

SEALED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

ALEXANDER BARABASH

Defendant

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CRIMINAL NO. JKB 22cr 232

UNDER SEAL

MOTION TO SEAL

The United States of America, by its undersigned attorneys, files this motion requesting that the Court order that the indictment and all related documents in this matter be sealed until further order of the Court, and in support says as follows:

1. The Fourth Circuit has recognized that a motion to seal may be granted for any legitimate prosecutorial need, including the proper completion of any investigation. In re Knight Publishing Co., 743 F.2d 231, 231-32 (4th Cir. 1984).

2. Law enforcement is conducting an on-going investigation.

3. The defendant, Alexander Barabash, has not been arrested.

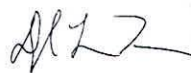
4. Disclosure of the indictment and arrest warrants, at this juncture, would seriously jeopardize this on-going criminal investigation; may cause the destruction or tampering with of evidence; and will notify targets of law enforcement's knowledge of their operations, and may cause targets to flee to avoid prosecution.

WHEREFORE, the government respectfully moves to seal the above captioned indictment, arrest warrants, all related documents, and this Motion and Order until further Order of the Court to protect an on-going criminal investigation.

Respectfully submitted,

Erek L. Barron
United States Attorney

By:



Digitally signed by Darryl
Louis Tarver
Date: 2022.06.28
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Darryl L. Tarver
Assistant United States Attorney