

FILED

MAY 21 2008

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MARTIN C. ASHMAN
UNITED STATES MAGISTRATE JUDGE
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA)
)
 v.)
)
 RONALD PIEKARZ and)
 MACARTHUR MILAM)

08CR

405

No. _____
Magistrate Judge Martin C. Ashman

**EX PARTE MOTION TO SEAL CRIMINAL
COMPLAINT, AFFIDAVIT AND ARREST WARRANTS**


The UNITED STATES OF AMERICA, by PATRICK J. FITZGERALD, United States Attorney for the Northern District of Illinois, moves to seal the contents of the above criminal complaint, affidavit in support of the criminal complaint and arrest warrants. In support of its Motion, the government states as follows:

1. The United States has presented the Court with a criminal complaint, an affidavit supporting the criminal complaint and arrest warrants for the defendants.
2. The complaint, affidavit and warrants contain information concerning a sensitive investigation and identify the targets of the investigation.
3. If the contents of the complaint, affidavit and warrant are made public prior to the arrest of the defendants, the defendants may take action to impede any further investigation and may also interfere with their arrests.

WHEREFORE, the United States respectfully requests this Court to enter an Order placing the complaint, affidavit, arrest warrant and this Motion under seal for until and including November 21, 2008 or until the time that either defendant is arrested, or until further order of this Court.

Respectfully submitted,

PATRICK J. FITZGERALD
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