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

UNITED STATES OF AMERICA,	,)	
)	
Plainti	f f,)	
)	
v.)	Case No. 11-00046-08-CR-W-ODS
)	
TIM MICHAEL WILSON,		
)	
Defend	ant.	

MOTION TO RECONSIDER BOND

COMES NOW defendant, by and through his undersigned legal counsel, and respectfully moves the Court to continue the above-captioned cause of action on the following grounds:

Defendant was indicted on March 1, 2011.

Defendant's bond was set at \$10,000 cash only on March 8, 2011. The Court at that time said it would reconsider the bond ordered after three weeks had passed upon a motion by defense counsel. The Government withdrew its motion for detention at the hearing.

Defendant has remained in custody during the past three weeks and would ask the Court to consider reducing defendant's bond to a signature bond. The Defendant will agree to abide by any conditions the Court deems appropriate including drug screening and treatment and/or electronic monitoring if necessary.

WHEREFORE, Defendant requests the Court reconsider reducing the current \$10,000 cash bond.

Respectfully submitted,

By <u>/s Patrick J. O'Connor</u>
Patrick J. O'Connor
Mo. Bar #52544
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
(816) 701-1100 Telephone
(816) 531-2372 Facsimile

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically delivered on this 29 day of March, 2011 addressed to: U.S. Attorney's Office, Charles Evans Whittaker Courthouse, 400 East Ninth Street, Kansas City, MO 64106.

s/ Patrick J. O'Connor