

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

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|---------------------------|---|--------------------------------------|
| UNITED STATES OF AMERICA, |) | Docket No. 1:21-cr-00195 |
| |) | |
| |) | |
| v. |) | ELECTRONICALLY FILED |
| |) | |
| |) | |
| DEBORAH SANDOVAL, |) | The Honorable Colleen Kollar-Kotelly |
| |) | |
| Defendant. |) | |

MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

AND NOW, to-wit, comes Defendant, Deborah Sandoval (hereinafter “Ms. Sandoval”), by and through her attorney, Komron Jon Maknoon, Esquire, and respectfully files the within Motion for Leave to File Documents Under Seal and, in support thereof, avers as follows:

1. Undersigned counsel intends to file a Memorandum in Aid of Sentencing in the above-captioned case which includes sensitive information pertaining to Ms. Sandoval’s medical, psychological, and personal history.
2. Medical information is safeguarded and protected from disclosure by the Health Insurance Portability and Accountability Act of 1996 (hereinafter “HIPAA”).
3. Sealing is necessary for the Memorandum in Aid of Sentencing due to the nature of the included information and strict privacy and security provisions under HIPAA.
4. There are no means other than sealing available or satisfactory in the present matter.

WHEREFORE, undersigned counsel respectfully requests this Honorable Court permit leave to file the Memorandum in Aid of Sentencing under seal.

Respectfully submitted,

s/ Komron Jon Maknoon
Komron Jon Maknoon, Esquire
PA I.D. NO. 90466

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