Hon. Richard A. Jones

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA, Plaintiff, v. CHANGPENG ZHAO, aka "CZ," Defendant.	NO. CR23-179 RAJ UNOPPOSED MOTION FOR PROTECTIVE ORDER NOTING DATE: February 20, 2024

16   The United States of America moves for entry of a protective order in this case.

17 Defendant Changpeng Zhao does not oppose.

18   1.   Mr. Zhao has pled guilty to an Information charging him with Failure to

19 Maintain an Effective Anti-Money Laundering Program.

20   2.   The materials being made available for discovery include sensitive witness

21 interviews, third party financial records, and third party internal business records,

22   3.   This Motion is submitted to ensure that material produced in discovery that

23 is designated by the government as subject to the proposed protective order is not

24 disseminated or distributed to anyone other than defense counsel, members of the defense

25 team, and the Defendant under the restrictions set forth in the proposed Order submitted

26 with this Motion. Furthermore, the identities of sensitive witnesses should be not

27 disclosed in public filings, but rather only in sealed filings.

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1   4.   Counsel for Mr. Zhao has told the United States that they do not object to

2 the proposed order.

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4 DATED this 20th day of February, 2024.

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7 MARGARET A. MOESER   TESSA M. GORMAN
   Acting Chief   United States Attorney

8 Money Laundering and Asset Recovery   Western District of Washington
   Section, Criminal Division   U.S. Department of Justice

9 U.S. Department of Justice

10

11 /s Kevin Mosley   /s Michael Dion
   Kevin G. Mosley   Michael Dion
   Elizabeth R. Carr   Jonas Lerman

12 Trial Attorneys   Assistant United States Attorneys

13

14 JENNIFER KENNEDY GELLIE
   Acting Chief

15 Counterintelligence and Export Control
   Section, National Security Division

16 U.S. Department of Justice

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18 /s Beau D. Barnes
   Beau D. Barnes

19 Alex Wharton
   Trial Attorneys

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