

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA

v.

ANTWAN HUE,

Defendant.

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Criminal Action No. 2:24-cr-38

NOTICE OF INTENT TO SEEK THE DEATH PENALTY

The United States of America, by and through its undersigned counsel and pursuant to 18 U.S.C. § 3593(a), notifies the Court and the defendant, ANTWAN HUE, a/k/a “Tony,” a/k/a “T,” that the United States believes the circumstances in Count One (Conspiracy to Commit Murder for Hire, in violation of 18 U.S.C. § 1958(a)), Count Two (Murder for Hire, in violation of 18 U.S.C. § 1958(a)) and Count Three (Murder While Engaged in a Drug Trafficking Offense, in violation of 21 U.S.C. §§ 841 (a)(1), (b)(1)(A) and 848(e)(1)(A)) of the Indictment are such that, in the event of a conviction, a sentence of death is justified under 18 U.S.C. § 3591, *et seq.*, and that the United States will seek the sentence of death for these offenses.

The United States proposes to prove the following factors as justifying a sentence of death with regards to Counts One, Two and Three:

1. Defendant ANTWAN HUE was more than 18 years old at the time of the offenses (18 U.S.C. § 3591(a)).
2. The government will prove the following intent factor enumerated under 18 U.S.C. § 3591(a)(2)(A)–(D) in justifying a sentence of death:
 - a. Defendant ANTWAN HUE intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in

connection with a person, other than one of the participants in the offense, and the victim, Charlene Ryals, died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C)); and

3. The government will prove the following statutory aggravating factors enumerated under 18 U.S.C. § 3592(c) in justifying a sentence of death:

- a. Defendant ANTWAN HUE, in commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to one or more persons in addition to the victim of the offense. (18 U.S.C. § 3592(c)(5)).
- b. Defendant ANTWAN HUE procured the commission of the offense by payment, or promise of payment, of anything of pecuniary value. (18 U.S.C. § 3592(c)(7)).
- c. Defendant ANTWAN HUE committed the offense after substantial planning and premeditation to cause the death of a person (18 U.S.C. § 3592(c)(9)).

4. Pursuant to 18 U.S.C. § 3593(a), the government will prove the following other aggravating factors in justifying a sentence of death:

- a. Defendant ANTWAN HUE caused injury, harm, and loss to Charlene Ryals, as well as to the family and friends of Charlene Ryals. The injury, harm, and loss caused by ANTWAN HUE with respect to Charlene Ryals is evidenced by the victim's personal characteristics and by the impact of the victim's death upon her family and friends;
- b. Defendant ANTWAN HUE has demonstrated a lack of remorse for the offenses charged in Counts One, Two and Three of the Indictment, as evidenced by his statements and actions following the commission of the offenses.

- c. Defendant ANTWAN HUE was motivated to commit the offenses in Counts One, Two and Three in order to facilitate drug trafficking.
- d. Defendant ANTWAN HUE was motivated to commit the offenses in Counts One, Two and Three to avoid child support payments.
- e. Defendant ANTWAN HUE solicited the murder of A.H.

The United States further gives notice that in support of imposition of the death penalty it intends to rely upon all of the evidence admitted by the Court at the guilt phase of the trial and the offenses of conviction as described in the Indictment as they relate to the background and character of defendant ANTWAN HUE, his moral culpability, and the nature and circumstances of the offenses charged in the Indictment.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of October, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/

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