

EXHIBIT 1

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

STEVE L. WRIGHT, JR.,
Movant,

v. Case No. _____

UNITED STATES OF AMERICA,
Respondent.

AFFIDAVIT OF GERALD JOHNSON

I, Gerald Johnson, solemnly swear that the following statement is true to the best of my recollection.

In 2001, while awaiting trial for the murder for which I am currently imprisoned, I was taken from my pod to meet with a detective. I learned that the interview concerned a man named Steve Wright, also known as "Moody." I was questioned about the murder of a Cuban man named Hector Santos. I told the detective that I knew Steve and that he never told me he committed the crime. I only said that he had insinuated involvement in a robbery that went bad and that he was with Brandon at the time.

In the early months of 2002, Steve was placed in the Jackson County Jail. This was my first actual encounter with him. I introduced myself and told him that we shared Cousin Dion and Jarvis Spriggs. From that day forward, we communicated a few times in the gym.

Shortly afterward, I was sent to Jefferson City State Prison with a life sentence. While there, I was interviewed again by Detective Herrington. He asked me about the murder of Hector Santos and told me that he could get my life sentence removed if I helped him "get" Steve Wright. He told me Hector was killed while riding his bike in front of his house with an assault rifle and that three people were seen running from the scene. Detective Herrington also explained that he needed me to claim that I was part of the crime and had witnessed it firsthand. He assured me immunity, stating that nothing I said would be held against me. He told me he would return to follow up.

The following month, Detective Herrington came back. This time, he gave me a drug-robbery plot that he said was "perfect." Following his instructions, I added my little cousin Jarvis to the story to make three people involved, with myself and Steve being the shooters. I testified to all of this before a grand jury.

At the time Hector was murdered—June 14, 2000—I was in the Johnson County Adult Detention Center. My booking dates were 05/25/2000 through 06/20/2000. I was nowhere near the crime scene.

In 2006, I was interviewed again by Detective Herrington, who brought a prosecutor with him. I do not remember the prosecutor's name. During this interview, I was told that we had to replace Jarvis with Dion because Jarvis had no criminal history and was still in school. I was also instructed to say that

Steve told me he had killed a man named David Williams, a rival gang member. I falsely testified that Steve admitted this to me while we were in the county jail. That was a lie added by Detective Herrington before trial.

I testified that I had known Steve since childhood. That was untrue. I first met him in the county jail in 2002, well after Hector's murder. I also testified that Steve, Dion, and I set up a plot to rob and murder Hector. That was a lie. In reality, Hector and I were not on good terms, and I was actually considered a suspect in his murder due to our personal feud.

I falsely testified about my cousin Jarvis (later changed to Dion at Detective Herrington's request). I have only seen my cousins once in my life, when they were about five and six years old.

All of the statements I previously made were untruthful. I was desperate to get out of a life sentence, so I did what was asked of me by Detective Herrington and the prosecutor.

My entire testimony was crafted by myself and Detective Herrington. My sole motive for testifying was to obtain a time cut.

I now understand, at this phase of my life, that my actions were disgusting and shameful. My recent conversion to Islam has changed my life and given me the strength to finally come forward and tell the truth. I am under no harm or threat as I make this statement.


Date Gerald Johnson, Affiant

Subscribed and sworn to before me by Gerald Johnson this 30th day of December, 2025.


Notary Public, State of Missouri

My Commission Expires: 6/30/28

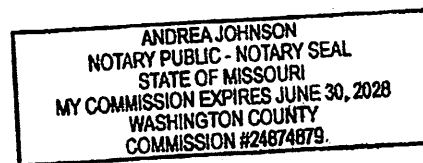


EXHIBIT 2



BYRON ROBERSON
SHERIFF

27747 W. 159th St.
New Century, KS 66031
www.jocosheriff.org

CINDY HENSON
UNDERSHERIFF

DARREN SHAFER
UNDERSHERIFF

LETTER OF INCARCERATION

To Whom It May Concern:

Name: Gerald Lamont Johnson
DOB: 11/10/1977
Race/Sex: B/M

BOOKING #	IN	OUT
99006209	06/16/1999	06/17/1999
99010834	10/19/1999	10/20/1999
00005712	05/25/2000	06/20/2000

These dates are only for the Johnson County Sheriff's Office Adult Detention Center and if at any time this individual was held at any other facility for this or another case before, after or between these dates you will have to contact that facility.

Verified by: RECORDS DIVISION (HLA2601)

Date: 11/24/2025

EXHIBIT 3

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVE L. WRIGHT, JR.,

a/k/a "MOODY,"

a/k/a "RONALD F. WHITE,"

[DOB: 06/10/83]

Defendant.



No. 02-00116-03-CR-W-FJG

COUNT ONE: (Conspiracy)

21 U.S.C. § 846

NLT 10 Years; NMT Life

Imprisonment

NMT/NLT 5 Years Supervised

Release

\$4,000,000 Fine

Class A Felony

COUNT TWO: (PWITD Marijuana)

21 U.S.C. §§ 841(a)(1) and

(b)(1)(D); and 18 U.S.C. § 2

NMT 5 Years Imprisonment

1 Year Supervised Release

\$250,000 Fine

Class D Felony

COUNT THREE: (PWITD More than
500 grams of Cocaine)

21 U.S.C. §§ 841(a)(1) and

(b)(1)(B)(ii), 846; and

18 U.S.C. § 2

NLT 5 Years; NMT 40 Years

Imprisonment

NMT/NLT 4 Years Supervised

Release

\$2,000,000 Fine

Class B Felony

COUNT FOUR: (Murder)

18 U.S.C. §§ 924(c)(1)(A) and

924(i)(1)

NMT Life Imprisonment

NMT 5 Years Supervised

Release

\$250,000 Fine

Class A Felony

COUNT FIVE: (Attempt PWITD
PCP)

21 U.S.C. §§ 841(a)(1),

841(b)(1)(B)(iv), 846; and

18 U.S.C. § 2

NLT 5 Years; NMT 40 Years

Imprisonment

NMT/NLT 4 Years Supervised

Release

RONALD F. WHITE, defendant herein, and Jamal T. Norris, a co-conspirator not indicted in this Count, aiding and abetting each other, did knowingly and intentionally possess, with intent to distribute, some amount of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(D), and Title 18, United States Code, Section 2.

COUNT THREE

On or about June 14, 2000, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did knowingly and intentionally attempt to possess, with the intent to distribute, more than five-hundred grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(ii) and 846.

COUNT FOUR

On or about June 14, 2000, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did, knowingly and intentionally, during and in relation to a drug-trafficking crime, to wit: the attempted possession of cocaine with intent to distribute as alleged in Count Three, use a firearm, by shooting at and thereby causing the death of Hector Santos, in

violation of Title 18, United States Code, Sections 924(c)(1)(A) and 924(i)(1) (codified at the time of the offense as 924(j)(1)).

COUNT FIVE

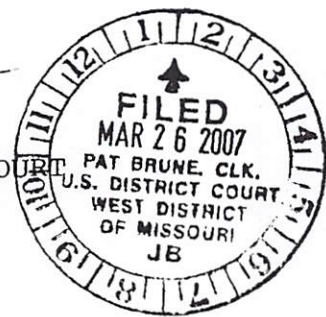
On or about February 1, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, aiding and abetting William Williams and Rashawn Long, did knowingly and intentionally attempt to possess, with the intent to distribute, more than one-hundred grams of a mixture and substance containing a detectable amount of phencyclidine (PCP), a Schedule II Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(iv), 846 and Title 18, United States Code, Section 2.

COUNT SIX

On or about February 1, 2001, in Jackson County, in the Western District of Missouri, STEVE L. WRIGHT, JR., a/k/a MOODY, a/k/a RONALD F. WHITE, defendant herein, did, during and in relation to a drug-trafficking crime, to wit: the attempted possession of phencyclidine (PCP) with intent to distribute as alleged in Count Five, aiding and abetting William Williams and Rashawn Long, knowingly and intentionally use and discharge firearms, by shooting at and wounding Anthony Conaway and Justin Hill, in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2.

EXHIBIT 4

~~10-2353~~
~~(3680881)~~ - ~~07-1439~~
~~(3295491)~~



IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	Appeal No.
	)	
Plaintiff,	)	
	)	Case No.
vs.	)	02-00116-03-CR-W-FJG
	)	
STEVE L. WRIGHT, JR.,	)	AUGUST 3, 2006
	)	MORNING SESSION
Defendant.	)	

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Pages 144 - 263

TRANSCRIPT ON APPEAL

BEFORE THE HONORABLE FERNANDO J. GAITAN, JR.,
UNITED STATES DISTRICT JUDGE, and a jury

For the Plaintiff: MR. CHARLES E. AMBROSE
MR. DAVID M. KETCHMARK
Assistant United States Attorneys
Charles Evans Whittaker Courthouse
400 East Ninth Street, Floor 5
Kansas City, Missouri 64106

For the Defendant: MR. WILLIAM E. SHULL
104 West Kansas
Liberty, Missouri 64068
and
MR. MARTIN D. WARHURST
1125 Grand Boulevard
Kansas City, Missouri 64106

Donna M. Turner RMR
U.S. Court Reporter, Room 7552
Charles Evans Whittaker Courthouse
400 East Ninth Street
Kansas City, MO 64106 (816) 512-5641

#577
WR

1 statements as follows:)

2 THE COURT: Mr. Ambrose.

3 GOVERNMENT'S OPENING STATEMENT

4 MR. AMBROSE: On March the 5th I believe it was,
5 2000, Reginald Blake was the passenger in the left rear
6 seat of a car driven by Gerald Johnson. They were cruising
7 Prospect in Kansas City, Missouri, as is the habit for many
8 young people in that area. It was about 8:20 at night.
9 Mr. Johnson pulled his car over to the right southbound
10 lane and stopped for a moment. At that point a maroon
11 Dodge Intrepid passed them on the left. The person sitting
12 in the front passenger seat of that Intrepid stuck his hand
13 out the window, he was holding a .45 caliber automatic
14 pistol, and he fired several rounds into Mr. Johnson's car
15 trying to hit Mr. Johnson. Mr. Johnson was in fact hit by
16 the second or third shot as it came through his door and
17 hit him in the leg.

18 The first shot, however, fired before that, went
19 through the back passenger door on the left side and it
20 also went through Reginald Blake's heart and Reginald Blake
21 died that night.

22 On June 14th of that year, 2000, Hector Santos
23 was riding a bicycle in the area of 51st and College in
24 Kansas City, Missouri. He was on his way to meet some
25 people for a drug deal because he's a cocaine dealer. One

1 of the parties who set that deal up did not want to pay
2 cash for the drugs that night. He wanted to pay for it in
3 another fashion and he paid Mr. Santos with countless
4 rounds from an assault rifle. Mr. Santos was shredded
5 literally from head to foot with assault rifle bullets,
6 and he died in the street that night.

7 On February 1st, 2001, Michael Birks had helped
8 some other individuals set up what is called a rip in the
9 terminology used by those who apply them, that is an armed
10 robbery to acquire drugs for resale. Mr. Birks had helped
11 William Williams, a member of the 51st Street Crips who
12 went by the name of Rabbit, Rashawn Long who went by the
13 name of Munch, another member of the 51st Street Crips, his
14 driver, Steve Wright, who went by the name of Moody, and
15 Marlon Brown, as they were going to set up two individuals
16 and rob them.

17 Those two individuals came to the scene, Anthony
18 Conaway and Justin Hill. They were shot and left to die,
19 but they both survived. Mr. Birks in a fit of conscience
20 doubled back and took one of those victims to the
21 hospital. His payment for that show of weakness came on
22 February 1st, 2001, at about 5 o'clock in the morning.
23 He was initially shot by Mr. Williams and as he was on
24 his knees at the side of the road begging for his life,
25 Mr. Long, using a gun handed to him by the defendant in

1 continued significance throughout the case.

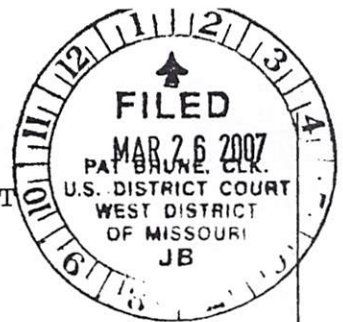
2 The day after the Jordan/Clark shooting, officers
3 responded to 51st Street and College. This is June 14th,
4 2000. They found Hector Santos lying dead in the street in
5 front of 5039 College. He'd been shot several times, and
6 fourteen 7.62x39 Wolf shell casings, the kind of ammunition
7 that fits assault rifles known as AK47s and Mac 90s, were
8 found at the scene. Two bullets were recovered from the
9 body during the autopsy. Gerald Johnson will testify that
10 he saw Mr. Wright shoot Mr. Santos with an assault rifle.
11 Johnson said that he and Wright had gotten back into
12 Mr. Santos' good graces, had ordered a kilo of cocaine from
13 him, but Wright didn't want to pay for it and after
14 murdering Santos, Wright took the cocaine which Mr. Santos
15 had in a backpack and fled the scene.

16 I need to talk to you a moment about Mr.
17 Johnson. I indicated earlier that there was one individual
18 for whom an exception had been made with respect to our
19 calling a witness who himself had been convicted of
20 murder. That in this case is Mr. Johnson. The evidence
21 will show, however, that there's a qualitative difference
22 between the murder for which he was convicted and those in
23 this case. Mr. Johnson's murder was the result of him
24 fleeing from police who were trying to arrest him. He blew
25 through a stop sign and hit a woman on her way to the

EXHIBIT 5

~~46-2353~~
~~(3680881)~~

~~07-1439~~
~~(3295491)~~



IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	Appeal No. 07-1439
	)	
Plaintiff,	)	
	)	Case No.
vs.	)	02-00116-03-CR-W-FJG
	)	
STEVE L. WRIGHT, JR.,	)	
	)	AUGUST 15, 2006
Defendant.	)	MORNING SESSION

VOLUME IX
Pages 1037 - 1170

TRANSCRIPT ON APPEAL

BEFORE THE HONORABLE FERNANDO J. GAITAN, JR.,
UNITED STATES DISTRICT JUDGE, and a jury

For the Plaintiff: MR. CHARLES E. AMBROSE
MR. DAVID M. KETCHMARK
Assistant United States Attorneys
Charles Evans Whittaker Courthouse
400 East Ninth Street, Floor 5
Kansas City, Missouri 64106

For the Defendant: MR. WILLIAM E. SHULL
104 West Kansas
Liberty, Missouri 64068
and
MR. MARTIN D. WARHURST
1125 Grand Boulevard
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TUESDAY, AUGUST 15, 2006

MORNING SESSION

THE COURT: Good morning, ladies and gentlemen
of the jury.

Ready to proceed, Mr. Ambrose?

MR. AMBROSE: Yes, thank you, sir.

GERALD JOHNSON, called as a witness on behalf of the
Government, being first duly sworn, testified:

DIRECT EXAMINATION BY MR. AMBROSE:

Q State your name for us, please.

A Gerald Johnson.

Q Mr. Johnson, where were you born?

A Kansas City, Missouri.

Q And where were you living during your early life, do
you remember the address?

A 30th and Chestnut. 3828 Chestnut.

Q Did something unusual happen to your parents while you
were young?

A Yes, sir.

Q What was that?

A They killed my mom and killed my dad.

Q How old were you when that happened?

A Thirteen.

Q As a result of having lost your parents at that age
were you placed in a series of foster homes?

1 A 500.

2 Q All right. Did you discuss Mr. Mitchell's request
3 with Mr. Wright?

4 A Yes, sir.

5 Q And tell us about that, please.

6 A Moody didn't really want to do it. He want to rob
7 Hector.

8 Q Now, three days before Mr. Santos is killed is when
9 you paid and cleared the deck that you talked about; is
10 that correct?

11 A Right.

12 Q Let's go to the day Mr. Santos is killed. Where did
13 you meet Mr. Wright on that day?

14 A On his grandma block.

15 Q 50th and Bellefontaine?

16 A Yes, sir.

17 Q How did you get there?

18 A I drove.

19 Q And where did you park your car?

20 A Four houses down.

21 Q Did you meet with Mr. Wright?

22 A Yes, sir.

23 Q And where did you go after you met with him?

24 A I don't -- I don't remember.

25 Q When did you first meet with Mr. Santos that day?

1 A At his house.

2 Q About what time of the day, if you recall?

3 A It was like -- like -- about 4 o'clock.

4 Q All right. And what happened at that point?

5 A He told us that he'd get back with us later.

6 Q Did you give him any money up front for the kilo that
7 you were supposed to buy?

8 A Yes, I gave some money up front.

9 Q How much money did you give him?

10 A I gave him like ten.

11 Q Would that be 10,000?

12 A Yes.

13 Q And as you were leaving the house, did you have a
14 conversation with Mr. Wright?

15 A Yes, sir.

16 Q Tell us about that.

17 A I was talking to him about getting the work.

18 Q And when you say work, what do you mean?

19 A The cocaine, I was talking to him about getting the
20 cocaine, and he said no, let's just rob him, and I was with
21 it.

22 Q When you say you were with it, what do you mean?

23 A I agreed with him to rob him.

24 Q Did you and Mr. Wright return to Mr. Santos' house
25 later that afternoon?

1 A Later that night, yes, sir.

2 Q About what time?

3 A About eleven something.

4 Q Had you had any more contact with Mr. Santos between
5 the first time you spoke with him and this other occasion
6 later that night?

7 A I can't really remember.

8 Q Well, how did you know to meet him later that night?

9 A I don't know. I think he -- I think he told us to
10 come around there. I don't really remember, Mr. Ambrose.
11 I be high, man. I be high.

12 Q What were you high on?

13 A I be high on water and Valiums.

14 Q Okay. You mentioned earlier that you had paid
15 Mr. Santos 10,000. When were you supposed to give him the
16 rest of the money?

17 A When we got the coke.

18 Q And where was Mr. Santos supposed to bring the coke?

19 A Around the corner on Moody's block.

20 Q So at some point there had been a contact that
21 Mr. Santos agreed to bring the cocaine to you and you're
22 going to pay him the rest of the money you owe him?

23 A Yes, sir.

24 Q And you mentioned seeing him about eleven that night.
25 Tell us what happened at that point.

1 A He -- he was like -- we was posted on the block and --

2 Q Hold on a minute. You say posted on the block. Tell
3 us what that means.

4 A We was outside standing on the street, standing
5 around.

6 Q All right. And what happens?

7 A And he pulled up on the bike and when he was coming --
8 when he was coming down the street on the bike Moody ran up
9 and shot him.

10 Q What kind of weapon did Moody have?

11 A I don't remember. Like an SK or AK, one of them. It
12 was a big gun, though.

13 Q It was a long gun?

14 A Yes.

15 Q How many times did he shoot Mr. Santos?

16 A About seven, eight times. I wasn't really for sure.
17 I was spooked.

18 Q When you saw Mr. Santos on the bicycle, did he have
19 anything with him, that you saw?

20 A He had a duffel bag with him.

21 Q How big a bag?

22 A Like that bag you be carrying all your folders in.

23 Q I don't seem to have that with me. Could you give us
24 a size, please?

25 A I can't --

1 Q Just hold your hands up and give us an estimate.

2 A I can't. It was a pretty nice -- it was like a --
3 like a little backpack that a kid would wear to school.

4 Q So something about the size of a backpack?

5 A Yes, sir.

6 Q And when you first saw Mr. Santos, he's riding down
7 the street on a bicycle?

8 A Right.

9 Q And Moody starts shooting at him?

10 A He ran up on him and hit him.

11 Q What did Mr. Santos do after the first shot was fired?

12 A He fell off the bike. Fell back off the bike.

13 Q Did he try to run at that point?

14 A I don't really remember because I was spooked.

15 Q Okay. Did you know this was going to happen?

16 A I didn't know Moody was going to kill him, but I knew
17 we was going to rob him.

18 Q So when you hear the shots, you're surprised. What do
19 you do?

20 A Kind of like take off jogging down the street.

21 Q And while you're running down the street, who catches
22 up with you?

23 A Moody.

24 Q What did he have at that point?

25 A The backpack and he had on a black hoodie and he had a

1 gun with him.

2 Q Did you see the contents of that backpack at any time?

3 A Yeah, in the car.

4 Q Now, you mentioned a car. What car are we talking
5 about?

6 A The get-away car.

7 Q Where was it parked?

8 A On the next block. Like on the side street.

9 Q Now, you had walked to this block where you say you
10 were posted from Moody's grandmother's house.

11 A Right.

12 Q Why did you need a get-away car?

13 A I don't know why we needed a get-away car. We just
14 had one. We had that car all day.

15 Q And so you're in the car with Moody and you say you
16 saw the contents of the backpack.

17 A Contents of the backpack.

18 Q And what was in the backpack?

19 A Had some coke and some money in.

20 Q How much cocaine, if you know?

21 A I can't -- I don't know.

22 Q Well, you had seen nine ounces. You had seen 18s
23 before. You had seen half kilos and kilos. Can you give
24 us your best guess?

25 A I couldn't. Probably a key, half a key, but you

1 still -- I still can't give you a full amount because it
2 was dark at night and it was inside of a backpack and I was
3 shook up. I was shook up and ready to roll.

4 Q Where did you go once you got in the car?

5 A Once I got in the car, he had another gun in his
6 hoodie. The way the gun was pointed, it was like it was
7 pointed at me, like he was going to shoot. So I -- I had a
8 car -- my car was over there, too. So I just got -- I just
9 told him I'm going to hop out. And I got in my car and
10 rolled out, and he went to a hotel. He went and got a
11 room.

12 Q Was anyone else with you and Moody in the car?

13 A Yeah, but I didn't know he was going to be there.

14 Q Who was that?

15 A Deon.

16 Q Who is Deon?

17 A Moody cousin.

18 Q Are you referring to Deon Spriggs?

19 A Yes, sir.

20 Q Did you see Munch in the block that night?

21 A No, but Munch had a girl live over there, though.

22 Q Where did she live?

23 A In the middle of the block.

24 Q Is that the same block that Hector was shot in?

25 A Yes, sir.

1 Q Did you see -- do you know someone named Rabbit?

2 A Yeah, I know Rabbit.

3 Q Who is Rabbit?

4 A Rabbit, he -- he wasn't there though. But Rabbit, he
5 a 5 1. I just know he go around on people too.

6 Q When you say 5 1, what are you referring to?

7 A 51st Street Crips.

8 Q Sometime after this, were you locked up in Jackson
9 County?

10 A Yes, sir.

11 Q During that period did you see Mr. Wright?

12 A Yes, sir.

13 Q Did you have a conversation with Mr. Wright concerning
14 someone named Little David?

15 A Yes, sir.

16 Q Tell us about that, please.

17 A Well, there was a lot of 33rd Street dudes in there
18 that was trying to get Moody, because I knew a lot of dudes
19 from 33rd. T.J. was in there, one of the dudes from 33rd,
20 and they was trying to get Moody to come to rec, they was
21 going to get Moody. And at that time -- well, I still was
22 in doubt if Moody is the one that --

23 MR. SHULL: Your Honor, I'm going to object; lack
24 of foundation.

25 THE COURT: Appears that way. Sustained.

EXHIBIT 6

~~10-2353~~
(~~3680881~~)

~~07-1439~~
(~~3295491~~)



IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

STEVE L. WRIGHT, JR.,

Defendant.

) Appeal No. 07-1439
)
)
) Case No.
) 02-00116-03-CR-W-FJG
)
)
) SEPTEMBER 5, 6 & 7,
) 2006
)

VOLUME XVII
Pages 2019 - 2117

TRANSCRIPT ON APPEAL

BEFORE THE HONORABLE FERNANDO J. GAITAN, JR.,
UNITED STATES DISTRICT JUDGE, and a jury

For the Plaintiff:

MR. CHARLES E. AMBROSE
MR. DAVID M. KETCHMARK
Assistant United States Attorneys
Charles Evans Whittaker Courthouse
400 East Ninth Street, Floor 5
Kansas City, Missouri 64106

For the Defendant:

MR. WILLIAM E. SHULL
104 West Kansas
Liberty, Missouri 64068
and
MR. MARTIN D. WARHURST
1125 Grand Boulevard
Kansas City, Missouri 64106

Donna M. Turner RMR
U.S. Court Reporter, Room 7552
Charles Evans Whittaker Courthouse
400 East Ninth Street
Kansas City, MO 64106 (816) 512-5641

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wr

1 and Norris have a significant amount of cash on them. And
2 the reason that you see this same CRN later is because this
3 is the case for which Mr. Wright was arrested on July 13th
4 at the address on Eastern.

5 Count 3. This is the buy that Mr. Wright and
6 Mr. Johnson negotiated with Hector Santos which led to his
7 murder, where they told him they wanted to buy the kilogram
8 of cocaine. And a kilogram, being a thousand grams, is
9 certainly more than 500.

10 You were instructed on an attempt. This was
11 charged as an attempt, one of the reasons being why is the
12 cocaine is not recovered. We don't know exactly what the
13 weight was. We know from the negotiations as testified to
14 by Gerald Johnson that they were trying to buy the kilo, or
15 at least that was their cover story to Mr. Santos, before
16 Mr. Wright decided to kill and rob him.

17 And again, substantial steps. Well, we have
18 several here, including the negotiations and finally an
19 ambush and a murder, all connected again to the attempted
20 possession of the drugs.

21 Count 4 is the murder of Mr. Santos. And what do
22 we know about this. Officers respond to 51st and College
23 on June 14th, 2000. They find Hector Santos literally
24 shredded by assault rifle rounds lying in the street in
25 front of 5039 College. He had been shot numerous times.

1 Fourteen 7.62 x 39 Wolf casings are located at the scene at
2 the point where, from the evidence, Mr. Wright must have
3 stepped out from behind the oak tree to ambush Mr. Santos.
4 Two bullets recovered from the body during an autopsy.
5 Mr. Johnson says he saw Wright shoot Mr. Santos with an
6 assault rifle. And again, this is the same rifle
7 previously used in the assault on Alex Clark and Roland
8 Jordan and later found at 5033 Bellefontaine.

9 Count 5. This is the initial attempt to get PCP
10 from Anthony Conaway based on what Michael Birks had
11 observed. Mr. Birks, as you will recall, had told Marlin
12 Brown that he thought Conaway would be in possession of at
13 least eight ounces of PCP, certainly more than 100 grams.

14 This again is an attempt, because as we know now
15 from Mr. Brown's testimony, Mr. Birks actually got the PCP
16 but didn't tell the rest of the conspirators that night.

17 And this leads to the shooting and wounding by
18 William Williams of Anthony Conaway and Justin Hill. They
19 do that in furtherance of the attempted possession of PCP.
20 You'll recall that Mr. Long and Mr. Wright had been parked
21 at the meeting leading to this rip, but had simply left a
22 little early because they got tired of waiting for
23 Mr. Conaway to show up.

24 January 31st, 2001, Birks tells William Williams,
25 otherwise known as Rabbit, that he thought Conaway had