IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

UNITED STATES OF AMERICA

v.

NO. 3:21-CR-366-S

Yaroslav Vasinskyi (01) a/k/a Profcomserv a/k/a Rabotnik a/k/a Rabotnik New a/k/a Yarik45 a/k/a Yaroslav2468 a/k/a Affiliate 22

MOTION FOR DETENTION AND TO CONTINUE DETENTION HEARING

The United States moves for pretrial detention of defendant, Yaroslav Vasinskyi,

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 (check all that apply):

- Crime of violence (18 U.S.C. § 3156);
- Maximum sentence life imprisonment or death
- 10 + year drug offense
- Felony, with two prior convictions in above categories
- <u>X</u> Serious risk defendant will flee
- <u>X</u> Serious risk of obstruction of justice
- _____ Felony involving a minor victim
- Felony involving a firearm, destructive device, or any other

dangerous weapon

Felony involving a failure to register (18 U.S.C. § 2250)

2. <u>Reason for Detention</u>. The Court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

<u>X</u> Defendant's appearance as required

_____ Safety of any other person and the community

3. <u>Rebuttable Presumption.</u> The United States will/will not invoke the

rebuttable presumption against defendant because (check one or both):

_____ Probable cause to believe defendant committed 10+ year drug

offense or firearms offense, 18 U.S.C. § 924(c)

- Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)
- _____ Probable cause to believe defendant committed an offense involving

a minor, 18 U.S.C. §§ 1201, 2251

_____ Previous conviction for "eligible" offense committed while on pretrial bond

4. <u>Time For Detention Hearing.</u> The United States requests the Court conduct the detention hearing:

_____ At first appearance

<u>X</u> After continuance of <u>3</u> days (not more than 3).

Respectfully submitted,

CHAD E. MEACHAM UNITED STATES ATTORNEY

<u>/s/ Tiffany H. Eggers</u> TIFFANY H. EGGERS Assistant United States Attorney Florida Bar Number 0193968 1100 Commerce Street, 3rd Floor Dallas, Texas 75242 Tel: 214-659-8600 Fax: 214-659-8605 Email: Tiffany.Eggers@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of March 2022, this document was filed via the Court's CM/ECF system and that counsel of record will receive a copy of the document via electronic delivery.

<u>/s/ Tiffany H. Eggers</u> TIFFANY H. EGGERS Assistant United States Attorney