

1 TODD BLANCHE  
 Acting Attorney General  
 2 BILAL A. ESSAYLI  
 First Assistant United States Attorney  
 3 ALEXANDER B. SCHWAB  
 Assistant United States Attorney  
 4 Acting Chief, Criminal Division  
 SHAWN T. ANDREWS (Cal. Bar No. 319565)  
 5 Deputy Chief, Major Crimes Section  
 Assistant United States Attorney  
 6 1300 United States Courthouse  
 312 North Spring Street  
 7 Los Angeles, California 90012  
 Telephone: (213) 894-6104  
 8 Facsimile: (213) 894-0141  
 E-mail: shawn.andrews@usdoj.gov

9 Attorneys for Plaintiff  
 10 UNITED STATES OF AMERICA

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 DENNIS ANAYA URIAS,

17 Defendant.

No. CR 25-413(A)-AB-3

NOTICE OF INTENT TO SEEK THE DEATH  
 PENALTY

18  
 19 Plaintiff United States of America, by and through its counsel  
 20 of record, the First Assistant United States Attorney for the Central  
 21 District of California, pursuant to 18 U.S.C. § 3593(a), hereby  
 22 notifies the Court and defendant DENNIS ANAYA URIAS that, the United  
 23 States believes the circumstances in Counts One, Two, and Three of  
 24 the Indictment are such that, in event of conviction, a sentence of  
 25 death is justified under 18 U.S.C. §§ 3591-3598, and that the United  
 26 States will seek the sentence of death for these offenses, each of  
 27 which carries a possible sentence of death:  
 28

1 The United States proposes to prove the following factors as  
2 justifying a sentence of death with regard to Counts One, Two and  
3 Three as specified below:

4 A. Defendant's Age at Time of Offense

5 DENNIS ANAYA URIAS was 18 years of age or older at the time of  
6 the offense.

7 B. Statutory Threshold Factors, Pursuant to 18 U.S.C.  
8 § 3591(a)(2)(A) - (D)

9 1. Intentional Killing

10 DENNIS ANAYA URIAS intentionally killed victim H.B. 18 U.S.C.  
11 § 3591(a)(2)(A).

12 2. Intentional Infliction of Serious Bodily Injury

13 DENNIS ANAYA URIAS intentionally inflicted serious bodily injury  
14 that resulted in the death of victim H.B. 18 U.S.C. § 3591(a)(2)(B).

15 3. Intentional Participation in an Act, Contemplating  
16 that the Life of Person Would be Taken

17 DENNIS ANAYA URIAS intentionally participated in an act,  
18 contemplating that the life of a person would be taken or intending  
19 that lethal force would be used in connection with a person, other  
20 than one of the participants in the offense, and victim H.B. died as  
21 a direct result of the act. 18 U.S.C. § 3591(a)(2)(C).

22 4. Intentional Engagement in Act of Violence, Knowing the  
23 Act Created a Grave Risk of Death to a Person

24 DENNIS ANAYA URIAS intentionally and specifically engaged in an  
25 act of violence, knowing that the act created a grave risk of death  
26 to a person, other than one of the participants in the offense, such  
27 that participation in the act constituted a reckless disregard for  
28

1 human life and victim H.B. died as a direct result of the act. 18  
2 U.S.C. § 3591(a)(2)(D).

3 C. Statutory Aggravating Factors, Pursuant to 18 U.S.C.  
4 § 3592(c)

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

8 1. Grave Risk of Death to Additional Persons

9 DENNIS ANAYA URIAS, in the commission of the offense, knowingly  
10 created a grave risk of death to at least one or more persons in  
11 addition to victim H.B. 18 U.S.C. § 3592(c)(5).

12 2. Substantial Planning and Premeditation

13 DENNIS ANAYA URIAS committed the offense after substantial  
14 planning and premeditation to cause the death of a person. 18 U.S.C.  
15 § 3592(c)(9).

16 D. Non-Statutory Factors, Pursuant to 18 U.S.C. § 3593(a)

17 Pursuant to Title 18, United States Code, Section 3593(a), the  
18 government will prove the following other aggravating factors in  
19 justifying a sentence of death:

20 1. Obstruction of Justice

21 DENNIS ANAYA URIAS murdered victim H.B. to retaliate for and  
22 prevent victim H.B.'s cooperation with the federal government in an  
23 active criminal prosecution.

24 2. Victim Impact

25 DENNIS ANAYA URIAS caused injury, harm and loss to victim H.B.,  
26 as well as to the family and friends of victim H.B. The injury, harm,  
27 and loss caused by DENNIS ANAYA URIAS is evidenced by the victim  
28

1 H.B.'s personal characteristics and by the impact of the victim  
2 H.B.'s death upon his family and friends.

3 3. Participation in Unadjudicated Criminal Offenses

4 In addition to the offenses charged in the First Superseding  
5 Indictment, defendant DENNIS ANAYA URIAS participated in  
6 unadjudicated criminal offenses, to wit: 1) beginning on a date  
7 unknown but no later than November 26, 2024, and continuing until on  
8 or about May 8, 2025, defendant URIAS conspired with ROBERTO CARLOS  
9 AGUILAR and GREVIL ZELAYA SANTIAGO, and others known and unknown, to  
10 commit Grand Theft, in violation of California Penal Code Section  
11 487; and 2) on or about April 7, 2025, defendant URIAS and GREVIL  
12 ZELAYA SANTIAGO, each aiding and abetting the other, attempted to  
13 murder victim E.D. in violation of California Penal Code Sections 31,  
14 187(a), 188(a)(1), 189(a), and 664(a).

15 4. Future Dangerousness of Defendant

16 a. *Lack of Remorse*

17 Defendant DENNIS ANAYA URIAS has demonstrated a lack of remorse  
18 for the capital offenses committed in this case, as indicated by  
19 defendant's statements and actions following the offenses charged in  
20 the First Superseding Indictment.

21 b. *Low Rehabilitative Potential*

22 Defendant DENNIS ANAYA URIAS has demonstrated a low potential  
23 for rehabilitation as evidenced by his longstanding involvement in  
24 criminal activities, including drug trafficking, grand theft, and  
25 acts of violence.

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