

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v.

CASE NO. 1:21-CR-00421-JDB

JOHN MARON NASSIF,

DEFENDANT.

**Motion for Payment of Travel Expenses Pursuant
to 18 U.S.C. § 4285**

Mr. John Maron Nassif, by and through counsel, respectfully moves this Honorable Court for an order directing the United States Marshal Service to make, at its expense, round-trip air travel arrangements for Mr. Nassif to travel from his home in Chuluota, Florida, to Washington, D.C., for the trial set before this Honorable Court on December 6, 2022, at 9:30 a.m. Mr. Nassif further requests the U.S. Marshal Service be ordered to furnish subsistence expenses to his destination, in accordance with the amount authorized as a per diem allowance for travel pursuant to 5 U.S.C. § 5702(a).

In support, counsel respectfully submits the following:

1. Mr. Nassif has previously been adjudged indigent and determined to qualify for appointed counsel. (Docket entry of May 17, 2021.)
2. This cause is set for a bench trial before this Honorable Court on

Tuesday, December 6, 2022. (Docket entry of November 8, 2022.)

3. Mr. Nassif resides in Chuluota, Florida, and is unable to pay the cost of transportation to the District of Columbia for his trial.

4. This Court is empowered, pursuant to 18 U.S.C. § 4285, to

direct the United States Marshal to arrange for [an indigent defendant's] means of noncustodial transportation or furnish the fare for such transportation to the place where his appearance is required, and in addition may 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 authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code.

5. Counsel has conferred with Assistant United States Attorney Elizabeth Nash Eriksen, who has advised that the government takes no position on this motion.

6. A proposed order is attached.

For all of these reasons, Mr. Nassif respectfully requests that the Court order the USMS to make round-trip travel arrangements and provide subsistence funds, both at USMS expense, to ensure Mr. Nassif's ability to appear in Court for his trial on December 6, 2022, at 9:30 a.m.

Respectfully submitted,

A. Fitzgerald Hall
Federal Defender, MDFL

/s/ James T. Skuthan

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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2022, I electronically filed the foregoing via this Court's CM/ECF system, which will send notice of such filing to all counsel of record.

/s/ James T. Skuthan

James T. Skuthan, Esq.
Attorney for Defendant