

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,            )  
  )  
  )            Plaintiff,                                    )  
  )  
  )            v.    )            No.    09-0128-REL-01  
  )  
JOHN B. ANGELL,                                    )  
  )  
  )            Defendant.                                    )

MOTION OF THE UNITED STATES FOR  
CONTINUANCE OF A DETENTION HEARING

Comes now the United States of America, by Matt J. Whitworth, Acting United States Attorney, and the undersigned Assistant United States Attorney, both for the Western District of Missouri, and does hereby move the Court for its order granting a continuance of the detention hearing as provided by Title 18, United States Code, Section 3142(f).

**Supporting Suggestions**

Title 18, United States Code, Section 3142(f), provides that the appropriate judicial officer shall hold a hearing to determine whether any condition or combination of conditions set forth in Section 3142(c) will reasonably assure the appearance of a defendant as required and the safety of any other person and the community when the attorney for the Government moves for a detention hearing provided by said subsection, or upon the appropriate judicial officer's own motion, also as provided by Section 3142(f).

Subsection (f) of Section 3142 provides: “The hearing shall be held immediately upon the person's first appearance before the judicial officer unless that person, or the attorney for the Government seeks a continuance. Except for good cause, a continuance on motion of the person may not exceed five days, and a continuance on motion of the attorney for the Government may not exceed three days. During a continuance, the person shall be detained. . . .”

The United States desires the continuance to facilitate the acquisition of additional information regarding the above defendant, to evaluate the said information, and to prepare for the hearing.

Respectfully submitted,

Matt J. Whitworth  
Acting United States Attorney

By */s/Jeffrey Valenti*

Jeffrey Valenti, #43254  
Assistant United States Attorney

Charles Evans Whittaker Courthouse  
400 East 9th Street, Suite 5510  
Kansas City, Missouri 64106  
Telephone: (816) 426-3122

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be hand-delivered to the defendant at the Office of the United States Marshals Service, 400 East 9th Street, Kansas City, Missouri 64106.

/s/ Jeffrey Valenti  
Jeffrey Valenti  
Assistant United States Attorney

JV/blw