

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

IN RE:)	NO. 3:07-mc-135
)	
A MATTER UNDER INVESTIGATION)	FILED UNDER SEAL
BY GRAND JURY NUMBER 3)	
(#2007R00845))	

MOTION TO UNSEAL MATTER

Now comes the Government, through its undersigned attorney, and moves this Court to unseal the pleadings and orders in Case No. 3:07-mc-135. On May 27, 2008, a complaint was issued against Joseph Brunson, Timothy McQueen, and Tony Pough – the primary individuals under investigation in the above-referenced matter – charging them with participating in a Conspiracy to Commit Mail Fraud, in violation of Title 18, United States Code, Section 1349. Brunson, McQueen, and Pough were arraigned May 28, 2008. At the arraignment, the Government moved for detention for all three, in part based on the activities perpetrated by these individuals while under investigation, and also in part due to their efforts to conceal assets from the court-appointed Receiver. The detention hearing for the Defendants is scheduled for Tuesday, June 3, 2008. The Government anticipates that, during this hearing, it will need to present evidence potentially construed as under seal. In order to fully present evidence in favor of detention, the Government requests that the pleadings and orders be unsealed.

In addition, the Government would note that this filing indicates that the matter is now before Grand Jury 3, whereas previously it was being investigated by Grand Jury 1. Upon the expiration of Grand Jury 1, the matter was transferred to Grand Jury 3.

Respectfully submitted,

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