

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

CRIMINAL DOCKET H-00-0000

CLIENT

FILED UNDER SEAL

**EX PARTE MOTION FOR APPROVAL TO EMPLOY
PRIVATE INVESTIGATOR**

Defendant, CLIENT asks for approval to employ INVESTIGATOR as a private investigator, and respectfully moves this Court to enter an order authorizing counsel to incur expenses for investigative assistance not to exceed \$1,600.00. In support of this motion, the defendant states:

I.

Defendant is charged in an eleven count fraud indictment. Defendant is charged with mail fraud, fraud in connection with identification documents, fraud in connection with access devices and aggravated identity theft. Counsel has identified several potential material witnesses in this case. Counsel needs investigative assistance to locate and interview these witnesses. Counsel needs further assistance in conducting thorough background checks on these witnesses. INVESTIGATOR's tasks will include investigation of issues relevant to both the guilt/innocence and penalty phases of the case. They will also investigate the credibility of prosecution witnesses who will testify against CLIENT.

III.

Pursuant to 18 U.S.C. 3006(A), defendant requests that this Honorable Court authorize counsel to incur reasonable investigative expenses not to exceed \$1,600.00.

WHEREFORE, PREMISES CONSIDERED, defendant prays that this court grant this *ex parte* application for approval to employ a private investigator.

Respectfully submitted,

DEFENSE COUNSEL
Federal Identification No. 0000
0000 Shark Infested Lane
Suite 000
Houston, Texas 77000
(713) 000-0000
(713) 000-0000 (Fax)

CERTIFICATE OF SERVICE

This document was filed *ex parte* and under seal. A copy was not provided to the government.

DEFENSE COUNSEL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

Cr. No. H-00-0000

CLIENT

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ORDER ON
EX PARTE MOTION FOR APPROVAL TO EMPLOY MITIGATION SPECIALIST AND
PRIVATE INVESTIGATOR

CLIENT's *ex parte* motion for approval to employ private investigator is:

GRANTED/DENIED.

CLIENT is authorized to retain the investigative services of Mr. INVESTIGATOR of
Investigators Are Us and expend a total of \$1600.00 to begin a factual investigation..

Signed in Houston, Texas on _____, 2009

United States District Judge