

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

**UNITED STATES OF AMERICA**

\*  
\*  
\*  
\*  
\*

**VS.**

**CASE NO. 22-cr-015-APM**

**ROBERTO MINUTA, et. al.**

**UNDER SEAL**

\*\*\*\*\*  
-  
\*\*\*\*\*

**MOTION FOR MISCELLANEOUS RELIEF**

Roberto Minuta, by and through counsel, Alfred Guillaume III, moves this Honorable Court to allow Alfred Guillaume III, Esq. to remain as appointed counsel pursuant to the Criminal Justice Act. In support of the motion offers the following:

1. On November 11, 2021, undersigned counsel entered his appearance on behalf of Mr. Roberto Minuta in *United States v. Caldwell*, 21-028-APM, pursuant to the Criminal Justice Act.
2. On January 24, 2022, undersigned counsel again entered his appearance on behalf of Mr. Roberto Minuta in the instant case, pursuant to the Criminal Justice Act.
3. On April 4, 2022, William Shipley entered his appearance on behalf of Mr. Minuta in the instant case.
4. That same day, Mr. Shipley contacted counsel and asked if he would be willing to remain as co-counsel because of the complexity of the case, the massive volume of discovery, and for the benefit of Mr. Minuta.
5. Mr. Roberto Minuta also requested that undersigned counsel continue to represent him.

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]  
[REDACTED]  
[REDACTED]

8. [REDACTED]  
[REDACTED]

9. To date, undersigned counsel has spent more than one hundred hours reviewing discovery, meeting with Mr. Minuta while preparing the case for trial.

10. [REDACTED]  
[REDACTED]  
[REDACTED]

11. Undersigned counsel respectfully suggests that if he is allowed to continue to represent Mr. Minuta, the continuity of representation would benefit both the Court, Mr. Minuta, and Mr. Shipley, considering the massive volume of discovery, undersigned counsel's familiarity with the case, and the unique nature of the facts and allegations made by the government in this case. Additionally, undersigned counsel lives and has an office in the District of Columbia. Mr. Shipley lives and has an office in Honolulu, Hawaii.

**WHEREFORE**, undersigned counsel respectfully requests that he be allowed to continue his representation of Mr. Roberto Minuta pursuant to the Criminal Justice Act.

Respectfully submitted

*Alfred Guillaume*

Alfred Guillaume III, Esq. #MD0085  
Law Offices of Alfred Guillaume III, LLC  
1350 Connecticut Ave. NW, Suite 308  
Washington, D.C. 20036

[REDACTED]

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of April 2022, a copy of this report was sent electronically to the United States Attorney's Office.

*Alfred Guillaume*

Alfred Guillaume III, Esq.