

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA** :

**v.** : **Case No. 21-cr-332-PLF-1**

**PAUL RUSSELL JOHNSON, *et al.*,** :

**Defendants.** :

**NOTICE LETTER TO THE COURT REGARDING  
FILING OF PREVIOUSLY SEALED DOCUMENTS**

The Honorable Judge Paul L. Friedman:

On November 22, 2021, Paul Russell Johnson filed his Motion to Suppress Electronic Evidence or, In the Alternative, to Appoint a Special Master (“Motion to Suppress”) (ECF No. 57-1) under seal. At the time of filing, two of the exhibits to Mr. Johnson’s Motion to Suppress (ECF Nos. 57-2, 57-3) were protected by an Order to Seal in the United States District Court for the Eastern District of Virginia. *See* Ex. A, Order to Seal. On November 30, 2021, U.S. Magistrate Judge Elizabeth W. Hanes of the Eastern District of Virginia entered an Order unsealing these same documents with redactions. *See* Ex. B, Order for Limited Unsealing. In addition, as the Parties previously addressed, pursuant to the Protective Order Governing Discovery (ECF No. 19), they have agreed that FBI-Form 302, Exhibit 3 to Mr. Johnson’s Motion to Suppress, can be disclosed in a public filing with certain redactions to protect the identity of an uncharged individual and the identities of the FBI agents involved in an ongoing investigation. As such, Mr. Johnson will be re-filing his Motion to Suppress in redacted form, without protected seal, today (December 9, 2021). Out of an abundance of caution, Mr. Johnson’s public filing of his Motion to Suppress will mirror the pseudonym “Person-1,” which the government used in its Opposition (ECF No. 63).