

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)(
)(No. 21-71 (ABJ)
v.)(Judge Amy B. Jackson
)(Status Conference: May 12, 2021
KARL DRESCH)(

**REPLY TO GOVERNMENT’S RESPONSE
TO DEFENDANT’S MOTION FOR BOND**

COMES NOW the defendant, Karl Dresch, by and through undersigned counsel, and respectfully replies to the Government’s Response to Defendant’s Motion for Bond. In support of this reply, Mr. Dresch would show:

1. On January 19, 2021, Karl Dresch was arrested near his home in a small town on the Upper Peninsula of Michigan on a warrant that had originated from this District. The charges at issue in the warrant pertain to the events that occurred at the United States Capitol on January 6, 2021. On January 20, 2021, Mr. Dresch appeared before a Magistrate Judge in the United States District Court for the Western District of Michigan for an initial appearance. Mr. Dresch was presented on three charges: 1) Entering and Remaining in a Restricted Building or Grounds (18 U.S.C. § 1752(a)(1)), 2) Disorderly Conduct on Capitol Grounds (40 U.S.C. § 5104(e)(2)(D)), and 3) Obstructing an Official Proceeding (18 U.S.C. 1512(c)). None of these charges are of the type that creates a presumption that Mr. Dresch should be held without bond. 18 U.S.C § 3142(e)(2),(3). Indeed, none of these charges are of the type that, by its nature, even qualifies Mr. Dresch for consideration for preventive detention. 18 U.S.C. §3142(f)(1). Nevertheless, the government moved for his preventive detention by claiming that, as a

general matter, he posed a serious risk of flight and a serious risk of obstruction of justice per 18 U.S.C. § 3142(f)(2)(A),(B). Motion for Detention.

2. For Mr. Dresch's initial appearance, the Pretrial Services Agency for the Western District of Michigan prepared a report (PSA Report). The report recommended that Mr. Dresch should be released on conditions with a \$20,000 unsecured bond. PSA Report at 6. Even still, the Magistrate Judge in the Western District ordered that Mr. Dresch be held without bond pending trial, finding by clear and convincing evidence that no condition or combination of conditions would reasonably assure the safety of any person and the community and also finding by preponderant evidence that no condition or combination of conditions would reasonably assure his appearance at future proceedings. Order of Detention Pending Trial (Detention Order) at 2. Mr. Dresch's case was transferred to this District.

3. On February 3, 2021, a five-count indictment was filed against Mr. Dresch in this District. At some point after this, Mr. Dresch was brought to this District by the United States Marshals Service. Mr. Dresch was arraigned on that indictment on March 29, 2021. A status conference has been set for May 12, 2021.

4. The five counts that Mr. Dresch is charged with in his indictment are: 1) Obstruction of an Official Proceeding (18 U.S.C. §§ 1512(c)(2), 2); 2), Entering and Remaining in a Restricted Building or Grounds (18 U.S.C. § 1752(a)(1)); 3) Disorderly or Disruptive Conduct in a Restricted Building or Grounds 18 U.S.C. § 1752(a)(2)); 4) Disorderly Conduct in a Capitol Building (40 U.S.C. § 5104(e)(2)(D)); and 5) Parading, Demonstrating, or Picketing in a Capitol Building (40 U.S.C. § 5104(e)(2)(G)). Only count 1 is a felony. As before, none of these charges are of the type that creates a presumption that Mr. Dresch should be held without bond (18 U.S.C. § 3142(e)(2),(3)) or that, by its nature, even qualifies Mr. Dresch for consideration for preventive detention (18 U.S.C. § 3142(f)(1)).

5. On April 1, 2021, Mr. Dresch filed a Motion to Lift Preventive Detention and Points and Authority in Support Thereof (Motion for Bond).

6. On April 12, 2021, the government filed a Government's Response to Defendant's Motion for Bond (Response).

7. In its Response, the government asserts that Mr. Dresch did not engage in the conduct he is accused of on January 6 because he got "caught up in the day's events," Response at 12, or because of the "presence of the group," Id. at 17 (quoting United States v. Munchel, No. 21-3010, slip op. at 19 (D.C. Cir. March 26, 2021)). Rather, the government asserts that Mr. Dresch intended beforehand to "interfere with the democratic process... [and cause] the disruption of the counting of the electoral votes," id. at 12, and to engage in "illegal behavior," id. at 17. The government makes this argument in an attempt to distinguish Mr. Dresch from the people who interfered with the functioning of Congress on January 6 simply being a part of the crowd—people who the Court of Appeals in Munchel indicates would pose less of a future danger than people who actually assaulted officers, destroyed property, or entered by force. Response at 17; see Munchel, slip op. at 19. Obviously, Mr. Dresch does not fit in this latter group. Nevertheless, the government argues he should be regarded like them anyway. The government argues that Mr. Dresch's "intent" to engage in illegal activity independent of the influence of the crowd has been "demonstrated by his words and actions prior to and after January 6." Response at 16.

8. In making the above argument, the government does not point to anything that Mr. Dresch has allegedly said or done that would indicate that he had actually formed the intent to disrupt the counting of the Electoral-College votes or even engage in any other specific illegal activity at the U.S. Capitol prior to the events that unfolded there on January 6. Moreover, in making the argument, the government appears to be relying heavily on Facebook messages that Mr. Dresch allegedly authored. Response at 3, 4, 5-6, 12-13, 14-16; Response, Attachments 7, 8, 9, 10, 11, 12, 14, 15. However, a review of Mr. Dresch's Facebook return, which has been provided to undersigned through discovery

pursuant to protective order, shows that, on January 5, 2021, a person identified as Mr. Dresch had a message exchange on Facebook with another individual. In the exchange, the other individual asks the person identified as Mr. Dresch, “What’s the goal of this [going to D.C. on January 6]?” The individual then continues, “I heard they are going to start a civil war if things don’t go our way.” To this, the person identified as Mr. Dresch responds, “Ya it may be necessary some day but could be done peacefully I think, I just figured Trump said be there maybe he needs bodies or something . . . I’m not sure the point but Trump’s the only big shot I trust right now so I’m going, making a trip out of it so even if it’s pointless.” This message makes clear that, as late as the day before, the person identified as Mr. Dresch on Facebook had no plans to do anything on January 6 other than to be present in D.C. to support the then-sitting president. Moreover, it is clear that the person was only envisioning engaging in peaceful activity. Thus, despite the government’s arguments to the contrary, it is clear that, at least as of the day before, Mr. Dresch had not intended to engage any illegal activity on January 6. Accordingly, it seems that, if he did indeed end up inside the Capitol on January 6 as the government alleges, he did so precisely because he got caught up in the crowd mentality that developed that day.

9. In its Response, the government frequently refers to Mr. Dresch’s previous “disregard for the law,” which it alternately describes as “flagrant,” “complete,” and “dangerous[],” as grounds for finding that he poses a danger to the community and a risk of flight. Response at 11, 12, 16-18. The previous disregard of the law by Mr. Dresch that the government refers to pertains to conduct that he engaged in 2013, when he got into a high-speed police chase across the Wisconsin-Michigan state line and ended up getting convictions in both jurisdictions for fleeing the police and a conviction in Michigan for Operating while Impaired.¹ Id. While the incident is obviously troubling, it must be noted

¹ According to the Pretrial Services Report (PSR) that was prepared for Mr. Dresch’s initial appearance in Nevada, convictions related to this incident from Michigan are dated 12/11/17, and the conviction from Wisconsin is dated 4/22/14. PSR at 4-5. However, all the convictions pertain to the same event, which occurred on June 7, 2013. Id.

that, according to the Pretrial Services Report (PSR) that was prepared for Mr. Dresch's initial appearance in Nevada, he served his jail sentence without reported incident and successfully completed the two years probation he was given. PSR at 4-5. Moreover, he has not had any other involvement with the police since this incident until his arrest in this case eight years later. Id. Additionally while Mr. Dresch does appear to have three prior convictions that pre-date the incident, these earlier convictions only resulted in him being given fines, PSR at 4, and thus should be considered minor. In light of this, it is unfair to view Mr. Dresch's impulsive conduct from one event eight years ago as being the event that defines who he is now.

10. In his Motion for Bond, Mr. Dresch argues that he does not even qualify for consideration for preventive detention because he does not present a "serious risk of flight" or a "serious risk to obstruct justice" under 18 U.S.C. § 3142(f)(2)(A),(B). Motion for Bond at 6. Apart from the incident in 2013 where Mr. Dresch engaged in a high-speed police chase while under the influence, there is nothing in his background that would even suggest a risk of flight. However, as Mr. Dresch argues in his Motion for Bond, it does not follow that, just because he impulsively fled the police in an incident occurring eight years ago, he would now deliberately fail to come to court in this case—especially given his lifelong ties to the small rural community he lives in and the fact that, though he has had five criminal cases in the past, he has never failed to appear for court in any of them. Id. At this point, it should be pointed out that there is no evidence that Mr. Dresch tried to flee from the law-enforcement agents who came to arrest him in this case. Accordingly, even considering the police-chase event in 2013, it still cannot be said that Mr. Dresch poses a serious risk of flight. Id. As for Mr. Dresch posing a serious risk to obstruct justice, there is nothing in his past to suggest that this would be the case, and nothing he has done in this case indicates differently. See id. In its Response, the government does not address the arguments that Mr. Dresch makes in his Motion for Bond that he does not qualify for

consideration for preventive detention because he does not pose a serious risk of flight or a serious risk to obstruct justice.

11. In its Response, the government discusses at length the fact that four guns and ammunition were found in Mr. Dresch's residence after his arrest. Response at 1, 6-10, 14. According to the search-warrant materials the government has appended to its Response, the four guns that were allegedly found at Mr. Dresch's residence are 1) a "Russian SKS style rifle," 2) an unspecified "shot gun," 3) a "Glock, model 23, .40 caliber" handgun, and 4) a "Remington, model 1100, 12 Gauge shotgun²." Response, Attachment 2 at 3; Response, Attachment 4 at 2. The Russian SKS rifle and the Glock .40 handgun were found in upstairs bedroom closets. Response, Attachment 2 at 8, Attachment 4 at 3. The Remington shotgun was found in a closet of an unspecified bedroom. Response, Attachment 4 at 3. However, diagrams of Mr. Dresch's house that were prepared by searching officers show that the only bedrooms with closets in Mr. Dresch's house are on the second floor. Response, Attachment 2 at 5-6. Thus, it appears that this gun was also found in an upstairs bedroom closet. The unspecified shotgun was found in an upstairs "hall room." Response, Attachment 2 at 3, 6. A diagram prepared by searching officers shows that this "hall room" is essentially a walk-in-closet-type room that has three access points—one to the hallway, another to a spare room, and the third to the closet in the master bedroom (i.e., the "room" can be accessed as a continuation of the master bedroom closet). Response, Attachment 2 at 6.

12. Mr. Dresch's house is not actually his; it is owned by his mother, Linda Dresch. Recently, Mr. Dresch's mother has submitted materials to the Bureau of Alcohol, Tobacco, and Firearms (ATF) regarding her ownership both of the house and of weapons and ammunition found in the house. Attachment, Materials Submitted to ATF by Linda

² In its Response, the government describes the Remington shotgun as a "rifle." Response at 9. This is a mistake. The picture of the gun that the government uses in its Response shows that it is a shotgun. Response at 10. Moreover, the search-warrant materials expressly describe the gun as a "Remington, model 1100, 12 Gauge shotgun." Response, Attachment 4 at 2.

Dresch. In an affidavit she submitted as part of those materials, Ms. Dresch attests that “the Russian rifle, the Glock, and one of the shotguns” found in her house after her son’s arrest in this case originally belonged to her husband and passed to her when he died in 2006. Attachment at 9. In the affidavit, Ms. Dresch further attests that she purchased the house as a second home in 2008 and that, sometime between 2008 and 2011, she put the three guns that had originally belonged to her late husband in “upstairs bedrooms closets” there for storage. She did this because she did not want the guns in her primary residence, which is where her grandchildren would visit her. Id. In her affidavit, Ms. Dresch indicates that her son moved into her second house only in the “last couple of years.” Thus, it appears that at least three of the four guns found at Mr. Dresch residence had initially been placed there for storage several years before Mr. Dresch even moved in.

13. The items recovered from Mr. Dresch’s residence were located during two different searches. The first search occurred on January 19, 2021, the same day that Mr. Dresch was arrested in this case. Response, Attachment 2 at 1. It is clear that Mr. Dresch had already been arrested before the search began and that he was somewhere else when the search occurred. Id. at 2. In regards to firearms, only the Russian SKS rifle and one of the shotguns were found. Id. at 3-4, 7-11. During the search, law-enforcement officers searched both floors of the residence and removed the evidentiary items and apparent contraband they found, including the guns and ammunition they found. Id. at 1. The officers entered the house through an “unlocked” door. Id. No one was present in the house at the time of the search, and the officers did NOT lock the house upon their departure. Id. at 2. The second search occurred on January 21, 2021.³ Response, Attachment 4 at 1. The entry team for the search reported “that the entry point was not unsecured as it had been left on January 19th and forced entry was required.” Id. at 2. As

³ In it Response, the government indicates that the second search occurred the day after the first search. Response at 9. This is incorrect. The first search occurred on January 19. Response, Attachment 2 at 1. The second search occurred 2 days later, on January 21. Response, Attachment 4 at 1.

with the first search, no one was present in the house at the time of the search. Id. The second search turned up the .40 caliber handgun, the second shotgun, assortments of ammunition, and a Ziploc of suspected marijuana. Id. The government indicates that both searches occurred pursuant to federal search warrants. Response at 6, 9. While it is perhaps understandable how one of the above items discovered during the January 21 search could have been overlooked during the search of January 19, it is much harder to understand how all of them could have been overlooked. Accordingly, it appears that some, if not all, of the items may have been placed in the residence after the first search. This conclusion is bolstered by the fact that the house door was found locked when the second search occurred on January 21, thus establishing that someone came to the house between the first and second searches. It should be noted that, since his arrest on January 19, prior to the first search, Mr. Dresch has been continuously detained in this case.

14. The SKS rifle that was allegedly found at Mr. Dresch's residence is not a modern rifle. Internet research shows that the SKS rifle was manufactured in Russia for its Army starting in 1945. The SKS rifle was last manufactured in Russia in 1958. See en.wikipedia.org/wiki/SKS. The rifle allegedly found at Mr. Dresch's residence would therefore have to be at least over 60 years old.

15. In its response, the government states that Mr. Dresch's Facebook posts from the day of the events at the Capitol show he had "apparent glee" at the resistance he faced from the police force protecting the building that day. Response at 17. The government cites this as evidence that Mr. Dresch poses a future danger to the community. Id. at 17-18. The government overlooks the fact that part of the reason the person identified as Mr. Dresch on Facebook talks about the resistance at the Capitol on January 6 is to stress how peaceful the persons who occupied the Capitol were in the face of that resistance. For instance, at 12:11 a.m. on January 7, 2021, the person posted, "I can't say I saw any violence from our people, despite all the poking of the capitol police, gassing randomly into woman and children being peaceful, beating old men we kept it chill." See

Response, Attachment 1 at 5. Moreover, a few hours later, the person posted, “[W]e didn’t fuck shit up...I seen a broken window...we picked up water bottles and shit cleaned up [ellipses in original].” Response, Attachment 16. These posts are consistent with posts the person identified as Mr. Dresch made on Facebook on January 6. At 4:46 p.m., the person posted, “It was peaceful... still got a lil gas tho [ellipsis in original],” and at 6:09 p.m., the person posted, “[W]e broke no glass, no shoving I seen.” See Response at 5, Attachment 1 at 7. At this point, it bears mentioning that not only does the government not have any evidence that Mr. Dresch assaulted anyone, destroyed any property, or made any kind of forced entry at the Capitol on January 6; it has not presented any evidence that he was even present when any such conduct occurred. It thus appears that Mr. Dresch’s experience of the events at the Capitol was very different from the way those events are being portrayed both by the government and the media. This is not to say that the government and the media are portraying things falsely. Rather, it is just to point out that, if Mr. Dresch was present at the Capitol on January 6, he did not participate in, witness, or experience the more disturbing behavior that occurred that day. This should be kept in mind when considering the comments about January 6 that the government claims Mr. Dresch made on Facebook afterwards. See, e.g., Response at 12, 14-15.

WHEREFORE, the defendant, Karl Dresch, replies to the Government’s Response to Defendant’s Motion for Bond.

Respectfully submitted,

/s/

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Washington, DC 20004
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Phone: (202) 347-6101

ATTACHMENT
Materials Submitted to ATF
By Linda Dresch

Linda Dresch

March 20, 2021

United States Department of Justice
Bureau of Alcohol, Tobacco, Firearms and Explosives
Washington, DC 20226

RE: Notice Letter ID: 239859

To whom it may concern:

I acknowledge ownership of all the guns and ammunition that belonged to my late husband, Stephen Dresch, that were seized from my home in Calumet, MI.

I have no interest in having the seized weapons returned to me -- with the exception of the Glock and the ammunition that goes to it. I have never had any interest in owning a gun, and actually feel nervous around guns. My oldest grandson, however, has completed a hunter's and gun safety course and voiced an interest in having his grandfather's Glock. He recently celebrated his 25th birthday and I believe his grandfather would have wanted him to have it.

By relinquishing the other weapons, I feel that the terrible burden of responsibility that I carry for ignoring these weapons and not securing them adequately is, in a small way, lessened.

I have great regret that, due to my discomfort and anxiety around guns in general, I did not responsibly address the proper care of these items.

Sincerely,



Linda N. Dresch

SECTION I – CONTACT INFORMATION

PETITIONER INFORMATION	
Petitioner/Contact Name: (Last, First) Dresch, Linda	
Business/Institution Name: (if applicable) n/a	Prisoner ID: (if applicable) n/a
Address: (Include Street, City, State, and Zip Code) [REDACTED]	
Social Security Number/Tax Identification Number: (Enter N/A if you do not have one) [REDACTED] 2566	
Please provide an explanation why you do not have a Social Security Number, if above is N/A: 	
Phone: (optional)	Email: (optional)
ATTORNEY INFORMATION (if applicable)	
Attorney Name: (Last, First) Eliason, Matthew	
Attorney Title: Attorney	
Firm Name: (if applicable) Eliason Law Office, P.C.	
Attorney Address: (Include Street, City, State, and Zip Code) [REDACTED]	
Are you an attorney filing this petition on behalf of your client? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
Attorney Phone: (optional) [REDACTED]	Attorney Email: (optional) [REDACTED]

If any of this information changes, you are responsible for notifying the agency of the new information.

SECTION II – ASSET LIST

You must identify your role for each asset in your petition. Please review the role definitions below.

ROLE INFORMATION (multiple roles may apply to each asset)	
Owner	Linda Dresch
Victim	n/a
Lienholder	n/a

Identify the asset ID and asset description for each asset you are petitioning and indicate your role as a petitioner for each asset. You may select one or more roles.

#	Asset ID	Asset Description	Owner	Victim	Lienholder
RA39 8US	21-ATF- 007891	Glock Inc. Pistol CAL:40 SN:RA398US	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	21-ATF-007897	11 Rounds PMC Ammunition CAL: 40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	21-ATF-00796	150 Rounds Assorted Ammunition CAL:40	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

SECTION III – VICTIM PETITION

n/a

If you are filing this petition as a victim, please fill out the information below. The information must apply to all of the assets you selected as a victim role in the previous section. If you are not filing as a victim for any assets, you may skip this section.

I am requesting remission of this forfeiture because I am a victim of the criminal offense underlying the forfeiture of this property or am the victim of a related offense and I have suffered a pecuniary loss as a result of that offense as described below:

Please provide the total pecuniary loss claimed. This is the total amount you claim to have lost.

If you have recovered any of your losses, please list the details below. If you have more than two sources of recovery, please print multiple copies of this table to submit with the petition.

SOURCE(S) OF RECOVERY (if applicable)	
Source of Recovery 1:	Amount of Recovery:
Source of Recovery 2:	Amount of Recovery:

In the space below, please list any documents you are including in support of your victim petition. If none are included, please explain why.

SECTION IV – INTEREST IN PROPERTY

Provide additional information for the assets where you have identified yourself as the owner and/or lienholder. If you are petitioning for multiple assets and the responses are not the same for each asset, please print out multiple copies of this page to submit with the petition and indicate which assets apply to each page. If you have documentation that supports your interest in the petitioned assets (bill of sale, retail installment agreements, contracts, titles or mortgages) please include copies of the documents with the submission of the petition.

INTEREST IN PROPERTY INFORMATION	
Asset ID	Asset Description
21-ATF-007891	Glock Inc. 23 Pistol CAL:40 SN:RA398US
21-ATF-007897	11 Rounds PMC Ammunition CAL:40
21-ATF-07906	150 Rounds Assorted Ammunition CAL:40

In the space below, please explain why you have a valid, good faith, and legally recognizable interest in the asset(s) as an owner or lienholder:

See attached Affidavit and letter

Select the reason why you are petitioning for remission and/or mitigation of the asset(s)?

- I am an innocent owner and I did not know of the conduct giving rise to the forfeiture OR I am an innocent owner and upon learning of the conduct giving rise to the forfeiture, I did all that reasonably could be expected under the circumstance to terminate such use of the property.
- I was a bona fide purchaser or seller of the forfeited property for value, AND I did not know and was without cause to believe that the property was subject to forfeiture at the time I acquired my interest in the property.
- None of the above. I am only seeking mitigation.

In the space below, please explain the reason for filing a petition.

See attached Affidavit and letter

In the event that the ruling official determines that I do not qualify for remission of the property, I hereby request mitigation of the forfeiture to avoid extreme hardship.

YES NO

In support of my request, I would like the ruling official to consider the following extenuating circumstances:

In the space below, please list any documents you are including in support of your interest in the asset(s). If none are included, please explain why.

- Cover Letter
- Affidavit

SECTION V – NET EQUITY WORKSHEET**N/A**

Complete the table below for each asset where you are a lienholder. If you are a lienholder for multiple assets, please print out multiple copies of this page to submit with the petition. NA

LOAN / ASSET INFORMATION		
Asset ID:	Asset Description:	Seizure Date:
Purchaser:	Co-Signer (optional):	
Loan Date:	Date of Last payment:	
Amount Financed: \$	Date Lien Perfected with State:	
Original Term of Loan (months):	Day of the Month Each Payment is Due:	
Contract Rate of Interest: %	Total Amount Paid to Lienholder After Seizure: \$	
Unpaid Principal Due at Seizure: \$	Unpaid Interest Due at Seizure: \$	
Dealer's Reserve: \$	Taxes, Transfer Fees, etc.: \$	
Insurance Costs: \$	Duration (months):	
Service Contract Costs: \$	Duration (months):	
Extended Warranty Costs: \$	Duration (months):	
Miscellaneous Costs: \$		
Provide Details (for miscellaneous costs):		
INFORMATION FURNISHED BY		
Contact Name: (Last, First)	Business Name:	
Address: (Include Street, City, State, and Zip Code)		
Phone: (optional)	Email: (optional)	

* Copies of your Net Equity assertions, such as bills of sale, retail installment agreements, contracts, certificates of title, payment history, security agreements, loan applications, or mortgages, which support the amount claimed as unpaid principal, must be attached to this report as an attachment.

In the space below, please list any documents you are including in support of this Net Equity Worksheet. If none are included, please explain why.

SECTION VI – RECOVERY OF LOSS**N/A**

Complete this section for the assets where you have identified yourself as the owner and/or lienholder and you have recovered all or a portion of your losses either via an insurance claim and/or via some other source of recovery. If you have more recovery of loss information than may fit on this page, print out multiple copies of this page to submit with the petition and indicate which assets apply to each page. If you have not received any recovery of your losses, then leave this section blank.

RECOVERY OF LOSS INFORMATION	
Asset ID	Asset Description

INSURANCE CLAIM INFORMATION (if applicable)	
Name of Insured: (Last, First)	
Policy Number:	Claim Number:
Name of Insurance Company:	Name of Insurance Agent: (Last, First)
Insurance Company Address: (Include Street, City, State, and Zip Code)	
Phone: (optional)	Email: (optional)
Have you received compensation from the insurance company? <input type="checkbox"/> YES <input type="checkbox"/> NO	Amount of Compensation:

If other sources of recovery exist (e.g., restitution, returns on investment or other settlements), please list and describe the details below.

OTHER SOURCE(S) OF RECOVERY (if applicable)	
Source of Recovery 1:	Amount of Recovery:
Source of Recovery 2:	Amount of Recovery:

In the space below, please list any documents you are including in support of your recovery of loss. If none are included, please explain why.

SECTION VII – DECLARATION AND REPRESENTATION

The following declaration should be completed by the petitioner. If the petitioner is represented by an attorney, the attorney may complete the declaration as long as the petitioner completes the sworn notice of representation.

I attest and declare under penalty of perjury that my petition is not frivolous and the information provided in support of my petition is true and correct to the best of my knowledge and belief.

Linda Dresch

Signature

Linda Dresch
Printed Name

March 24, 2021

Date

Sworn Notice of Representation

This section must be completed only by petitioners who are represented by an attorney and whose attorney has executed the declaration provided above.

I have retained the above-named attorney who has authority to represent me in this matter. I have fully reviewed the foregoing petition and found that its contents are truthful and accurate in every respect. I declare under penalty of perjury that the foregoing information is true and correct.

Linda Dresch

Signature

Linda Dresch
Printed Name

March 24, 2021

Date

A petition containing false information may subject the petitioner to criminal prosecution under Title 18 United States Code Section 1001 and Title 18 United States Code Section 1621.

AFFIDAVIT

I, LINDA DRESCH, HEREBY ATTEST THAT:

1. The guns, namely, the Russian rifle, the Glock, and one of the shotguns, listed in Notice Letter ID: 239859, were the property of my husband, who passed away in August of 2006.
2. Upon my husband's death, the guns listed in number 1 above and listed in Notice Letter ID: 239859 became my property.
3. Sometime between 2008, when I bought the house in Calumet, and 2011 I put the firearms in the upstairs bedrooms closets to get them out of my primary residence in Hancock, where my grandchildren stay when they visit.
4. Until the Bureau of Alcohol, Tobacco, Firearms and Explosives seized the weapons, I had not given them much thought.
5. My son moved into that home with his wife in the last couple of years. Prior to that I had only periodically used the house as a peaceful retreat.

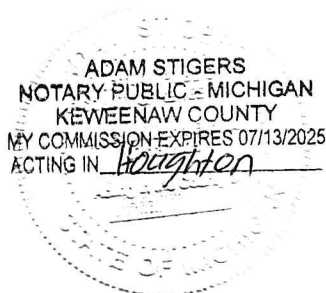
Dated: March 24, 2021

Linda Dresch
Linda Dresch

STATE OF MICHIGAN)

COUNTY OF HOUGHTON) ss)

Acknowledged before me in Houghton County, Michigan, on March 24th, 2021, by Linda Dresch acting on her own volition.



Adam Stigers
NOTARY PUBLIC