing through and including October 28, 2008, in the County of Flagler and the State of Florida, did unlawfully and knowingly combine, conspire, confederate and agree each with the other and others, known and unknown, to violate the laws of Florida, to-wit: section 895.03(3), Florida Statutes, prohibiting racketeering, and as part of said conspiracy, the above-named defendant was employed by or associated with an enterprise as defined in Section 895.02(3), Florida Statutes, to-wit: a group of individuals associated in fact although not a legal entity, known as the Bloods Gang, aka "nine-tec grenades" aka "Brick Mafia," did conduct or participate in such enterprise,

directly or indirectly, through a continuous pattern of racketeering activity, as defined in Section 895.02(4), Florida Statutes, either by intending to personally engage in at least two incidents of racketeering activity or by intending to participate in the affairs of the enterprise with the knowledge and intent that one or more members of the conspiracy would engage in at least two incidents of racketeering activity, including but not limited to the following predicate acts, which had similar intents, results, accomplices, victims, or methods of commission or which were otherwise interrelated by distinguishing characteristics and were not isolated incidents, and in furtherance of said conspiracy, and Brandon Washington committed the charged offense for the purpose of benefiting, promoting, or furthering the interests of a criminal gang, contrary to Sections 895.03(4) and 874.04(2)(c), Florida Statutes.

Predicate Incident 1

On or about August 4, 2004, in Flagler County, **BRANDON WASHINGTON** did after being found guilty of a felony or being found to have committed a delinquent act that would be a felony if committed by an adult in the courts of this State, another State, the United States, a territory, or other country pursuant to Florida Statute 790.23(1)(c) or (d), unlawfully owned or had care, custody, possession, or control, of a firearm or an electric weapon or device, or carried a concealed weapon, including any tear gas gun or chemical weapon or device, contrary to Florida Statute 790.23(1).

Predicate Incident 2

On or about October 11, 2005, in Flagler County, **BRANDON WASHINGTON** and/or **MICHAEL GILBERT**, **GERRELL SMITH**, and **ANDRE McCARTHY** were unlawfully and knowingly in actual or constructive possession of marijuana or cannabis, including any salt, isomers, and salts of isomers, compound, derivative or preparation of marijuana or cannabis, a controlled substance, contrary to Florida Statutes 893.13(6)(b) and 893.03(1)(c)7.

Predicate Incident 3

On or between May 29, 2006 and May 30, 2006, in Flagler County, **BRANDON WASHINGTON** did knowingly obtain or use, or endeavor to obtain or use an automobile which was the property of Catherine Combs, with the intent to permanently or temporarily deprive Catherine Combs of the property or a benefit therefrom or to appropriate the property to the use of **BRANDON WASHINGTON** or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1)(a).

Predicate Incident 4

4A

On or about March 12, 2008, in Flagler County, **BRANDON WASHINGTON** and/or **ROBERTO BRAVO** and/or **GERRELL SMITH** and/or **JOEL ORTIZ** and/or **ANCIL OLIVER** did actually and intentionally touch or strike Ritchy Bien-Aime against the will of

Ritchy Bien-Aime or did intentionally cause bodily harm to Ritchy Bien-Aime, contrary to Florida Statute 784.03(1).

AND

4B

On or about March 12, 2008, in Flagler County, **BRANDON WASHINGTON** and/or **ROBERTO BRAVO** and/or **GERRELL SMITH** and/or **JOEL ORTIZ** and/or **ANCIL OLIVER** did intentionally cause, encourage, solicit, or recruit another person to become a criminal gang member where a condition of membership or continued membership is the commission of any crime or did commit such crime by aiding, abetting, counseling, hiring, or otherwise procuring such offense to be committed, contrary to Florida Statute 874.05(1) and 777.011.

Predicate Incident 5

On or about March 15, 2008, in Flagler County, **BRANDON WASHINGTON** did by force, violence, assault, or putting in fear, knowingly take away personal property, of some value, from the presence or custody of William Tinsley, with the intent to permanently or temporarily deprive William Tinsley or any other person not the defendant of the property, or did commit such crime by aiding, abetting, counseling, hiring, or otherwise procuring such offense to be committed, contrary to Florida Statutes 812.13(1)2c and 777.011.

Predicate Incident 6

On or about March 15, 2008, in Flagler County, **BRANDON WASHINGTON** did by force, violence, assault, or putting in fear, knowingly take away U.S. Currency, of some value, from the presence or custody of Sub Base and/or Christina Ratliff, with the intent to permanently or temporarily deprive Sub Base and/or Christina Ratliff or any other person not the defendant of the property, or did commit such crime by aiding, abetting, counseling, hiring, or otherwise procuring such offense to be committed, contrary to Florida Statutes 812.13(1)2c and 777.011.

Predicate Incident 7

On or between January 1, 2008, and March 19, 2008, in St. Johns County, **BRANDON WASHINGTON** did, after having been convicted of a felony in the courts of Florida, unlawfully own or have care, custody, possession, or control of a firearm, contrary to Florida Statute 775.087(2) and 790.23(1)(a), (c), (d), and (e).

Predicate Incident 8

8A

On or about August 7, 2006, in Flagler County, **BRANDON WASHINGTON** did

unlawfully threaten by word or act to do violence to the person of BRADLEY SANGUINETTI, coupled with an apparent ability to do so which created a well founded fear in BRADLEY SANGUINETTI that such violence was imminent, contrary to Florida Statute 784.011.

AND

8B

On or about August 7, 2006, in Flagler County, **BRANDON WASHINGTON**, did unlawfully and knowingly enter or remain in a dwelling, the property of BRADLEY SANGUINETTI, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and 777.011, Florida Statutes.

AND

8C

On or about August 7, 2006, in Flagler County, **BRANDON WASHINGTON** by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of BRADLEY SANGUINETTI, with the intent to permanently or temporarily deprive BRADLEY SANGUINETTI or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 9

9A

On or about December 18, 2007, in Flagler County, **BRANDON WASHINGTON** did unlawfully perpetrate or attempt to perpetrate a BURGLARY and/or ROBBERY, and in the course of perpetrating or attempting to perpetrate said BURGLARY and/or ROBBERY, RASHAUN PUGH, a human being, was killed by a person other than BRANDON WASHINGTON, or did commit such crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 782.04(3) and 777.011, Florida Statutes.

AND

9B

On or about December 18, 2007, in Flagler County, **BRANDON WASHINGTON**, did unlawfully and knowingly enter or remain in a dwelling, the property of SEAN CHRISTOPHER ADAMS, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and (2)(a) and 777.011, Florida Statutes.

AND

9C

On or about December 18, 2007, in Flagler County, **BRANDON WASHINGTON** by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of SEAN CHRISTOPHER ADAMS, with the intent to permanently or temporarily deprive SEAN CHRISTOPHER ADAMS or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 10

10A

On or between October 1, 2005 and February 24, 2006, in Flagler County, **BRANDON WASHINGTON** did unlawfully threaten by word or act to do violence to the person of JOSHUA FORTNEY AND/OR MEAGAN GANEM, coupled with an apparent ability to do so which created a well founded fear in JOSHUA FORTNEY AND/OR MEAGAN GANEM that such violence was imminent, contrary to Florida Statute 784.011.

AND

10B

On or between October 1, 2005 and February 24, 2006, in Flagler County, **BRANDON WASHINGTON**, did unlawfully and knowingly enter or remain in a dwelling, the property of JOSHUA FORTNEY AND/OR MEAGAN GANEM, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and 777.011, Florida Statutes.

AND

10C

On or between October 1, 2005 and February 24, 2006, in Flagler County, **BRANDON WASHINGTON** by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of JOSHUA FORTNEY AND/OR MEAGAN, with the intent to permanently or temporarily deprive JOSHUA FORTNEY AND/OR MEAGAN or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 11

11A

On or between December 13, 2007 and December 15, 2007, in Flagler County, **BRANDON WASHINGTON** did unlawfully threaten by word or act to do violence to the person of **SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA**, coupled with an apparent ability to do so which created a well founded fear in **SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA** that such violence was imminent or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statute 784.011 and 777.011.

AND

11B

On or between December 13, 2007 and December 15, 2007, in Flagler County, **BRANDON WASHINGTON**, did unlawfully and knowingly enter or remain in a dwelling, the property of **SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA**, with the intent to commit a **ROBBERY, THEFT, ASSAULT** or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b) and 777.011, Florida Statutes.

AND

11C

On or between December 13, 2007 and December 15, 2007, in Flagler County, **BRANDON WASHINGTON** by force, violence, assault, or putting in fear, did knowingly attempt to take away property, of some value, from the person or custody of **SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA**, with the intent to permanently or temporarily deprive **SCOTT SAWYER AND/OR KAYLEIGH LACERTOSA** or any other person not the defendant(s) of the property, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Florida Statutes 812.13(1) and (2)(c), 777.04(1) and 777.011.

Predicate Incident 12

On or about November 4, 2005, in Flagler County, **BRANDON WASHINGTON** was unlawfully and knowingly in actual or constructive possession of marijuana or cannabis, including any salt, isomers, and salts of isomers, compound, derivative or preparation of marijuana or cannabis, a controlled substance, contrary to Florida Statutes 893.13(6)(b) and 893.03(1)(c)7.

Predicate Incident 13

13A

On or about August 3, 2008, in Flagler County, **MICHAEL GILBERT** and/or **ANCIL OLIVER** and/or **CHRISTOPHER KEE** and/or **TERRANCE LEEKS** and/or **ALEX DECOSTA** and/or **BIANCA DORISMOND** did unlawfully and knowingly combine, conspire, confederate and agree each with the other and others, known and unknown, to commit Battery against Manual Cabral, a misdemeanor, contrary to Florida Statutes 777.04(3) and 784.03.

AND

13B

On or about August 3, 2008, in Flagler County, **MICHAEL GILBERT** and/or **ANCIL OLIVER** and/or **CHRISTOPHER KEE** and/or **ALEX DECOSTA** and/or **TERRANCE LEEKS** and/or **BIANCA DORISMOND** did unlawfully and knowingly combine, conspire, confederate and agree each with the other and others, known and unknown, to commit Witness Tampering against Manual Cabral, a felony, contrary to Florida Statutes 777.04(3) and 914.22.

Predicate Incident 14

On or about March 5, 2008, in Flagler County, **BRANDON WASHINGTON** did unlawfully resist, obstruct or oppose Deputy J. Welker, a law enforcement officer of the Flagler County Sheriff's Office, in the execution of a legal process or in the lawful execution of a legal duty, without offering or doing violence to the person of such officer, contrary to Florida Statute 843.02.

COUNT 3

IN THAT **BRANDON WASHINGTON** on or about December 18, 2007, in the County of Flagler and the State of Florida, did unlawfully perpetrate or attempt to perpetrate a **BURGLARY** and/or **ROBBERY**, and in the course of perpetrating or attempting to perpetrate said **BURGLARY** and/or **ROBBERY**, **RASHAUN PUGH**, a human being, was killed by a person other than **BRANDON WASHINGTON**, or did commit such crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 782.04(3) and 777.011, Florida Statutes.

COUNT 4

IN THAT **BRANDON WASHINGTON** on or about December 18, 2007, in the County of Flagler and the State of Florida, did unlawfully and knowingly enter or remain in a dwelling, the

property of SEAN CHRISTOPHER ADAMS, with the intent to commit a ROBBERY, THEFT, ASSAULT or other offense therein, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 810.02(1) and (2)(b), and 777.011, Florida Statutes.

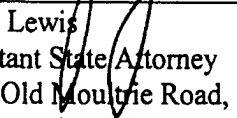
COUNT 5

IN THAT BRANDON WASHINGTON on or about December 18, 2007, in the County of Flagler and the State of Florida, did unlawfully enter a dwelling, the property of SEAN CHRISTOPHER ADAMS, with the intent to commit a ROBBERY and did by force, violence, assault, or putting in fear ATTEMPT to take United States currency or other property of value from the person or custody of SEAN CHRISTOPHER ADAMS, with the intent to temporarily or permanently deprive SEAN CHRISTOPHER ADAMS of his right to the money or property or any benefit from it or to appropriate the money or property to his, her or their own use or the use of any person not entitled to it, or did commit said crime by aiding, abetting, counseling, hiring or otherwise procuring it to be committed, contrary to Sections 812.135(1) and (2)(a), 777.04(1), and 777.011, Florida Statutes.

ALL SAID OFFENSES BEING AGAINST THE PEACE AND DIGNITY OF THE STATE OF FLORIDA.

Dated this 21 day of September, 2011.

FOR THE STATE ATTORNEY



Jason Lewis
Assistant State Attorney
2155 Old Moultrie Road, Suite 105
St. Augustine, FL 32086
Fla Bar #: 0495395

STATE OF FLORIDA :
COUNTY OF PUTNAM :

Personally appeared before me JASON LEWIS, a Designated Assistant State Attorney for the State of Florida, personally known to me, who being first duly sworn say that this prosecution is instituted in good faith and certifies that testimony was received under oath from material witnesses for the offenses, and the allegations as set forth in the foregoing Information, if true, would constitute the offenses therein charged.

Sworn to and subscribed before me this 21st day of September, 2011.



Denise E. Orr
Notary Public
State of Florida

DEFENDANTS BIOGRAPHICAL DATA:

BRANDON E WASHINGTON,
Last Known Address: **3 Windmere Place, Palm Coast, FL 32164;**
Race: **Black;** Sex: **MALE;** DOB: **03/22/1987;** Ht: **5'6"** Wt: **150 LBS;**
Hair: **Black;** Eyes: **Brown;** SS #: **[REDACTED]**