IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

Case No. 1:24-MJ-498

ABDULLAH EZZELDIN TAHA MOHAMED HASSAN

Defendant.

CONSENT MOTION FOR ENTRY OF A PROTECTIVE ORDER

This United States, by and through undersigned counsel, with the consent of the defendant, by his counsel, hereby moves the Court for an entry of the attached Protective Order, which imposes certain restrictions on defense counsel's use and disclosure of certain electronic records produced by the United States to the defendant pursuant to its disclosure obligations in this case. In support thereof, the government states as follows:

- 1. During the course of its investigation in the instant matter, the government has gathered materials that contain sensitive information including any actual or cover name, identifier, or online account name used by any Federal Bureau of Investigation (FBI) Confidential Human Source (CHS) or FBI Online Covert Employees (OCE), and any other descriptors, photographs, video/audio recordings or information that could lead to the identity of a CHS or OCE (collectively, "Sensitive Information").
- 2. In an effort to resolve this case pre-indictment, the government is prepared to produce discovery in accordance with the Federal Rules of Criminal Procedure and relevant case law. Given the nature and/or format of the Sensitive Information, normal reduction is insufficient and impracticable.

3. Rule 16(d)(1) of the Federal Rules of Criminal Procedure provides that the Court may, for good cause, deny, restrict, or defer discovery or inspection, or grant other appropriate relief. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of the Sensitive Information in order to safeguard sensitive and personal identifying information.

4. The defendant and his counsel have reviewed this Motion and the attached proposed Protective Order and have agreed to its terms.

For these reasons, the government respectfully requests that the Court enter the proposed Protective Order.

Respectfully Submitted,

Erik S. Siebert United States Attorney

By: /s/

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