

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA §
 §
v. § NO. 22-cr-290 APM
 §
KELLYE SORELLE §

**AMENDED UNOPPOSED MOTION
FOR TRANSPORTATION AND SUBSISTENCE EXPENSES**

TO THE HONORABLE AMIT P. MEHTA, UNITED STATES DISTRICT JUDGE FOR THE DISTRICT OF COLUMBIA:

COMES NOW Defendant Kellye SoRelle, by and through her counsel, and moves this Court to order the United States Marshals Service to pay for her transportation from Austin, Texas, to Washington, D.C., and attendant subsistence expenses, pursuant to 18 U.S.C. § 4285, showing the Court as follows:

I.

Ms. SoRelle will be appearing to enter a guilty plea pursuant to a plea agreement on August 21, 2024, at 10:00 a.m.

II.

Title 18, United States Code Section 4285 provides that when an indigent defendant is released pending a court appearance, a judge “may, when the interests of justice would be served thereby”, direct the United States Marshals Service to arrange for or pay for transportation “to the place where [her] appearance is required” and “and furnish that person with an amount of money for subsistence expenses to [her] destination, not to exceed the amount authorized as a per diem allowance for travel under section 5702(a) of title 5, United States Code.”

III.

The Court has previously determined that Ms. SoRelle is indigent. Ms. SoRelle will be required to appear before the Court on August 21, 2024, at 10:00 a.m., and lacks the funds to pay for her travel and subsistence. Ms. SoRelle therefore requests that the Court direct the United States

Marshals Service to pay for transportation from Austin, Texas to Washington, D.C. and for subsistence expenses while in Washington, D.C. to enable Ms. SoRelle to make her court appearance and comply with her conditions of release.

IV.

AUSA Kathryn Rackozy has been consulted and is unopposed to this motion.

FOR THESE REASONS, Defendant requests that the Court grant this motion and direct the United States Marshals Service to pay for Ms. SoRelle's transportation from Austin, Texas to Washington, D.C. and for subsistence expenses while in Washington, D.C. to enable to make her court appearance on August 21, 2024, at 10:00 a.m.

Respectfully submitted.

MAUREEN SCOTT FRANCO
Federal Public Defender

By:

/s/ HORATIO R. ALDREDGE
Supervisory Assistant Federal Public Defender
Western District of Texas
Lavaca Plaza
504 Lavaca, Suite 960
Austin, Texas 78701
(512) 916-5025
(512) 916-5035 (FAX)
Bar Number: Texas 00795216

Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July 2024, I delivered the foregoing via electronic mail to the following:

Kathryn L. Rakoczy
Assistant U.S. Attorney
USAO – D.D.C.
601 D Street NW
Washington, D.C. 20530

/s/ HORATIO R. ALDREDGE

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 22-cr-290 APM
	§	
KELLYE SORELLE	§	

ORDER

On this day there came before the Court Defendant's Amended Unopposed Motion for Transportation and Subsistence Expenses and after considering same it is hereby GRANTED/DENIED.

The United States Marshals Service for the District of Columbia shall pay for Defendant Kellye SoRelle's transportation from Austin, Texas, to Washington, D.C. and for attendant subsistence expenses, not to exceed the amount authorized by law, to enable Ms. SoRelle to attend her court appearance on August 21, 2024, at 10:00 a.m.

All other bond conditions remain in effect.

SIGNED THIS _____ DAY OF JULY 2024.

AMIT P. MEHTA
UNITED STATES DISTRICT JUDGE