IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
v.	)	Criminal No. 26-10031-RGS-JCB
(1) SNIDERS JEAN-JACQUES, (2) LORNE JOHNSON, (3) TANYA PIERRE, and (4) ASHLEY SPIKE	)	
Defendants	)	

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 witnesses, defendants, and unindicted co-conspirators. As grounds for this motion, the government states as follows:

The indictment alleges that the defendants conspired to obtain Paycheck Protection Program ("PPP") loans for dozens of borrowers by submitting fraudulent PPP loan applications to PPP lenders in which they fraudulently stated the borrowers' gross income and created fake Schedule C forms to substantiate the claimed income. As part of its investigation, the government has, among other things, (1) obtained PPP loan records for hundreds of borrowers ("the Borrowers"), which comprise more than 6,300 separate files; (2) collected the Borrowers' tax returns filed with the Internal Revenue Service ("IRS"); (3) obtained records, including the Borrowers' tax forms, from the tax preparation software company defendants used to create the fake Schedule C forms; (4) 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 (5) executed search warrants that led to the collection of five cell phones from Sniders Jean-Jacques.

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—in particular, the Borrowers' tax returns filed with the IRS—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 the PPP loan files and chats between co-conspirators, the quantity and nature of the remaining materials subject to discovery in this case make redaction of these other materials infeasible.

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 Borrowers' tax returns filed with the IRS 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