

APR 10 2002

JOHN F. CORCORAN, CLERK  
BY:  DEPUTY CLERK

IN THE  
UNITED STATES DISTRICT COURT  
FOR THE  
WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 3:02CR00026  
 )  
 DARRELL DAVID RICE )

GOVERNMENT'S FIRST NOTICE OF INTENT TO INTRODUCE EVIDENCE  
PURSUANT TO FEDERAL RULE OF EVIDENCE 404(B)

Pursuant to Federal Rule of Evidence 404(b), the United States of America, by and through its attorney the United States Attorney for the Western District of Virginia, hereby provides our first notice of our intent to introduce evidence of other crimes, wrongs and acts as proof of motive, opportunity, intent, preparation, plan, knowledge, identity, or absence of mistake or accident.

A federal grand jury has indicted the defendant Darrell David Rice for the murder of Julianne Marie Williams and Laura "Lollie" S. Winans in the Shenandoah National Park in May of 1996. The defendant has been charged in a four-count indictment with Capital Murder and for intentionally selecting and murdering the two young women because of his hatred of women and homosexuals. Specifically, the United States maintains that the defendant hated women and lesbians and that that hatred was a motive for his killing Julianne Marie Williams and Laura "Lollie" S. Winans. The United States also asserts that the defendant's killing of the two women was part of an ongoing plan, scheme or *modus operandi* to assault, intimidate, injure and kill women because of their gender.

The government intends to introduce evidence including, but not limited to, the following acts:

1. On July 9, 1997, the defendant verbally and physically assaulted and attempted to abduct a female bicyclist in the Shenandoah National Park. When his attempted abduction failed, the defendant attempted to kill her by running her over with his truck. Subsequent to his arrest, investigators recovered hand and leg restraints from the defendant's truck. The verbal assault included, but was not limited to, the defendant angrily screaming sexual references at the female victim such as "Show me your titties!" The physical assault included, but was not limited to, using his truck to force the victim from the road, grabbing the victim, and attempting to force her into the truck. The defendant plead guilty to Attempted Abduction in 1998 and was sentenced to 136 months incarceration.
2. The defendant's numerous physical and verbal assaults upon randomly selected women, including, but not limited to, acts of road rage, physical assaults, demeaning sexual comments, and threats of injury and death.
3. The defendant's stated intent that he intentionally selected women to intimidate and assault "because they are more vulnerable than men."
4. The defendant's stated intent that he "hates gays" and that Julianne Williams and Laura Winans "deserved to die because they were lesbian whores."

The government reserves the right to supplement this Notice after appointment of defense counsel and the completion of discovery.

Respectfully submitted,

JOHN L. BROWNLEE  
United States Attorney

*Thomas J. Bondurant, Jr.*  
Thomas J. Bondurant, Jr. *By BJ*  
Chief, Criminal Division  
United States Attorney's Office  
VSB #18894

CERTIFICATE

I certify that a true and correct copy of the GOVERNMENT'S FIRST NOTICE OF INTENT TO INTRODUCE EVIDENCE PURSUANT TO FEDERAL RULE OF EVIDENCE 404(B) has been mailed to Darrell David Rice, FCI Petersburg, Petersburg, Virginia, on this 10<sup>th</sup> day of April, 2002.

*Thomas J. Bondurant, Jr.*  
Thomas J. Bondurant, Jr. *By BJ*  
Chief, Criminal Division  
United States Attorney's Office  
VSB Code # 18894