

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 92-81127

-vs-

HONORABLE AVERN COHN

D-6 MICHAEL WILLIAMS,

Defendant.

AMENDED NOTICE OF INTENT TO SEEK THE DEATH PENALTY

COMES NOW the United States of America, pursuant to 21 U.S.C. § 848(h)(1) (A) and (B), 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 murder of Joseph Long and Stanley Minkerson, the government will seek the sentence of death for Michael Williams.

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

I. For the Murder of Joseph Long

A. Aggravating Factors Enumerated under 21 U.S.C. § 848(n) (1) (A) through (D):

1. The defendant intentionally killed the victim, (n)(1)(A).
2. The defendant intentionally inflicted serious bodily injury which resulted in the death of the victim, (n)(1)(B).
3. The defendant intentionally engaged in conduct intending that the victim be killed and that lethal force be employed against the victim, which resulted in the death of the victim, (n)(1)(C).

B. Aggravating Factors Enumerated under 21 U.S.C. § 848(n) (2) through (12):

1. The defendant committed the offense after substantial planning and premeditation, (n)(8).

II. For the Murder of Stanley Minkerson

A. Aggravating Factors Enumerated under 21 U.S.C. § 848(n) (1) (A) through (D):

1. The defendant intentionally killed the victim, (n)(1)(A).

2. The defendant intentionally inflicted serious bodily injury which resulted in the death of the victim, (n)(1)(B).

3. The defendant intentionally engaged in conduct which defendant knew would create a grave risk of death to more than one person, other than the participants in the offense and resulted in the death of an innocent victim, namely Stanley Minkerson, (n)(1)(D).

B. Aggravating Factors Enumerated under 21 U.S.C. § 848(n) (2) through (12):

1. The defendant committed the offense after substantial planning and premeditation, (n)(8).

C. Other Aggravating Factors Identified under 21 U.S.C. § 848 (h)(1)(B) and § 848(k):

1. The defendant represents a continuing danger to the lives of others in the future based upon:

(a) continuing pattern of indiscriminate violence and criminal activity; namely, the defendant intentionally killed and counseled, commanded, induced, procured and caused the

intentional killing of Tony Spiers, and such killing resulted,

(b) continuing pattern of indiscriminate violence and criminal activity; namely, the defendant intentionally killed and counseled, ~~commanded~~, induced, procured and caused the intentional killing of Randolph Wilson, and such killing resulted,

(c) continuing pattern of indiscriminate violence and criminal activity; namely, the defendant intentionally killed and counseled, commanded, induced, procured and caused the intentional killing of Jerome Douglas, and such killing resulted,

(d) continuing pattern of indiscriminate violence and criminal activity; namely, the defendant intentionally killed and counseled, commanded, induced, procured and caused the intentional killing of Bernard Lamar, and such killing resulted,

(e) continuing pattern of indiscriminate violence and criminal activity; namely, the defendant intentionally killed and counseled, commanded, induced, procured and caused the intentional killing of William Miles, and such killing resulted,

(f) continuing pattern of indiscriminate violence and criminal activity; namely, the defendant intentionally killed and counseled, commanded, induced, procured and caused the intentional killing of George Mason, and such

Killing resulted,

(g) continuing pattern of indiscriminate violence and criminal activity; namely, the defendant intentionally killed and counseled, commanded, induced, procured and caused the intentional killing of Sidney Edwards, and such killing resulted,

(h) low potential for rehabilitation, and

(i) lack of remorse.

2. The defendant caused harm as a result of the impact of the killing upon the family of one or more of the victims:

(a) Joseph Long

(b) Stanley Minkerson

(c) Tony Spiers

(d) Randolph Wilson

(e) Jerome Douglas

(f) Bernard Lamar

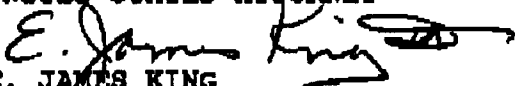
(g) William Miles

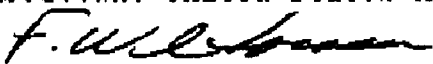
(h) George Mason

(i) Sidney Edwards

Respectfully submitted,

SAUL A. GREEN
UNITED STATES ATTORNEY


E. JAMES KING
Assistant United States Attorney


F. WILLIAM SOISSON
Assistant United States Attorney

Dated: 3/10/95

LAW OFFICES

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March 17, 1995

Kevin McNally
513 Capitol Ave.
Frankfort, Ky. 40602

David Bruck
P.O. Box 11744
Columbia, S.C. 29211

VIA FACSIMILE

Re: U.S. v. Michael Williams
No. 92-81127

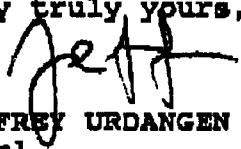
Dear Kevin & David:

Earlier this week I received the government's amended death penalty notice. I include a copy with this fax. Some of the new names have not previously been mentioned in connection with my client's activities. No discovery materials accompanied this notice, though a prosecutor has assured me this is "in the mail."

Cindy has been out all week, but Tony Chambers advises me their client's notice has also been amended to include several additional names.

We are set to begin jury selection June 1st. Please call with any comments.

Very truly yours,


JEFFREY URDANGEN
JU/rl

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 92-81127

-vs-

HONORABLE AVERN COHN

D-6 MICHAEL WILLIAMS,

Defendant.

**NOTICE OF INTENT TO SEEK
THE DEATH PENALTY**

Now comes the United States of America, by and through Alan Gershel, United States Attorney and F. William Soisson, and E. James King, Assistant United States Attorneys, and notifies the Court and the Defendant that the government, in the event of a conviction on Count 54 of the Indictment in this case which charges a violation of Title 21, United States Code, Section 848(e)(1)(A), the United States of America will seek the sentence of death.

The applicable aggravating factors enumerated in Title 21, United States Code, Section 848(n) are as follows:

THE INTENTIONAL KILLING OF JOSEPH LONG AND STANLEY MINKERSON

1. Joseph Long was intentionally killed. 21 U.S.C. § 848(n)(1).
2. The offense was committed after substantial planning and premeditation. 21 U.S.C. § 848(n)(8).
3. The defendant intentionally engaged in conduct intending that a person be killed and that lethal force be employed against Joseph Long which resulted in the death of the victim. 21 U.S.C. § 848(n)(1)(C).

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U.S. DISTRICT COURT
EAST DISTRICT
OF MICHIGAN
DETROIT

4. The defendant intentionally engaged in conduct which defendant knew would create a grave risk of death to more than one person, other than the participants in the offense and resulted in the death of an innocent victim, namely, Stanley Minkerson. 21 U.S.C. § 848(n)(1)(D).

OTHER FACTORS

5. Deadly weapons were used by the defendant in the murders of Joseph Long and Stanley Minkerson.

6. The defendant committed the offenses as to which he is charged in the Indictment herein.

7. The offense charged in Count 54 of the Indictment herein was committed in relation to certain drug trafficking criminality.

8. Attempts to rehabilitate defendant or deter defendant from future felonious criminal behavior have been unsuccessful.

9. There is a probability that the defendant will commit criminal acts of violence that will constitute a continuing threat to society in the future.

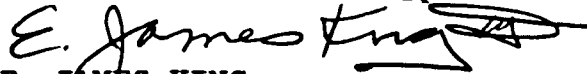
10. Any relevant aggravating conduct committed by defendant or attributable to defendant which is admitted at trial herein

respecting the charged drug trafficking conspiracy and or the
charged continuing criminal enterprise.

Respectfully submitted,



ALAN M. GERSHEL
United States Attorney.



E. JAMES KING
Assistant United States Attorney



F. WILLIAM SOISSON
Assistant United States Attorney

Dated: 8/11/93

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 92-81127

-vs-

HONORABLE AVERN COHN

D-6 MICHAEL WILLIAMS,

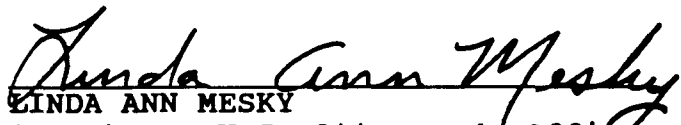
Defendant.

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the Government's
NOTICE OF INTENT TO SEEK THE DEATH PENALTY has this 11th day of
August, 1993, made upon the counsel by placing same in a government
franked envelope and depositing said envelope in the United States
mail addressed to:

Patricia A. Streeter
1816 One Kennedy Square
Detroit, MI 48226


LINDA ANN MESKY
Secretary, U.S. Attorney's Office

Dated: 8/11/93