

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

United States of America	)	
Complainant	)	
	)	Case No. 1:21-CR-00028-APM-19
v.	)	
	)	
James Beeks	)	The Honorable Amit P. Mehta
Defendant	)	
_____	)	

UNOPPOSED MOTION TO PROVIDE TRAVEL FUNDS FOR THE DEFENDANT

The Defendant, known to this Court as James Beeks, hereby respectfully moves this Honorable Court to direct the United States Marshal for the District of Columbia to pay for his non-custodial travel to the District of Columbia so that he can appear at his trial on July 10, 2023.

IN SUPPORT OF HIS MOTION, the Defendant states:

1. The Defendant has been charged with six counts of a nine-count indictment, but he has entered into an agreement to have a stipulated trial before the Court, sitting without a jury. During this Court’s July 5 status hearing, counsel for the government and both defendants expressed their belief that this stipulated trial should be done in a single day, thus relieving the Court, all counsel of record and dozens of prospective jurors from a trial that would have lasted several weeks.
2. The trial in this matter is scheduled to begin on July 10, 2023 at 10:00 a.m. As stated above, the parties believe that the trial will be completed in a single day.

3. The Defendant does not have the means to pay for the expenses incurred in getting to and from Washington for trial, let alone associated costs such as lodging and food.
4. Though the Defendant is acting as his own attorney, he has been found to be indigent and the Court has previously appointed Standby Counsel to assist him. An updated CJA-23 affidavit is attached to this Motion.
5. The Court has the authority, pursuant to 18 U.S.C. § 4285, to direct the United States Marshal to arrange and pay for the Defendant's travel to this District for trial, and to furnish him with money for subsistence expenses.
6. The Defendant and Standby Counsel believe that the Defendant can arrive in Washington as early as Saturday evening, allowing them a full day to prepare for trial in person. Assuming the Defendant is either not convicted or not ordered into custody pending sentencing immediately after a potential finding of guilt, he would begin his journey home on Monday evening.
7. The United States does not oppose this Motion.
8. Paying for the Defendant's expenses to travel to Washington, D.C. and his subsistence while he is here would serve the interests of justice.

WHEREFORE the Defendant, through his Standby Counsel, respectfully requires that this Court direct the United States Marshal for the District of Columbia to pay for the costs of driving to Washington, D.C. from his home in Orlando, Florida, and to pay the costs of his subsistence while he is here for his trial.

Respectfully Submitted,

\_\_\_\_\_/S/\_\_\_\_\_  
Gregory T. Hunter, Esquire  
Virginia State Bar Number 45489  
Standby Counsel for the Defendant  
2111 Wilson Boulevard  
8<sup>th</sup> Floor  
Arlington, Virginia 22201  
(703) 966-7226 telephone  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 6<sup>h</sup> day of July, 2023, an exact copy of the foregoing Appearance of Counsel was filed with the Clerk of the Court using the CM/ECF system, causing a Notice of Electronic Filing to be served upon all counsel of record.

\_\_\_\_\_/S/\_\_\_\_\_  
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Standby Counsel for the Defendant  
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CJA-23  
(Rev 3/21)

# FINANCIAL AFFIDAVIT

IN SUPPORT OF REQUEST FOR ATTORNEY, EXPERT, OR OTHER SERVICES WITHOUT PAYMENT OF FEE

IN THE UNITED STATES  DISTRICT COURT  COURT OF APPEALS  OTHER (Specify Below)

IN THE CASE OF

United States of America v. James Beeks

FOR \_\_\_\_\_  
AT \_\_\_\_\_

LOCATION NUMBER  
\_\_\_\_\_

PERSON REPRESENTED (Show your full name)

James Beeks

- Defendant - Adult
- Defendant - Juvenile
- Appellant
- Probation Violator
- Supervised Release Violator
- Habeas Petitioner
- 2255 Petitioner
- Material Witness
- Other (Specify) \_\_\_\_\_

DOCKET NUMBERS

Magistrate Judge \_\_\_\_\_

District Court \_\_\_\_\_

Court of Appeals \_\_\_\_\_

CHARGE/OFFENSE (Describe if applicable & check box-->)

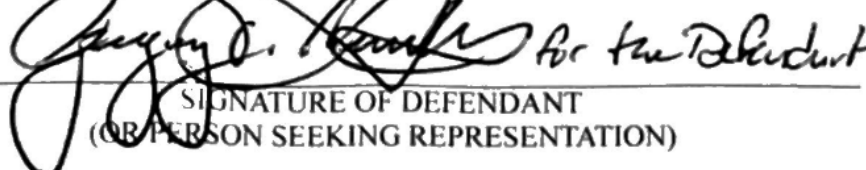
Conspiracy to Obstruct an Official Proceeding,  
Civil Disorder and Aiding and Abetting

- Felony
- Misdemeanor

## ANSWERS TO QUESTIONS REGARDING ABILITY TO PAY

<b>INCOME &amp; ASSETS</b>	<b>EMPLOYMENT</b>	Do you have a job? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
		IF YES, how much do you earn per month? <u>2000</u>	
		Will you still have a job after this arrest? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Unknown	
	<b>PROPERTY</b>	Do you own any of the following, and if so, what is it worth?	
		<b>APPROXIMATE VALUE</b>	<b>DESCRIPTION &amp; AMOUNT OWED</b>
	Home	\$ _____	_____
	Car/Truck/Vehicle	\$ 15000	10000
	Boat	\$ _____	_____
	Stocks/bonds	\$ _____	_____
	Other property	\$ _____	_____
	<b>CASH &amp; BANK ACCOUNTS</b>	Do you have any cash, or money in savings or checking accounts? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
		IF YES, give the total approximate amount after monthly expenses \$ <u>100</u>	
<b>OBLIGATIONS, EXPENSES, &amp; DEBTS</b>	How many people do you financially support? <u>1</u>		
	<b>BILLS &amp; DEBTS</b>	<b>MONTHLY EXPENSE</b>	<b>TOTAL DEBT</b>
	Housing	\$ 975	\$ _____
	Groceries	\$ 200	\$ _____
	Medical expenses	\$ _____	\$ _____
	Utilities	\$ 250	\$ _____
	Credit cards	\$ 75	\$ _____
	Car/Truck/Vehicle	\$ 400	\$ _____
	Childcare	\$ _____	\$ _____
	Child support	\$ _____	\$ _____
	Insurance	\$ 350	\$ _____
	Loans	\$ _____	\$ _____
	Fines	\$ _____	\$ _____
Other	\$ _____	\$ _____	

I certify under penalty of perjury that the foregoing is true and correct.

  
 \_\_\_\_\_  
 SIGNATURE OF DEFENDANT  
 (OR PERSON SEEKING REPRESENTATION)

July 6, 2023

\_\_\_\_\_  
Date