

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

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA
SEP 11 PM 12:42
WILLIAM B. DUTHRIE, CLERK
BY: 

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.)
)
 RAMON MEDINA MOLINA, a/k/a)
 RAY MOLINA, et al.,)
)
 Defendants.)

Case No. CR-92-32

NOTICE

TO: RAMON MEDINA MOLINA, a/k/a RAY MOLINA

You are hereby notified that in the event of your conviction on Count 16 of the Indictment in this case which charges a violation of Title 21, United States Code, Section 848(e)(1)(A), the United States of America will seek the sentence of death.

You are further notified that the United States of America will seek to prove the following aggravating factors as the basis for the death penalty:

1. Jewell Leon Collins was intentionally killed. Title 21, United States Code Section 848(n)(1).
2. The offense was committed after substantial planning and premeditation. Title 21, United States Code, Section 848(n)(2)(8).
3. The defendant intentionally engaged in conduct intending that a person be killed or that lethal force be employed against Claude Avery Rogers which resulted in the death of an innocent

victim, Jewell Leon Collins. Title 21, United States Code, Section 848(n)(1)(C).

4. The defendant intentionally engaged in conduct which defendant knew would create a grave risk of death to more than one person, other than the participants in the offense, and resulted in the death of an innocent victim, Jewell Leon Collins.

5. The offense was committed deliberately and with a reasonable expectation that the death of a human being would result.

6. The offense was committed for pecuniary benefit.

7. There is a probability that the defendant will commit criminal acts of violence that will constitute a continuing threat to society in the future.

8. A deadly weapon or weapons (a firearm or firearms) was/were used during the commission of this crime in an attempt to kidnap or kill Claude Avery Rogers.

9. A deadly weapon or weapons was/were used in the murder of Jewell Leon Collins.

10. The defendant has previously been convicted of two or more state or federal offenses punishable by imprisonment for more than one year, committed on different occasions, to-wit: conspiracy to smuggle marijuana (4/29/71); conspiracy to distribute heroin (12/19/78); sale of narcotic (11/2/84) and conspiracy to distribute heroin (3/8/89).

11. The defendant committed the offenses as to which he is charged in the Indictment herein.

12. The offense charged in Count 16 herein was committed in relation to certain drug trafficking criminality.

13. Repeated attempts to rehabilitate defendant or deter defendant from future felonious criminal behavior have been unsuccessful.

14. Any relevant aggravating conduct committed by defendant or attributable to defendant which is admitted at trial herein respecting the charged continuing criminal enterprise.

Respectfully submitted,



JOHN RALEY
United States Attorney

SHELDON J. SPERLING
Assistant United States Attorney

PAUL G. HESS
Assistant United States Attorney
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CERTIFICATE OF MAILING

I hereby certify that a copy of the foregoing Notice was mailed this 11th day of September, 1992, to Gene Primomo, Attorney at Law, 112 N. 5th, Muskogee, Oklahoma 74401.



JOHN RALEY
United States Attorney

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Notice was hand delivered to the defendant, Ramon Medina Molina, by

 DEPUTY U.S. MARSHAL on 9-11-92, 1992, at MUSKOGEE COUNTY JAIL