

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No.  
 )  
 WALTER KENDALL MYERS, )  
 ) **UNDER SEAL**  
 Defendant. )  
 \_\_\_\_\_ )

**MOTION TO SEAL**

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully moves this Honorable Court for entry of an Order in this matter sealing the Arrest Warrant, the Complaint, the accompanying affidavit of Special Agent Brett Kramarsic, all attachments thereto, together with this Motion to Seal and proposed Order, until the United States makes a motion to unseal these documents. In support of this motion, the United States represents the following:

The complaint concerns violations of 18 U.S.C. §§ 371, 951, and 1343, arising from a national security investigation involving allegations that Walter Kendall Myers, his wife Gwendolyn Myers, and others, are illegal agents of the Government of Cuba. Disclosure of the documents noted above could reasonably be expected to hinder or compromise the ongoing investigation. Disclosure could also reasonably be expected to encourage other subjects of the investigation to destroy evidence, flee, avoid arrest, or otherwise jeopardize the investigation.

WHEREFORE, for the reasons stated above, it is respectfully requested that this motion be granted, and that this Court sign the attached Order sealing the Arrest Warrant, the Complaint, the accompanying affidavit of Special Agent Brett Kramarsic, any attachments thereto, this Motion to Seal, and the sealing Order.

Respectfully submitted,

CHANNING PHILLIPS  
Acting United States Attorney

By: \_\_\_\_\_/s/\_\_\_\_\_  
G. MICHAEL HARVEY  
Assistant U.S. Attorney  
D.C. Bar # 447465  
National Security Section  
United States Attorney's Office  
555 Fourth Street, N.W., 11<sup>th</sup> Floor  
Washington, D.C. 20530  
(202)305-4155  
michael.harvey2@usdoj.gov