

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
DUBLIN DIVISION

UNITED STATES OF AMERICA

v.

GLADYS HARUN

Case No. 1:21-MJ-051

Filed Under Seal

UNITED STATES' MOTION TO SEAL

The United States requests that the Court place under seal this Motion, the Complaint and Affidavit of U.S. Secret Service Special Agent Brian Truax, excepting only such disclosures as necessary to effect service of process and for the United States' production in discovery.

The Affidavit discusses investigatory measures used in an ongoing investigation, and the investigative steps undertaken as described in the Affidavit are not publicly known. Premature disclosure of the contents of the Affidavit and related documents may allow the targets of the investigation to flee arrest and prosecution, destroy or tamper with evidence and witnesses, and impact law enforcement's ability to investigate the crimes that are the subject of the investigation.

This 1st day of July, 2022.

DAVID H. ESTES
UNITED STATES ATTORNEY

/s/ Chris Howard

Assistant United States Attorney
New York Bar No. 4935938