

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
ST. JOSEPH DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 12-06001-5-CR-SJ-GAF
	)	
CHRISTINA M. GONZALEZ	)	
	)	
Defendant.	)	

**MOTION FOR DETENTION**

Comes now the United States of America, by and through its undersigned counsel, and hereby moves this Court to order the detention of Christina M. Gonzalez and states the following in support of the motion:

1. This motion is being made at the defendant's first appearance before a judicial officer. An Indictment has been filed charging the defendant with one count of conspiracy to transport illegal aliens, to unlawfully produce identification documents, to unlawfully transfer the means of identification of another person and to commit social security fraud, in violation of 18 U.S.C. § 371.

2. The defendant faces a statutory maximum term of imprisonment of up to five years upon a conviction of count one. 18 U.S.C. § 371.

3. The defendant has three prior felony convictions and is currently on parole in the State of Missouri for her most recent conviction. The defendant was convicted on September 14, 2009, of the class B felony of delivery of a controlled substance in the Circuit Court of Buchanan County, Missouri, and sentenced to 8 years in the Missouri Department of Corrections. The defendant was convicted on May 25, 2006, of the class D felony of unlawful use of a weapon in

the Circuit Court of Buchanan County, Missouri, and sentenced to 3 years in the Missouri Department of Corrections. The defendant was convicted on May 22, 2006, of the class C felony of stealing from a person in the Circuit Court of Buchanan County, Missouri, and sentenced to 3 years in the Missouri Department of Corrections. If the defendant is released she would pose a serious risk of flight. 18 U.S.C. § 3142(f). Additionally, the defendant has been charged with a crime related to the production of false identity documents and upon release she would pose a serious risk to obstruct or attempt to obstruct justice by further using one or more of those means of identification to flee or evade law enforcement authorities. 18 U.S.C. § 3142(f).

4. The United States submits that there is clear and convincing evidence that there are no conditions which the Court could place on the defendant's release which would reasonably assure the defendant's appearance in Court and the safety of the community. *See* 18 U.S.C. § 3142(g): (1) nature and circumstances of the offense; (2) weight of the evidence; (3) whether the defendant was on probation/parole at the time of the offense; and (4) danger to the community. Because of this, the United States requests that a Detention Hearing be held and that the defendant be detained. *See generally, United States v. Sazenski*, 806 F.2d 846, 848 (8th Cir. 1986); *United States v. Warren*, 787 F.2d 1237, 1238 (8th Cir. 1986).

WHEREFORE, based on the foregoing, the United States requests that the Court hold a Detention Hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendant.

Respectfully submitted,

Beth Phillips  
United States Attorney

By: /s/ **Jess E. Michaelsen**  
Jess E. Michaelsen  
Assistant United States Attorney  
Charles Evans Whittaker Courthouse  
400 East Ninth Street, Suite 5510  
Kansas City, Missouri 64106  
Telephone: (816) 426-3122

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that a copy of the foregoing document will be hand-delivered to the defendant at his first appearance before a judicial officer.

/s/ **Jess E. Michaelsen**  
Jess E. Michaelsen  
Assistant United States Attorney