	1	MELINDA HAAG (CABN 132612) United States Attorney				
	2	J. DOUGLAS WILSON (DCBN 412811) Chief, Criminal Division	FILED			
	4	SCOTT D. JOINER (CABN 223313) Assistant United States Attorney	FILED DEC 18 2014			
	5	450 Golden Gate Avenue, Box 36055	RICHARD W. WIEKING CLERK, U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA			
	6	San Francisco, California 94102-349 Telephone: (415) 436-6824	SEALED			
	7	Fax: (415) 436-7027				
	8	Attorneys for United States of America	COULT ORDER			
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(A	12	OAKL	AND DIVISION			
	13	UNITED STATES OF AMERICA,	$C_{AS} = 14 0638$			
	14	Plaintiff,)))))))))))))))))))			
	15	V.				
	16	KONRAD P. WOLFF,)) Under Seal			
	17	Defendant.)			
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MOTION TO SEAL

The United States hereby moves the Court for an order sealing this Motion, the Indictment, the Arrest Warrant, the Sealing Order, and all other related documents in the above-captioned case until further order of the Court. The reason for this request is that disclosure of the existence of the Indictment and Arrest Warrant could compromise the safety of law enforcement agents in the execution of the Arrest Warrant. In addition, the requested sealing is reasonably necessary to protect against the potential destruction of evidence and to prevent the possible flight of the defendant.

The United States also requests that, notwithstanding any sealing order, the Clerk of Court be required to give copies of the sealed documents to employees of the United States Attorney's Office, and that they be permitted to provide working copies to special agents and other investigative and law enforcement officers of the Federal Bureau of Investigation, federally deputized state and local law enforcement officers, other government and contract personnel acting under the supervision of such investigative or law enforcement officers, and telecommunications companies as necessary to effectuate the Court's Order.

DATED: December 18, 2014

Respectfully Submitted, MELINDA HAAG United States Attorney

SCOTT D. JOINER Assistant United States Attorney

MOTION TO SEAL

[PROPOSED] SEALING ORDER

Based upon the motion of the United States and for good cause shown regarding the need to ensure the safety of law enforcement agents in the execution of the warrant, to protect against the potential destruction of evidence, and to prevent the possible flight of the defendant, the Motion, the Indictment, the Arrest Warrant, the Sealing Order, and all other related documents shall be sealed until further order of the Court. Endorsed, filed copies shall be provided to the United States Attorney's Office, which shall be permitted to provide working copies to Special Agents of the Federal Bureau of Investigation, federally deputized state and local law enforcement officers, other government and contract personnel acting under the supervision of such investigative or law enforcement officers, and telecommunications companies as necessary to effectuate the Court's Order. IT IS SO ORDERED. DATED:) 2-19-14

AUREL BEELER United States Magistrate Judge

AO 257 (Rev. 6/78)

□ charges previously disinsed SHOW □ which were dismissed on motion OCKET NO. □ U.S. ATTORNEY DEFENSE □ before U.S. Magistrate regarding this MAGISTRATE CASE NO. If "Yes" □ perior proceedings or appearance(s) MAGISTRATE □ before U.S. Magistrate regarding this CASE NO. □ before U.S. Magistrate regarding this If "Yes" □ defendant were recorded under MAGISTRATE Name and Office of Person MELINDA HAAG □ U.S. Attorney Other U.S. Agency Name of Assistant U.S. SCOTT D. JOINER □ SUMMONS NO PROCESS* □ Sumons, complete following: "Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment □ Date/Time: Before Judge:	DEFENDANT INFORMATION RELATIVE TO	D A CRIMINAL ACTION - IN U.S. DISTRICT COURT					
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give name of court	Federal Bureau of Investigation	summons was served on above charges					
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1 2 3 4	MELINDA HAAG (CABN 132612) United States Attorney United States Attorney Elerk U.S. DISTRICT COURT NORTHERN DISTRICT COURT NORTHERN DISTRICT OF CAURT					
5 6 7 8	SEALED BY COURT ORDER					
9 10	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA					
 11 12 13 14 15 16 17 18 	OAKLAND DIVISION CR 14 0638 UNITED STATES OF AMERICA, Plaintiff, V. V. KONRAD P. WOLFF, Defendant.					
19 20	<u>INDICTMENT</u> The Grand Jury charges:					
21 22 23 23 24 25 26 27 28	COUNT ONE: (18 U.S.C. § 2252(a)(4)(B) – Possession of Child Pornography) On or about September 24, 2014, in the Northern District of California, the defendant, KONRAD P. WOLFF, did knowingly possess visual depictions of minors engaging in sexually explicit conduct that had been mailed, or had been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which were produced using materials which had been mailed or shipped or transported, by any means, including by computer, specifically: videos and image files depicting minor and prepubescent children engaging in sexually explicit conduct.					
	INDICTMENT					

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1	All in violation of Title 18, United States Code, Section 2252(a)(4)(B).							
2	FORFEITURE ALLEGATION: (18 U.S.C. §§ 2253(a)(1) and (a)(3) – Criminal Forfeiture)							
3	Upon conviction of the offense alleged in Count One, the defendant,							
4	KONRAD P. WOLFF,							
5	shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 2253(a)(1) and							
6	(a)(3), all visual depictions described in Title 18, United States Code, Section 2252, and all property,							
7	real or personal, used or intended to be used to commit or promote the commission of the offense of							
8	conviction, including but no	t limited to the followi	ng items that were seiz	ed on or about September 24-				
9	25, 2014:							
10	NUMBER OF ITEMS	ITEM TYPE	BRAND	SERIAL NUMBER				
11	1	Hard drive	Western Digital	WXD1A4328437				
12	1	Hard drive	Hitachi	091219PCK400VLG976YK				
13	1	Laptop computer	HP	CNF00177N8				
14	1	USB Flash Drive	Kingston	CN030407				
15	1	USB Flash Drive	Simple Tech	40060162				
16	All in violation of Ti	tle 18, United States C	ode, Sections 2253(a)(1) and (a)(3).				
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18	DATED: December <u>/</u>	, 2014	A TRUE BIL	A TRUE BILL.				
19								
20			FOREPERSO					
21	I OKLI EKOON							
22	MELINDA HAAG United States Attorney							
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24	J. DOUGLAS WILSON Chief, Criminal Division							
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27 28	(Approved as to form:							
	INDICTMENT							

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