

10:20 am, Apr 29 2022

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND****IN THE MATTER OF THE SEARCH
OF:****THE PERSON AND PREMISES
DESCRIBED IN ATTACHMENTS A-1
THROUGH A-5; AND****THE CRIMINAL COMPLAINT AND
ARREST WARRANT OF AHMED M.
SARY**

1:22-mj-01286-JMC

1:22-mj-01287-JMC

1:22-mj-01288-JMC

1:22-mj-01289-JMC

1:22-mj-01290-JMC

Case No. ~~1:22-mj-01291-JMC~~**Filed Under Seal****GOVERNMENT'S MOTION TO SEAL**

The United States of America respectfully moves this Court for an order sealing the affidavit submitted in support of the above-referenced Criminal Complaint, arrest warrant, search warrants, and related documents, and in support thereof states:

1. The affidavit submitted in support of the above-referenced Criminal Complaint, arrest warrant, and search warrants contains information regarding an ongoing investigation related to alleged violations of Wire Fraud (18 U.S.C. § 1343), Wire Fraud Conspiracy (18 U.S.C. § 1349), and Money Laundering (18 U.S.C. § 1956).

2. Disclosure of the Criminal Complaint, arrest warrant, affidavit, and related documents at this time could seriously jeopardize the investigation as it would reveal the name and identity of the target of the investigation who is unaware of the scope of the ongoing federal investigation and who, if he—or any confederates—becomes aware, may attempt to destroy evidence, or otherwise obstruct justice. Therefore, disclosure of the affidavit at this time would in all likelihood compromise the integrity of the investigation and could quite possibly jeopardize the outcome of the investigation.

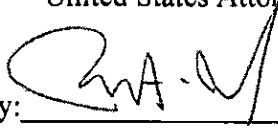
3. To seal an affidavit, the government must demonstrate that: (1) there is a

compelling government interest requiring materials to be kept under seal and (2) there is no less restrictive means, such as redaction, available. *In re Search Warrants Issued on April 26, 2004*, 353 F. Supp. 2d 584 (D. Md. 2004). The procedures for sealing are set forth in *Baltimore Sun Co. v. Goetz*, 886 F.2d 60 (4th Cir. 1989). “The judicial officer may explicitly adopt the facts that the government presents to justify the sealing.” *Id.* at 65. This motion and the Court’s reasons for sealing should also be sealed. *Id.* Notice of the sealing is required, but the notice requirement is satisfied by the docketing of the order sealing the documents. *Id.*

WHEREFORE, the government respectfully requests that above-referenced Criminal Complaint, arrest warrant, search warrants and supporting affidavit, along with this motion and the Court’s reasons for sealing, if made express in the order, be placed under seal until further order of this Court.

Respectfully submitted,

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