

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) No. 22-MJ-04506-DHH
)
 BRIAN ANDREW BUSHELL and)
 TRACEY M.A. STOCKTON,)
)
 Defendants)

MOTION TO DISMISS CRIMINAL COMPLAINT

Pursuant to Federal Rule of Criminal Procedure 48(a), the United States Attorney for the District of Massachusetts hereby seeks leave of this Court to dismiss the criminal complaint filed against defendants Brian Andrew Bushell and Tracey M.A. Stockton in this matter, charging them with conspiracy to commit wire fraud, in violation of 18 U.S.C. § 1349, and conspiracy to commit unlawful monetary transactions, in violation of 18 U.S.C. § 1956(h). The government respectfully submits that dismissal is in the interests of justice.

Respectfully submitted,

JOSHUA S. LEVY
ACTING UNITED STATES ATTORNEY

By: /s/ David M. Holcomb
DAVID M. HOLCOMB
Assistant United States Attorney

Date: November 8, 2023

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system on November 8, 2023 and will be sent electronically to the registered participants identified on the Notice of Electronic Filing (NEF).

Dated: November 8, 2023

By: /s/ David M. Holcomb
DAVID M. HOLCOMB
Assistant United States Attorney