FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

03 OCT 29 PM 4: 36

U.S. DISTRICT COURT
N.D. OF ALABAMA

UNITED STATES OF AMERICA,	)	**Case No.** CR-03-BE-0530-S
	)	
v.	)	
	)	
RICHARD M. SCRUSHY,	)	
Defendant.	)	

ENTERED
OCT 30 2003

GRANTED
USMJ 10/29/03

Motion to Seal

Comes now the United States, by and through the United States Attorney for the Northern District of Alabama, and moves the court to seal the Indictment in the above styled cause filed October 29, 2003, for the following reasons:

1. The United States has requested a warrant be issued for the arrest of the defendant.

2. Should the defendant be convicted, he would face many years imprisonment, and the forfeiture of millions of dollars in assets.

3. The defendant has more than sufficient resources to flee the country, including millions of dollars in liquid funds, aircraft and boats capable of overseas travel. The defendant has a pilots license, boating license, and has traveled overseas.

4. The United States will seek seizure and restraining orders for many assets that are easily liquidated and/or moved, and would like to make such seizures, and effect such restraints, before the defendant has an opportunity to liquidate or move the same.

5. Witnesses have expressed fear of the defendant and are concerned for their personal safety.

6. The United States also has evidence that former members of HealthSouth's security force are still loyal to him, and are currently being employed by him, both to help him in

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