

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	CR No. 10-00184-S
	)	
JASON W. PLEAU,	)	
	)	
Defendant.	)	
	)	

BILL OF PARTICULARS

COMES NOW the United States of America, by and through the undersigned counsel, and, in compliance with this court's Order of April 17, 2013 (Dkt. 265), files the instant Bill of Particulars.

1. In support of the Other Serious Acts of Violence non-statutory aggravating factor, the United States will prove beyond a reasonable doubt the defendant's participation in the following acts of violence:

- (i) home invasion and armed robbery of Brenda Goguen, on or about October 7, 1996, in Woonsocket, RI.
- (ii) felony assault of Pauline LaRose and armed robbery of Antoine Elhosri, on or about October 14, 1996, at a store in Woonsocket, RI.
- (iii) attempted armed robbery of Michelle Decelles, on or about October 21, 1996, at a restaurant in Bellingham, Massachusetts.
- (iv) armed robbery of Renee Crisafulli, on or about October 22, 1996, at a store in Woonsocket, RI.
- (v) felony assault of Correctional Officer Osvaldo Cuevas, on or about March 10, 2000, at the Adult Correctional Institutions in Cranston.

- (vi) armed robbery of John Chan, on or about August 8, 2010, in Woonsocket, RI.

2. In support of the Future Dangerousness non-statutory aggravating factor, specifically, the continuing pattern of violence, attempted violence and threatened violence, the United States will prove beyond a reasonable doubt the defendant's participation in the following acts of violence:

- (i) home invasion and armed robbery of Brenda Goguen, on or about October 7, 1996, in Woonsocket, RI.
- (ii) felony assault of Pauline LaRose and armed robbery of Antoine Elhosri, on or about October 14, 1996, at a store in Woonsocket, RI.
- (iii) attempted armed robbery of Michelle Decelles, on or about October 21, 1996, at a restaurant in Bellingham, Massachusetts.
- (iv) armed robbery of Renee Crisafulli, on or about October 22, 1996, at a store in Woonsocket, RI.
- (v) Assault of another inmate on April 6, 1999.
- (vi) Assault of another inmate on September 24, 1999.
- (vii) Assault of another inmate on October 14, 1999.
- (viii) felony assault of Correctional Officer Osvaldo Cuevas, on or about March 10, 2000, at the Adult Correctional Institutions in Cranston.
- (ix) armed robbery of John Chan, on or about August 8, 2010, in Woonsocket, RI.
- (x) armed robbery and murder of David Main, on or about September 20, 2010, in Woonsocket, RI.
- (xi) threat of death against Correctional Sergeant Ralph Dilone, on or about February 8, 2013, at the Wyatt Correctional Institution.

3. In support of the Future Dangerousness non-statutory aggravating factor, specifically, the offenses committed while Pleau was on parole, the United States will prove beyond a reasonable doubt the defendant's participation in the following acts of violence:

- (i) armed robbery of Chan's Restaurant, on or about August 8, 2010, in Woonsocket, RI.
- (ii) armed robbery and murder of David Main, on or about September 20, 2010, in Woonsocket, RI.

WHEREFORE, the United States respectfully requests that the Honorable Court take notice of the foregoing.

Respectfully submitted,

UNITED STATES OF AMERICA,

By its attorneys,

PETER F. NERONHA

UNITED STATES ATTORNEY

/s/ ADI GOLDSTEIN

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CERTIFICATION OF SERVICE

I hereby certify that on this 20th day of May, 2013, I caused the within Bill of Particulars to be filed electronically and it is available for viewing and downloading from the ECF system.

Electronic Notification:

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