

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	CRIM NO. 25-CR-318
KEONTE WILSON,)	
)	
Defendant.)	

SUPPLEMENT TO DEFENDANT’S MOTION TO SUPPRESS

COMES NOW Keonte Wilson and files the following supplement to Defendant’s Motion to Suppress.

At the hearing, the government attempted to show, through various police reports, that the area where the stop occurred was a high crime area. However, the government solely attempted to do this by just moving the reports into evidence, over objection by the defense. However, as indicated by the defense at the hearing, Mr. Wilson did not stipulate that the area was indeed a “high crime area.”

The court should not make a finding that the area was a high crime area for two main reasons. First, the officer indicated that he was not familiar with all the reports, but only a few of them – namely, the ones in which he was involved. He did not specify which ones they were.

Second, the government failed to provide proof of the high crime area by

completing evidence of its attempted argument. While there were police reports, this alone is sufficient to establish the 1400 block of V Street N.W. is a “high crime area” comparative to other areas of the District of Columbia. Do two crimes a month make the location a high crime area in the District of Columbia? Four crimes a month? Ten crimes a month? How many crimes happen comparatively in other parts of Washington, D.C.? Without a comparative analysis, or a determination of the number of crimes and/or arrests that establish a “high crime area,” the police reports and the events they allege to report are ambiguous and fail to provide context, and accordingly no conclusion can be made solely by these reports, including that the 1400 block of V Street, N.W. is indeed a “high crime area.”

Third, there is the fact that they are solely police reports. We have no indication of whether the people who were arrested in these reports either pled guilty, were found guilty, or whether they were acquitted of the charges. Without such additional information, the court cannot determine whether each police report represents a valid data point for the government’s argument establishing that the 1400 block of V St., N.W. is indeed a “high crime area.”

Conclusion

For the foregoing reasons, and for reasons presented in defendant's original motion and the hearing, the Court should grant the motion to suppress.

Respectfully submitted,

KEONTE WILSON
By Counsel

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Certificate of Service

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 2nd day of March 2025, which will send a notification of such filing (NEF) to the following to all counsel of record.

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