

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS CHRISTOPHER ROSS,

Defendant.

Case No. 26-mj-2084DPR

MOTION FOR PRETRIAL DETENTION HEARING AND ORDER OF DETENTION

Comes now the United States of America, by and through its undersigned counsel, and hereby moves the Court for a pretrial detention hearing and to order the pretrial detention of the defendant, Thomas Christopher Ross, pursuant to 18 U.S.C. § 3142 (e) and (f), for the following reasons:

1. **Eligibility of Case.** This case is eligible for a detention hearing and order of detention because this case involves (check all that apply):

- ☐ Crime of violence (18 U.S.C. § 3156(a)(4)), under 18 U.S.C. § 3142(f)(1)(A).
- ☐ Violation of 18 U.S.C. § 1591, under 18 U.S.C. § 3142(f)(1)(A).
- ☐ Crime of terrorism (18 U.S.C. § 2332b(g)(5)(B)) with a maximum sentence of ten years or more, under 18 U.S.C. § 3142(f)(1)(A).
- ☐ Crime with a maximum sentence of life imprisonment or death, under 18 U.S.C. § 3142(f)(1)(B).
- ☒ Drug offense with a maximum sentence of ten years or more, under 18 U.S.C. § 3142(f)(1)(C).
- ☐ Felony offense and defendant has two prior convictions as described in 18 U.S.C. § 3142(f)(1)(A) through (C), or two State convictions that would

otherwise fall within 18 U.S.C. § 3142(f)(1)(A) through (C) if federal jurisdiction had existed, under 18 U.S.C. § 3142(f)(1)(D).

- ☐ Felony offense involving a minor victim other than a crime of violence, under 18 U.S.C. § 3142(f)(1)(E).
- ☐ Felony offense, other than a crime of violence, involving possession or use of a firearm or destructive device (as those terms are defined in 18 U.S.C. § 921), or any other dangerous weapon, under 18 U.S.C. § 3142(f)(1)(E).
- ☐ Felony offense other than a crime of violence that involves a failure to register as a Sex Offender (18 U.S.C. § 2250), under 18 U.S.C. § 3142(f)(1)(E).
- ☒ Serious risk the defendant will flee, under 18 U.S.C. § 3142(f)(2)(A).
- ☐ Serious risk of obstruction of justice, including intimidation of a prospective witness or juror, under 18 U.S.C. § 3142(f)(2)(B).

2. **Reason for Detention.** The Court should detain the defendant because there are no conditions of release which would reasonable assure (check all that apply):

- ☒ Defendant's appearance as required.
- ☒ Safety of any person and the community.

3. **Rebuttable Presumption.** The United States will invoke a rebuttable presumption against the defendant pursuant to 18 U.S.C. § 3142(e). The presumption applies because (check all that apply):

- ☐ Probable cause to believe the defendant committed offense within five years of release following conviction for a qualifying offense committed while on pretrial release, under 18 U.S.C. § 3142(e)(2).
- ☒ Probable cause to believe the defendant committed a drug offense with a maximum sentence of ten years or more, under 18 U.S.C. § 3142(e)(3)(A).
- ☐ Probable cause to believe the defendant committed a violation of one of the following offenses: 18 U.S.C. §§ 924(c) (use or possession of firearm during or in furtherance of drug crime), 956 (conspiracy to murder or kidnap), or 2333b (act of terrorism), under 18 U.S.C. § 3142(e)(3)(B).

- ☐ Probable cause to believe the defendant committed a violation of 18 U.S.C. § 233b(g)(5)(B) (crime of terrorism) with a maximum sentence of ten years or more, under 18 U.S.C. § 3142(e)(3)(C).
- ☐ Probable cause to believe the defendant committed an offense under chapter 77 of Title 18 with a maximum sentence of twenty years or more, under 18 U.S.C. § 3142(e)(3)(D).
- ☐ Probable cause to believe the defendant committed an offense involving a victim under the age of 18 under 18 U.S.C. §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251, 2251A, 2252(a)(1) through 2252(a)(3), 2252A(a)(1) through 2252A(a)(4), 2260, 2421, 2422, 2423, or 2425, under 18 U.S.C. § 3142(e)(3)(E).

4. **Time for Detention Hearing.** The United States requests the Court conduct the detention hearing:

- ☐ At the initial appearance.
- ☒ After a continuance of three days.

WHEREFORE, based on the foregoing, the United States requests that the Court hold a detention hearing in accordance with 18 U.S.C. § 3142(f), and following such hearing, order the detention of the defendant in accordance with 18 U.S.C. § 3142(e).

Respectfully submitted,

R. Matthew Price
Acting United States Attorney

By /s/ Jessica R. Eatmon
Jessica R. Eatmon
Missouri Bar No. 69322
Assistant United States Attorney
901 St. Louis Street, Suite 500
Springfield, Missouri 65806-2511

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was delivered on September 3, 2026, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Jessica R. Eatmon

Jessica R. Eatmon

Assistant United States Attorney