UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

UNITED STATES OF AMERICA

8:21MJ1294AAS

v. CASE NO.

JULIO LUGO, a/k/a "Rick Williams," and
ROSENIDE VENANT, a/k/a "Rose Lugo"

MOTION TO SEAL COMPLAINT
AND RELATED DOCUMENTS

The United States of America, by Karin Hoppmann, Acting United States Attorney for the Middle District of Florida, moves the Court to direct the Clerk to seal the Complaint, the file copy of the arrest warrant, this motion, the Court's order regarding this motion, and any other documents filed in thiscase that would identify the defendant. Disclosure of the existence of these documents prior to the arrest of the defendant could hinder or impede arrest efforts and compromise an ongoing criminal investigation.

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

The United States further requests that the Court's Order allow the United States Marshals Service to release certified copies of the arrest warrant to the case agent or other appropriate law-enforcement officers 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 to disclose the existence of the Complaint in any subsequent search warrants or seizure warrants, which may be executed in conjunction with the arrest of the defendant, without further order of the Court.

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,

KARIN HOPPMANN
Acting United States Attorney

By: */s/ Kristen A. Fiore*

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