CLYDE M. BLACKMON (SBN 36280)
ROTHSCHILD WISHEK & SANDS LLP
765 University Avenue
Sacramento, CA 95825
Telephone: (916) 444-9845
E-Mail: cblackmon@rwslaw.com

Attorneys for Defendant,
KIMBERLY JONES

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, vs. KIMBERLY JONES, Defendant.	Case No.: 2:13-CR-0125-TLN APPLICATION PURSUANT TO 18 U.S.C. § 4285 FOR GOVERNMENT PROVIDED TRANSPORTATION FOR DEFENDANT ATTEND COURT PROCEEDINGS; DECLARATION IN SUPPORT THEREOF; ORDER

Kimberly Jones, through her appointed counsel Clyde M. Blackmon, requests the Court to issue an order directing the United States Marshal for the Eastern District of California to provide Kimberly Jones with commercial airline transportation from Wichita, Kansas to Sacramento, California so that Ms. Jones may attend court on June 1, 2017. Ms. Jones's application is made pursuant to 18 U.S.C. § 4285 and is based on the attached declaration of Clyde M. Blackmon.

Section 4285 permits the Court, in the interests of justice and upon a proper showing, to direct the marshal to provide noncustodial transportation necessary for an indigent defendant to attend court proceedings.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Ms. Jones has pleaded guilty to one count of wire fraud in violation of 18 U.S.C. § 1343. She is scheduled to be sentenced on June 1, 2017. Ms. Jones lives in Wichita, Kansas, and she is indigent. While she is employed, she makes only $11.80 per hour working as a customer service representative in a telephone call center. For the period November 10, 2016, to January 20, 2017, her take home pay averaged $647.21 every two weeks, $1,294.42 per month. She has no savings, and her monthly expenses are approximately $1,100. Her financial condition is such that she cannot afford the round-trip airfare necessary for her to travel Sacramento to attend court on June 1, 2017.

It is necessary for Ms. Jones to be in Sacramento on the day before her court appearance in order to meet with her counsel and prepare for the sentencing proceedings. Therefore, she requests the Court to issue an order directing the United States Marshal for the Eastern District of California to provide her with commercial airline transportation for a round trip flight leaving Wichita on May 30, 2017, and on June 2, 2017.

Respectfully submitted.

ROTHSCHILD WISHEK & SANDS LLP

DATED: March 31, 2017

By: //s// Clyde M. Blackmon
CLYDE M. BLACKMON
Attorneys for Defendant
Kimberly Jones

DECLARATION OF CLYDE M. BLACKMON IN SUPPORT OF APPLICATION FOR FUNDS TO PAY FOR TRANSPORTATION TO ATTEND COURT PROCEEDINGS

I, Clyde M. Blackmon, declare:

1. I am an attorney licensed to practice in California, and I am admitted to practice before this Court. I am appointed

counsel for Kimberly Jones.

2. Ms. Jones has pleaded guilty to one count of wire fraud in violation of 18 U.S.C. § 1343. A sentencing hearing is set for June 1, 2017. Prior to the court appearance it is necessary that I meet with her to prepare for the sentencing proceedings.

3. Ms. Jones lives in Wichita, Kansas and works as a service representative at a telephone call center. She makes only $11.80 per hour. She has provided me with her payroll information covering the period from November 10, 2016, through January 20, 2017. Her pay stubs for that period are attached. They indicate that her income averages $647.21 every two weeks. Ms. Jones informs me that she has monthly living expenses of approximately $1,100.00: clothing $100.00, rent $575.00, food $200.00, insurance $40.00 and credit card debt $200.00. She has no savings. Therefore, she is unable to pay the air fare necessary for her to travel to Sacramento for her sentencing and return to Wichita afterward. For that reason, I am requesting the Court to direct the United States Marshal to provide Ms. Jones with commercial airline transportation from Wichita to Sacramento on May 30, 2017, and to return to Wichita on June 2, 2017.

Executed at Sacramento, California this 31st day of March, 2017.

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

//s// Clyde M. Blackmon
CLYDE M. BLACKMON

ORDER

IT APPEARING that Kimberly Jones is indigent and cannot pay for transportation from Wichita, Kansas to Sacramento, California to attend court on June 1, 2017, the United States Marshal for the Eastern District of California is directed to provide Kimberly Jones with commercial airline transportation from the Wichita Dwight D. Eisenhower National Airport to the Sacramento International Airport, departing Wichita on May 30, 2017. The marshal is also directed to provide Ms. Jones with commercial airline transportation to return home after the court appearance, departing Sacramento on the afternoon of June 1, 2017, or any time on June 2, 2017.

IT IS SO ORDERED.

Dated: March 31, 2017

Troy L. Nunley
United States District Judge