

**ORIGINAL  
FILED**

**DEC 13 2011**

**CLERK, U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_  
DEPUTY CLERK**

1 BENJAMIN B. WAGNER  
United States Attorney  
2 RUSSELL L. CARLBERG  
Assistant United States Attorney  
3 501 I Street, Suite 10-100  
Sacramento, California 95814  
4 Telephone: (916) 554-2748

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7  
8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA, ) CR. NO. S-11-511 JAM  
12 )  
12 Plaintiff, ) Application For Order Unsealing  
13 ) Indictment; [Proposed] Order  
13 v. )  
14 )  
14 WILEY C. CHANDLER, )  
ANDREW B. KATAKIS, )  
15 DONALD M. PARKER, )  
ANTHONY B. JOACHIM, and )  
16 W. THEODORE LONGLEY, )  
17 )  
17 Defendants. )  
18 )  
18 \_\_\_\_\_ )

19 TO THE HONORABLE KENDALL J. NEWMAN, UNITED STATES MAGISTRATE  
20 JUDGE:

21 COMES NOW Russell L. Carlberg, Assistant United States Attorney  
22 for the Eastern District of California, to petition this Court and  
23 respectfully represent:  
24

25 1. On December 7, 2011, the Honorable United States Magistrate  
26 Judge Kendall J. Newman issued an order sealing the Indictment in  
27 the above-referenced case. That order stated that the indictment  
28 should be unsealed upon arrest of the first defendant.

**Cr. No. S-11-511 JAM  
Application to Unseal Indictment**

1           2. The government brings this motion to unseal the indictment  
2 now because at least one of the defendants has been arrested. The  
3 interests of justice are served by unsealing the indictment so that  
4 the defendants and pretrial services may receive a copy of it in  
5 advance of their initial appearances. Accordingly, the government  
6 respectfully requests that the indictment in this case be unsealed.

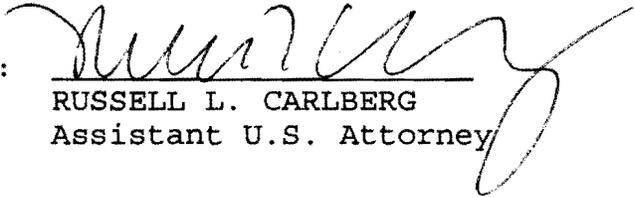
7           THEREFORE, your petitioner prays that the aforesaid indictment  
8 be unsealed and made part of the public record.

9  
10 Dated: December 13, 2011

Respectfully submitted,

BENJAMIN B. WAGNER  
UNITED STATES ATTORNEY

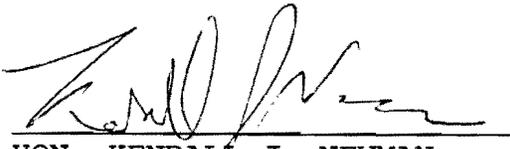
11  
12  
13  
14 by:

  
RUSSELL L. CARLBERG  
Assistant U.S. Attorney

15  
16  
17 ~~PROPOSED~~ ORDER

18           THE COURT HEREBY ORDERS that the Indictment in Criminal Case  
19 No. S-11-511 JAM be unsealed and made part of the public record.

20  
21 DATED: Dec 13, 2011

22  
23  
24   
25 HON. KENDALL J. NEWMAN  
26 United States Magistrate Judge  
27  
28