



NOTICE.ADD

JUN 18 1991

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : CRIM. NO. 90-328 (HAA)
v. : 21 U.S.C. § 848(e)
BILAL PRETLOW, ET AL. : SUPERSEDING NOTICE OF
 : AGGRAVATING FACTORS

TO: BILAL PRETLOW

HAVING BEEN PREVIOUSLY NOTIFIED that in the event of your conviction on Count Five of the superseding indictment in this case, which charges a violation of Title 21, United States Code, Section 848(e)(1)(A), the United States will seek the sentence of death,

YOU ARE FURTHER NOTIFIED that the United States will seek to prove the following aggravating factors as the bases for the death penalty:

1. You intentionally killed Mutah Sessoms. 21 U.S.C. Section 848(n)(1)(A).
2. You intentionally engaged in conduct intending that Mutah Sessoms be killed or that lethal force be employed against Mutah Sessoms, which resulted in the death of Mutah Sessoms. 21 U.S.C. § 848(n)(1)(C).
3. You have previously been convicted of two or more State Federal offenses punishable by a term of imprisonment of more

than one year, committed on different occasions, involving the distribution of a controlled substance. 21 U.S.C. § 848(n)(4).

4. You committed the offense after substantial planning and premeditation. 21 U.S.C. § 848(n)(8).

5. The continuing criminal enterprise you headed involved the distribution of narcotics to people under 21 years of age. 21 U.S.C. § 848(n)(11).

6. You committed the offense in an especially heinous, cruel, or depraved manner, in that it involved torture or serious physical abuse to the victim, Mutah Sessoms. 21 U.S.C. § 848(n)(12).

7. You committed the offense to prevent Mutah Sessoms from cooperating as a witness in a criminal investigation into your continuing criminal enterprise. 21 U.S.C. § 848(h)(1)(B).


KEVIN E. MCCARTHY
Assistant U.S. Attorney



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BILAL PRETLOW, ET AL. : SUPERSEDING NOTICE OF
 : AGGRAVATING FACTORS

TO: BILAL PRETLOW

HAVING BEEN PREVIOUSLY NOTIFIED that in the event of your conviction on Count Four of the superseding indictment in this case, which charges a violation of Title 21, United States Code, Section 848(e)(1)(A), the United States will seek the sentence of death,

YOU ARE FURTHER NOTIFIED that the United States will seek to prove the following aggravating factors as the bases for the death penalty:


1. You intentionally killed Melanie Baker. 21 U.S.C. § 848(n)(1)(A).
2. You intentionally engaged in conduct intending that Melanie Baker be killed or that lethal force be employed against Melanie Baker, which resulted in the death of Melanie Baker. 21 U.S.C. § 848(n)(1)(C).
3. You have previously been convicted of two 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. 21 U.S.C. § 848(n)(4).

4. You committed the offense after substantial planning and premeditation. 21 U.S.C. § 848(n)(8).

5. The victim, Melanie Baker, was particularly vulnerable due to her youth. 21 U.S.C. § 848(n)(9).

6. The continuing criminal enterprise you headed involved the distribution of narcotics to people under 21 years of age. 21 U.S.C. § 848(n)(11).



KEVIN E. MCCARTHY
Assistant U.S. Attorney