

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:15-cv-00299-REB-CBS

UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,

Plaintiff,

v.

KRISTINE L. JOHNSON,
TROY A. BARNES, and
WORK WITH TROY BARNES, INC. (d/b/a THE ACHIEVE COMMUNITY),

Defendants,

and

ACHIEVE INTERNATIONAL, LLC,

Relief Defendant.

PARTIES' JOINT MOTION TO RESTRICT PUBLIC ACCESS

Pursuant to D.C.Colo.LCivR 7.2, Defendant Kristine Johnson (“Johnson”) and Plaintiff United States Securities and Exchange Commission (the “SEC”) (collectively, the “Parties”) jointly submit this Motion to Seal the Parties’ Joint Motion, Pursuant to F.R.C.P. 67, For Leave to Deposit Funds with the Court. The Parties submit the following in support of this Motion:

1. Because of the nature of the proceedings referenced in the parties Joint Motion for Authority [#28] and the Court’s Order granting that Motion [#30], the Parties’ interests at this time substantially outweigh the public’s interest in open proceedings. If

not sealed, it is possible that the relief sought by the parties' Joint Motion could be hindered or prevented altogether.

2. The purpose of Documents 28, 29, and 30, as well as the Parties' Joint Motion, Pursuant to F.R.C.P. 67, For Leave to Deposit Funds with the Court, is to achieve one goal—to transfer certain funds into a secure account in the United States so that they can become part of the larger collection of funds subject to the asset freeze that this Court first entered as a Temporary Restraining Order [#10] and which was subsequently converted into Preliminary Injunctions [#s 17, 22, 25 & 26].

3. Accordingly, Johnson and the SEC respectfully request that the Joint Motion and any subsequent order be restricted only to the filing parties—Johnson and the SEC—and the Court. Specifically, the Parties request that Defendants Troy Barnes and Work With Troy Barnes, Inc. not have access.

Certification Pursuant to D.C.COLO.LCivR 7.1(a)

On March 2, 2015, undersigned counsel for both Johnson and the SEC conferred and agreed to jointly request the relief requested herein. For the reasons stated above, undersigned counsel did not confer with counsel for Troy Barnes or the two unrepresented entity defendants.

Dated: March 2, 2015

Respectfully submitted,

s/ Chad D. Williams

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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of March, 2015 I electronically filed the foregoing PARTIES' JOINT MOTION TO RESTRICT PUBLIC ACCESS using the CM/ECF system which will send notification of such filing to the following:

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