



- 1  Felony offense and defendant has two prior convictions in the four  
2 categories above, or two State convictions that would otherwise fall within  
3 these four categories if federal jurisdiction had existed.
- 4  Felony offense involving a minor victim other than a crime of violence.
- 5
- 6  Felony offense, other than a crime of violence, involving possession or use  
7 of a firearm, destructive device (as those terms are defined in 18 U.S.C.  
8 921), or any other dangerous weapon.
- 9  Felony offense other than a crime of violence that involves a failure to  
10 register as a Sex Offender (18 U.S.C. 2250).
- 11  Serious risk the defendant will flee.
- 12  Serious risk of obstruction of justice, including intimidation of a  
13 prospective witness or juror.

14 2. **Reason for Detention.** The Court should detain defendant because there  
15 are no conditions of release which will reasonably assure (check one or both):

- 16  Defendant's appearance as required.
- 17  Safety of any other person and the community.

18 3. **Rebuttable Presumption.** The United States will invoke the rebuttable  
19 presumption against defendant under 3142(e). The presumption applies because:

- 20  Probable cause to believe defendant committed offense within five years of  
21 release following conviction for a qualifying offense committed while on  
22 pretrial release.
- 23  Probable cause to believe defendant committed drug offense with a  
24 maximum sentence of ten years or more.
- 25  Probable cause to believe defendant committed a violation of one of the  
26 following offenses: 18 U.S.C. 924(c), 956 (conspiracy to murder or  
27 kidnap), 2332b (act of terrorism), 2332b(g)(5)(B) (crime of terrorism).
- 28

Probable cause to believe defendant committed an offense involving a victim under the age of 18 under 18 U.S.C. 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423 or 2425.

4. **Time for Detention Hearing.** The United States requests the Court conduct the detention hearing:

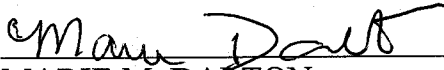
At the initial appearance

After a continuance of \_\_\_\_ days (not more than 3)

DATED this 29<sup>th</sup> day of March, 2017.

Respectfully submitted,

ANNETTE L. HAYES  
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