IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

(1) SNIDERS JEAN-JACQUES,
(2) GERMAN OLIVO,
(3) JIM KELLY MICHEL,
(4) TANYA PIERRE, and
(5) ROSALIE CLEMENT-JACKSON,

Defendants

Criminal No. 26-10030-RGS-JCB

ASSENTED-TO MOTION FOR PROTECTIVE ORDER

The government hereby moves for the entry of a protective order, which will enable the government to produce relevant evidence to the defendants while protecting confidential information, including the Social Security numbers, dates of birth, and bank account numbers of victims, witnesses, defendants, and unindicted co-conspirators. As grounds for this motion, the government states as follows:

The indictment alleges that the defendants committed bank and wire fraud conspiracy by conspiring to obtain money and property, including mortgage loans and apartment leases, through fraudulent misrepresentations, including fake paystubs, altered bank statements, fraudulent credit histories, and the unauthorized use of Social Security numbers belonging to others. As part of its investigation, the government has, among other things, (1) obtained thousands of pages of mortgage loan and apartment rental applications; (2) collected thousands of pages of bank statements for victims, defendants, and unindicted coconspirators; (3) executed a search warrant on the iCloud account of defendant Sniders Jean-Jacques, which includes multiple chats in which co-conspirators exchange bank statements as well as personal identifying information of themselves and victims; and (4) executed search warrants that led to the collection of five cell phones from Sniders Jean-Jacques and one cell phone from Jim Kelly Michel.

The government wishes to produce these materials, both in an attempt to move the case toward resolution or trial, and to guard against the possibility that the documents contain information the defendants might argue is material to their respective defenses. Because of the sensitive nature of the documents in question, however, the government does not wish to produce the materials without a protective order. While the government intends to redact Social Security numbers, dates of birth, and bank account numbers from a large swath of discovery materials, the quantity and nature of the materials subject to discovery in this case make redaction infeasible. Further, in some instances, the Social Security number, date of birth, or bank account number used on a particular document are relevant to the charge, making redaction unproductive in those instances.

For those reasons, the government moves, pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Local Rules 7.2 and 116.6, for a protective order and proposes that the Court enter the order attached. The proposed protective order differentiates between classes of discovery material, with some materials subject to greater restrictions than others. The proposed protective order also defends against the possibility that the disclosure of victim information leads to their revictimization, either by defendants or by others to whom documents might be disclosed in the absence of a protective order like the one proposed.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

By: */s/ Kristen A. Kearney*
Kristen A. Kearney
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: March 5, 2026

/s/ Kristen A. Kearney
Assistant United States Attorney

LOCAL RULE 7.1 CERTIFICATION

I certify that I have conferred with counsel for defendants and counsel assents to this motion.

Dated: March 5, 2026

/s/ Kristen A. Kearney
Assistant United States Attorney