

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 3:98CR150 - 01
)	
)	
JOSEPH BULLOCK, III,)	
aka "Bay Bay")	
aka "Anthony B. Bullock")	
aka "Anthony Benjamin Bullock")	
Defendant)	
)	

NOTICE OF INTENT TO SEEK A SENTENCE OF DEATH

COMES NOW the United States of America, pursuant to Title 21, United States Code, Sections 848(e)(1)(A) and 848(h)(1)(A) & (B), by its United States Attorney for the Eastern District of Virginia, Helen F. Fahey, and her Assistant United States Attorney, David Novak, and hereby notifies the Court and the defendant JOSEPH BULLOCK, III, and his counsel, that in the event of the defendant's conviction of any of Counts Four, Seven and Eight of the pending Indictment, wherein the defendant is charged with intentionally killing Larry Spruill, Charlie Blount and Steven Mitchell, and aiding and abetting said intentional killings, while engaged in an offense punishable under Title 21, United States Code, Section 841(b)(1)(A), the Government will seek the sentence of death.

I. 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 Indictment for the intentional

killing of Larry Spruill:

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

1. The defendant intentionally killed Larry Spruill. Section 848(n)(1)(A).
2. The defendant intentionally inflicted serious bodily injury which resulted in the death of Larry Spruill. Section 848(n)(1)(B).
3. The defendant intentionally engaged in conduct intending that the victim, Larry Spruill, be killed and that lethal force be employed against the victim, which resulted in the death of Larry Spruill. Section 848(n)(1)(C).
4. The defendant intentionally engaged in conduct which the defendant knew would create a grave risk of death to a person, other than one of the participants in the offense, and that conduct resulted in the death of Larry Spruill. Section 848(n)(1)(D).

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

1. The defendant JOSEPH BULLOCK, III committed the offense described in Count Four in expectation of the receipt of something of pecuniary value. Section 848(n)(7).
2. The defendant JOSEPH BULLOCK, III committed the offense described in Count Four after substantial planning and premeditation. Section 848(n)(8).

C. Non-Statutory, Aggravating Factors Identified under 21 U.S.C. § 848 (h)(1)(B) and § 848(k):

1. The defendant JOSEPH BULLOCK, III has engaged in a pattern of juvenile criminal activity dating from age fourteen (14) which demonstrates the defendant's propensity for violence, use of weapons, and inability to conform his behavior to societal norms even while

incarcerated, as shown by the following predicate acts and adjudications:

- a. On or about August 7, 1980, the defendant committed a Petit Larceny of a bicycle.
- b. On or about August 12, 1980, the defendant possessed a Concealed Weapon.
- c. On or about January 29, 1981, the defendant committed an Assault.
- d. On or about September 15, 1981, the defendant committed a Petit Larceny.
- e. On or about September 26, 1981, the defendant escaped from the juvenile facility (Richmond Detention Home) where he was detained.
- f. On or about June 8, 1982, which was approximately ten (10) weeks after being released from the Beaumont Learning Center, the defendant committed a Robbery when he robbed a sixteen (16) year old victim at gunpoint of the victim's sneakers.

2. The defendant JOSEPH BULLOCK, III has been convicted as an adult of numerous criminal offenses, demonstrating his disdain for the criminal justice system and his low potential for rehabilitation and reform, as shown by the following:

- a. On or about October 5, 1982, the defendant JOSEPH BULLOCK, III pled guilty to Robbery.
- b. On or about July 23, 1991, the defendant JOSEPH BULLOCK, III was convicted of possessing a Concealed Weapon.
- c. On or about October 9, 1992, the defendant JOSEPH BULLOCK, III pled guilty to Possession of Heroin as an Accessory after the Fact.
- d. On or about April 13, 1995, the defendant JOSEPH BULLOCK, III pled guilty to Forging a Public Record.

e. On or about April 27, 1995, the defendant JOSEPH BULLOCK, III pled guilty to possessing a Concealed Weapon.

f. On or about October 20, 1997, the defendant JOSEPH BULLOCK, III pled guilty to Forging a Financial Responsibility Document.

g. On or about November 6, 1997, the defendant JOSEPH BULLOCK, III was convicted of Possession of a Firearm by a Convicted Felon.

3. The defendant JOSEPH BULLOCK, III has had little or no gainful employment in his adult life and has supported himself by selling drugs to others.

4. The defendant JOSEPH BULLOCK, III as a convicted felon, has illegally obtained and possessed numerous firearms and has carried these firearms on his person and in his vehicles.

5. The defendant JOSEPH BULLOCK, III has repeatedly engaged in acts of violence as demonstrated by the following:

a. On or about December 13, 1985, the defendant JOSEPH BULLOCK, III shot Timothy Bell in the head.

b. On or about an unknown date in 1989, the defendant JOSEPH BULLOCK, III shot his cousin, Thomas Horton, in the shoulder.

c. The defendant JOSEPH BULLOCK, III repeatedly abused his wife, Adricne Bullock, including, but not limited to, shooting and wounding her on November 8, 1988 and again on July 3, 1991.

d. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Tanyelle Peoples, including, but not limited to, beating her on March 13, 1991 to the extent that

Ms. Peoples suffered from a damaged kidney and then, on another occasion, took her to a wooded area with the intent of shooting her to death.

c. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Talinda Davis, including, but not limited to, stabbing her in her right breast on December 10, 1995, and later had her held hostage to prevent her from testifying about the attack in a state prosecution of the defendant for this attack.

f. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Leslie Harris.

g. The defendant JOSEPH BULLOCK, III repeatedly threatened to kill his mother, Dorothy Ward, and his brother, Eddie Samuels aka "Nixon Bullock".

h. On or about May 31, 1990, the defendant JOSEPH BULLOCK, III urged his friend, David Johnson, to shoot at Richmond Police Narcotics Detectives Darrell Alston and Ronnic Armstead. Johnson then did shoot at the officers.

i. On or about May 14, 1991, the defendant JOSEPH BULLOCK, III and co-conspirator Marvin Damon attempted to shoot Jeff Hawkins aka "Boroach" and Maurice Gainyard to death in the alley at Mosby and O Streets in Richmond, Virginia, due to an on-going battle over drug turf.

j. On or about an unknown date in January of 1994, the defendant JOSEPH BULLOCK, III accepted a contract to kill Tion Kimbrough for \$10,000 and attempted to locate Kimbrough in order to kill him.

k. On or about March 22, 1995, the defendant JOSEPH BULLOCK, III abused his son, Deonte Bullock, then six (6) years old, by beating him to the extent that he required

medical treatment.

l. On or about an unknown date during the summer of 1995, the defendant JOSEPH BULLOCK, III and two co-conspirators invaded the residence of drug trafficker Corey Johnson at 4421 Foxtail Lane in Henrico County, Virginia, and robbed him at gunpoint of drugs, money and various items.

m. The defendant JOSEPH BULLOCK, III regularly threatened to kill those who refused his requests to sell his drugs.

6. The defendant JOSEPH BULLOCK, III has displayed a lack of remorse for the murder of Larry Spruill aka "Little Larry" and, indeed, bragged that he tortured Spruill before killing him.

7. The defendant JOSEPH BULLOCK, III, threatened witness Talinda Davis in an effort to prevent her from revealing her knowledge of the defendant having murdered Larry Spruill aka "Little Larry".

8. Less than nine (9) months after murdering Larry Spruill aka "Little Larry", the defendant shot Charlic Blount and Steven Mitchell to death on April 6, 1994 as alleged in Counts Seven and Eight of the Indictment.

9. The defendant JOSEPH BULLOCK, III poses a future danger to society in that he is likely to return to narcotics trafficking and acts of violence if ever released back into society.

10. The defendant JOSEPH BULLOCK, III poses a future danger to society in that he is likely to attempt to escape from confinement.

11. The defendant JOSEPH BULLOCK, III poses a future danger to inmates and correctional officers in an institutional setting in that he is likely to engage in acts of violence

against others.

The Government further gives notice that in support of 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 Indictment as they relate to the background and character of the defendant JOSEPH BULLOCK, III, his moral culpability, his future dangerousness, and the nature and circumstances of the offense charged in Count Four of the Indictment.

II. AGGRAVATING FACTORS AS TO COUNT SEVEN

The Government will seek to prove the following aggravating factors as the basis for imposition of the death penalty in relation to Count Seven of the Indictment for the intentional killing of Charlie Blount:

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

1. The defendant intentionally killed Charlie Blount. Section 848(n)(1)(A).
2. The defendant intentionally inflicted serious bodily injury which resulted in the death of Charlie Blount. Section 848(n)(1)(B).
3. The defendant intentionally engaged in conduct intending that the victim, Charlie Blount, be killed and that lethal force be employed against the victim, which resulted in the death of Charlie Blount. Section 848(n)(1)(C).
4. The defendant intentionally engaged in conduct which the defendant knew would create a grave risk of death to a person, other than one of the participants in the offense, and that conduct resulted in the death of Charlie Blount. Section 848(n)(1)(D).

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

1. The defendant JOSEPH BULLOCK, III created a grave risk of death to others than the intended victims. Section 848(n)(5).

2. The defendant JOSEPH BULLOCK, III committed the offense described in Count Seven in expectation of the receipt of something of pecuniary value. Section 848(n)(7).

3. The defendant JOSEPH BULLOCK, III committed the offense described in Count Seven after substantial planning and premeditation. Section 848(n)(8).

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

1. The defendant JOSEPH BULLOCK, III has engaged in a pattern of juvenile criminal activity dating from age fourteen (14) which demonstrates the defendant's propensity for violence, use of weapons, and inability to conform his behavior to societal norms even while incarcerated, as shown by the following predicate acts and adjudications:

a. On or about August 7, 1980, the defendant committed a Petit Larceny of a bicycle.

b. On or about August 12, 1980, the defendant possessed a Concealed Weapon.

c. On or about January 29, 1981, the defendant committed an Assault.

d. On or about September 15, 1981, the defendant committed a Petit Larceny.

e. On or about September 26, 1981, the defendant escaped from the juvenile facility (Richmond Detention Home) where he was detained.

f. On or about June 8, 1982, which was approximately ten (10) weeks after being released from the Beaumont Learning Center, the defendant committed a Robbery when he

robbed a sixteen (16) year old victim at gunpoint of the victim's sneakers.

2. The defendant JOSEPH BULLOCK, III has been convicted as an adult of numerous criminal offenses, demonstrating his disdain for the criminal justice system and his low potential for rehabilitation and reform, as shown by the following:

a. On or about October 5, 1982, the defendant JOSEPH BULLOCK, III pled guilty to Robbery.

b. On or about July 23, 1991, the defendant JOSEPH BULLOCK, III was convicted of possessing a Concealed Weapon.

c. On or about October 9, 1992, the defendant JOSEPH BULLOCK, III pled guilty to Possession of Heroin as an Accessory after the Fact.

d. On or about April 13, 1995, the defendant JOSEPH BULLOCK, III pled guilty to Forging a Public Record.

e. On or about April 27, 1995, the defendant JOSEPH BULLOCK, III pled guilty to possessing a Concealed Weapon.

f. On or about October 20, 1997, the defendant JOSEPH BULLOCK, III pled guilty to Forging a Financial Responsibility Document.

g. On or about November 6, 1997, the defendant JOSEPH BULLOCK, III pled guilty to Possession of a Firearm by a Convicted Felon.

3. The defendant JOSEPH BULLOCK, III has had little or no gainful employment in his adult life and has supported himself by selling drugs to others.

4. The defendant JOSEPH BULLOCK, III, as a convicted felon, has illegally obtained and possessed numerous firearms and has carried these firearms on his person and in his

vehicles.

5. The defendant JOSEPH BULLOCK, III has repeatedly engaged in acts of violence as demonstrated by the following:

a. On or about December 13, 1985, the defendant JOSEPH BULLOCK, III shot Timothy Bell in the head.

b. On or about an unknown date in 1989, the defendant JOSEPH BULLOCK, III shot his cousin, Thomas Horton, in the shoulder.

c. The defendant JOSEPH BULLOCK, III repeatedly abused his wife, Adrienne Bullock, including, but not limited to, shooting and wounding her on November 8, 1988 and again on July 3, 1991.

d. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Tanyelle Peoples, including, but not limited to, beating her on March 13, 1991 to the extent that Ms. Peoples suffered from a damaged kidney and then, on another occasion, took her to a wooded area with the intent of shooting her to death.

e. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Talinda Davis, including, but not limited to, stabbing her in her right breast on December 10, 1995, and later had her held hostage to prevent her from testifying about the attack in a state prosecution of the defendant for this attack.

f. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Leslie Harris.

g. The defendant JOSEPH BULLOCK, III repeatedly threatened to kill his mother, Dorothy Ward, and his brother, Eddie Samuels aka "Nixon Bullock".

h. On or about May 31, 1990, the defendant JOSEPH BULLOCK, III urged his friend, David Johnson, to shoot at Richmond Police Narcotics Detectives Darrell Alston and Ronnie Armstead. Johnson then did shoot at the officers.

i. On or about May 14, 1991, the defendant JOSEPH BULLOCK, III and co-conspirator Marvin Damon attempted to shoot Jeff Hawkins aka "Boroach" and Maurice Gainyard to death in the alley at Mosby and O Streets in Richmond, Virginia, due to an on-going battle over drug turf.

j. On or about an unknown date in January of 1994, the defendant JOSEPH BULLOCK, III accepted a contract to kill Tion Kimbrough for \$10,000 and attempted to locate Kimbrough in order to kill him.

k. On or about March 22, 1995, the defendant JOSEPH BULLOCK, III abused his son, Deonte Bullock, then six (6) years old, by beating him to the extent that he required medical treatment.

l. On or about an unknown date during the summer of 1995, the defendant JOSEPH BULLOCK, III and two co-conspirators invaded the residence of drug trafficker Corey Johnson at 4421 Foxtail Lane in Henrico County, Virginia, and robbed him at gunpoint of drugs, money and various items.

m. The defendant JOSEPH BULLOCK, III regularly threatened to kill those who refused his requests to sell his drugs.

6. The defendant JOSEPH BULLOCK, III participated in the killing of two human beings, Charlie Blount and Steven Mitchell, in one criminal episode.

7. The defendant JOSEPH BULLOCK, III has displayed a lack of remorse for the

murders of Charlie Blount and Steven Mitchell and, indeed, bragged about killing them.

8. The defendant JOSEPH BULLOCK, III, threatened witnesses in an effort to prevent them from revealing their knowledge of the defendant having murdered Charlie Blount and Steven Mitchell.

9. The defendant killed Charlie Blount and Steven Mitchell less than nine (9) months after murdering Larry Spruill aka "Little Larry" on July 21, 1993 as alleged in Count Four of the Indictment.

10. The defendant JOSEPH BULLOCK, III poses a future danger to society in that he is likely to return to narcotics trafficking and acts of violence if ever released back into society.

11. The defendant JOSEPH BULLOCK, III poses a future danger to society in that he is likely to attempt to escape from confinement.

12. The defendant JOSEPH BULLOCK, III poses a future danger to inmates and correctional officers in an institutional setting in that he is likely to engage in acts of violence against others.

The Government further gives notice that in support of 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 Indictment as they relate to the background and character of the defendant JOSEPH BULLOCK, III, his moral culpability, his future dangerousness, and the nature and circumstances of the offense charged in Count Seven of the Indictment.

III. AGGRAVATING FACTORS AS TO COUNT EIGHT

The Government will seek to prove the following aggravating factors as the basis for imposition of the death penalty in relation to Count Eight of the Indictment for the intentional killing of Steven Mitchell:

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

1. The defendant intentionally killed Steven Mitchell. Section 848(n)(1)(A).
2. The defendant intentionally inflicted serious bodily injury which resulted in the death of Steven Mitchell. Section 848(n)(1)(B).
3. The defendant intentionally engaged in conduct intending that the victim, Steven Mitchell, be killed and that lethal force be employed against the victim, which resulted in the death of Steven Mitchell. Section 848(n)(1)(C).
4. The defendant intentionally engaged in conduct which the defendant knew would create a grave risk of death to a person, other than one of the participants in the offense, and that conduct resulted in the death of Steven Mitchell. Section 848(n)(1)(D).

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

1. The defendant JOSEPH BULLOCK, III created a grave risk of death to others than the intended victims. Section 848(n)(5).
2. The defendant JOSEPH BULLOCK, III committed the offense described in Count Eight in expectation of the receipt of something of pecuniary value. Section 848(n)(7).
3. The defendant JOSEPH BULLOCK, III committed the offense described in Count Eight after substantial planning and premeditation. Section 848(n)(8).

C. Non-Statutory, Aggravating Factors Identified under 21 U.S.C. § 848 (h)(1)(B) and § 848(k):

1. The defendant JOSEPH BULLOCK, III has engaged in a pattern of juvenile criminal activity dating from age fourteen (14) which demonstrates the defendant's propensity for violence, use of weapons, and inability to conform his behavior to societal norms even while incarcerated, as shown by the following predicate acts and adjudications:

a. On or about August 7, 1980, the defendant committed a Petit Larceny of a bicycle.

b. On or about August 12, 1980, the defendant possessed a Concealed Weapon.

c. On or about January 29, 1981, the defendant committed an Assault.

d. On or about September 15, 1981, the defendant committed a Petit Larceny.

e. On or about September 26, 1981, the defendant escaped from the juvenile facility (Richmond Detention Home) where he was detained.

f. On or about June 8, 1982, which was approximately ten (10) weeks after being released from the Beaumont Learning Center, the defendant committed a Robbery when he robbed a sixteen (16) year old victim at gunpoint of the victim's sneakers.

2. The defendant JOSEPH BULLOCK, III has been convicted as an adult of numerous criminal offenses, demonstrating his disdain for the criminal justice system and his low potential for rehabilitation and reform, as shown by the following:

a. On or about October 5, 1982, the defendant JOSEPH BULLOCK, III pled guilty to Robbery.

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c. On or about October 9, 1992, the defendant JOSEPH BULLOCK, III pled guilty to Possession of Heroin as an Accessory after the Fact.

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a. On or about December 13, 1985, the defendant JOSEPH BULLOCK, III shot Timothy Bell in the head.

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shot his cousin, Thomas Horton, in the shoulder.

c. The defendant JOSEPH BULLOCK, III repeatedly abused his wife, Adrienne Bullock, including, but not limited to, shooting and wounding her on November 8, 1988 and again on July 3, 1991.

d. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Tanyelle Peoples, including, but not limited to, beating her on March 13, 1991 to the extent that Ms. Peoples suffered from a damaged kidney and then, on another occasion, took her to a wooded area with the intent of shooting her to death.

e. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Talinda Davis, including, but not limited to, stabbing her in her right breast on December 10, 1995, and later had her held hostage to prevent her from testifying about the attack in a state prosecution of the defendant for this attack.

f. The defendant JOSEPH BULLOCK, III repeatedly abused his girlfriend, Leslie Harris.

g. The defendant JOSEPH BULLOCK, III repeatedly threatened to kill his mother, Dorothy Ward, and his brother, Eddie Samuels aka "Nixon Bullock".

h. On or about May 31, 1990, the defendant JOSEPH BULLOCK, III urged his friend, David Johnson, to shoot at Richmond Police Narcotics Detectives Darrell Alston and Ronnie Armstead. Johnson then did shoot at the officers.

i. On or about May 14, 1991, the defendant JOSEPH BULLOCK, III and co-conspirator Marvin Damon attempted to shoot Jeff Hawkins aka "Boroach" and Maurice Gainyard to death in the alley at Mosby and O Streets in Richmond, Virginia, due to an on-going

battle over drug turf.

j. On or about an unknown date in January of 1994, the defendant JOSEPH BULLOCK, III accepted a contract to kill Tion Kimbrough for \$10,000 and attempted to locate Kimbrough in order to kill him.

k. On or about March 22, 1995, the defendant JOSEPH BULLOCK, III abused his son, Deonte Bullock, then six (6) years old, by beating him to the extent that he required medical treatment.

l. On or about an unknown date during the summer of 1995, the defendant JOSEPH BULLOCK, III and two co-conspirators invaded the residence of drug trafficker Corey Johnson at 4421 Foxtail Lane in Henrico County, Virginia, and robbed him at gunpoint of drugs, money and various items.

m. The defendant JOSEPH BULLOCK, III regularly threatened to kill those who refused his requests to sell his drugs.

6. The defendant JOSEPH BULLOCK, III participated in the killing of two human beings, Charlie Blount and Steven Mitchell, in one criminal episode.

7. The defendant JOSEPH BULLOCK, III has displayed a lack of remorse for the murders of Charlie Blount and Steven Mitchell and, indeed, bragged about killing them.

8. The defendant JOSEPH BULLOCK, III threatened witnesses in an effort to prevent them from revealing their knowledge of the defendant having murdered Charlie Blount and Steven Mitchell.

9. The defendant killed Charlie Blount and Steven Mitchell less than nine (9) months after murdering Larry Spruill aka "Little Larry" on July 21, 1993 as alleged in Count Four of the

Indictment.

10. The defendant JOSEPH BULLOCK, III poses a future danger to society in that he is likely to return to narcotics trafficking and acts of violence if ever released back into society.

11. The defendant JOSEPH BULLOCK, III poses a future danger to society in that he is likely to attempt to escape from confinement.

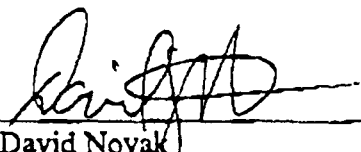
12. The defendant JOSEPH BULLOCK, III poses a future danger to inmates and correctional officers in an institutional setting in that he is likely to engage in acts of violence against others.

The Government further gives notice that in support of 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 Indictment as they relate to the background and character of the defendant JOSEPH BULLOCK, III, his moral culpability, his future dangerousness, and the nature and circumstances of the offense charged in Count Eight of the Indictment.

Respectfully submitted,

HELEN F. FAHEY
UNITED STATES ATTORNEY

By:



David Novak
Assistant United States Attorney

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 6th day of July, 1998, a copy of the foregoing Government's Notice was faxed and mailed to the following persons:

1. Attorneys for Defendant Bullock:

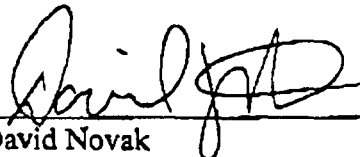
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