

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
<b>v.</b>	:	<b>Case No. 1:22-CR-64 (RBW)</b>
	:	
<b>LLOYD CASIMIRO CRUZ, JR.,</b>	:	
	:	
<b>Defendant.</b>	:	

**GOVERNMENT’S MOTION FOR LEAVE TO FILE EXHIBITS RELATED TO  
DEFENDANT’S MOTION TO SUPPRESS**

The United States, by and through the U.S. Attorney for the District of Columbia, respectfully seeks leave to file copies of exhibits relevant to Defendant Lloyd Casimiro Cruz, Jr.’s motion to suppress (ECF No. 34).

In his motion, Cruz seeks to suppress location evidence obtained by search warrants from Google and AT&T. The government opposes Cruz’s motion on grounds that Cruz lacked a reasonable expectation of privacy in the collected location information, that the warrants were nonetheless supported by probable cause and particularity, and that the executing officers relied on the warrants in good faith (ECF No. 39). Cruz’s motion remains pending before this Court, which has scheduled a hearing for December 12, 2022.

In litigating this suppression claim, the parties inadvertently neglected to attach copies of the challenged Google and AT&T search warrants. The government accordingly seeks leave to file copies of these warrants (attached as Exhibits A and B) on this Court’s docket to ensure a complete record in this case. Because these warrants remain under seal, the government further seeks leave to file them under seal on this Court’s docket.

The government's opposition to Cruz's suppression motion additionally cited Google's privacy policy (ECF No. 39 at 10). Although this policy is a publicly available document, the government similarly seeks leave to file a copy (attached as Exhibit C) on this Court's docket to ensure a complete record in this case.

For these reasons, the government respectfully requests leave to file the attached suppression exhibits on this Court's docket. A proposed order is attached.

Respectfully submitted,

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