

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF NORTH CAROLINA  
ASHEVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	<b>DOCKET NO. 1:00CR74</b>
	)	
<b>v.</b>	)	
	)	<b><u>NOTICE</u></b>
<b>RICHARD ALLEN JACKSON</b>	)	
	)	

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

COMES NOW the United States of America, pursuant to 18 U.S.C. § 3593(a), by and through its undersigned counsel, and notifies the Court and the defendant in the above-captioned case that the Government believes the circumstances of the offense charged in Count One of the Superseding Indictment are such that, in the event of the defendant's conviction of this offense, a sentence of death is justified under Chapter 228 (Sections 3591 through 3598) of Title 18 of the United States Code, and that the Government will seek the sentence of death for this offense: murdering Karen Styles by shooting her to death with a firearm during and in relation to kidnapping and aggravated sexual abuse, in violation of Title 18, United States Code, Section 924(j), which carries a possible sentence of death.

The Government proposes to prove the following factors as justifying a sentence of death.

**A. Statutory Proportionality Factors Enumerated under 18 U.S.C. § 3591(a)(2).**

1. **Intentionally Killing.** Richard Allen Jackson intentionally killed Karen Styles. Section 3591(a)(2)(A).
2. **Intentionally Inflicting Serious Bodily Injury.** Richard Allen Jackson intentionally inflicted serious bodily injury that resulted in the death of Karen Styles. Section 3591(a)(2)(B).
3. **Intentionally Participating in an Act Contemplating Taking a Life or Using Lethal Force.** Richard Allen Jackson 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 Karen Styles died as a direct result of the act. Section 3591(a)(2)(C).
4. **Intentionally and Specifically Engaging in an Act of Violence with Reckless Disregard for Life.** Richard Allen Jackson 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 Karen Styles 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. **Death During Commission of Another Crime.** The death, or injury resulting in death, occurred during the commission or attempted commission of, or during the immediate flight from the commission of an offense under Title, 18 United States Code, Section 1201: (Kidnapping). Section 3592(c)(1).

2. **Heinous, Cruel, or Depraved Manner of Committing Offense.**

Richard Allen Jackson committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to Karen Styles . Section 3592(c)(6).

3. **Substantial Planning and Premeditation.** Richard Allen Jackson committed the offense after substantial planning and premeditation to cause the death of a person. Section 3592(c)(9).

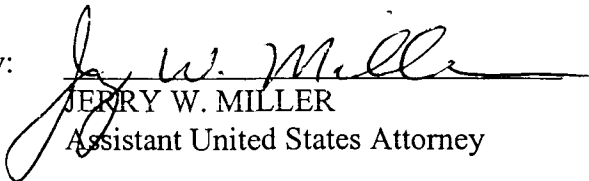
**C. Other, Non-Statutory, Aggravating Factors Identified under 18 U.S.C. § 3593(a)(2).**

1. **Future Dangerousness of the Defendant.** Richard Allen Jackson is likely to commit criminal acts of violence in the future which would be a continuing and serious threat to the lives and safety of others. Simmons v. South Carolina, 114 S.Ct. 2187, 2193 (1994).

2. **Victim Impact Evidence.** Richard Allen Jackson caused injury, harm, and loss to Karen Styles' family because of Karen Styles' personal characteristics as an individual human being and the impact of her death upon her family. Payne v. Tennessee, 111 S.Ct. 2597, 2608-09 (1991).

Respectfully submitted this 4<sup>th</sup> day of December, 2000.

MARK T. CALLOWAY  
United States Attorney

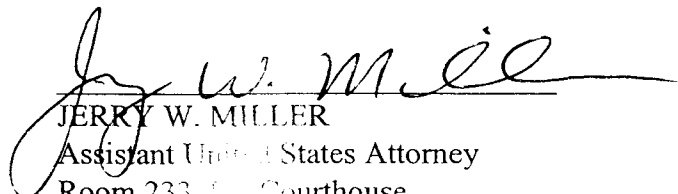
By:   
JERRY W. MILLER  
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of December 2000, a true and correct copy of the foregoing notice of intent to seek the death penalty was mailed via first class mail, postage prepaid thereon, to the following attorneys of record:

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