

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

UNITED STATES OF AMERICA,
Plaintiff,

VS.

RASHONDA GOLDEN,
Defendant.

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NO. 24-00029-04-CR-W-BP

DEFENDANT’S REQUEST TO CONTINUE SENTENCING

COMES NOW the Defendant, Rashonda Golden, by and through her counsel, and hereby requests that the Court continue sentencing in the case for approximately 60 days to a date and time to be agreed by the parties. Sentencing is presently scheduled for March 6, 2025, at 11:00 a.m. In support thereof, Defendant states as follows:

1. The Defendant, Rashonda Golden, was arrested on the instant case and granted pretrial release pending disposition. Ms. Golden thereafter pled guilty to one count of Conspiracy to Commit Wire Fraud carrying a sentencing range of 0 to 20 years. Ms. Golden pled with a written plea agreement and there are no objections to the PSR.
2. The Defendant previously lived in the Pacific Northwest. Due to a relationship unexpectedly ending, the Defendant was recently forced to relocate to the Los Angeles, California area where she has started a new job and cares for her preteen son as a single mother.
3. The Defendant is having difficulty at the current time in securing care for her son while she attends sentencing here in Kansas City and, moreover, the Defendant is currently without sufficient funds to finance travel and lodging to and from Kansas City, Missouri due to the expense of her relocation and starting a new job.

4. The government has been made aware of Defendant's request and has no objection.
5. The Defendant is anxious to get the case concluded but is not presently situated to get herself back to the Kansas City area for sentencing next week. The Defendant is not seeking to be obstreperous and remains transparent in her challenges leading to this formal request for a brief extension of sentencing.

Based upon the foregoing, Ms. Golden requests that this Honorable Court continue her sentencing date consistent with the suggestions contained in this motion and for any other relief deemed proper by the Court.

Respectfully submitted,

/S/ DAVID A. KELLY

David A. Kelly (MO #45983)
Kelly, Reed & Jansen
114 Southwest Third Street
Lee's Summit, MO 64063
(816) 347-1818
FAX (816) 347-1854
dave@mokanlegal.com
ATTORNEY FOR DEFENDANT

CERTIFICATE REGARDING SERVICE

I hereby certify that it is my belief and understanding that counsel for plaintiff as well as all counsel for all co-defendants are participants in the Court's CM/ECF program and that separate service of the foregoing document is not required beyond the Notification of Electronic Filing to be forwarded upon the filing of the foregoing document. Copies of each document have been provided to opposing counsel via email as well.

/s/ David A. Kelly

David A. Kelly, Attorney for Defendant