

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 23-MJ-05013-JGD
	)	
ERIN BROWN,	)	
	)	
Defendant	)	

MOTION TO DISMISS CRIMINAL COMPLAINT

Pursuant to Federal Rule of Criminal Procedure 48(a), the United States Attorney for the District of Massachusetts hereby seeks leave of this Court to dismiss the criminal complaint filed in this matter as to Erin Brown, charging her with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, and conspiracy to commit unlawful monetary transactions, in violation of 18 U.S.C. § 1956(h). The government respectfully submits that dismissal is in the interests of justice.

Respectfully submitted,

JOSHUA S. LEVY
ACTING UNITED STATES ATTORNEY

By: /s/ David M. Holcomb
DAVID M. HOLCOMB
Assistant United States Attorney

Date: January 16, 2024

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF).

Dated: January 16, 2024

By: /s/ David M. Holcomb
DAVID M. HOLCOMB
Assistant United States Attorney