

GILLIAN GOSCH  
Assistant Federal Defender  
Federal Defenders of Montana  
Billings Branch Office  
2702 Montana Avenue, Suite 101  
Billings, Montana 59101  
Phone: (406) 259-2459  
Fax: (406) 259-2569  
gillian\_gosch@fd.org  
Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
WENONAH SUE WAGNER,  
  
Defendant.

**Case No. CR-16-55-BLG-SPW**

**MOTION TO CHANGE PLEA**

COMES NOW, Defendant Wenonah Sue Wagner, by and through her Counsel of record, Gillian Gosch, Assistant Federal Defender, and the Federal Defenders of Montana, and hereby moves this Court to allow her to enter a plea of guilty to the Indictment, without the benefit of a written plea agreement.

This motion certifies that all parties to the case have been informed of the defendant's intent to plead guilty.

RESPECTFULLY SUBMITTED this 29<sup>th</sup> day of November, 2016.

/s/ Gillian Gosch  
GILLIAN GOSCH  
Federal Defenders of Montana  
Counsel for Defendant

**CERTIFICATE OF SERVICE**  
**L.R. 5.2(b)**

I hereby certify that on November 29, 2016, a copy of the foregoing document was served on the following persons by the following means:

1, 2 CM-ECF  
       Hand Delivery  
3 Mail  
       Overnight Delivery Service  
       Fax  
       E-Mail

1. CLERK, UNITED STATES DISTRICT COURT
2. JOHN D. SULLIVAN  
Assistant United States Attorney  
United States Attorney's Office  
2601 2nd Avenue North, Suite 3200  
Billings, MT 59101  
Counsel for the United States
3. WENONAH SUE WAGNER  
Defendant

/s/ Gillian Gosch  
GILLIAN GOSCH  
Federal Defenders of Montana  
Counsel for Defendant