

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

v.

AUSTIN MARTIN SIAMPWIZI

Criminal Action No.

1:23-CR-246-WMR-RDC

**Government's Consent Motion for Protective Order
for Discovery Materials**

The United States of America, by Ryan K. Buchanan, United States Attorney, and Sarah E. Klapman, Assistant United States Attorney for the Northern District of Georgia, moves for a protective order to limit the defendant's use and dissemination of information provided in discovery to that which is reasonably necessary to prepare his defense, pursuant to Federal Rule of Criminal Procedure 16(d)(1).

In support of its motion, the United States submits as follows:

1. On July 25, 2023, a federal grand jury sitting in the Northern District of Georgia returned a five-count Indictment against the defendant Siampwizi for: (1) one count of conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h); (2) three counts of concealment money laundering, in violation of 18 U.S.C. § 1956(a)(1)(B)(i); and (3) one count of wire fraud, in violation of 18 U.S.C. § 1343.

2. The United States will provide Rule 16 discovery to the defendant as soon as possible.

3. The United States considers many of the records that will be produced in this case to be “sensitive materials” in that they contain dates of birth, addresses, social security numbers, and bank account numbers for individuals that are not parties to this litigation. Given the volume of discovery materials in this case, redaction of all “sensitive information” within the materials would be unduly burdensome and would be subject to error. Further, the degree of redaction that would be required for certain documents may obscure some of the documents and make them illegible.

4. As a result, pursuant to Federal Rule of Criminal Procedure 16(d)(1), the United States requests that a protective order be issued to guard against the unwarranted dissemination of the discovery materials in this case. *See* FED. R. CRIM. P. 16(d)(1) (“[a]t any time the court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief”).

5. First, the United States requests an order mandating that any discovery materials and all information included in the discovery materials (regardless of whether such materials are defined as discovery under Rule 16) that are provided by the United States to the defendant, shall not be further disseminated by the defendant or his counsel to any individuals, organizations, or other entities, except than to:

- a. Members of the defense team (co-counsel, paralegals, investigators, litigation support personnel, the defendant, and secretarial staff);

- b. Any experts or consultants retained to assist in the preparation of the defense; or
- c. The Court.

6. Second, the United States requests an order requiring that all discovery is to be provided and used by the defendant and his counsel exclusively for the purpose of allowing the defendant to prepare a defense, and that the defendant, defense counsel, or members of the defense team will not disseminate, disclose, or provide the discovery produced by the United States to anyone who is not necessary to the preparation of the defense.

7. The United States submits that these protective measures are necessary to guard against dissemination of confidential and sensitive personal information and that a protective order is the most reasonable way of balancing the defendant's need for access to these materials with the rights of individuals whose information may be reflected in this discovery.

8. Defendant consents to the entry of the attached protective order.

WHEREFORE, and based on good cause shown, the United States respectfully requests that the Court issue the submitted protective order.

Dated: August 17, 2023

Respectfully submitted,

RYAN K. BUCHANAN
United States Attorney

/s/SARAH E. KLAPMAN
Assistant United States Attorney
Georgia Bar No. 437221
sarah.klapman@usdoj.gov

Certificate of Service

The United States Attorney's Office served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

Lynsey Barron

Counsel for Defendant Siampwizi

August 17, 2023

/s/ SARAH E. KLAPMAN

SARAH E. KLAPMAN

Assistant United States Attorney