

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-00306
	:	
JON SCHAFFER,	:	
	:	
Defendant.	:	
<hr/>		

**MOTION FOR AN ORDER TO DISCLOSE ITEMS PROTECTED BY
FEDERAL RULE OF CRIMINAL PROCEDURE 6(e) AND SEALED MATERIALS**

The United States of America respectfully moves for entry by this Court of an order permitting the disclosure in discovery of materials protected by Federal Rule of Criminal Procedure 6(e). The United States also requests permission to provide in discovery in *United States v. Thomas Caldwell, et. al.* (21-cr-00028), sealed materials related to the above-captioned case, pursuant to the previously entered protective order in 21-cr-00028 governing discovery. Finally, the United States requests that any order granting this motion be made applicable to co-defendants who may later be joined.

The United States is authorized to represent to the Court that Defendant does not oppose this motion or the entry of the attached order.

WHEREFORE, the United States respectfully requests an order authorizing the disclosure in discovery of the materials described above.

Respectfully submitted,

MATTHEW M. GRAVES
UNITED STATES ATTORNEY
D.C. Bar Number 481052



By:

Ahmed M. Baset
Assistant United States Attorney
IL Bar No. 630-4552
Troy A. Edwards, Jr.
Louis Manzo
Kathryn Rakoczy
Jeffrey Nestler
Assistant United States Attorneys
U.S. Attorney's Office for the District of Columbia
555 4th Street, N.W.
Washington, D.C. 20530

/s/

Alexandra Hughes
Justin Sher
Trial Attorneys
National Security Division
United States Department of Justice
950 Pennsylvania Avenue NW
Washington, D.C. 20004

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Case No. 21-cr-00306
	:	
JON SCHAFFER,	:	
	:	
Defendant.	:	
_____	:	

ORDER

Upon consideration of the United States’ motion to disclose items protected by Federal Rule of Criminal Procedure 6(e) and sealed materials, it is hereby

ORDERED, that the motion is GRANTED, and it is further

ORDERED, that the United States may provide in discovery to the defendants in *United States v. Thomas Caldwell, et. al.*, (21-cr-00028), materials related to the above referenced-case protected by Federal Rule of Criminal Procedure 6(e), and it is further

ORDERED, that the United States may provide in discovery to the defendants in *United States v. Thomas Caldwell, et. al.*, (21-cr-00028), pursuant to the protective order governing discovery in that case, sealed materials related to the above referenced-case, and it is further

ORDERED, that this Order also applies to the disclosure of the materials described above to any co-defendants who may later be joined.

Date:

HONORABLE AMIT P. MEHTA
United States District Judge