

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

**UNITED STATES OF AMERICA**

**v.**

**RALPH JOSEPH CELENTANO III,**

**Defendant.**

**Crim. Action No. 22-186 (TJK)**

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

Mr. Ralph Joseph Celentano III, through counsel, hereby moves this Court to enter the attached Order, which will authorize and direct the United States Marshals Service to furnish Mr. Celentano 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 his trial beginning on March 20, 2023. Government counsel opposes this motion.

Mr. Celentano can make his own travel arrangements to travel from Queens, New York, where he currently resides, to the District of Columbia for his trial. However, he cannot afford to pay for overnight housing for the duration of his trial. Mr. Celentano 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, Mr. Celentano is unable to work due to an injury he

sustained on the job as a carpenter and collects approximately \$3,600 a month in workers compensation. His monthly expenses, including food, household expenses, and child support, amount to approximately \$3,000 a month. While Mr. Celentano can afford travel expenses to and from the District of Columbia, he is unable to 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 Mr. Celentano 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 his appearance for trial as indicated in the attached order.

Respectfully submitted,

*Marissa Sherman*

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