

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 2:22-mj- 1043-DNF

DANIEL JOSEPH TISONE

**MOTION TO SEAL CRIMINAL COMPLAINT
AND RELATED DOCUMENTS**

Pursuant to Fed. R. Crim. P. 6(e)(4), and in the interests of law enforcement, the United States of America by Roger B. Handberg, United States Attorney for the Middle District of Florida, hereby moves the Court to direct the Clerk to seal the Criminal Complaint, the attached affidavit, the file copy of the warrant(s), defendant information sheet(s), this motion, the Court's order regarding this motion and any other documents filed in this case that would identify the defendant(s). Disclosure of the existence of these documents prior to the arrest of a defendant could hinder or impede arrest efforts.

The United States further moves that the Court direct the Clerk to seal the Criminal Complaint in this case except when necessary to provide certified copies of the Criminal Complaint to the United States Attorney's Office.

The United States further requests that the Court's Order allow the

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United States Marshals Service to release certified copies of the arrest warrant to the case agent or other appropriate law enforcement and/or to the United States Attorney's Office, upon verbal request of the United States Attorney's Office to the United States Marshals Service, without further order of the Court.

The United States further requests that the Court's Order allow the United States Marshals Service or other appropriate law enforcement agency to enter the arrest warrant into the National Crime Information Center (NCIC) database or other appropriate law enforcement database, without further order of the Court.

The United States further requests that the Court's Order allow the United States to disclose the existence of the Criminal Complaint in any subsequent search and/or seizure warrants which may be executed in conjunction with the arrest of the defendant(s).

The United States further moves that the Court direct the Clerk to

unseal the documents described herein without further order when any named defendant is taken into custody.

Respectfully submitted,

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By:



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