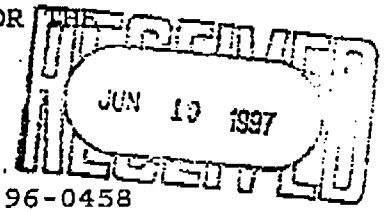


IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
ANTHONY ANEYI JONES,)
Defendant.)

Cr. No. WMN-96-0458



NOTICE OF INTENT TO SEEK THE DEATH PENALTY

The United States of America, pursuant to 18 U.S.C. § 3593(a), by and through its undersigned counsel, notifies the Court and Anthony Aneyi Jones, the defendant in the above-captioned case that the Government believes the circumstances of the offense charged in Count Five of the Fourth Superseding Indictment are such that, in the event of a conviction, 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: murder in aid of racketeering, resulting in the death of Keith Westmoreland, 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) (A) - (D).

Intentional Infliction of Serious Bodily Injury That Resulted In The Death of The Victim. The defendant intentionally

inflicted serious bodily injury that resulted in the death of Keith Westmoreland. Section 3591(a)(2)(B).

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

1. Substantial Planning and Premeditation. The defendant committed the offense after substantial planning and premeditation to cause the death of Keith Westmoreland. Section 3592(c)(9).

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

1. Future Dangerousness of the Defendant. The defendant is likely to commit criminal acts of violence in the future which would be a continuing and serious threat to society. Simmons v. South Carolina, 114 S.Ct. 2187, 2193 (1994), as evidenced by:

a. Other Acts of Violence. The defendant has committed, attempted to commit, and/or threatened to commit other acts of violence, in addition to the capital offense(s) committed in this case and the statutory factors alleged in this Notice, including but not limited to one or more of the following:

The murder of John Doe, a/k/a "Snake" in 1989;

The murders of Darnell Solomon and Sean Brown in

1994;

The murder of Anthony Green in 1995;

The murder of Glen Michael Wilson in 1996;

The murder of Derrick Rivers in 1996;

Continued efforts to kill and kidnap Elway

Williams after Feb. 26, 1996;

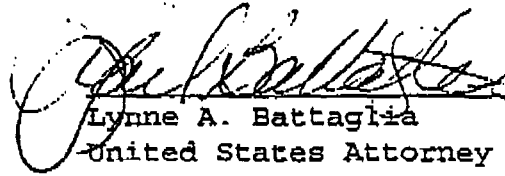
The attempted murder of Angelo Carter;

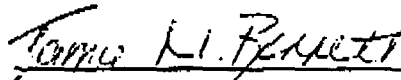
The murder of John Jones

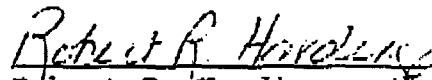
b. Lack of Remorse. The defendant has demonstrated a lack of remorse for the capital offense committed in this case by statements and actions.

2. Victim Impact Evidence. The victim's personal characteristics as an individual human being and the impact of the death upon the victim's family. Payne v. Tennessee, 111 S.Ct. 2597, 2608-09 (1991).

Respectfully submitted,


Lynne A. Battaglia
United States Attorney

By: 
Jamie M. Bennett
Assistant United States Attorney


Robert R. Harding *JRH*
Assistant United States Attorney

Dated: June 18th, 1997

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MARYLAND

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) Cr. No. WMN-96-0458
ANTHONY ANEYI JONES,)
Defendant.)

NOTICE OF INTENT TO SEEK THE DEATH PENALTY

The United States of America, pursuant to 18 U.S.C. § 3593(a), by and through its undersigned counsel, notifies the Court and the defendant in the above-captioned case that the Government believes the circumstances of the offense charged in count two of the Indictment are such that, in the event of a conviction, 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: murder in aid of racketeering, resulting in the death of Derrick Rivers, 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)(A)-(D).

Intentional Acts to Take Life or Use Lethal Force. The defendant 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 Derrick Rivers died as a direct result of the act. Section 3591(a)(2)(C).

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

1. Procurement of the Offense by Payment. The defendant procured the commission of the offense by payment or promise of payment, of anything of pecuniary value. Section 3592(c)(7).

2. Pecuniary Gain. The defendant committed the offense in expectation of the receipt of something of pecuniary value. Section 3592(c)(8).

3. Substantial Planning and Premeditation. The defendant committed the offense after substantial planning and premeditation to cause the death of Derrick Rivers. Section 3592(c)(9).

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

1. The murder of Keith Westmoreland in 1994.

2. Future Dangerousness of the Defendant. The defendant is likely to commit criminal acts of violence in the future which would be a continuing and serious threat to society. Simmons v. South Carolina, 114 S.Ct. 2187, 2193 (1994), as evidenced by:

a. Other Acts of Violence. The defendant has committed, attempted to commit, and/or threatened to commit other acts of violence, in addition to the capital offense(s) committed in this case and the statutory factors alleged in this Notice, including but not limited to one or more of the following:

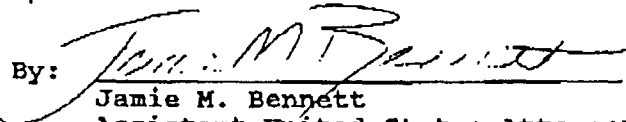
The murder of John Doe, a/k/a "Snake" in 1989;
The murders of Darnell Solomon and Sean Brown in
1994;
The murder of Anthony Green in 1995;
The murder of Glen Michael Wilson in 1996;
Continued efforts to kill and kidnap Elway
Williams after Feb. 26, 1996;
The attempted murder of Angelo Carter;
The murder of John Jones


b. Lack of Remorse. The defendant has demonstrated a lack of remorse for the capital offense committed in this case by statements and actions.

2. Victim Impact Evidence. The victim's personal characteristics as an individual human being and the impact of the death upon the victim's family. Payne v. Tennessee, 111 S.Ct. 2597, 2608-09 (1991).

Respectfully submitted,


Lynne A. Battaglia
United States Attorney

By: 
Jamie M. Bennett
Assistant United States Attorney


Robert R. Harding
Assistant United States Attorney

Dated: March 20, 1997.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21 day of March, 1997,
a copy of the foregoing Notice of Intent too Seek the Death
penalty was mailed, postage prepaid to the defendants:

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