

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SUSAN GAFFNEY, in her official capacity :
as Inspector General, U.S. Department of :
Housing and Urban Development, :
451 7th Street, S.W. :
Washington, D.C. 20410, :

Petitioner, :

v. :

THE HAMILTON SECURITIES :
GROUP, INC. and HAMILTON :
SECURITIES ADVISORY :
SERVICES, INC., :
7 Dupont Circle, N.W. :
Washington, D.C. 20036, :

Respondents :

Misc. No. _____

FILED UNDER SEAL

MOTION TO SEAL PROCEEDINGS


Susan Gaffney, the Inspector General of the United States Department of Housing and Urban Development ("HUD"), by her undersigned attorneys, hereby moves that the Court enter an order requiring that the Inspector General's Petition for Summary Enforcement of Administrative Subpoenas ("Petition"), together with the this motion and the accompanying motions for a temporary restraining order and preliminary injunction and all papers filed in support of or in opposition to the Petition and those motions be sealed and the contents thereof not be disclosed, except to the parties herein and their agents, pending further order of the Court.

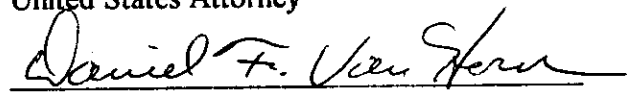
This motion is made upon the grounds that sealing these proceedings will assist in the preservation of the seal on a related qui tam complaint, will help to protect the confidentiality of a



pending law enforcement investigation, and will protect Respondents from adverse publicity concerning the ongoing investigation. The grounds for this motion are described in greater detail in the accompanying memorandum of points and authorities. A proposed Order consistent with the requested relief is also submitted herewith.

Respectfully submitted,


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United States Attorney


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