

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	
)	Criminal No. 1:17-cr-00039
RUBEN LAUREL and)	
MICHAEL A. OWLE,)	
)	
Defendants.)	

NOTICE OF INTENT TO SEEK THE DEATH PENALTY AGAINST RUBEN LAUREL

Comes now the United States of America, by and through undersigned counsel, and pursuant to Title 18, United States Code, Section 3593(a), notifies the Court and the defendant, Ruben Laurel, that in the event he is convicted of premeditated murder as charged in the Superseding Indictment, the United States believes that the circumstances of the offense are such that a sentence of death is justified, and the United States will seek a sentence of death.

The United States proposes to prove the following factors as justifying a sentence of death against Ruben Laurel:

- A. Threshold Intent Factors Enumerated Under title 18, United States Code, Section 3591
 - 1. **RUBEN LAUREL** intentionally killed Anthony M. Dallas. [18 U.S.C. §3591(a)(2)(A)];
 - 2. **RUBEN LAUREL** intentionally inflicted serious bodily injury that resulted in the death of Anthony M. Dallas. [18 U.S.C. §3591(a)(2)(B)];
 - 3. **RUBEN LAUREL** 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 Anthony M. Dallas died as a direct result of the act. [18 U.S.C. §3591(a)(2)(C)];

4. **RUBEN LAUREL** 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 Anthony M. Dallas died as a direct result of the act. [18 U.S.C. §3591(a)(2)(D)].

B. Statutory Aggravating Factors Enumerated Under Title 18 United States Code, Section 3592(c)

1. **RUBEN LAUREL**, in the commission of the offense, or in escaping apprehension for the violation of the offense, knowingly created a grave risk of death to 1 or more persons in addition to the victim of the offense. [18 U.S.C. §3592(c)(5)];
2. **RUBEN LAUREL** committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim. [18 U.S.C. §3592(c)(6)];
3. **RUBEN LAUREL** committed the offense after substantial planning and premeditation to cause the death of a person or commit an act of terrorism. [18 U.S.C. §3592(c)(9)];
4. **RUBEN LAUREL** has previously been convicted of 2 or more State or Federal offenses punishable by a term of imprisonment of more than one year, committed on different occasions, involving the distribution of a controlled substance. [18 U.S.C. §3592(c)(10)]; and
5. **RUBEN LAUREL** had previously been convicted of violating Title II or III of the Comprehensive Drug Abuse Prevention and Control Act of 1970 for which a

sentence of 5 or more years may be imposed or had previously been convicted of engaging in a continuing criminal enterprise. [18 U.S.C. §3592(c)(12)].

C. Non-Statutory Aggravating Factors

1. Future Dangerousness. The defendant, **RUBEN LAUREL**, is a continuing danger to the lives and safety of other persons, and he is likely to commit criminal acts of violence in the future as evidenced by:

- a. his history of violent conduct; and
- b. his history of illicit weapons possession while in custody.

2. Victim Impact. **RUBEN LAUREL** caused injury, harm, and loss to Anthony M. Dallas as well as to his family and friends. The injury, harm, and loss caused by **RUBEN LAUREL** is evidenced by the victim's personal characteristics and by the impact of the victim's death upon his family and friends.

Dated this 2nd day of May, 2018:

Respectfully submitted,

William J. Powell
United States Attorney

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CERTIFICATE OF SERVICE

I, Stephen L. Vogrin, Assistant United States Attorney, for the Northern District of West Virginia, hereby certify that I electronically hereby certify I electronically filed the NOTICE OF INTENT TO SEEK THE DEATH PENALTY AGAINST RUBEN LAUREL with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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Dated: May 2, 2018

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