

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

INOCENTE MONTANO

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CR. NO. 11m-5193-JGD

**GOVERNMENT'S OPPOSITION TO DEFENDANT'S
MOTION TO AMEND CONDITIONS OF RELEASE**

The government opposes the defendant's motion to amend the conditions of his bail to release him from home incarceration to travel to western Massachusetts near the New York border. The government originally moved to detain the defendant pending trial because the circumstances surrounding his arrest strongly suggested the defendant had taken steps to flee the United States to avoid prosecution. The government ultimately agreed to withdraw its motion for detention in place of stringent conditions of release placing the defendant on 24-hour-a-day lock-down home incarceration, and subjecting the defendant to close oversight by Pretrial Services. In the government's view, these restrictive conditions are necessary at a minimum to mitigate the otherwise unacceptably high flight risk the defendant poses, and should remain in place. The government accordingly opposes the defendant's motion and asks the Court to deny it.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/Donald L. Cabell
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Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, Donald L. Cabell, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/Donald L. Cabell
DONALD L. CABELL