



of the investigation of the existence and extent of the investigation, and it might alert these same individuals of the particular methods being used by law enforcement to investigate their criminal activities. As such, disclosure would undoubtedly frustrate the investigation, likely cause some subjects of the investigation to flee and/or destroy evidence, and could endanger the safety of law enforcement agents and witnesses. Accordingly, these facts present an extraordinary situation and a compelling governmental interest which justify sealing of documents pertaining to this investigation that are being submitted at this time. *See Washington Post v. Robinson*, 935 F.2d 282, 289 n.10 (D.C. Cir. 1991); *United States v. Hubbard*, 650 F.2d 293, 316-17 (D.C. Cir. 1980).

WHEREFORE, for all the foregoing reasons, the government respectfully requests that the Criminal Complaint, Affidavit in Support of Criminal Complaint, Arrest Warrant, and this Motion to Seal and the accompanying Order to Seal, be placed under seal until further order of the Court.

Respectfully submitted,

MICHAEL R. SHERWIN  
ACTING UNITED STATES ATTORNEY  
N.Y. Bar No. 4444188

By: /s/ Ahmed Baset  
AHMED BASET  
Assistant United States Attorney  
Ill. Bar. No. 6304552  
U.S. Attorney's Office for the District of Columbia  
Public Corruption & Civil Rights Section  
555 4th Street, N.W., 5th Floor  
Washington, D.C. 20530  
AHMED.BASET@USDOJ.GOV  
Tel: (202) 252-7097

UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	Criminal Nos.
	:	
v.	:	18 U.S.C. § 1752(a) and 40 U.S.C. § 5104(e)(2)
	:	
LARRY RENDALL BROCK,	:	
	:	
Defendant.	:	
	:	<b><u>FILED UNDER SEAL</u></b>
	:	

**ORDER**

Upon consideration of the Government's Motion to Seal the Criminal Complaint and Arrest Warrant, concerning the above-defendant, it is hereby

**ORDERED** that the Criminal Complaint, the Affidavit of the United States for the Criminal Complaint, Arrest Warrant, and the Government's Motion to Seal, and this corresponding Court Order be sealed until further Order of this Court.

**ORDERED** that notwithstanding the sealing, the government may disclose the criminal complaint and arrest warrant in furtherance of its law enforcement and prosecution needs and discovery obligations.

**ORDERED** that upon execution of the arrest warrant in this case, the charging documents shall be unsealed.

G. Michael Harvey  
2021.01.09  
23:05:25 -05'00'

1/9/2021  
DATE

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HONORABLE G. MICHAEL HARVEY  
UNITED STATES MAGISTRATE JUDGE  
for the DISTRICT OF COLUMBIA