

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

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.) Criminal Action No.
) 10-00320-19-CR-W-DGK
MUHAMMAD IBRAHIM ROLLIE,)
Defendant.)

**MOTION TO RECONSIDER DETENTION ORDER AND GRANT DEFENDANT
PRE-TRIAL RELEASE**

COMES NOW Defendant Mohammed Rollie (“Rollie”) by and through counsel, and, pursuant to Title 18 U.S.C. §3145 (b), respectfully moves this Court reconsider the Order of Detention entered against Rollie and grant Rollie pre-trial release. In support of this motion Rollie states:

1. Rollie is one of 19 defendants charged with conspiracy to distribute cocaine, crack cocaine and marijuana in violation of 21 U.S.C. 841 and 21 U.S.C. 846. The defendants are also charged with conspiracy to conduct financial transactions involving proceeds of unlawful drug activity in violation of 21 U.S.C. 841, 21 U.S.C. 846 and 18 U.S.C. 1956.

2. A detention hearing was held on March 24, 2011 wherein the parties stipulated to the factual contents of the Pretrial Services Report and heard testimony from Special Agent Joe Geraci. Rollie did not testify. Based on the evidence, the Court entered an Order of Detention against Rollie.

3. At the time of the hearing Rollie had no place to live and no prospects of employment. However, the circumstances have changed as Rollie’s father, France Rollie, has since agreed to have Rollie live with him at his apartment located in the Kansas City metro area. Rollie’s father is gainfully employed and can offer a good

environment for Rollie to live in. Moreover, Rollie is confident he can find employment once he is released and living back in the Kansas City area. Employment will also help him support his children.

4. In addition to the family contact with his father, Rollie has other strong contacts to the Kansas City community. Rollie is a native of Kansas City and his ex-wife and the mother of his 2 young children, who are both under 5 years old, all live with Rollie's mother and two younger sisters in the Kansas City area.

5. Rollie is currently incarcerated in St. Clair County, which is close to 2 hours from Kansas City. This makes it difficult for Rollie and counsel to communicate and difficult for Rollie to assist counsel in preparing his defense. Granting Rollie pre-trial release and allowing him to come back to the Kansas City area will greatly facilitate the undersigned counsel's efforts in preparing Rollie's defense.

Based on the Father's offer to house Defendant, his potential employment and his family connections in the Kansas City area, Rollie has demonstrated sufficient changed circumstances which demonstrate he is no longer a flight risk nor is he a danger to the community. Moreover, the opportunity to assist counsel in preparing his defense further supports Rollie's pretrial release. As such, Rollie respectfully moves this Court reconsider its order of detention and grant Defendant pre-trial release.

Respectfully submitted,

/s/Michael L. Barrera (MO Bar 40998)
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion was served on AUSA

Bruce Rhoades and all defense attorneys of record by CM/ECF this 26th day of April 2011.

/s/Michael L. Barrera

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