

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,

v.

ADAM VILLARREAL,

Defendant.

Case No.: 1:22-mj-00070

MOTION TO UNSEAL ARREST WARRANT AND CRIMINAL COMPLAINT

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully moves for an order to unseal the Affidavit in Support of the Criminal Complaint, Criminal Complaint, and Arrest Warrant in the above-captioned matter; the previously submitted Motion for an Order to Seal the Affidavit in Support of Criminal Complaint, Supporting Memorandum, proposed Order and Order granting the motion; this Motion and Supporting Memorandum, the proposed Order attached to this Motion, and any Order granting this motion. In support thereof, the government states as follows:

1. On March 23, 2022, Hon. Zia M. Faruqui, United States Magistrate Judge for the District of Columbia, authorized an arrest warrant for ADAM VILLARREAL based on an Affidavit Submitted in Support of a Criminal Complaint. The Criminal Complaint charged the defendant with violations of 18 U.S.C. §§ 111(a) and (b), 231(a)(3), 641, 1752(a)(1) and (2), and 40 U.S.C. § 5104(e)(2)(D), (E), and (F).

2. On March 23, 2022, the United States moved for an order to place and maintain under seal, until the Arrest Warrants were executed, the Affidavit in Support of Criminal Complaint, Criminal Complaint, and Arrest Warrant, as well as its motion and supporting

memorandum, the proposed order, and any order granting the motion. On March 23, 2022, Hon Zia M. Faruqui, United States Magistrate Judge for the District of Columbia, granted that motion and issued an order maintaining the above-referenced materials under seal.

3. As of the date of this motion, Adam Villarreal has neither been located nor arrested. Law enforcement has undertaken considerable efforts to locate defendant since the filing of the criminal complaint without success. At this time, the government believes a request for information from the public will aid in defendant's apprehension. The government, therefore, asks that the above materials be unsealed to facilitate the request for information from the public. Additionally, based on interviews of associates of defendant, law enforcement believes defendant may already be aware of the pending charges against him. Therefore, the sealing order is no longer necessary to avoid hindering the ongoing investigation of this matter.

WHEREFORE, the United States respectfully requests that this Court issue an Order directing the Clerk of the Court to unseal the Arrest Warrant and the Affidavit in Support of Criminal Complaint; the previously submitted Motion for an Order to Seal the Affidavit in Support of Criminal Complaint, Supporting Memorandum, proposed Order, and Order granting the motion; this Motion and Supporting Memorandum, the proposed Order attached to this Motion, and any Order granting this motion.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

By: /s/ Kaitlin Klamann
KAITLIN KLAMANN
Assistant United States Attorney
601 D Street NW
Washington, D.C. 20530
(202) 252-6778
Kaitlin.klamann@usdoj.gov
IL Bar No. 6316768