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8 Attorneys for Plaintiff
UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT

10 FOR THE CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 KERWIN ALDRIC JORDAN,

15 Defendant.
16

CR 2:25-cr-00801-SVW

GOVERNMENT'S NOTICE OF REQUEST FOR
DETENTION

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

- 20 ☐ 1. Temporary 10-day Detention Requested (§ 3142(d)) on the
21 following grounds:
22 ☐ a. present offense committed while defendant was on release
23 pending (felony trial),
24 ☐ b. defendant is an alien not lawfully admitted for
25 permanent residence; and
26 ☐ c. defendant may flee; or
27 ☐ d. pose a danger to another or the community.
28

- 1 x 2. Pretrial Detention Requested (§ 3142(e)) because no
 2 condition or combination of conditions will reasonably
 3 assure:
- 4 x a. the appearance of the defendant as required;
 5 ☐ b. safety of any other person and the community.
- 6 ☐ 3. Detention Requested Pending Supervised Release/Probation
 7 Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C.
 8 § 3143(a)):
- 9 ☐ a. defendant cannot establish by clear and convincing
 10 evidence that he/she will not pose a danger to any
 11 other person or to the community;
- 12 ☐ b. defendant cannot establish by clear and convincing
 13 evidence that he/she will not flee.
- 14 ☐ 4. Presumptions Applicable to Pretrial Detention (18 U.S.C.
 15 § 3142(e)):
- 16 ☐ a. Title 21 or Maritime Drug Law Enforcement Act ("MDLEA")
 17 (46 U.S.C. App. 1901 et seq.) offense with 10-year or
 18 greater maximum penalty (presumption of danger to
 19 community and flight risk);
- 20 ☐ b. offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or
 21 2332b(g)(5)(B) with 10-year or greater maximum penalty
 22 (presumption of danger to community and flight risk);
- 23 ☐ c. offense involving a minor victim under 18 U.S.C.
 24 §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251,
 25 2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4),
 26 2260, 2421, 2422, 2423 or 2425 (presumption of danger
 27 to community and flight risk);
- 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 x f. serious risk defendant will flee;

7 x 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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1 ☐ 7. Good cause for continuance in excess of three days exists in
2 that:

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8 Dated: September 29, 2025

Respectfully submitted,

9 BILAL A. ESSAYLI
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