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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF ARIZONA**
8

9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 vs.
12 13. CARMELO AROZ-ARAIZA,
13 Defendant.
14

CR-07-1120-TUC-JMR (GEE)

**AMENDED MOTION FOR
APPROVAL OF FUNDS**

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16 **COMES NOW,** Carmelo Aroz-Araiza, by and through counsel undersigned,
17 and hereby moves the court to approve funds in excess of \$500 for the purposes of
18 trial preparation.
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20 Counsel had previously contracted with Sandra Frady to prepare
21 transcriptions and translations of the Spanish-language interviews conducted by
22 law-enforcement personnel in this matter. Ms. Frady, however, was unable to
23 perform said work due to a conflict of interest, and the project was undertaken by
24 Vivian Erikson.
25

1 Said transcriptions/translations are urgently necessary to prepare for the trial
2 in this matter and also to conduct proper examinations of the witnesses testifying in
3 said trial¹.

4 There are numerous cassette tapes containing eight interviews that required
5 transcription and translation. Ms. Eriksen charges \$45.50 per hour. Because these
6 interviews require transcription of Spanish language followed by translation thereof,
7 this work is very labor intensive. Ms. Eriksen translated and transcribed the
8 following interviews:
9

10 Oscar Meza-Licea (46 pp)

11 Ramon Perez-Muñoz (42 pp)

12 Ricardo Duran-Ortiz (13 pp)

13 Carmelo Aroz-Araiza,(17 pp)

14 Julio Cesar Baldenegro (25 pp)

15 David Fraga-Chavez (8 pp)

16 Miguel Sandoval-Perez (7 pp)

17 Roberto Diaz-Garcia (8 pp)

18 Ms. Eriksen's itemized statement is attached hereto as a related document.
19

20 Ms. Eriksen spent 135.3 hours translating and transcribing the interviews. At
21 \$45.50 per hour, the total for this work is \$6,156.15.
22

23
24
25 ¹ This is a complicated case involving 15 co-defendants and serious charges. The government has disclosed a large volume of evidence to defense counsel. In addition to the cassette tapes described herein, the government has disclosed approximately 1,200 pages of documents for defense counsel's review. 3000 more are expected. The case was recently designated as complex.

1 Counsel has shared the transcripts with all defense counsel in the case,
2 thereby minimizing costs.

3 Wherefore, Defendant respectfully requests that the Court approve funds for
4 Ms. Eriksen in excess of \$500, to wit \$6,156.15.

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6 RESPECTFULLY SUBMITTED this 9th day of October, 2007

7
8 By: s/ Peter Hormel
9 Peter Hormel
Attorney for Defendant

10 Electronic copy of the foregoing to:

11 U.S. Attorney's Office
12 Angela Martinez
13 405 W. Congress
Tucson, Arizona 85701

14 Counsel for co-defendants

15 Counsel for Material Witnesses
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