

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA (D.C)

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AUG 27 2026

Angela W. Caesar, Clerk of Court
U.S. District Court, District of Columbia

UNITED STATES OF AMERICA

*

Plaintiff,

*

v.

*

Criminal No. 1:07-cr-00126-RJL

AARON BURROUGHS,

*

Case: 1:26-mc-00126

Defendants.

*

Assigned To : Leon, Richard J.

Assign. Date : 8/27/2026

* * * * *

Description: Misc.

**DEPARTMENT OF PUBLIC SAFETY AND CORRECTIONAL
SERVICES' MOTION TO UNSEAL AND DELIVER COPY OF TRANSCRIPT
OF GUILTY PLEA PROCEEDINGS**

The Maryland Department of Public Safety and Correctional Services ("DPSCS" or "Department"), by their attorneys, Anthony G. Brown, Attorney General of Maryland, and Reva Chopra, Assistant Attorney General, submits this Motion to Unseal and Deliver Copy of Transcript of Guilty Plea Proceedings held on August 16, 2007, and respectfully states the following in support:

1. On August 4, 2008, Defendant Aaron Burroughs was sentenced in this Court pursuant to a plea of guilty to one count of exploitation of children, in violation of 18 U.S.C. § 2251(a), one count of transportation of a minor to engage in prostitution, in violation of 18 U.S.C. § 2423(a), and first-degree child sexual abuse, in violation of DC code § 22-3008.

2. As part of the Defendant's plea agreement – entered in the court record on August 16, 2007 via ECF No. 8 – the Defendant agreed to certain conditions, necessitating

the need to seal the proceedings at that time. Additionally, the Defendant's plea agreement required him to register as a sexual offender under the Sexual Offender Registration Act, D.C. Code § 22-4001.

3. Per the Government's Motion to Unseal the Pleadings, Records, and Proceedings filed in this matter on May 7, 2008, the defendant satisfied the noted conditions and "there is no longer any ongoing criminal investigation that could be compromised by the unsealing of the records, files, and proceedings in this case." The Government's motion was granted on July 15, 2008.

4. The Maryland Sex Offender Registration Unit ("MSOR") is the unit of DPSCS that maintains the sex offender registry, where Defendant is a resident.

5. The MSOR is currently conducting a review of the Defendant's registration requirements under Maryland Code. This will require a review of the statement of facts verbally provided in support of the Defendant's guilty plea.

6. Undersigned counsel requests that this Court grant this motion to unseal and deliver a copy of the transcript of the proceedings on August 16, 2007 in this case for the purposes of reviewing the Defendant's sex offender registration requirements.

WHEREFORE, DPSCS requests that the transcript of the proceedings on August 16, 2007 be unsealed, and that the Clerk of the Court photocopy the same, and deliver it to Reva Chopra, Assistant Attorney General, DPSCS, 6776 Reisterstown Road, Suite 313, Baltimore, Maryland 21215 or via email to reva.chopra@maryland.gov.

Respectfully submitted,

ANTHONY G. BROWN
Attorney General of Maryland

/s/ Reva Chopra
REVA CHOPRA
Assistant Attorney General
Federal Bar No. 31457
Department of Public Safety and
Correctional Services
6776 Reisterstown Road, Suite 313
Baltimore, Maryland 21215
(410) 585-3017 (Telephone)
(410) 484-5939 (Telefax)
E-mail: reva.chopra@maryland.gov

Attorneys for DPSCS

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day of August, 2026, a copy of the
foregoing Motion was mailed, postage pre-paid to:

Joshua A. Gold
United States Attorney's Office
601 D Street NW
Washington, DC 20001

Karen Shinskie
United States Attorney's Office
601 D Street NW
Washington, DC 20001

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409 Seventh Street, NW
Suite 200
Washington, DC 20004

Spencer M. Hecht
Hecht & Associates
1100 Wayne Avenue, Suite 600
Silver Spring, MD 20910

/s/ Reva Chopra
REVA CHOPRA
Assistant Attorney General



Justin Gause <justin.gause@maryland.gov>

RE: Motion - USA v. Aaron Burroughs; 1:07-cr-00126-RJL

1 message

dcd cmecf_cr <dcd_cmecf_cr@dcd.uscourts.gov>
To: Justin Gause <justin.gause@maryland.gov>
Cc: Reva Chopra -DPSCS- <reva.chopra@maryland.gov>

Mon, Aug 24, 2026 at 1:13 PM

Good afternoon,

Apologies for the delayed response, but that is correct, you will mail a Motion, along with a Related Case Form and the filing fee of \$52. Thank you.

Shedelle Dorsett

Criminal Docket Workleader

U.S. District & Bankruptcy Courts of D.C.

333 Constitution Ave. NW | Washington, D.C. 20001

(202) 354-3285 | email: Shedelle_Dorsett@dcd.uscourts.gov

From: Justin Gause <justin.gause@maryland.gov>
Sent: Monday, August 24, 2026 12:37 PM
To: dcd cmecf_cr <dcd_cmecf_cr@dcd.uscourts.gov>
Cc: Reva Chopra -DPSCS- <reva.chopra@maryland.gov>
Subject: Fwd: Motion - USA v. Aaron Burroughs; 1:07-cr-00126-RJL

CAUTION - EXTERNAL:

Good Afternoon,

Following up on my previous inquiry, as we haven't heard anything back. Can someone please advise?

Thank you.

Justin L. Gause

Paralegal II

Office of the Attorney General

Department of Public Safety and Correctional Services

6776 Reisterstown Road, Suite 313

Baltimore, Maryland 21215

Phone: (443) 635-9426

----- Forwarded message -----

From: **Justin Gause** <justin.gause@maryland.gov>

Date: Thu, Aug 13, 2026 at 12:33 PM

Subject: Motion - USA v. Aaron Burroughs; 1:07-cr-00126-RJL

To: <dcd_cmecf_cr@dcd.uscourts.gov>

Cc: Reva Chopra -DPSCS- <reva.chopra@maryland.gov>

Good Afternoon,

Our office is attempting to obtain transcripts for the 8/16/07 hearing in criminal case 1:07-cr-00126-RJL on behalf of the Maryland Sex Offender Registry. The transcript of proceedings is listed on the docket as sealed.

We were advised by the Court Reporter that we would need to file a Motion to Remove Seal prior to obtaining the transcript. Your office confirmed via telephone that we are unable to file via CM/ECF as a 3rd party in the case.

I was advised by your office to send the Motion to Remove Seal to the clerk's main office in order to obtain a ruling. Please confirm if this is correct, and if there are any additional required steps to obtain a ruling.

Thank you.

Justin L. Gause

Paralegal II

Office of the Attorney General

Department of Public Safety and Correctional Services

6776 Reisterstown Road, Suite 313

Baltimore, Maryland 21215

Phone: (443) 635-9426

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