

JUDGE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

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UNITED STATES OF AMERICA

v.

ROMAN SELEZNEV,

Defendant.

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No.: CR 11-00070-RAJ

**DEFENDANT'S MOTION TO SEAL**

**NOTE ON MOTION CALENDAR:**

**April 14, 2017**

The defendant, Roman Seleznev, by and through his attorney, Igor Litvak, Esq., moves this Court to order that a full version of defendant's written statement accepting responsibility be filed under seal and secured from public access until further order of the Court. The redacted substance of this letter is of the sensitive and confidential nature and thus, the right of public access is outweighed by the interests of both the public and the parties in protecting the substance of this document from public view.

There are compelling reasons to order that the unredacted statement be sealed. Please note that a redacted version was filed with the court. The government does not object to this motion.

Therefore, pursuant to LCrR 55(b)(9),(12), defense counsel requests leave to file the unredacted version of defendant's written statement accepting responsibility under seal.

**WHEREFORE**, based on all the reasons set forth above, the defendant respectfully requests to grant his motion.

Dated: Brooklyn, New York  
March 31, 2017

Respectfully submitted,

/s/ Igor Litvak  
Igor Litvak, Esq.  
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**Certificate of Service**

I hereby certify that I caused the above document to be served on counsel of record for the Government by filing it via the Court's CM/ECF system on this day of April 3<sup>rd</sup>, 2017.

/s/ Igor Litvak\_\_\_\_\_

Igor Litvak, Esq.

*Attorney for Defendant ROMAN SELEZNEV*