IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

JONATHAN ACE SANDERS, SR.

Defendant

Case: 1:21-mj-00427

Assigned to: Judge Faruqui, Zia M.

Assign Date: 5/14/2021

Description: COMPLAINT W/ARREST

WARRANT

Filed Under Seal

ERRATA TO CORRECT STATEMENT IN AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

The United States, by and through its attorney, the United States Attorney for the District of Columbia, hereby files this errata motion to correct misstatements in a court document. On May 14, 2021, the Court signed a Complaint with an accompanying statement of facts which the United States had submitted.

The Statement of Facts which accompanied the Complaint misspelled the defendant's name in the second to last paragraph as "Jonathon" when in fact the name, spelled accurately elsewhere in the documents, is spelled "Jonathan." Also, in the last paragraph, another defendant's names is listed when it should in fact read "Jonathan Ace Sanders. Sr." This other defendant has already been charged in open court filings, so there has been no disclosure of an uncharged individual. The arrest warrant has not yet been executed in this matter.

The government regrets these errors. Attached to this motion, the government submits a revised Statement of Facts, and redacted Statement of Facts. The government respectfully requests that the Court enter the revised Statements of Facts and redacted Statement of Facts on the record before the planned arrest slated for May 25, 2021.

Additionally, this matter remains under seal and the government continues to request that this matter remain under seal as it relates on an ongoing criminal investigation and grand jury matter whose direction remains unknown to the general public. Because of such potential jeopardy to the investigation, there also exists a compelling governmental interest in confidentiality to justify the continued sealing the warrant, this application (and all attachments thereto), and the Court order addressing to this application. *See Washington Post v. Robinson*, 935 F.2d 282, 287-89 (D.C. Cir. 1991). The revised Statement of Facts and redacted Statement of Facts submitted is intended to replace the originals previously entered, and the Government asks that this Motion and the attached documents continue to be sealed under the Order to Seal now in place.

Dated this 17th day of May, 2021.

Respectfully submitted,

CHANNING D. PHILIPS ACTING UNITED STATES ATTORNEY D.C. Bar No. 415793

By: <u>s/Mona Lee M. Furst</u>

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