

ORIGINAL

ELLIOT ENOKI #1528
Acting United States Attorney
District of Hawaii

RONALD G. JOHNSON #4532
Assistant U.S. Attorney
PJKK Federal Building, Room 6-100
300 Ala Moana Boulevard
Honolulu, Hawaii 96850
Telephone: (808) 541-2850
Facsimile: (808) 541-2958
E-mail: Ron.Johnson@usdoj.gov

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

SEP 25 2017

at 1 o'clock and 23 min. PM
SUE BEITIA, CLERK

Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 17-00101 LEK
)	
Plaintiff,)	MOTION TO DETAIN DEFENDANT
)	WITHOUT BAIL
vs.)	
)	
ANTHONY T. WILLIAMS, (01))	
)	
Defendant.)	
)	

MOTION TO DETAIN DEFENDANT WITHOUT BAIL

The United States hereby moves to detain defendant
without bail, pursuant to 18 U.S.C. § 3142.

1. Eligibility of Case. This defendant is eligible for
detention because the case involves (check all that apply):

- _____ a. Offense committed on release pending
felony trial (3142(d)(1)(A)(i))*
- _____ b. Offense committed on release pending
imposition, execution, or appeal of

____ sentence, conviction or completion of
sentence (3142(d)(1)(A)(ii))*

____ c. Offense committed while on probation
or parole (3142(d)(1)(A)(iii))*

____ d. A citizen of a foreign country or
unlawfully admitted person
(3142(d)(1)(B))*

____ e. Crime of violence (3142(f)(1)(A))

____ f. Maximum sentence life imprisonment
or death (3142(f)(1)(B))

____ g. 10+ year drug offense
(3142(f)(1)(C))

____ h. Felony, with two prior convictions in
above categories (3142(f)(1)(D))

____ i. Felony not otherwise a crime of
violence involving a minor victim
(3142(f)(1)(E))

____ j. Felony not otherwise a crime of
violence involving the possession or use
of a firearm, destructive device, or
dangerous weapon (3142(f)(1)(E))

____ k. Felony not otherwise a crime of
violence involving a failure to register
under 18 U.S.C. § 2250 (3142(f)(1)(E))

~~X~~ l. Serious risk defendant will flee
(3142(f)(2)(A))

~~X~~ m. Danger to other person or community
**

~~X~~ n. Serious risk obstruction of justice
(3142(f)(2)(B))

____ o. Serious risk threat, injury,
intimidation of prospective witness or
juror (3142(f)(2)(B))

* requires "l" or "m" additionally

** requires "a", "b", "c", or "d" additionally

2. Reason for Detention. The court should detain defendant (check all that apply):

- ☒ a. Because there is no condition or combination of conditions of release which will reasonably assure defendant's appearance as required (3142(e))
- ☒ b. Because there is no condition or combination of conditions of release which will reasonably assure the safety of any other person and the community (3142(e))
- ☐ c. Pending notification of appropriate court or official (not more than 10 working days (3142(d)))

3. Rebuttable Presumption. A rebuttable presumption that no condition or combination of conditions will reasonably assure the appearance of defendant as required and the safety of the community arises under Section 3142(e) because (check all that apply):

- ☐ a. Probable cause to believe defendant committed 10+ year drug offense
- ☐ b. Probable cause to believe defendant committed an offense under 18 U.S.C. § 924(c)
- ☐ c. Probable cause to believe defendant committed an offense under 18 U.S.C. § 956(a) or 2332b

- _____ d. Probable cause to believe defendant committed 10+ year offense listed in 18 U.S.C. § 2332b(g) (5) (B)
- _____ e. Probable cause to believe defendant committed an offense involving a minor victim listed in 18 U.S.C. § 3142(e)
- _____ f. Previous conviction for eligible offense committed while on pretrial release

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

- _____ a. At first appearance
- _____ b. After continuance of _____ days (not more than 3)

5. Out of District Rule 5 Cases. The United States requests that the detention hearing be held:


- _____ a. In the District of Hawaii
- _____ b. In the District where charges were filed

6. Other Matters.

Defendant is present in the district on a writ from the State of Florida where he is serving a sentence for a felony conviction.

DATED: September 25, 2017, Honolulu, Hawaii.

ELLIOT ENOKI
Acting United States Attorney
District of Hawaii

By 
RONALD G. JOHNSON
Assistant U.S. Attorney