

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

UNITED STATES OF AMERICA

v.

CASE NO. 6:17-cr-18-Orl-40KRS

NOOR ZAHI SALMAN

**UNITED STATES' UNOPPOSED MOTION TO
DISCLOSE JUROR NAMES TO CONTRACTORS**

The parties recently received the names of the jurors who will participate in in-person voir dire beginning on March 1, 2018. The Court's order regarding those names indicates that the names may only be provided to counsel of record in the case. The government entered into a contract with a consulting firm to assist with the review of the jury questionnaires and intended to use the firm to conduct searches of public records and social media of the remaining jurors. Thus, the government seeks this Court's permission to provide the names to a consulting firm and/or its subcontractors.

Counsel for the defendant, Charles D. Swift, Esquire, has advised the undersigned that the defendant does not oppose the relief sought herein, provided that the defense is provided similar resources for a consultant.

As part of its agreement with the government, the consulting firm has signed a statement of work, which required the firm to agree that "other than provided by law, he/she will at no time or under any circumstances, directly,

or indirectly, divulge, disclose, or communicate information to a third party, or use it for its own benefit without the prior written permission from the USAO. The contractor may disclose information to its employees and subcontractors, who may be working on the case The contractor and its employees and subcontractors will protect the information and treat it as strictly confidential.” Further, the statement of work requires that the contractor return all records to the U.S. Attorney’s Office following the conclusion of its work on the case.

As to the review of public records and social media, the undersigned will advise the contractor of the allowable parameters of such research and will advise the contractor that in no circumstances should it make contact with the potential jurors. The undersigned will further advise the contractor of the need for absolute confidentiality of the potential jurors names at all times.

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CONCLUSION

The United States respectfully requests that this Court allow the parties to provide the potential juror names to a consulting firm retained for the purposes of assisting with review of the remaining potential jurors.

Respectfully submitted,

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United States Attorney

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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2018, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to the following:

Charles D. Swift, Esquire (counsel for Defendant)

Fritz J. Scheller, Esquire (counsel for Defendant)

Linda G. Moreno, Esquire (counsel for Defendant)

s/ Sara C. Sweeney

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