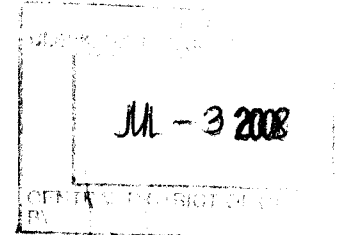


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8 Attorneys for Plaintiff
 UNITED STATES OF AMERICA

9 UNITED STATES DISTRICT COURT
 10 FOR THE CENTRAL DISTRICT OF CALIFORNIA
 11 SOUTHERN DIVISION

12 UNITED STATES OF AMERICA,)	No. SA CR 08 - 00180
13 Plaintiff,)	<u>GOVERNMENT'S EX PARTE APPLICATION</u>
14 v.)	<u>FOR ORDER SEALING INDICTMENT AND</u>
15 MOSES ONCIU,)	<u>RELATED DOCUMENTS; DECLARATION OF</u>
16 BEATA GIZELLA PRIORE, and)	<u>IVY A. WANG</u>
17 IRENE PEMKOVA,)	[<u>UNDER SEAL</u>]
18 Defendants.)	

19 The government hereby applies ex parte for an order that the
 20 indictment and any related documents in the above-titled case be
 21 kept under seal until the defendant is taken into custody and the
 22 government files a "Report Commencing Criminal Action" in this
 23 matter.

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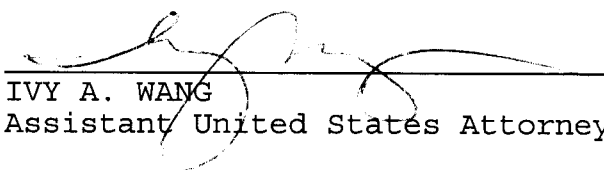
1 This ex parte application is made pursuant to Federal Rule of
2 Criminal Procedure 6(e)(4) and is based on the attached declaration
3 of Ivy A. Wang.

4 DATED: July 2, 2008

5 Respectfully submitted,

6 THOMAS P. O'BRIEN
7 United States Attorney

8 ROBB C. ADKINS
9 Assistant United States Attorney
Chief, Santa Ana Branch Office

10 
11 IVY A. WANG
12 Assistant United States Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA

DECLARATION OF IVY A. WANG

I, Ivy A. Wang, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I represent the government in the prosecution of United States v. Moses Onciu, Beata Gizella Priore, and Irene Pemkova, the indictment in which is being presented to a federal grand jury in the Central District of California on July 2, 2008.

2. Defendants Onciu, Priore, and Pemkova have not been taken into custody on the charges contained in the indictment and have not been informed that are being named as defendants in the indictment to be presented to the grand jury on July 2, 2008. The likelihood of apprehending defendants Onciu, Priore, and Pemkova might be jeopardized if the indictment in this case is made publicly available before defendants Onciu, Priore, and Pemkova are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealing documents in this case be sealed and remain so until defendants Onciu, Priore, and Pemkova are taken into custody on

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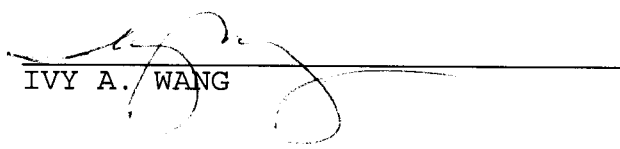
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1 the charges contained in the indictment and the government files a
2 "Report Commencing Criminal Action" in this matter.

3 I declare under penalty of perjury that the foregoing is true
4 and correct to the best of my knowledge and belief.

5 DATED: July 2, 2008

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9 IVY A. WANG
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