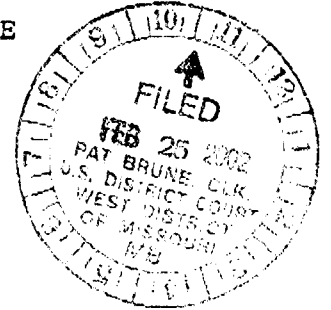


IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION



UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) No. 00-00395-01-CR-W-2
)
CARL HASKELL,)
)
Defendant.)

NOTICE OF INTENT TO SEEK THE DEATH PENALTY

Comes now the United States of America, by Todd P. Graves, United States Attorney and Mark A. Miller, K. Michael Warner, Jeffrey E. Valenti, Assistant United States Attorneys, all for the Western District of Missouri, pursuant to Title 18, United States Code, Section 3593(a), notifies the Court and the defendant, Carl Haskell, that in the event the defendant is convicted of intentionally killing Jovan S. Ross, as alleged in Count Three of the superseding indictment, the government will seek a sentence of death.

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

A. Statutory Aggravating Factors Enumerated Pursuant to Title 18, United States Code, Sections 3591(A) through (D)

1. Carl Haskell intentionally killed Jovan S. Ross

[18 U.S.C. § 3591(a)(2)(A)].

2. Carl Haskell intentionally inflicted serious bodily injury which resulted in the death of Jovan S. Ross [18 U.S.C. § 3591(a)(2)(B)].

3. Carl Haskell intentionally engaged in conduct intending that Jovan S. Ross be killed and that lethal force be employed against Jovan S. Ross, which resulted in Jovan S. Ross' death [18 U.S.C. § 3591(a)(2)(C)].

4. Carl Haskell intentionally engaged or caused others to engage in conduct which:

(i) Carl Haskell knew would create a grave risk of death to a person, other than one of the participants in the offense; and

(ii) resulted in the death of Jovan S. Ross [18 U.S.C. § 3591(a)(2)(D)].

B. Statutory Aggravating Factors Enumerated Pursuant to Title 18, United States Code, Sections 3592(c)(1) through (16)

1. The defendant committed the offenses described in Count Three of the superseding indictment after substantial planning and premeditation. [18 U.S.C. § 3592(c)(9)].

2. The defendant committed the offense of murder as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value. [18 U.S.C. § 3592(c)(8)].

3. The defendant committed the offense of murder in an especially heinous, cruel or depraved manner.

C. Other, Non-Statutory Aggravating Factors Enumerated Pursuant to Title 18, United States Code, Section 3593(a)

1. Victim impact, as evidenced by the impact of the murder upon Jovan Ross' family, particularly his mother.

2. The victim was killed by the defendant to obstruct justice, tamper with a government witness and in retaliation for cooperating with law enforcement authorities.

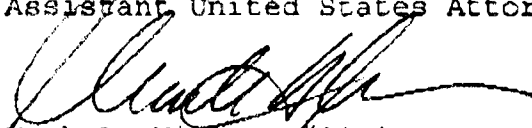
Respectfully submitted,

Stephen L. Hill, Jr.
United States Attorney

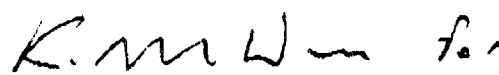
By



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was mailed
this 25 day of February, 2002, to the following:

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