

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

**UNITED STATES,
Plaintiff,**

v.

Case No. 1:23-cr-20036-KMM

**DANIELA RENDON,
Defendant.**

**AMENDED/REVISED AND UNOPPOSED MOTION TO ALLOW
RETURN OF CHILDRENS PASSPORTS AND GREEN CARDS**

COMES NOW the Defendant, Daniela Rendon, by and through the undersigned Counsel, and submits her unopposed motion to allow for the return of the Defendant's children and neice's passports and green cards and as grounds therefore alleges as follows:

1. The Defendant has entered into a plea agreement in this case and was Sentenced on August 17, 2023.
2. The Defendant and her family and children, including her niece, Mannuela Heredia Rendon, had agreed to surrender of their passports as a condition of the Defendant's release prior to sentencing.
3. In a prior motion the Defendant's niece's passport was

requested to be turned, the Defendant's counsel was only notified after the initial passport was attempted to be picked up that her, (their) green cards needed to be requested to be returned as well. The Court issued an order for the return of the neice's passport and left the amended asking for the greencard as well, unanswered.

4. Now that the Defendant has been sentenced and is in custody, her counsel is requesting the return of all of the childrens passports and greencards, their names and dates of birth are:

Enzo Reyes - dob: 8/25/2017

Paulinna Moreno Rendon - dob: 4/20/2011

Mannuela Heredia Rendon - dob: 7/27/2012

5. On August 21, 2023, the undersigned conferred with Assistant United States Attorney, Jonathan Bailyn, who advised that he has no objection to return of the children's passports and green cards.

6. The children's natural grandmother, Gilda Isabel Andrade Sarmiento is granted by the Defendant, full custodial care and authority of the children while she is incarcerated and would ask the Court to have pretrial services, (or whatever agency retains them at this time), to release the passports and greencards directly to Gilda Isabel Andrade

Sarmiento.

For the foregoing reasons, the Defendant respectfully requests that the Court grant this Amended/Revised Motion for release of Children's passports and green cards to the childrens natural grandmother, Gilda Isabel Andrade Sarmiento.

DATED this 21st day of August, 2023.

Respectfully submitted,

/s/ Robert Mandell

ROBERT I. MANDELL, ESQ.

FBN: 15484

/s/ Asad Ali

ASAD ALI, ESQ.

CO-COUNSEL

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CERTIFICATE OF SERVICE

On August 21, 2023 via Conventional Filing, I filed the foregoing with the clerk of the court which will send notice to: US Attorney's Office, Southern District of Florida, 99 NE 4th Street, Miami, FL 33132.

/s/ Robert Mandell

ROBERT I. MANDELL, ESQ.

FBN: 15484

/s/ Asad Ali

ASAD ALI, ESQ.

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