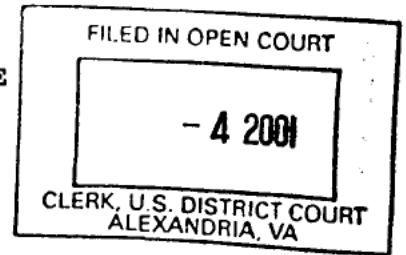


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division



UNITED STATES OF AMERICA,)

v.)

CHRISTOPHER ANDARYL WILLS)

) Criminal No. 99-396-A
)
)
)

SPECIAL VERDICT FORM

Section I. Threshold Factors

Instructions: To answer "YES" to these questions, the Jury must unanimously find that the Government has proven the Threshold Factors beyond a reasonable doubt. If the jury cannot so find unanimously, it must answer "NO".

A. Age of the Defendant

Does the Jury unanimously find that the Government has proven beyond a reasonable doubt that CHRISTOPHER ANDARYL WILLS was over the age of eighteen (18) at the time of the offense?

YES X

NO

B. Intent of the Defendant

Has the Government proven beyond a reasonable doubt that CHRISTOPHER ANDARYL WILLS intentionally participated in an act of kidnapping, contemplating that the life of Zabiullah Alam would be taken and/or intending that lethal force would be used in connection with the kidnapping of Zabiullah Alam, and that the victim Zabiullah Alam died as a direct result of the kidnapping?

YES X

NO

Instructions: If you answered "NO" to either question, that ends your consideration of the death penalty as to CHRISTOPHER ANDARYL WILLS. Go directly to Section V(A) to record your decision and then proceed to Section VI to certify your decision.

If you answered "YES", go to Section II.

Section II. Statutory Aggravating Factors

Instructions: Answer "YES" or "NO" as to whether the Jury unanimously finds that the Government has proven each Statutory Aggravating Factor beyond a reasonable doubt:

A. Previous conviction of violent felony involving firearm.

CHRISTOPHER ANDARYL WILLS has previously been convicted of a Federal or State offense punishable by a term of imprisonment of more than 1 year, involving the use or attempted or threatened use of a firearm against another person.

YES X

NO

B. Substantial planning and premeditation.

CHRISTOPHER ANDARYL WILLS committed the kidnapping offense after substantial planning and premeditation to cause the death of Zabiullah Alam.

YES X

NO

Instructions: If you answered "NO" with respect to both Statutory Aggravating Factors, that ends your consideration of the death penalty as to CHRISTOPHER ANDARYL WILLS. Go directly to Section V(A) to record your

decision and then proceed to Section VI to certify your decision.

If you answered "YES" with respect to either one or both of the Statutory Aggravating Factors, go to Section III.

Section III. Non-Statutory Aggravating Factors

Instructions: Answer "YES" or "NO" as to whether the Jury unanimously finds that the Government has proven each Non-Statutory Aggravating Factor beyond a reasonable doubt.

A. Future Dangerousness of the Defendant.

CHRISTOPHER ANDARYL WILLS is likely to commit criminal acts of violence in the future which would be a continuing and serious threat to the lives and safety of others.

YES _____
NO X

B. Victim Impact.

CHRISTOPHER ANDARYL WILLS caused injury, harm, and loss to Zabiullah Alam's family because of Zabiullah Alam's personal characteristics as an individual human being and the impact of Zabiullah Alam's death upon his family.

YES X
NO _____

C. Obstruction of Justice.

CHRISTOPHER ANDARYL WILLS committed the offense with the intent to prevent Zabiullah Alam from, and/or to retaliate

against Zabiullah Alam for providing information and assistance to law enforcement authorities in regard to the investigation or prosecution of the commission or possible commission of another offense.

YES X

NO

Instructions: No matter what your answers, go to Section IV.

Section IV. Mitigating Factors

Instructions: Indicate the number of Jurors who find that the defense has established the existence of each listed Mitigating Factor by a preponderance of the evidence. If no Juror finds that the defense proved a particular Mitigating Factor, the word "NONE" should be written in the blank. You may also write in paragraph O any additional Mitigating Factors found by at least one Juror, by a preponderance of the evidence, even if not raised by the defense.

- A. Should the Jury so direct, CHRISTOPHER ANDARYL WILLS will be sentenced to life imprisonment without any possibility of release if he is not executed.

Number of Jurors who so find 12

- B. A sentence of life imprisonment without the possibility of release is an adequately harsh alternative punishment that will protect society from any further risk of criminal conduct by CHRISTOPHER ANDARYL WILLS.

Number of Jurors who so find NONE

- C. A sentence of life imprisonment without the possibility of

release is severe and exacts both significant physical restraint and hardship as well as great psychological pain, particularly because CHRISTOPHER ANDARYL WILLS is left for years to contemplate his wrongdoing and to feel the loss of his children, friends, and family.

Number of Jurors who so find 12

- D. Imposing a sentence of life imprisonment without the possibility of release yet preserving CHRISTOPHER ANDARYL WILLS' life, protects society and at the same time shows a proper respect for life itself.

Number of Jurors who so find 8

- E. Given his prison and jail record, CHRISTOPHER ANDARYL WILLS will not present a risk to prison officials or other inmates if he is sentenced to life imprisonment without the possibility of release.

Number of Jurors who so find NONE

- F. CHRISTOPHER ANDARYL WILLS has adjusted well to structured environments, and would likely make an excellent adaptation to prison if he were sentenced to life imprisonment without the possibility of release.

Number of Jurors who so find 9

- G. If incarcerated, CHRISTOPHER ANDARYL WILLS is unlikely to represent a continuing danger to society.

Number of Jurors who so find 5

H. CHRISTOPHER ANDARYL WILLIS has performed numerous acts of kindness for friends and relatives, including the young and the elderly, through which he has demonstrated that there are other human beings for whom he cares.

Number of Jurors who so find 10

I. CHRISTOPHER ANDARYL WILLIS' fiancée, siblings, aunts and uncles, nieces and nephews and friends will be adversely affected if he is executed.

Number of Jurors who so find 10

J. CHRISTOPHER ANDARYL WILLIS is the father of two children, his daughter, Crystal, and his step-daughter, Nykia, both of whom will suffer greatly if he is executed.

Number of Jurors who so find 11

K. CHRISTOPHER ANDARYL WILLIS took an active role with his step-daughter Nykia's education and behavioral difficulties at school, attending conferences with Nykia's teacher and working with Nykia daily to provide her with parental guidance.

Number of Jurors who so find 12

L. CHRISTOPHER ANDARYL WILLIS was active in his daughter Crystal's life and her education as he constantly asked her teacher what he could do to help with her studies and came to school to see her.

Number of Jurors who so find 10

M. CHRISTOPHER ANDARYL WILLIS set up the First Sign youth guidance

program to help guide area youth through activities such as field trips to local businesses to talk to the owners about their businesses.

Number of Jurors who so find NONE

N. Other factors in CHRISTOPHER ANDARYL WILLS's childhood, background or character mitigate against imposition of the death sentence.

Number of Jurors who so find 5

O. List on the lines below any additional Mitigating Factors found by at least one Juror and the number of Jurors who so found. If you need additional space, ask for more paper:

1. The imposition of a life sentence without possibility of release would preserve the opportunity for remorse that could lead Christopher Andaryl Wills to disclose the whereabouts of the remains of Zabiullah Alam.

Number of Jurors who so find 12

2. A sentence of life imprisonment without the possibility of release is an adequately harsh alternative punishment that will reduce the risk of criminal conduct by Christopher Andaryl Wills.

Number of Jurors who so find 12

3. Crystal Wills will be adversely affected due to the loss of all paternal contact if Christopher Andaryl Wills is executed.

Number of Jurors who so find 10

4. _____

Number of Jurors who so find _____

5. _____

Number of Jurors who so find _____

6. _____

Number of Jurors who so find _____

Instructions: Go to Section V(B) to record your decision as to the appropriate sentence recommendation.

Section V. FINAL DECISION

Instructions: Answer Section V(A) only if the Jury answered "NO" to either of the Threshold Factors in Section I or the Jury found none of the Statutory Aggravating Factors in Section II. Answer either Section V(B) (1) or Section V(B) (2) if the Jury found both Threshold Factors in Section I and found at least one Statutory Aggravating Factor in Section II.

A. NO THRESHOLD OR STATUTORY AGGRAVATING FACTORS FOUND.

We, the Jury, unanimously find that the Government has not proven, beyond a reasonable doubt, the existence of the Threshold Factors and/or any Statutory Aggravating Factors required by law as prerequisites for the imposition of capital punishment, and therefore do not recommend the death penalty for CHRISTOPHER ANDARYL WILLS.

FOREPERSON

Date: _____, 2001

Instructions: Go directly to Section VI to certify this decision.

Section V. FINAL DECISION (Cont.)

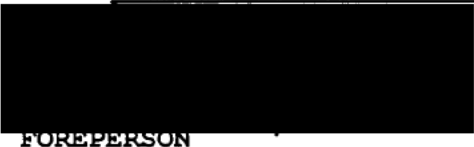
B. THE JURY'S SENTENCING RECOMMENDATION

Instructions: Answer either B(1) or B(2) but not both. If your answer is "YES", all Jurors must sign. If your answer is "NO", only the Foreperson should sign the Sentencing Recommendation. Then go directly to Section VI to certify your decision.

1. DEATH SENTENCE

Based upon consideration of whether the Aggravating Factors found to exist sufficiently outweigh any Mitigating Factor or Factors found to exist, or in the absence of any Mitigating Factors, whether the Aggravating Factors are themselves sufficient to justify a sentence of death, we recommend, by unanimous vote, that a sentence of death shall be imposed upon the defendant CHRISTOPHER ANDARYL WILLS.

YES _____
NO X



FOREPERSON

Date: October 4, 2001

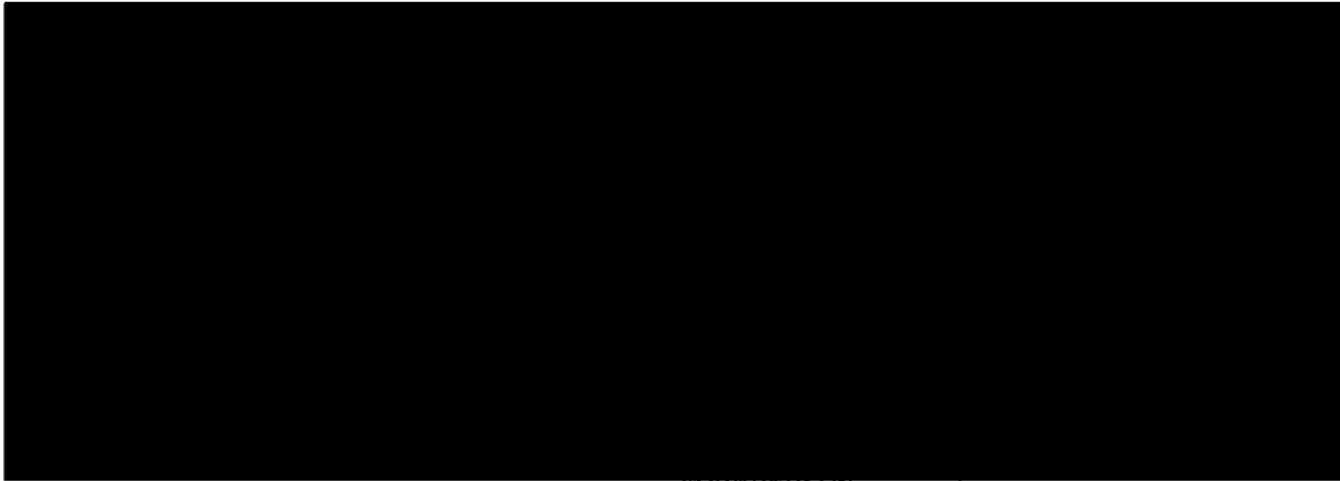
Section V. FINAL DECISION (Cont.)

2. SENTENCE OF LIFE IMPRISONMENT WITHOUT POSSIBILITY OF RELEASE

Based upon consideration of whether the Aggravating Factors found to exist sufficiently outweigh any Mitigating Factor or Factors found to exist, or in the absence of any Mitigating Factors, whether the Aggravating Factors are themselves sufficient to justify a sentence of death, we the Jury recommend, by unanimous vote, that a sentence of life imprisonment without the possibility of release shall be imposed upon the defendant CHRISTOPHER ANDARYL WILLS.

YES X

NO




FOREPERSON

Date: October 4, 2001

Section VI. CERTIFICATION

By signing below, each juror certifies that consideration of the race, color, religious beliefs, national origin, or sex of the defendant or the victim was not involved in reaching his or her individual decision, and that the individual juror would have made the same sentence recommendation for CHRISTOPHER ANDARYL WILLS no matter what the race, color, religious beliefs, national origin, or sex of the defendant, or the victim, would have been.

All Jurors and Foreperson must sign below:



FOREPERSON

Date: October 4, 2001