

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 97-CR-80235-01

Plaintiff,

HON: ARTHUR J. TARNOW

-vs-

D-1 JOHN BASS,

Defendant .

NOTICE OF INTENT TO SEEK THE DEATH PENALTY

FILED
APR 16 1998
U.S. DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NOW COMES the United States of America, pursuant to 18 U.S.C. § 3593, by and through its undersigned counsel, and notifies the Court and the defendant in the above captioned case that in the event of conviction for the murders of Patrick Webb and/or Armenty Shelton by use of a firearm in relation to a drug trafficking crime, the government will seek the penalty of death for John Bass.

The government will seek to prove the following aggravating factors as the basis for the death penalty:

A. Factors Enumerated under Title 18 United States Code § 3591(a)(2):

1. The defendant intentionally killed the victims. 18 U.S.C. § 3591(a)(2)(A).

B. Aggravating Factors Enumerated under Title 18 United States Code § 3592(c):

1. The defendant created a grave risk of death to others. 18 U.S.C. § 3592(c)(5).

2. The defendant committed the offense after substantial planning and premeditation to cause

the death of a person.


C. Other Aggravating Factors Identified Under 18 U.S.C. § 3593(a)(2) and § (c):

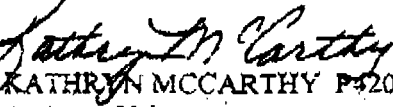
1. The defendant represents a continuing danger to the lives and safety in the future. This will be established by proof that defendant was involved in at least one additional murder /armed robbery and numerous physical assaults on other persons which will demonstrate a continuing pattern of violence.

2. Defendant has shown no remorse for the homicides.

Respectfully submitted,

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Dated: November 16, 2000