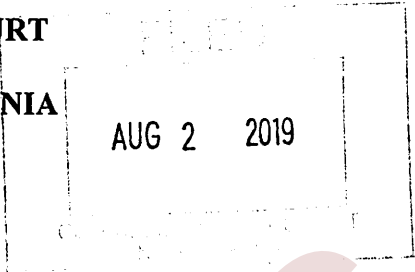


**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

**Newport News Division**



**IN RE:  
CRIMINAL COMPLAINT**

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**CASE NUMBER 4:19mj116**

**UNDER SEAL**

**MOTION TO SEAL CRIMINAL COMPLAINT**

The United States of America, by and through its attorneys, G. Zachary Terwilliger, United States Attorney for the Eastern District of Virginia, and Brian J. Samuels, Assistant United States Attorney, pursuant to Local Criminal Rule 49(B) moves to seal the criminal complaint, affidavit in support of the complaint and arrest warrant in this case.

Sealing is necessary to avoid notification of the existence of the arrest warrant which could result in flight from prosecution, the destruction of or tampering with evidence, the intimidation of potential witnesses, jeopardize the safety of the arresting officers or otherwise jeopardize the investigation. Another procedure will not adequately protect the needs of law enforcement at this time.

Such sealing is within the discretion of this Court and may be granted "for any legitimate prosecutorial need." *United States v. Ramey*, 791 F.2d 317, 321 (4th Cir. 1986); *see also, In re Baltimore Sun Co. v. Goetz*, 886 F.2d 60, 65 (4th Cir. 1989).

The United States requests that the criminal complaint, affidavit in support of the complaint and arrest warrant remain under seal until the arrest of the defendant, at which time the criminal complaint and affidavit in support of the complaint may be treated as a matter of public record.

The United States further requests that: (1) a certified copy of the complaint be provided to those law enforcement officials involved in the prosecution of the case; and (2) a copy of the sealed arrest warrant be made available to agents of the Federal Bureau of Investigation for execution.

G. Zachary Terwilliger  
United States Attorney



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Assistant United States Attorney  
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