

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 10-00320-09-CR-W-DGK
)	
JASON RICHARDSON,)	
)	
Defendant.)	

**DEFENDANT JASON RICHARDSON'S
MOTION TO CONTINUE CHANGE OF PLEA HEARING**

COMES NOW Jason Richardson, by and through appointed counsel, and moves this Honorable Court to enter an order continuing Mr. Richardson's change of plea hearing, in support of which is offered the following:

1. Defendant is among nineteen defendants charged by way of a November 8, 2010, indictment related to a conspiracy to distribute controlled substances.

2. Mr. Richardson and the government have negotiated an agreement, by which Mr. Richardson will enter a change of plea. The change of plea hearing is scheduled for October 19, 2012.

3. Based upon a review of docket entries, it is the understanding of undersigned counsel that all defendants in this case have either entered changes of plea or are scheduled to enter changes of plea, except for defendants Margo Charlene Davidson and DeShaun Latkeek Ceruti. Ms. Davison is already scheduled for trial on the docket beginning April 22, 2013. This date, counsel for Mr. Ceruti filed a motion to continue trial and a motion to withdraw based upon circumstances that would preclude counsel from defending the case at trial during its present setting on the October 22, 2012, docket. The government is not opposed to Mr. Ceruti's

continuance motion.

4. Mr. Richardson is currently on pretrial release and has done an exceptional job of meeting the conditions of release, including finding employment, avoiding the use of controlled substances, and maintaining contact with pretrial services.

5. Due to the nature of the charge to which Mr. Richardson has agreed to plead guilty, the government is required to request the detention of Mr. Richardson until sentencing.

6. Given the success Mr. Richardson has had on pretrial release, his detention for several months awaiting the trial of the remaining co-defendants and then his own sentencing would be an unnecessary expense at a time when our government can ill-afford wasteful spending.

7. Further, Mr. Richardson has a medical condition that requires monitoring and daily medication, which condition would require efforts and additional expenditures not typically associated with detainees.

8. Finally, Mr. Richardson's detention would present an unnecessary hardship upon his family, which relies upon his support—both as bread winner and as husband and father.

9. Counsel for the government has been contacted concerning this request and provided the response that in light of Mr. Ceruti's motion the government takes no position on Mr. Richardson's motion.

WHEREFORE, defendant Jason Richardson respectfully prays that this Honorable Court continue his change of plea hearing to a date immediately prior to the trial date of this matter.

Respectfully Submitted,

/s/ John G. Gromowsky

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served electronically via the Court's CM/ECF Filing System, this 18th day of October, 2012, upon counsel for all parties.

/s/ John G. Gromowsky

Attorney for Defendant Richardson