ORIGINAL

FILED IN OPEN COURT
U.S.D.C. - Atlanta

NOV 13 2025

KEVIN P. WEIMER, Clerk
By: Deputy Clerk

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA *v.* SAMUEL TUNICK	**UNDERSEAL** Criminal Indictment No. 1:25-CR-0499

THE GRAND JURY CHARGES THAT:

On or about January 24, 2025, in the Northern District of Georgia, the defendant, SAMUEL TUNICK, before and during the search for and seizure of property by Customs and Border Patrol Tactical Terrorism Response Team Supervisory Officer L.C., a person authorized to make such search and seizure, did knowingly destroy, damage, waste, dispose of, and otherwise take any action to delete the digital contents of a Google Pixel cellular phone, for the purpose of preventing and impairing the Government's lawful authority to take said

property into its custody and control, in violation of Title 18, Untied States Code, Section 2232(a).

A _____ BILL

_____
FOREPERSON

THEODORE S. HERTZBERG
United States Attorney

MATTHEW S. CARRICO
Assistant United States Attorney
Georgia Bar No. 538608

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