

I. AGGRAVATING FACTORS AS TO COUNT TWO

The Government will seek to prove the following aggravating factors as the basis for the imposition of the death penalty in relation to Count Two of the Superseding Indictment for the killing of Lori A. Robinson during the commission of a bank robbery in violation of Title 18, United States Code, Section 2113(e):

A. Statutory Aggravating Factors Enumerated under 18 U.S.C. § 3591(a)(2)(A) through (D):

1. The defendant, LAFAWN DEWAYNE BOBBITT, intentionally killed the victim, Lori A. Robinson. Section 3591(a)(2)(A).

2. The defendant, LAFAWN DEWAYNE BOBBITT, intentionally inflicted serious bodily injury that resulted in the death of the victim, Lori A. Robinson. Section 3591(a)(2)(B).

3. The defendant, LAFAWN DEWAYNE BOBBITT, 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, Lori A. Robinson, died as a direct result of the act. Section 3591(a)(2)(C).

4. The defendant, LAFAWN DEWAYNE BOBBITT, intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Lori A. Robinson, died as a direct result of the act. Section 3591(a)(2)(D).

B. Statutory Aggravating Factors Enumerated under 18 U.S.C. § 3592(c)(1) through (16):

1. In committing the offense described in Count Two, and in escaping apprehension for the violation of the offense, defendant LAFAWN DEWAYNE BOBBITT knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Lori A. Robinson. Section 3592(c)(5).

2. The defendant, LAFAWN DEWAYNE BOBBITT, committed the offense in Count Two as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value. Section 3592(c)(8).

3. The defendant, LAFAWN DEWAYNE BOBBITT, committed the offense in Count Two after substantial planning and premeditation to cause the death of a person. Section 3592(c)(9).

4. The defendant, LAFAWN DEWAYNE BOBBITT, attempted to intentionally kill more than one person in the single criminal episode alleged in Count Two. Section 3592(c)(16).

C. Other Non-Statutory Aggravating Factors Identified under 18 U.S.C. §3593(a) and (c):

1. On or about May 2, 1991, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a charge of breaking and entering occurring on or about April 10, 1991, in Chesterfield County, Virginia.

2. On or about August 17, 1992, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a charge of Curse and Abuse occurring on or about March 3, 1992, in Chesterfield County, Virginia.

3. On or about August 17, 1992, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a charge of Credit Card Forgery occurring on or about April 17, 1992, in Chesterfield County, Virginia.

4. On or about April 2, 1992, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a charge of Curse and Abuse occurring in Henrico County, Virginia.

5. On or about July 28, 1992, defendant LAFAWN DEWAYNE BOBBITT was found guilty on charges of Credit Card Forgery and Credit Card Theft in Henrico County, Virginia.

6. On or about June 21, 1993, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a show cause order in the Chesterfield County, Virginia, Juvenile and Domestic Relations Court.

7. In or about the fall of 1994, in Richmond, Virginia, defendant LAFAWN DEWAYNE BOBBITT, while armed with a handgun, took an automobile without permission and later returned it with a bullet hole in the door.

8. In or about the fall of 1994, at a Shoney's Restaurant in the Richmond area, defendant LAFAWN DEWAYNE BOBBITT threatened to kill another, and displayed a handgun in support of that threat.

9. On or about November 10, 1994, defendant LAFAWN DEWAYNE BOBBITT, was found in violation of the Richmond City Schools' Standards of Conduct, in that he was in possession of a weapon (box cutter) on school premises.

10. On or about March 31, 1995, in Richmond, Virginia, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a charge of Larceny from the Person arising from the theft of a purse from a 70 year old woman on September 9, 1994, which he committed with

his co-defendant Rashi Taque Jones.

11. On or about September 25, 1995, defendant LAFAWN DEWAYNE BOBBITT was found guilty of Obstruction of Justice and Trespassing occurring on August 26, 1995, in Richmond, Virginia.

12. On or about September 27, 1995, defendant LAFAWN DEWAYNE BOBBITT was found guilty of Brandishing a Firearm occurring on or about August 26, 1995, in Richmond, Virginia.

13. On or about October 26, 1995, defendant LAFAWN DEWAYNE BOBBITT was found guilty of Contempt of Court occurring on or about September 25, 1995, in Richmond, Virginia.

14. On or about February 9, 1996, the defendant, LAFAWN DEWAYNE BOBBITT, used and carried a .38 caliber revolver while committing a burglary of, and grand larceny from, D.R. Frick Auto Sales in Richmond, Virginia, which he committed with his co-defendant Rashi Taque Jones, and another.

15. On or about March 18, 1997, in Henrico County, Virginia, defendant LAFAWN DEWAYNE BOBBITT was convicted of Grand Larceny of an automobile, Possession of a Vehicle with an Altered Vehicle Identification Number (VIN), and Operating a Motor Vehicle after License Revoked, arising from offenses committed on August 2, 1996.

16. On or about September 24, 1996, defendant LAFAWN DEWAYNE BOBBITT committed a residential burglary in Chesterfield County, Virginia, in which he stole a .22 caliber revolver.

17. During in or about August of 1996 through December of 1996, in Richmond,

Virginia, defendant LAFAWN DEWAYNE BOBBITT possessed crack cocaine and marijuana with the intent to distribute those drugs, and packaged drugs for distribution.

18. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT shot Lori A. Robinson and Bobbi Jo White with a .380 caliber Lorcin semi-automatic pistol which was stolen during a residential burglary in Richmond, Virginia, on or about August 2, 1996.

19. On January 30, 1997, defendant LAFAWN DEWAYNE BOBBITT committed the offenses alleged in the Superseding Indictment while on pre-trial release from the felony charge of Grand Larceny, arising from the offenses occurring on August 2, 1996.

20. Defendant LAFAWN DEWAYNE BOBBITT committed the bank robbery alleged in the Superseding Indictment after substantial planning and premeditation, in that he and his co-defendant prepared for the bank robbery for several weeks ahead of time, shopped for specific weapons, planned for contingencies by purchasing reserve ammunition, planned ways to prevent being interrupted during the robbery, planned ways to intimidate and coerce bank employees, and planned ways to avoid personal identification.

21. During January, 1997, defendant LAFAWN DEWAYNE BOBBITT caused another to unwittingly purchase weapons for the bank robbery to avoid having the weapons traced to him, and because he could not lawfully purchase firearms.

22. On January 30, 1997, defendant LAFAWN DEWAYNE BOBBITT armed himself with semi-automatic weapons, extended clips and extra ammunition, amounting to a quantity and degree of firepower far in excess of any resistance or force he might encounter during a bank robbery.

23. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT, using a semiautomatic assault rifle, attempted to kill a Richmond City police officer while the police officer was engaged in the performance of his official duties.

24. The loss of Lori A. Robinson as an individual human being, including her personal characteristics and accomplishments is an aggravating factor.

25. The impact of the loss of Lori A. Robinson on her family is an aggravating factor.

26. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence against unarmed people who gave no resistance and presented no provocation.

27. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence which caused serious bodily injury and emotional trauma to Bobbi Jo White, in that he shot Bobbi Jo White two times in the torso at close range and without warning, which injuries have had a serious impact on the life of Bobbi Jo White.

28. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence which caused serious emotional trauma and bodily injury, including blindness in both eyes, to Floyd H. Dean, in that he shot Floyd H. Dean four times, one shot being to the head, which injuries have had a serious impact on the life of Floyd H. Dean.

29. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of

violence which caused serious bodily injury and emotional trauma to John Wiggins, in that he shot John Wiggins with a semiautomatic assault rifle, which injury has had a serious impact on the life of John Wiggins.

30. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence which caused severe emotional trauma to Karen L. Jones, which has had a serious impact on her life.

31. On January 30, 1997, defendant LAFAWN DEWAYNE BOBBITT intended to inflict serious emotional and physical harm on the employees and customers of NationsBank during the robbery through threats, intimidation and torture by the use of three cans of flammable charcoal lighter fluid and electrical cords which were implements of the criminal activity.

32. On or about February 7, 1997, in Richmond, Virginia, defendant LAWFAWN DEWAYNE BOBBITT possessed a Cobrey PM-11, nine millimeter semiautomatic weapon, which he referred to as a MAC-11, with an attached laser scope.

33. While incarcerated awaiting trial, defendant LAFAWN DEWAYNE BOBBITT has expressly exhibited a total lack of remorse toward the death of Lori A. Robinson, and has boastfully re-enacted the shooting which occurred during the bank robbery.

34. Defendant LAFAWN DEWAYNE BOBBITT poses a future danger to society in that he is likely to engage in acts of violence against others if ever released back into society.

35. Defendant LAFAWN DEWAYNE BOBBITT poses a future danger to inmates and correctional officers in an institutional setting in that he is likely to attempt to escape or engage in acts of violence against others.

(a) In or about late May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, while in the custody of the United States Marshal in the Piedmont Regional Jail, Farmville, Virginia, did devise a scheme to escape from that facility by breaking out through a perimeter wall of the jail.

(b) In or about late May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, while in the custody of the United States Marshal at the Piedmont Regional Jail, Farmville, Virginia, fashioned from a mop bucket a shank which was to be used as an implement in aid of his escape.

(c) In or about late May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, as part of the scheme to escape from the custody of the United States Marshal and from confinement at the Piedmont Regional Jail, solicited others to obtain and purchase firearms, including a Cobrey PM-11, nine millimeter semiautomatic weapon, referred to as a MAC-11 by the defendant, to aid in his escape from the institution.

(d) In or about May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, did express his intent to kill any correctional officers, police officers, or other law enforcement officers who attempted to prevent his escape from custody at the Piedmont Regional Jail.

36. The Government further gives notice that in support of the imposition of the death penalty it intends to rely upon all the evidence admitted by the Court at the guilt phase of the trial and the offenses of conviction as described in the Superseding Indictment as they relate to the background and character of the defendant, LAFAWN DEWAYNE BOBBITT, his moral culpability, his future dangerousness, and the nature and circumstances of the offense charged in

Count Two of the Superseding Indictment.

II. AGGRAVATING FACTORS AS TO COUNT FOUR

The Government will seek to prove the following aggravating factors as the basis for imposition of the death penalty in relation to Count Four of the Superseding Indictment for the killing of Lori A. Robinson through the use of a firearm during a violation of Title 18, United States Code, Section 924(c), in violation of Title 18 United States Code, Section 924(j)(1):

A. Statutory Aggravating Factors Enumerated under 18 U.S.C. § 3591(a)(2)(A) through (D):

1. The defendant, LAFAWN DEWAYNE BOBBITT, intentionally killed the victim, Lori A. Robinson. Section 3591(a)(2)(A).

2. The defendant, LAFAWN DEWAYNE BOBBITT, intentionally inflicted serious bodily injury that resulted in the death of the victim, Lori A. Robinson. Section 3591(a)(2)(B).

3. The defendant, LAFAWN DEWAYNE BOBBITT, 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, Lori A. Robinson, died as a direct result of the act. Section 3591(a)(2)(C).

4. The defendant, LAFAWN DEWAYNE BOBBITT, intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim, Lori A. Robinson, died as a direct result of the act.

Section 3591(a)(2)(D).

B. Statutory Aggravating Factors Enumerated under 18 U.S.C. § 3592(c)(1) through (16):

1. In committing the offense described in Count Four, and in escaping apprehension for the violation of the offense, defendant LAFAWN DEWAYNE BOBBITT knowingly created a grave risk of death to one or more persons in addition to the victim of the offense, Lori A. Robinson. Section 3592(c)(5).

2. The defendant, LAFAWN DEWAYNE BOBBITT, committed the offense in Count Four as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value. Section 3592(c)(8).

3. The defendant, LAFAWN DEWAYNE BOBBITT, committed the offense in Count Four after substantial planning and premeditation to cause the death of a person. Section 3592(c)(9).

4. The defendant, LAFAWN DEWAYNE BOBBITT, attempted to intentionally kill more than one person in the single criminal episode alleged in Count Four. Section 3592(c)(16).

C. Other Non-Statutory Aggravating Factors Identified under 18 U.S.C. §3593(a) and (c):

1. On or about May 2, 1991, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a charge of breaking and entering occurring on or about April 10, 1991, in Chesterfield County, Virginia.

2. On or about August 17, 1992, defendant LAFAWN DEWAYNE BOBBITT was

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6. On or about June 21, 1993, defendant LAFAWN DEWAYNE BOBBITT was found guilty on a show cause order in the Chesterfield County, Virginia, Juvenile and Domestic Relations Court.

7. In or about the fall of 1994, in Richmond, Virginia, defendant LAFAWN DEWAYNE BOBBITT, while armed with a handgun, took an automobile without permission and later returned it with a bullet hole in the door.

8. In or about the fall of 1994, at a Shoney's Restaurant in the Richmond area, defendant LAFAWN DEWAYNE BOBBITT threatened to kill another, and displayed a handgun in support of that threat.

9. On or about November 10, 1994, defendant LAFAWN DEWAYNE BOBBITT, was found in violation of the Richmond City Schools' Standards of Conduct, in that he was in possession of a weapon (box cutter) on school premises.

10. On or about March 31, 1995, in Richmond, Virginia, defendant LAFAWN

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18. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT shot Lori A. Robinson and Bobbi Jo White with a .380 caliber Lorcin semi-automatic pistol which was stolen during a residential burglary in Richmond, Virginia, on or about August 2, 1996.

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20. Defendant LAFAWN DEWAYNE BOBBITT committed the bank robbery alleged in the Superseding Indictment after substantial planning and premeditation, in that he and his co-defendant prepared for the bank robbery for several weeks ahead of time, shopped for specific weapons, planned for contingencies by purchasing reserve ammunition, planned ways to prevent being interrupted during the robbery, planned ways to intimidate and coerce bank employees, and planned ways to avoid personal identification.

21. During January, 1997, defendant LAFAWN DEWAYNE BOBBITT caused another to unwittingly purchase weapons for the bank robbery to avoid having the weapons traced to him, and because he could not lawfully purchase firearms.

22. On January 30, 1997, defendant LAFAWN DEWAYNE BOBBITT armed himself with semi-automatic weapons, extended clips and extra ammunition, amounting to a quantity and

degree of firepower far in excess of any resistance or force he might encounter during a bank robbery.

23. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT, using a semiautomatic assault rifle, attempted to kill a Richmond City police officer while the police officer was engaged in the performance of his official duties.

24. The loss of Lori A. Robinson as an individual human being, including her personal characteristics and accomplishments is an aggravating factor.

25. The impact of the loss of Lori A. Robinson on her family is an aggravating factor.

26. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence against unarmed people who gave no resistance and presented no provocation.

27. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence which caused serious bodily injury and emotional trauma to Bobbi Jo White, in that he shot Bobbi Jo White two times in the torso at close range and without warning, which injuries have had a serious impact on the life of Bobbi Jo White.

28. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence which caused serious emotional trauma and bodily injury, including blindness in both eyes, to Floyd H. Dean, in that he shot Floyd H. Dean four times, one shot being to the head, which injuries have had a serious impact on the life of Floyd H. Dean.

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30. On January 30, 1997, during the robbery alleged in the Superseding Indictment, defendant LAFAWN DEWAYNE BOBBITT intentionally and willfully committed acts of violence which caused severe emotional trauma to Karen L. Jones, which has had a serious impact on her life.

31. On January 30, 1997, defendant LAFAWN DEWAYNE BOBBITT intended to inflict serious emotional and physical harm on the employees and customers of NationsBank during the robbery through threats, intimidation and torture by the use of three cans of flammable charcoal lighter fluid and electrical cords which were implements of the criminal activity.

32. On or about February 7, 1997, in Richmond, Virginia, defendant LAFAWN DEWAYNE BOBBITT possessed a Cobrey PM-11, nine millimeter semiautomatic weapon, which he referred to as a MAC-11, with an attached laser scope.

33. While incarcerated awaiting trial, defendant LAFAWN DEWAYNE BOBBITT has expressly exhibited a total lack of remorse toward the death of Lori A. Robinson, and has boastfully re-enacted the shooting which occurred during the bank robbery.

34. Defendant LAFAWN DEWAYNE BOBBITT poses a future danger to society in that he is likely to engage in acts of violence against others if ever released back into society.

35. Defendant LAFAWN DEWAYNE BOBBITT poses a future danger to inmates and

correctional officers in an institutional setting in that he is likely to attempt to escape or engage in acts of violence against others.

(a) In or about late May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, while in the custody of the United States Marshal in the Piedmont Regional Jail, Farmville, Virginia, did devise a scheme to escape from that facility by breaking out through a perimeter wall of the jail.

(b) In or about late May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, while in the custody of the United States Marshal at the Piedmont Regional Jail, Farmville, Virginia, fashioned from a mop bucket a shank which was to be used as an implement in aid of his escape.

(c) In or about late May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, as part of the scheme to escape from the custody of the United States Marshal and from confinement at the Piedmont Regional Jail, solicited others to obtain and purchase firearms, including a Cobrey PM-11, nine millimeter semiautomatic weapon, referred to as a MAC-11 by the defendant, to aid in his escape from the institution.

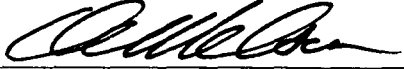
(d) In or about May and early June, 1997, defendant LAFAWN DEWAYNE BOBBITT, did express his intent to kill any correctional officers, police officers, or other law enforcement officers who attempted to prevent his escape from custody at the Piedmont Regional Jail.

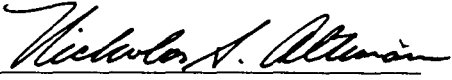
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background and character of the defendant, LAFAWN DEWAYNE BOBBITT, his moral culpability, his future dangerousness, and the nature and circumstances of the offense charged in Count Four of the Superseding Indictment.

Respectfully submitted,

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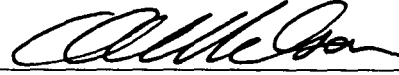

Todd B. Stone
Special Assistant
United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was mailed this date to below listed counsel.

9/22/97

Date



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