

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 10-00162-14-CR-W-FJG
	)	
RONNELL BROWN,	)	
	)	
Defendant.	)	

**MOTION TO EXCEED CJA CAP OF ATTORNEY’S FEES  
WITH SUPPORTING SUGGESTIONS**

**COMES NOW** RONNELL BROWN’S counsel, pursuant to 18 U.S.C. § 3006A, and hereby respectfully moves this Court for an order certifying that the amount of anticipated attorney’s fees for the effective assistance in the representation of RONNELL BROWN will substantially exceed the CJA Cap on attorney’s fees, and that the payment of those excess fees is necessary to provide fair compensation for the representation.

**SUPPORTING SUGGESTIONS**

This is a complex case. There are twenty-three defendants, with seventeen counts. RONNELL BROWN is named in Count One of the Indictment which alleges that between July 1, 2009, and May 26, 2010, he was a member of a conspiracy to distribute over five kilograms of cocaine and over fifty grams of crack. These allegations expose RONNELL BROWN to a possible sentence of not less than ten years and not more than life imprisonment, a fine of not more than \$4,000,000, and a term of supervised release of not less than five years.

The government has produced discovery consisting of seven discs which in turn contain 10,310 “pages” of investigative reports, transcripts of wire taps, surveillance photographs, and other discoverable information.

RONNELL BROWN is being detained pending the February 2011, trial, in the St. Claire County Jail in Osceola, Missouri. For RONNELL BROWN to be able to review and discuss the government’s discovery, a four hour round trip is necessary. Six of these trips have already been necessarily made and a substantial number more are anticipated.

With the size of the discovery, RONNELL BROWN’S location, an anticipated trial date in February 2011, and the other necessary actions of counsel to effectively represent RONNELL BROWN, the necessary attorney’s fees are already at the initial CJA cap of \$9,700.00, with many more hours being necessary going forward.

**WHEREFORE,** RONNELL BROWN’S counsel respectfully prays that this motion be granted.

Respectfully submitted,

/s/

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## CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which electronically served all parties.

/s/

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E. Eugene Harrison