

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

DANEAN KIMBERLY MACANDREW,

Defendant.

Criminal No. 21-cr-00730 (CKK)

**DEFENDANT’S MOTION FOR FINANCIAL
ASSISTANCE FOR TRAVEL EXPENSES**

Danean Kimberly MacAndrew, by and through her counsel Deputy Federal Public Defender Lillian Chu, hereby respectfully requests this Court order financial assistance from the U.S. Marshals to assist with travel and lodging expenses for Ms. MacAndrew’s attendance at her trial. This motion is brought pursuant to the due process and confrontation rights guaranteed under the Fifth and Sixth Amendments and is necessary to ensure Ms. MacAndrew’s presence at trial currently set for January 10, 2023.

ARGUMENT

Under 18 U.S.C. § 4285, the Court has the authority to “direct the United States marshal to arrange for [a defendant’s] means of noncustodial transportation or furnish the fare for such transportation” for the defendant to attend trial. Additionally, the Court may also “direct the United States marshal to furnish that person with an amount of money for subsistence expenses to his destination, not to exceed the amount theorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code.” 18 U.S.C. § 4285.

Ms. MacAndrew qualifies for representation by the Federal Public Defender because she is indigent. Ms. MacAndrew is currently not fully employed. She cannot afford travel to Washington D.C. and lodging for the duration of the travel without assistance.

Accordingly, Ms. MacAndrew respectfully requests that the Court order the U.S. Marshals to arrange for or furnish the funds for roundtrip air travel from the Central District of California to Washington D.C. and for lodging during the duration of the trial, including the pretrial conference on January 9, 2023. Specifically, Ms. MacAndrew requests funds for travel and lodging for January 8, 2023, through approximately January 12, 2023, based on current trial length estimates.

Respectfully submitted,

DATED: December 21, 2022

/s/ Lillian Chu

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