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U.S. Courts
Rec'd _____ Filed _____

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Cameron S. Burke
Clerk, Idaho

1 THOMAS E. MOSS
2 UNITED STATES ATTORNEY
3 WENDY J. OLSON
4 ASSISTANT UNITED STATES ATTORNEY
5 DISTRICT OF IDAHO
6 WELLS FARGO BANK BLDG.
7 877 WEST MAIN STREET, SUITE 201
8 BOISE, IDAHO 83702
9 TELEPHONE: (208) 334-1211
10 MAILING ADDRESS:
11 BOX 32
12 BOISE, IDAHO 83707

13 IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

14 UNITED STATES OF AMERICA,
15 Plaintiff,

16 -vs-

17 ILDEFONSO CASTILLO-ARCADIA,
18 Defendant.

19) CRIMINAL No. 03-254-S-EJL
20) REQUEST FOR
21) DETENTION

22 The United States of America by and through Thomas E. Moss, United States Attorney
23 and Wendy J. Olson, Assistant United States Attorney for the District of Idaho, submits this Request
24 for Detention of defendant ILDEFONSO CASTILLO-ARCADIA, pursuant to the 18 U.S.C.
25 §§3142(a)(4) and 3142(e), and pursuant to the oral motion made this same date in Court, for the
26 purpose of holding the defendant without bail prior to his probation revocation hearing.

27 () Pursuant to Title 18 U.S.C. §3142(f), the United States asks for a continuance of ____
28 days from the date of the defendant's first appearance before a judicial officer. The continuance is
requested in order for agents to travel to Boise for the hearing.

The prosecution will introduce evidence as follows pursuant to the specific sections of
Title 18, U.S.C., as indicated:

() §3142(f)(1)(A) - a crime of violence;

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1 () §3142(f)(1)(B) - an offense for which the maximum sentence is life imprisonment or
2 death;

3 () §3142(f)(1)(C) - an offense for which a maximum term of imprisonment of ten years
4 or more is prescribed in the Controlled Substances Act (21 USC 801, et seq.), the Controlled
5 Substances Import and Export Act (21 USC 951, et seq.), or Section 1 of the Act of September 15,
6 1980 (21 USC 955a);

7 () §3142(f)(1)(D) - any felony committed after the person had been convicted of two or
8 more prior offenses described in §3142(f)(1)(A) through (C), or two or more State or local offenses
9 that would have been offenses described in §3142(f)(1)(A) through (C) if a circumstance giving rise
10 to Federal jurisdiction had existed;

11 (X) §3142(f)(2)(A) - a serious risk that the person will flee;

12 (X) §3142(f)(2)(B) - a serious risk that the person will:

13 () obstruct or attempt to obstruct justice, or

14 () threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a
15 prospective witness or juror; or

16 (X) otherwise pose a danger to any other person or the community.

17 Dated this 7th day of June, 2004.

18 THOMAS E. MOSS
19 United States Attorney

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21 WENDY J. OLSON
22 Assistant United States Attorney
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