

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 11-00223-10-CR-W-ODS
)	
JEFFREY A. OLSON,)	
)	
Defendant.)	

DEFENDANT JEFFREY A. OLSON'S
MOTION FOR CONTINUANCE

COMES NOW Jeffrey A. Olson, by and through appointed counsel, and respectfully moves this Honorable Court to continue this matter from the joint criminal jury trial docket scheduled to commence November 28, 2011, in support of which is offered the following:

1. Jeffrey A. Olson is charged by way of a September 21, 2011, multi-count, multi-defendant indictment with one count of filing false claims for tax refunds, in violation of 18 U.S.C. §287.

2. The matter is presently set on the joint criminal jury trial docket scheduled to commence on November 28, 2011.

3. This is a complex criminal matter involving several thousand pages of discovery, some of which has only recently come into the possession of undersigned counsel. Counsel will need additional time to review discovery, conduct independent investigation, and discuss issues with Mr. Olson and counsel for the government.

4. Undersigned counsel discussed the need for a continuance with Mr. Olson during their first meeting prior to initial appearance, and he does not object to this continuance.

5. Assistant United States Attorney Dan Nelson has expressed to other attorneys in this case that he is not opposed to continuing this matter from its initial trial setting.

6. This request for a continuance is not made for the purpose of unduly delaying proceedings in this matter, but is in fact made to ensure that Mr. Olson receives the competent representation he deserves.

WHEREFORE, Jeffrey A. Olson respectfully prays that this matter be removed from the November 28, 2011, trial docket and continued to a date agreeable to the parties and the Court.

Respectfully submitted,

/s/ John G. Gromowsky
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a copy of this motion was served electronically via the court's CM/ECF filing system this 9th day of November, 2011, upon:

Dan Nelson
Assistant United States Attorney
400 E. 9th Street, Fifth Floor
Kansas City, Missouri 64106
ATTORNEY FOR PLAINTIFF

with a courtesy copy served electronically upon counsel for all other parties.

/s/ John G. Gromowsky
Attorney