UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	**No. 21-cr-537-JMC-3**
	:	
PAUL RUSSELL JOHNSON,	:	
	:	
Defendant.	:	

UNITED STATES OF AMERICA'S UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby moves this Court for an order granting the Government permission to file, under seal, two exhibits that the Government intends to introduce at the upcoming March 17, 2022 suppression hearing. The first exhibit, Exhibit 1, is an unredacted copy of the search warrant affidavit, signed by United States Magistrate Judge Elizabeth W. Hanes of the United States District Court for the Eastern District of Virginia on April 12, 2021. The second exhibit, Exhibit 8, is a Declaration from the Commissioner of the Revenue in the county where Paul Johnson resides, as well as accompanying real estate property records.

Exhibit 1, the search warrant affidavit, contains personal identifying information ("PII"), including various references to Mr. Johnson's purported home address and his date of birth. Exhibit 1 also contains information about an uncharged individual—including photographs and PII of the uncharged individual—who has a reputational interest in keeping such information private. A redacted version of Exhibit 1 has already been filed on the public docket in connection with Mr. Johnson's Motion to Suppress. *See* ECF No. 96-2. Nevertheless, the parties agree that the Court and witnesses should have available to them an unredacted copy of the search warrant affidavit, to include Attachments A and B, in order to understand and/or testify intelligibly about

the issues that the parties intend to raise at the suppression hearing.

Exhibit 8, the Declaration of the Commissioner of Tax Revenue of the county where Mr. Johnson resides, references the home address that the Government contends belongs to the Mr. Jonson. The records attached to the declaration also contain photographs and references to what the Government contends is Mr. Johnson's home address. The Government intends to introduce this record into evidence during the suppression hearing. The Defense does not oppose the Government's application to seal this exhibit.

Accordingly, the Government respectfully requests that this Court grant it permission to file two exhibits under seal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

On this 16th day of March 2022, a copy of the foregoing was served upon all parties listed on the Electronic Case Filing (ECF) System.

/s/ *Hava Mirell*
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