

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN**

UNITED STATES OF AMERICA,

v.

RICHARDSON DANGLEBEN, JR.,

Defendant.

Case No. 23-cr-72

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 Defendant **RICHARDSON DANGLEBEN, JR.** that the United States believes the circumstances in Count One of the Superseding Indictment (Use of a Firearm During a Crime of Violence Resulting in Death) 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 this offense.

The United States proposes to prove the following factors as justifying a sentence of death with regard to Count One:

1. Defendant **RICHARDSON DANGLEBEN, JR.** was 18 years of age or older at the time of the offense (18 U.S.C. § 3591(a)).
2. The government will prove the following intent factors enumerated under 18 U.S.C. § 3591(a)(2)(A)–(D) in justifying a sentence of death:
 - a. **RICHARDSON DANGLEBEN, JR.** intentionally killed the victim (18 U.S.C. § 3591(a)(2)(A));

b. **RICHARDSON DANGLEBEN, JR.** intentionally inflicted serious bodily injury that resulted in the death of the victim (18 U.S.C. § 3591(a)(2)(B));

c. **RICHARDSON DANGLEBEN, JR.** 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 a participant in the offense, and the victim died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C)); and

d. **RICHARDSON DANGLEBEN, JR.** intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than a participant in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D)).

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. **RICHARDSON DANGLEBEN, JR.** in the 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); and

b. **RICHARDSON DANGLEBEN, JR.** intentionally killed or attempted to kill more than one person in a single criminal episode (18 U.S.C. § 3592(c)(16).

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. **RICHARDSON DANGLEBEN, JR.**, caused injury, harm, and loss to the victim, as well as to the family and friends of the victim. The injury, harm, and loss caused

by **RICHARDSON DANGLEBEN, JR.** 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;

b. **RICHARDSON DANGLEBEN, JR.** committed other charged crimes of violence: the Attempted First Degree Murder and/or First Degree Assault and/or Third Degree Assault, as charged in Count 10, 11 and 12 of the Superseding Indictment;

c. **RICHARDSON DANGLEBEN, JR.** participated in additional uncharged crime: the homicide of Keith Jennings occurring on February 24, 2023;

d. In committing the crime charged in Count One of the Superseding Indictment **RICHARDSON DANGLEBEN, JR.** targeted a law enforcement officer acting in the line of duty; and

e. **RICHARDSON DANGLEBEN, JR.,** was on pretrial release from a violent crime at the time he committed the crime charged in Count One of the Superseding Indictment.

Respectfully submitted,

ADAM F. SLEEPER
ACTING UNITED STATES ATTORNEY

Dated: May 21, 2025

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