

**PLEADING FILED AS DOCUMENT 206
AND
WITHDRAWN BY GOVERNMENT ON SAME DAY**

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

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 08-00026-03/05-CR-W-FJG
)	
TROY R. SOLOMON, ET AL.,)	
)	
Defendants.)	

MOTION TO COMPEL TESTIMONY

Matt J. Whitworth, Acting United States Attorney for the Western District of Missouri, and Rudolph R. Rhodes IV and James Curt Bohling, Assistant United States Attorneys, Western District of Missouri, hereby request that the Court issue an Order pursuant to the provisions of Sections 6002-6003, of Title 18, United States Code, compelling Pleshette B. Johnson to give testimony and provide other information, which she has refused to give and provide on the basis of her privilege against self-incrimination, as to all matters about which she may be interrogated in the above-styled case, and in support of this request state as follows:

1. Pleshette B. Johnson has been called to testify and provide other information before the Court.
2. In the judgment of the undersigned, the testimony and other information from the witness is necessary to the public interest.
3. The witness has refused to testify and provide other information on the basis of her privilege against self-incrimination.

4. This motion is made with the approval of Kenneth A. Blanco, Deputy Assistant Attorney General, Criminal Division, United States Department of Justice, pursuant to the authority vested in her by 18 U.S.C. § 6003(b) and 28 C.F.R. § 0.175(a). A copy of the letter expressing such approval is attached hereto.

Respectfully submitted,

by */s/ Matt J. Whitworth*

Matt J. Whitworth
Acting United States Attorney
Western District of Missouri

by */s/ Rudolph R. Rhodes, IV*

Rudolph R. Rhodes IV
Assistant United States Attorney

by */s/ James Curt Bohling*

James Curt Bohling
Assistant United States Attorney

Charles Evans Whittaker Courthouse
400 East Ninth Street, Suite 5510
Kansas City, Missouri 64106
Telephone: (816) 426-3122

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was delivered on April 10, 2009, to the Electronic Filing System (CM/ECF) of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

John R. Osgood
Attorney at Law
740 NW Blue Parkway, Suite 305
Lee's Summit, Missouri 64086
Attorney for Defendant Elder

Anthony L. Bannwart
7322 Southwest Frwy., Suite 1510
Houston, Texas 77074
Attorney for Defendants Solomon and Johnson

/s/ Rudolph R. Rhodes, IV

Rudolph R. Rhodes, IV
Assistant United States Attorney

RRR/rah