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- The offense charged is a felony which was committed after the Defendant had been convicted of two or more prior offenses described in 18 U.S.C. § 3142(f)(1)(A) through (C), or two or more state or local offenses that would have been offenses if a circumstance giving rise to federal jurisdiction had existed, or a combination of such offenses.
- The offense charged involves a minor victim. 18 U.S.C. § 3142(f)(1)(E).
- The offense charged involves the possession or use of a firearm or destructive device (as those terms are defined in 18 U.S.C. § 921), or any other dangerous weapon, or involves a failure to register under 18 U.S.C. § 2250. 18 U.S.C. § 3142(f)(1)(E).
- The existence of a serious risk that the Defendant will flee.
- The existence of a serious risk that the Defendant will obstruct or attempt to obstruct justice, threaten, injure or intimidate, or attempt to threaten, injure or intimidate, a prospective witness or juror.
- Release of the Defendant would create a serious danger to the safety of other persons or the community. 18 U.S.C. § 3142(b) and (g)(4).
- This revocation matter is brought under 18 U.S.C. § 3148. Defendant is subject to the “penalty” provisions of 18 U.S.C. § 3147, the release provisions in 18 U.S.C. § 3142(g)(3)(B) and the rebuttable presumptions in 18 U.S.C. § 3148(b).

Respectfully submitted,

R. TRENT SHORES
UNITED STATES ATTORNEY

/s/ Shannon B. Cozzoni

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October, 2020, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF recipient:

Attorney for Defendant

/s/ Shannon B. Cozzoni

SHANNON B. COZZONI