

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

UNITED STATES OF AMERICA, \*  
 \*  
 Plaintiff, \*  
 \* Cr. No. 04-20254-D  
 vs. \*  
 \*  
 SHANNON SHIELDS, \*  
 \*  
 Defendant. \*

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

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Comes now the United States, pursuant to Title 18, United States Code, Section 3593(a), by and through its undersigned counsel, and notifies the Court and the defendant Shannon Shields, that the United States believes that the circumstances of the offense charged in Count One of the superseding indictment are such that, in the event of 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 United States will seek a sentence of death against the defendant for this offense, to wit, kidnaping resulting in death in violation of Title 18, United States Code, Section 1201 (a).

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

**A. Statutory Proportionality factors enumerated under Title 18, United States Code, Section 3591 (a) (2) (A) & (C)**

**1. Intentional Killing-**

The defendant, being aided and abetted by Sonny Shields, Lendzo Earl Parker, and James Edward Stafford, intentionally killed the victim, Jerrell K. Lott. (Title 18, United States Code, Section 3591 (a) (2) (A));

**2. Intentional Participation in Act Contemplating that Life Would be Taken -**

The defendant, being aided and abetted by Sonny Shields, Lendzo Earl Parker, and James Edward Stafford, intentionally participated in an act, contemplating that the life of a person would be taken, other than one of the participants in the offense, and the victim, Jerrell K. Lott, died as a direct result of the act. (Title 18, United States Code, Section 3591(a)(2)(C)).

**B. Statutory Aggravating Factors**

**1. Death During Commission of Another Crime -**

The death of the victim, Jerrell K. Lott, occurred during the commission of another crime, that is, kidnaping in violation of Title 18, United State Code, Section 1201. (Title 18, United States Code, Section 3592 (c) (1)).

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

The defendant, being aided and abetted by Sonny Shields, Lendzo Earl Parker, and James Edward Stafford, committed the offense in an especially heinous, cruel, or depraved manner in that it involved torture or serious physical abuse to the victim, Jerrell K. Lott. (Title 18, United States Code, Section 3592 (c) (6)) .

**3. Pecuniary Gain -**

The defendant, being aided and abetted by Sonny Shields, Lendzo Earl Parker, and James Edward Stafford, committed the offense as consideration for the receipt of, or in the expectation of the receipt of, anything of pecuniary value. (Title 18, United States Code, Section 3592 (c) (8)).

**4. Substantial Planning and Premeditation -**

The defendant, being aided and abetted by Sonny Shields, Lendzo Earl Parker, and James Edward Stafford, committed the offense after substantial planning and premeditation to cause the death of a person. (Title 18, United States Code, Section 3592 (c) (9)).

**C . Other Non-Statutory Aggravating Factors Identified Under Title 18, United States Code, Section 3593 (a) (2).**

**1. Victim Impact Evidence -**

As reflected by victim Jerrell K. Lott's personal characteristics as an individual human being and the impact of the offense on Jerrell K. Lott, his family, and his friends, the defendant caused loss to Jerrell K. Lott, his family, and his friends. Title 18, United States Code, Section 3593(a).

**2. Obstruction of Justice -**

The defendant killed the victim Jerrell K. Lott in order to eliminate Jerrell K. Lott as a witness to the defendant's crimes in an effort to obstruct justice.

**3. Future Dangerousness -**

The defendant presents a threat of future danger to the lives and safety of other persons as evidenced by his threats of escape risk and his pattern of violence while incarcerated.

Respectfully submitted,

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Acting United States Attorney

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**CERTIFICATE OF SERVICE**

I, Lorraine Craig, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing notice has been filed via the Court's electronic filing system to Howard Wagerman and Jeff C. Woods, Wagerman Law Firm, One Memphis Place, 200 Jefferson Avenue, Suite 1313, Memphis, TN 38103

This 28<sup>th</sup> day of August, 2008.

BY: s/Lorraine Craig  
LORRAINE CRAIG  
Assistant United States Attorney