

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING

SEP 25 2008

Stephan Harris, Clerk
Cheyenne

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	No. 07-CR-0032-B
)	
v.)	MOTION FOR DETENTION HEARING
)	
NATHANIEL SOLON,)	
)	
Defendant.)	

The United States moves for pretrial detention of defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

- Crime of violence (18 U.S.C. § 3156)
- Maximum sentence life imprisonment or death
- 10+ year drug offense
- Serious risk defendant will flee
- Felony, with two prior convictions in above categories
- Serious risk obstruction of justice

2. Reason for Detention. The court should detain defendants because there are no conditions of release which will reasonably assure:

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

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

- Probable cause to believe defendant committed 10+ year drug offense, firearms offense, 18 U.S.C. § 924(c), or child exploitation offense.
- Previous conviction for "eligible" offense committed while on pretrial bond

4. Time for Detention Hearing. The United states requests the court conduct the detention hearing:

- At first appearance
- After a continuance of 3 days

DATED this 23rd day of September, 2008.

Respectfully submitted,

KELLY H. RANKIN
United States Attorney



JAMES C. ANDERSON
Assistant United States Attorney