

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

UNITED STATES OF AMERICA,
Plaintiff,

v

Case No. 10-00162-FJG

ALFONSO VELO,
Defendant.

**DEFENDANT VELO'S MOTION TO EXTEND DEADLINE FOR OBJECTIONS TO
PSR AND SUGGESTIONS IN SUPPORT**

The draft Presentence Investigation Report has been prepared and the initial deadline for objections, corrections and modifications is April 16, 2012. At least one change should be made, the adjustment for safety valve. That adjustment is contingent on a debriefing by the government which has not yet occurred due to scheduling issues. Accordingly, the defense seeks an extension for submitting its objections to May 7, 2012. In further support the following suggestions are offered:

1. Mr. Velo is in custody in Caldwell County, Missouri.
2. Even with the safety valve Mr. Velo will be serving a sentence in excess of the time already spent in custody so Mr. Velo is not prejudiced by this delay.
3. Mr. Venneman, AUSA, has no objection to this request and in fact is working with his agent(s) to get the necessary interview scheduled.
4. This extension is in the interests of justice as it will allow the Court to fully consider all information relevant to Mr. Velo and correctly calculate the guidelines prior to imposing

sentence.

For these reasons, the defense requests an extension to May 7, 2012.

Respectfully Submitted,

MORGAN PILATE LLC

s/ Melanie S. Morgan
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CERTIFICATE OF SERVICE

I, Melanie S. Morgan, do hereby certify that a true and accurate copy of the foregoing was served on opposing counsel and counsel of record by the ECF system on April 16, 2012.

/s/ Melanie S. Morgan
Melanie S. Morgan