

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

UNITED STATES OF AMERICA

v.

SARA CARPENTER,

Defendant.

Crim. Action No. 21-305 (JEB)

DEFENDANT'S MOTION FOR PAYMENT OF TRAVEL EXPENSES
PURSUANT TO 18 U.S.C. § 4285

Ms. Sara Carpenter, through counsel, hereby moves this Court to enter the attached Order, which will authorize and direct the United States Marshals Service to furnish Ms. Carpenter with an amount of money for subsistence expenses, specifically overnight housing, not to exceed the amount authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code, for the duration of her trial beginning on March 6, 2023. Government counsel opposes this motion.

Ms. Carpenter can make her own travel arrangements to travel from Queens, New York, where she currently resides, to the District of Columbia for her trial. However, she cannot afford to pay for overnight housing for the duration of her trial. Ms. Carpenter has previously been determined to be financially indigent and to qualify for court-appointed counsel. As documented in the Pretrial Report from the Eastern District of New York, Ms. Carpenter is unable to work and subsists on Social Security Disability (“SSD”) payments of approximately \$2,400 a month in addition to \$4,000 a month from her New York City Police Department Pension.

As Ms. Carpenter’s son is now 19 years old, her disability benefits have been reduced since the time of her arrest. While Ms. Carpenter owns her own home with an

estimated value of between \$650,000 and \$700,000, she has an outstanding mortgage balance of approximately \$500,000. In addition, she has been shouldering the cost of her son's college tuition and room and board, totaling between \$30,000 to \$40,000 annually. While Ms. Carpenter can afford travel expenses to and from the District of Columbia, she cannot afford the cost of lodging for the duration of the trial.

Pursuant to 18 U.S.C. § 4285, this Court may:

direct the United States marshal to arrange for [an indigent defendant's] means of noncustodial transportation or furnish the fare of 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.

Accordingly, we respectfully request that the Court enter the attached Order directing the U.S. Marshal to furnish Ms. Carpenter with an amount of subsistence expenses, specifically for overnight lodging, not to exceed the amount authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code, to facilitate her appearance for trial as indicated in the attached order. (Ex. A). In the alternative, we request that the Court authorize funding through the Criminal Justice Act, 18 U.S.C. § 3006A. (Ex. B). *See United States v. Mendoza*, 734 F. Supp. 2d 281, 286 (E.D.N.Y. 2010) (authorizing payment from Criminal Justice Act funds for out-of-district indigent defendants' hotel costs during estimated two-week long trial).

Respectfully submitted,

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