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8 Attorneys for Plaintiff
 9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

No. 23-CR-331-DSF

13 Plaintiff,

GOVERNMENT'S NOTICE OF REQUEST FOR
 DETENTION

14 v.

15 FEREIDOUN KHALILIAN,
 aka "Prince Fred,"
 16 "Fred,"

17 Defendant.

18
 19 Plaintiff, United States of America, by and through its counsel
 20 of record, hereby requests detention of defendant and gives notice of
 21 the following material factors:

22 1. Temporary 10-day Detention Requested (§ 3142(d)) on the
 23 following grounds:

24 a. present offense committed while defendant was on release
 25 pending (felony trial),

26 b. defendant is an alien not lawfully admitted for
 27 permanent residence; and

- 1 c. defendant may flee; or
- 2 d. pose a danger to another or the community.
- 3 2. Pretrial Detention Requested (§ 3142(e)) because no
- 4 condition or combination of conditions will reasonably
- 5 assure:
- 6 a. the appearance of the defendant as required;
- 7 b. safety of any other person and the community.
- 8 3. Detention Requested Pending Supervised Release/Probation
- 9 Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C.
- 10 § 3143(a)):
- 11 a. defendant cannot establish by clear and convincing
- 12 evidence that he/she will not pose a danger to any
- 13 other person or to the community;
- 14 b. defendant cannot establish by clear and convincing
- 15 evidence that he/she will not flee.
- 16 4. Presumptions Applicable to Pretrial Detention (18 U.S.C.
- 17 § 3142(e)):
- 18 a. Title 21 or Maritime Drug Law Enforcement Act ("MDLEA")
- 19 (46 U.S.C. App. 1901 et seq.) offense with 10-year or
- 20 greater maximum penalty (presumption of danger to
- 21 community and flight risk);
- 22 b. offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or
- 23 2332b(g)(5)(B) with 10-year or greater maximum penalty
- 24 (presumption of danger to community and flight risk);
- 25 c. offense involving a minor victim under 18 U.S.C.
- 26 §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251,
- 27 2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4),
- 28

1 2260, 2421, 2422, 2423 or 2425 (presumption of danger
2 to community and flight risk);

- 3 d. defendant currently charged with an offense described
4 in paragraph 5a - 5e below, AND defendant was
5 previously convicted of an offense described in
6 paragraph 5a - 5e below (whether Federal or
7 State/local), AND that previous offense was committed
8 while defendant was on release pending trial, AND the
9 current offense was committed within five years of
10 conviction or release from prison on the above-
11 described previous conviction (presumption of danger to
12 community).

- 13 5. Government Is Entitled to Detention Hearing Under § 3142(f)
14 If the Case Involves:

- 15 a. a crime of violence (as defined in 18 U.S.C.
16 § 3156(a)(4)) or Federal crime of terrorism (as defined
17 in 18 U.S.C. § 2332b(g)(5)(B)) for which maximum
18 sentence is 10 years' imprisonment or more;
- 19 b. an offense for which maximum sentence is life
20 imprisonment or death;
- 21 c. Title 21 or MDLEA offense for which maximum sentence is
22 10 years' imprisonment or more;
- 23 d. any felony if defendant has two or more convictions for
24 a crime set forth in a-c above or for an offense under
25 state or local law that would qualify under a, b, or c
26 if federal jurisdiction were present, or a combination
27 or such offenses;

28

1 e. any felony not otherwise a crime of violence that
2 involves a minor victim or the possession or use of a
3 firearm or destructive device (as defined in 18 U.S.C.
4 § 921), or any other dangerous weapon, or involves a
5 failure to register under 18 U.S.C. § 2250;

6 f. serious risk defendant will flee;

7 g. serious risk defendant will (obstruct or attempt to
8 obstruct justice) or (threaten, injure, or intimidate
9 prospective witness or juror, or attempt to do so).

10 6. Government requests continuance of ____ days for detention
11 hearing under § 3142(f) and based upon the following
12 reason(s):

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7. Good cause for continuance in excess of three days exists in that:

Dated: October 31, 2023

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

/s/ Jeremiah Levine
JEREMIAH LEVINE
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UNITED STATES OF AMERICA