

**IN THE CIRCUIT COURT FOR ST. CHARLES CITY
TWENTY-FIRST JUDICIAL CIRCUIT
STATE OF MISSOURI**

American Civil Liberties Union,)	
of Missouri Foundation, Inc., and)	
)	
Mustafa A. Abdullah,)	
)	Cause No. 14SL-CC02395
Plaintiffs,)	
)	Division: 9
v.)	
)	Judge: David L. Vincent, III
County of St. Louis,)	
)	
Respondent.)	

**FEDERAL BUREAU OF INVESTIGATION'S
MOTION TO INTERVENE**

COMES NOW Intervener, Federal Bureau of Investigation ("FBI"), by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Nicholas P. Llewellyn, Assistant United States Attorney for said District, and files its Motion to Intervene pursuant to Missouri Rule 52.12(a)(2) that the Federal Bureau of Investigation "claims an interest relating to the property or transaction that is the subject the action and the applicant is so situated that the disposition of the action may as a practical matter impair or impede the applicant's ability to protect that interest."

At issue is FBI-generated material, both written and electronic, that "contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and was loaned to the St. Louis County Counselor's Office; it and its contents are not to be distributed outside of that agency.

Disclosure of the written and electronic FBI-generated material under the Missouri Sunshine Law creates various issues of unwarranted invasions of privacy, as well as disclosure

of federal property not in the control of a state and/or local entity.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2014, the foregoing *Memorandum in Support the FBI's Motion to Intervene* was file with the Court, and by sent electronically to the following:

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