

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

S2 25 Cr. 91 (VB)

KALIF COX,
a/k/a “Leef,”
a/k/a “LG,”

Defendant.

NOTICE OF INTENT TO SEEK THE DEATH PENALTY

The United States of America, by and through its undersigned counsel and pursuant to Title 18, United States Code, Section 3593(a), notifies the Court and KALIF COX, a/k/a “Leef,” a/k/a “LG,” the defendant, that the United States believes the circumstances of the offenses charged in Counts Five and Six are such that, in the event of a conviction, a sentence of death is justified under Chapter 228 (Sections 3591 through 3598) of Title 18 of the United States Code, and that the United States will seek the sentence of death for these offenses: Murder in Aid of Racketeering, in violation of Title 18, United States Code, Sections 1959(a)(1) and 2, and Murder Through the Use of a Firearm, in violation of Title 18, United States Code, Sections 924(j) and 2, each of which carries a possible sentence of death.

The United States proposes to prove the following factors as justifying a sentence of death with regard to Counts Five and Six:

A. KALIF COX, a/k/a “Leef,” a/k/a “LG,” was 18 years of age or older at the time of the offense. 18 U.S.C. § 3591(a).

B. Statutory Threshold Factors Enumerated under 18 U.S.C. § 3591(a)(2)(A)-(D):

1. **Intentional Participation in an Act Resulting in Death.** KALIF COX, a/k/a “Leef,” a/k/a “LG,” 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 offenses, and the victim, Amed Alberto Alvarado Baquedano, died as a direct result of the act. 18 U.S.C § 3591(a)(2)(C).

C. Statutory Aggravating Factors Enumerated under 18 U.S.C. § 3592(c).

1. **Grave risk of death to additional persons.** KALIF COX, a/k/a “Leef,” a/k/a “LG,” in the commission of the offenses, knowingly created a grave risk of death to one or more persons in addition to the victim of the offenses. 18 U.S.C. § 3592(c)(5).

D. Non-Statutory Aggravating Factors Identified under 18 U.S.C. § 3593(a)(2).

1. **Victim impact.** KALIF COX, a/k/a “Leef,” a/k/a “LG,” caused injury, harm, and loss to the family and friends of Amed Alberto Alvarado Baquedano. The injury, harm, and loss caused by COX with respect to the victim is evidenced by the victim’s personal characteristics and by the impact of the victim’s death upon his family and friends.

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2. **Future dangerousness.** KALIF COX, a/k/a “Leef,” a/k/a “LG,” presents a future danger as demonstrated by his ability and willingness to murder another individual in aid of racketeering; his longstanding association with a racketeering enterprise that, among other things, engaged in multiple shootings, firearms trafficking, international narcotics trafficking, the glorification of violence, and the use of firearms in connection with drug trafficking; and his criminal history, which includes a violent slashing.

Respectfully Submitted,

JAY CLAYTON
United States Attorney

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cc: Counsel of Record (via ECF)