

THE STATE OF NEW HAMPSHIRE  
SUPERIOR COURT

BELKNAP, SS.  
#211-2019-CR-254

JULY TERM, 2025

The State of New Hampshire

v.

Hassan Sapry

**STATE’S MOTION TO SEQUESTER WITNESSES**

NOW COMES the State of New Hampshire, by and through its attorneys, the Office of the Attorney General, and respectfully asks the Court to issue an order sequestering the witnesses for the trial in this case. In support of this request, the State says as follows:

1. The defendant is charged with first-degree murder and related charges. The trial is set to begin with jury selection on August 11, 2025.
2. New Hampshire Rule of Evidence 615(a) requires the sequestration of witnesses upon a “party’s request.” The State respectfully requests that the Court order the sequestration of witnesses in this case beginning with opening statements, through the presentation of evidence.
3. Rule 615 does not authorize excluding “a person authorized by statute to be present.” N.H. R. Ev. 615(a)(4). Therefore, in accordance with RSA 21-M:8-k, II(e), the victim’s immediate family members are not subject to the sequestration order and may attend all phases of the trial. The term “immediate family” has been defined, in an unrelated statute,

to include children, parents, siblings, and grandparents. *See* RSA 397-A:1, VIII-b.

Therefore, except for the victim's immediate family, all other potential witnesses must be excluded from the trial beginning with opening statements, through the presentation of evidence.

WHEREFORE, the State of New Hampshire respectfully requests that this Honorable Court:

- A. Grant the State's motion; and
- B. Order such further relief as may be deemed just and proper.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

By its attorneys,

John M. Formella  
Attorney General

July 21, 2025

/s/ Jeffery A. Strelzin

Jeffery A. Strelzin  
NH Bar ID# 8841  
Senior Assistant Attorney General  
New Hampshire Department of Justice  
Office of the Attorney General  
1 Granite Place - South  
Concord, New Hampshire 03301  
(603) 271-3671  
[jeffery.strelzin@doj.nh.gov](mailto:jeffery.strelzin@doj.nh.gov)

**CERTIFICATE OF SERVICE**

I certify that a copy of this pleading has been provided to Mark L. Sisti, Esquire, and Amy A. Ashworth, Esquire.

/s/ Jeffery A. Strelzin

Jeffery A. Strelzin

[3574873]