

**FILED**

**MAY 01 2008 TC**

**MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA )

No.

**08CR 349**

v. )

JULIUS A. MACKLIN )

a.k.a. Julius A. Heart )

Magistrate Judge Morton Denlow

UNDER SEAL

**GOVERNMENT'S MOTION TO SEAL  
COMPLAINT, AFFIDAVIT, AND ARREST WARRANT**

The UNITED STATES OF AMERICA, by its attorney, PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, moves this Honorable Court for entry of an order sealing the criminal Complaint, Affidavit, and Arrest Warrant in this matter.

The public filing of the Complaint, Affidavit, and Arrest Warrant in this matter before the Arrest Warrant can be executed could alert the defendant and result in flight. For this reason, the government respectfully requests that the Complaint, Affidavit, and Arrest Warrant, as well as this Motion to Seal, be sealed until June 1, 2008, or until the arrest of the defendant, or until such earlier time as the Court directs the unsealing of these documents. The government requests, however, that law enforcement officers be allowed to enter the warrant in appropriate law enforcement databases.

Respectfully submitted,

PATRICK J. FITZGERALD  
United States Attorney .

By:

*Bethany K. Birsenthal*  
BETHANY K. BIRSENTHAL  
Assistant United States Attorney