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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

SOUTHERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. JASON FONG, aka "asian_ghazi," aka "Jason Asian Ghazi," aka "Mustafa Ahmed Al-Hakim," Defendant.	No. SA CR 20-00146(A)-DOC STIPULATION REGARDING TRIAL PROTECTIVE MEASURES FOR GOVERNMENT WITNESSES OCE #1, OCE #2, AND THE CHS

Plaintiff United States of America, by and through its counsel of record, the United States Attorney for the Central District of

California and Assistant United States Attorneys Christine M. Ro and Solomon Kim, and National Security Division Counterterrorism Section Trial Attorney John Cella, and defendant Jason Fong ("defendant"), both individually and by and through his counsel of record, Karren Kenny and Charles Swift, hereby stipulate as follows:

The parties have agreed to the following protective measures during the trial in this matter for government witnesses OCE #1, OCE #2, and CHS:

1. The witnesses may testify under a light disguise (such as changing their facial hair, hair style, or dress style).

2. The witnesses may testify under a pseudonym. Without prior approval from the court, the defense shall be prohibited from asking the witnesses that would reveal personally identifiable information or that could lead to the discovery of their true identities.

3. When the witnesses testify, only the court, essential personnel, the jury, defendant and his counsel, the government's trial team (including supervisors and agents), and the defendant's immediate family members shall be present. In addition, the Court shall broadcast a contemporaneous audio feed of these witnesses' testimony to a separate courtroom that will be open to the public.

4. During the testimony of these witnesses, two courtroom security officers will be present to ensure that those present in the courtroom (without permission of the Court) are not using any digital devices (including to record the proceedings).

5. These witnesses shall be permitted to use non-public entrances and exits to the courthouse and courtroom, to take their seat in the witness chair prior to the entry of the jury and the

defendant into the courtroom, and to remain seated when sworn in and testifying.

6. If defense counsel believes any cross-examination will lead to classified information, defense counsel will preview the questions to government counsel.

IT IS SO STIPULATED.

Dated: January 19, 2023

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

ANNAMARTINE SALICK
Assistant United States Attorney
Chief, National Security Division

/s/
CHRISTINE M. RO
SOLOMON KIM
Assistant United States Attorney

JOHN CELLA
Trial Attorney
Counterterrorism Section
National Security Division

Attorneys for Plaintiff
UNITED STATES OF AMERICA

Dated: January 19, 2023

Respectfully submitted,

/s/ with e-mail authorization
CHARLES SWIFT
KARREN KENNEY

Attorneys for Defendant
Jason Fong