

ORIGINAL

FILED IN OPEN COURT
U.S.D.C. - Atlanta

MAY 10 2022

KEVIN P. WEIMER, Clerk
By *Kevin P. Weimer* Deputy Clerk

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

UNITED STATES OF AMERICA

v.

CARL DELANO TORJAGBO A/K/A
KARL LUCIUS DELANO

CRIMINAL INDICTMENT

1 22 - CR - 171

UNDER SEAL

Motion to Seal Indictment

The United States of America, by Ryan K. Buchanan, United States Attorney, and John Russell Phillips, Assistant United States Attorney for the Northern District of Georgia, respectfully requests that the attached Indictment, Motion to Seal and Order be sealed for the following reasons:

The Defendant is likely unaware that he has been identified as the target of this investigation. Revealing the content of the Indictment prior to his arrest would disclose information that might lead to him fleeing, destroying evidence, or taking other steps to evade law enforcement.

WHEREFORE, the United States of America respectfully requests that this motion, the Indictment and ensuing order be sealed.