


commit school shootings. Should the defendant be released from custody he poses a great danger to the children found on the property as well as a threat to the community as a whole due to the presence of firearms and his intent to use these firearms in a violent and illegal manner. *See* Rule 5-401(C)(1) ("the nature and circumstances of the offense charged, including whether the offense is a crime of violence or involves a narcotic drug.")


4. Should the defendant be released from custody the defendant is a flight risk as the defendant does not have family in New Mexico and does not have strong ties to the community. The majority of the defendant's family appear to be from Georgia, New York or other States along the Eastern Coast of the United States. *See* Rule 5-401(C)(3)(b) ("the person's family ties) and Rule 5-401(C)(3)(f) ("any facts tending to indicate that the person has strong ties to the community").
5. Should the defendant be released from custody, there is a substantial likelihood defendant may commit new crimes due to his planning and preparation for future school shootings.

Conclusion

For these reasons, the State requests that this Court order the defendant to be held in State custody while awaiting a pretrial detention hearing. Further, the State requests this matter be set for a detention hearing wherein the State will prove by clear and convincing evidence that no release conditions will reasonably protect the safety of any other person or the community pending trial in this matter.

RESPECTFULLY SUBMITTED
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CERTIFICATE OF SERVICE: I hereby certify that I delivered by bin drop\fax\mail\hand-delivery\electronic discovery a true and correct copy of the foregoing pleading to: Taos Public Defender Office, 105 Sipapu St. Taos, NM 87571.

For the State of New Mexico:

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Dated: 8/8/16 /jal