

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

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 17-201-1 (ABJ)

Filed Under Seal

GOVERNMENT’S MOTION FOR LEAVE TO FILE DOCUMENT UNDER SEAL

Pursuant to LCrR 49(f)(6), the United States of America, by and through Special Counsel Robert S. Mueller, III, hereby requests leave of the Court to file under seal an unredacted version of the government’s submission in support of its breach determination (Attachment A) (including its exhibits) and a proposed redacted version, which would be filed publicly with the Court’s approval. The government seeks to seal Attachment A (including its exhibits) and make the redactions reflected in Attachment B and its exhibits because the redactions relate to ongoing law enforcement investigations or uncharged individuals, and public disclosure of certain information in the submission could unduly risk harming those efforts. *See, e.g., Virginia Dep’t of State Police v. Washington Post*, 386 F.3d 567, 579 (4th Cir. 2004) (“[A] compelling governmental interest exists in protecting the integrity of an ongoing law enforcement investigation.”); *Washington Post v. Robinson*, 935 F.2d 282, 291 (D.C. Cir. 1991) (recognizing that situations where “the release of a plea agreement may threaten an ongoing criminal investigation” can justify sealing, but finding no risk of harm on the facts of that case). To preserve the confidentiality of that information, the government requests that its unredacted submission (Attachment A) (including its exhibits) be filed under seal, with a redacted version to be submitted

on the public docket after this Court rules on this motion. A proposed order accompanies this motion.

Respectfully submitted,

ROBERT S. MUELLER III

Special Counsel

Dated: January 14, 2019

By: /s/ Andrew Weissmann

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