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7 **UNITED STATES DISTRICT COURT**  
8 **SOUTHERN DISTRICT OF CALIFORNIA**

9 UNITED STATES OF AMERICA,  
10 Plaintiff,  
11 v.  
12 KIRILL VICTOROVICH FIRSOV,  
13 Defendant.

Case No.: 20MJ1029

**UNITED STATES' MOTION TO  
UNSEAL COMPLAINT**

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17 COMES NOW the plaintiff, UNITED STATES OF AMERICA, by and through its  
18 counsel, Robert S. Brewer, Jr., United States Attorney, and Alexandra F. Foster, Assistant  
19 United States Attorney, and hereby moves this Court for an order unsealing the complaint  
20 in the above-captioned matter. The Defendant was arrested at John F. Kennedy Airport  
21 on Saturday, March 7, 2020. I am asking that this Complaint be unsealed, so that he can  
22 be properly processed through the Eastern District of New York.

23  
24 DATED: March 9, 2020

Respectfully submitted,

25  
26 ROBERT S. BREWER, JR.  
United States Attorney

27 s/Alexandra F. Foster  
28 ALEXANDRA F. FOSTER  
Assistant United States Attorney