

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No. 08-320 (PAM/FLN)

UNITED STATES OF AMERICA, )  
 )  
 Plaintiff, )  
 v. )  
 )  
 LARRY REYNOLDS, )  
 )  
 Defendant. )

**GOVERNMENT'S MEMORANDUM  
IN RESPONSE TO DEFENDANT'S  
MOTION TO MODIFY CONDITIONS  
OF RELEASE**

The United States of America, by and through its attorneys, Frank J. Magill, Jr., United States Attorney for the District of Minnesota, and Timothy C. Rank, Assistant United States Attorney, hereby submits this memorandum in opposition to defendant Larry Reynolds's motion to modify the Order of Detention issued by Magistrate Judge Nelson.

On October 23, 2008, defendant entered a guilty plea to an information charging him with conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(h). On October 29, 2008, defendant was released on bond pending sentencing, with the condition that he be subject to electronic monitoring and home detention, requiring him to be at his residence at all times, "except for employment, activities, appointments, treatment, education or religious services pre-approved by the Pre-Trial Services Officer." Order Setting Conditions of Release, ¶ 7(o).

The United States has been advised by Pretrial Services that defendant has complied with all conditions of his release.

However, because he is being supervised in the Los Angeles area, rather than Minnesota, the United States is opposed to removing defendant entirely from electronic monitoring. Instead, to adequately supervise Reynolds and ensure his appearance at subsequent court proceedings, Pretrial Services recommends that if defendant remains on electronic monitoring, that he be taken off home detention and his conditions of release be modified to place him on a curfew. The United States defers to the recommendation of Pretrial Services that Reynolds's conditions be modified to keep him on electronic monitoring subject to curfew as directed by his supervising Pretrial Services Officer.

March 23, 2009

Respectfully submitted,

FRANK J. MAGILL, JR.  
United States Attorney

BY: S/ TIMOTHY C. RANK  
JOSEPH T. DIXON, III  
JOHN F. DOCHERTY  
JOHN R. MARTI  
TIMOTHY C. RANK  
Assistant U.S. Attorneys