

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Criminal No.: 1:21-CR-10269
	)	
CHYNNA SAVATH,	)	
Defendant.	)	

ASSENTED-TO MOTION FOR LEAVE TO FILE
SENTENCING MEMORANDUM UNDER SEAL

Defendant Chynna Savath, by and through her undersigned counsel, hereby moves this Court for an Order authorizing her to file her Sentencing Memorandum in this case under seal.

As grounds for this Motion, undersigned counsel states as follows:

1. On January 20, 2022, pursuant to a plea agreement under Fed. R. Crim. P. 11(c)(1)(C), Defendant Savath pled guilty to a two count information charging her with committing wire fraud in violation of 18 U.S.C. § 1343. Sentencing in this case is scheduled for Thursday, June 2, 2022 at 2:00 p.m.
2. Defendant Savath intends to submit a short Sentencing Memorandum addressing the circumstances of the case, as well as certain of the sentencing factors under 18 U.S.C. § 3553(a), including her own personal history and characteristics. The Sentencing Memorandum will address, in part, private and personal information relating to her health care.
3. The private and personal information to be addressed in her Sentencing Memorandum has been previously disclosed to the Probation Office and government counsel, but Defendant requests that the information not be placed in the public record.

4. Undersigned counsel has conferred with government counsel regarding the subject matter of this Motion, and the United States has assented to the relief requested herein.

WHEREFORE, Defendant Savath respectfully requests that this Court issue an Order authorizing her counsel to file her Sentencing Memorandum in this matter under seal.

Respectfully submitted,
DEFENDANT, CHYNNA SAVATH,
By her attorney,

/s/ Daniel J. Cloherty
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I served a true copy of the above document upon all parties with an interest in this matter by electronically filing through this Court's CM/ECF filing system this 27th day of May, 2022.

/s/ Daniel J. Cloherty
Daniel J. Cloherty