

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

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 24-00029-06-CR-BP
	)	
KIANDRA CROWE,	)	
	)	
Defendant.	)	

MOTION TO EXTEND DEADLINE TO FILE PSI OBJECTIONS

COMES NOW the defendant, Kiandra Crowe, through his counsel, Robert Kuchar, Assistant Federal Public Defender for the Western District of Missouri and moves this Court to extend the deadline for filing Objections to the PSI until February 18, 2025.

SUGGESTIONS IN SUPPORT

1. On February 6, 2024, an indictment was filed charging defendant with violations of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud) in Count 1; and 18 U.S.C. § 1343 (Wire Fraud) in Count 7 of the indictment.
2. On February 22, 2024, the defendant appeared before the Honorable W. Brian Gaddy, United States Magistrate Judge, for an initial appearance and bond hearing, and the office of the Federal Public Defender was appointed to represent the defendant.
3. On February 29, 2024, the defendant appeared before the Honorable Lajuana M. Counts, United States Magistrate Judge, for an arraignment
4. On November 20, 2024, defendant plead guilty to count 1 of the indictment.
5. The preliminary PSI was completed and the deadline to make objections is on January 29, 2025.
6. Additional time is needed for the undersigned counsel to meet with the defendant

and review the presentence report with him.

WHEREFORE, the defendant, Kiandra Crowe, respectfully requests this Court extend the deadline for filing Objections to the PSI until February 18, 2025.

Respectfully submitted,

/s/ Robert Kuchar
ROBERT KUCHAR
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CERTIFICATE OF SERVICE

In accordance with Rule 49(a), (b) and (d), Fed. R. Crim. P., and Rule 5(b), Fed. R. Civ. P., it is hereby CERTIFIED that the foregoing motion was electronically filed and emailed to all interested parties on this 31st day of January 2025.

/s/ Robert Kuchar
ROBERT KUCHAR