

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

Alexandria Division

UNITED STATES OF AMERICA

v.

ABDULLAH EZZELDIN TAHA MOHAMED
HASSAN

Defendant.

Case No. 1:24-MJ-498

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 redaction is insufficient and impracticable.

