

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JOHN HERBERT STRAND
SIMONE MELISSA GOLD

Defendants.

Magistrate No. _____

UNDER SEAL

MOTION TO SEAL CRIMINAL COMPLAINT AND RELATED DOCUMENTS

The United States respectfully moves this Court 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, or 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.

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 and other federal law enforcement officers for execution.

Sincerely,

MICHAEL SHERWIN
ACTING UNITED STATES ATTORNEY

Date: January 13, 2021

By: /s/ *Melissa Jackson*

Melissa J. Jackson
Assistant United States Attorney
D.C. Bar No. 996787
555 4th St NW Washington, D.C. 20530
(202) 252-6879
Melissa.Jackson@usdoj.gov

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

UNITED STATES OF AMERICA

v.

**JOHN HERBERT STRAND
SIMONE MELISSA GOLD**

Defendants.

No. _____

ORDER

This matter having come before the Court pursuant to the application of the United States to seal the criminal complaint, affidavit in support of the complaint, and arrest warrant in this case. The Court finds that the United States has established that a compelling governmental interest exists to justify the requested sealing and that the requested sealing is no greater than necessary to protect those interests.

IT IS THEREFORE ORDERED that the motion is hereby GRANTED, and 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, or until otherwise ordered by the Court.

Date: January 13, 2021

G. MICHAEL HARVEY
UNITED STATES MAGISTRATE JUDGE

cc: MELISSA JACKSON
Assistant United States Attorney
United States Attorney's Office
555 Fourth Street, N.W.
Washington, D.C. 20530