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United States Attorney  
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Chief, Criminal Division

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Attorneys for United States of America

**FILED**  
DEC 18 2014  
RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**SEALED  
BY COURT ORDER**

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

**JD**

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 KONRAD P. WOLFF,

17 Defendant.  
18  
19

CASE NO. **14 0638**

**MOTION TO SEAL AND [PROPOSED]  
SEALING ORDER**

Under Seal

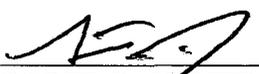
JD  
CR14-638

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

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

14  
15 DATED: December 18, 2014

Respectfully Submitted,  
MELINDA HAAG  
United States Attorney

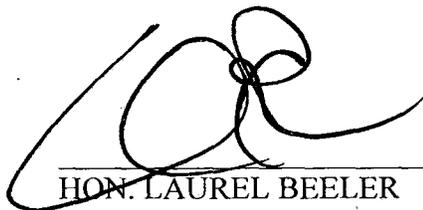
  
SCOTT D. JOINER  
Assistant United States Attorney

1 [PROPOSED] SEALING ORDER

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

11  
12 IT IS SO ORDERED.

13  
14  
15  
16 DATED: 12-18-09



HON. LAUREL BEELER  
United States Magistrate Judge

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT**

BY:  COMPLAINT  INFORMATION  INDICTMENT  
 SUPERSEDING

**OFFENSE CHARGED**

18 U.S.C. § 2252(a)(4)(B)- Possession of Child Pornography  Petty  
 Minor  
 Misdemeanor  
 Felony

**SEALED  
BY COURT ORDER**

**PENALTY:** Maximum Prison Term of 20 Years;  
 Maximum Fine of \$250,000  
 At Least Five Years, but up to a Lifetime, of Supervised Release;  
 Mandatory Special Assessment of \$100.

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)  
Federal Bureau of Investigation

person is awaiting trial in another Federal or State Court, give name of court \_\_\_\_\_

this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District \_\_\_\_\_

this is a reprosecution of charges previously dismissed which were dismissed on motion of:  
 U.S. ATTORNEY  DEFENSE } SHOW DOCKET NO. \_\_\_\_\_

this prosecution relates to a pending case involving this same defendant  
 } MAGISTRATE CASE NO. \_\_\_\_\_

prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under } \_\_\_\_\_

Name and Office of Person Furnishing Information on this form MELINDA HAAG  
 U.S. Attorney  Other U.S. Agency

Name of Assistant U.S. Attorney (if assigned) SCOTT D. JOINER

Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

**DEFENDANT - U.S.**

▶ KONRAD P. WOLFF

**DISTRICT COURT NUMBER**

**CR 14 0638**

**JD**

**DEFENDANT**

**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)  If not detained give date any prior summons was served on above charges ▶ \_\_\_\_\_
- 2)  Is a Fugitive
- 3)  Is on Bail or Release from (show District) \_\_\_\_\_

**FILED**

**DEC 18 2014**

**RICHARD W. WIEKING**  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

**IS IN CUSTODY**

- 4)  On this charge
  - 5)  On another conviction }  Federal  State
  - 6)  Awaiting trial on other charges
- If answer to (6) is "Yes", show name of institution \_\_\_\_\_

Has detainer been filed?  Yes  No

} If "Yes" give date filed \_\_\_\_\_

**DATE OF ARREST** ▶ \_\_\_\_\_  
 Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED TO U.S. CUSTODY** ▶ \_\_\_\_\_  
 Month/Day/Year

This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**

SUMMONS  NO PROCESS\*  WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

Arraignment  Initial Appearance

\* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Defendant Address: \_\_\_\_\_

Date/Time: \_\_\_\_\_ Before Judge: \_\_\_\_\_

Comments: \_\_\_\_\_

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MELINDA HAAG (CABN 132612)  
United States Attorney

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NORTHERN DISTRICT OF CALIFORNIA

**SEALED  
BY COURT ORDER**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

**JD**

**CR 14 0638**

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
KONRAD P. WOLFF,  
  
Defendant.

) NO.  
) VIOLATION: 18 U.S.C. § 2252(a)(4) – Possession of  
) Child Pornography; 18 U.S.C. §§ 2253(a)(1) and  
) (a)(3) – Criminal Forfeiture  
) OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

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

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 not limited to the following items that were seized on or about September 24-  
9 25, 2014:

10 <u>NUMBER OF ITEMS</u>	<u>ITEM TYPE</u>	<u>BRAND</u>	<u>SERIAL NUMBER</u>
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

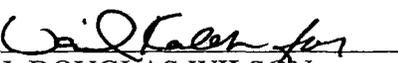
16 All in violation of Title 18, United States Code, Sections 2253(a)(1) and (a)(3).

17  
18 DATED: December 18, 2014

A TRUE BILL.

19  
20   
21 FOREPERSON

22 MELINDA HAAG  
23 United States Attorney

24   
25 J. DOUGLAS WILSON  
26 Chief, Criminal Division

27 (Approved as to form: )  
28 AUSA JOINER

INDICTMENT