

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-mj-03829-LOUIS

UNITED STATES OF AMERICA,

v.

JUAN ANDRES DONATO BAUTISTA,

Defendant.

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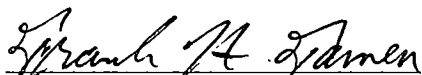
**GOVERNMENT'S RESPONSE TO HERRING NETWORKS, INC.'S MOTION TO INTERVENE AND GOVERNMENT'S MOTION TO UNSEAL WITHOUT PREJUDICE**

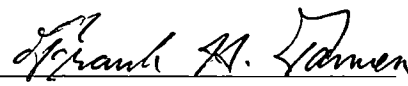
Comes now the United States of America, by and through its undersigned attorneys, and hereby responds to Herring Networks, Inc.'s (d/b/a One America News Network) motion to intervene for the limited purpose of unsealing the Court's docket and related records ("Motion to Unseal"), and respectfully moves the Court to unseal this matter – including the complaint and arrest warrant. The defendant has been arrested and is currently pending extradition to the United States. The government notes that circumstances may necessitate future sealing of docket entries and/or related records, and thus, reserves the right to seek such relief of the Court, if warranted.

Respectfully submitted this 27<sup>th</sup> day of December 2023.

GLENN S. LEON  
CHIEF  
Fraud Section, Criminal Division  
United States Department of Justice

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on Dana J. McElroy, counsel for Herring Networks, Inc., via email on the 27<sup>th</sup> date of December 2023.

  
Michel C. DiLorenzo  
Trial Attorney