UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

:

v. : Case No. 21-cr-291-3 (ABJ)

:

KYLE JAMES YOUNG, :

:

Defendant. :

CONSENT MOTION TO DOCKET REDACTED STATEMENT OF OFFENSE

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully moves for an order to publicly docket a redacted version of the Statement of Offense during the plea hearing set for May 5, 2022.

In support thereof, the government states as follows:

- 1. The parties are scheduled to enter into a plea agreement on May 5, 2022.
- 2. The Statement of Offense, which both parties have signed, contains information from the victim's medical records. To protect the victim's privacy, the government is requesting that the version of the Statement of Offense filed to the public docket be redacted of information that was obtained from the victim's medical records.
- 3. Defense counsel, Sam Moore, indicated that the defense does not object to the government's request.

WHEREFORE, the United States respectfully requests that this Court issue an Order directing that the Clerk of the Court publicly docket a redated version of the Statement of Offense.

Respectfully submitted,

MATTHEW M. GRAVES UNITED STATES ATTORNEY D.C. Bar No. 481052

BY:

/s/

KIMBERLY L. PASCHALL Assistant United States Attorney Federal Major Crimes Section D.C. Bar No. 1015665 601 D St, N.W., Washington, D.C. 20001 202-252-2650 Kimberly.paschall@usdoj.gov

____/s/

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CERTIFICATE OF SERVICE

I certify that a copy of the Government's Consent Motion to Docket Redacted

Statement of Offense was served on all counsel of record via the Court's electronic filing service.

/s/ Cara Gardner
CARA GARDNER

Assistant United States Attorney

Date: May 4, 2022

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

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Defendant.

ORDER

This matter having come before the Court pursuant to the application of the United States to publicly docket a redacted version of the Statement of Offense for Kyle James Young, the Court finds that the victim's right to privacy regarding medical records justifies the request.

IT IS THEREFORE ORDERED that the motion is hereby GRANTED, and that Clerk's office shall docket the government's redacted version of the Statement of Offense.

Date: May 5, 2022

AMY BERMAN JACKSON

UNITED STATES DISTRICT JUDGE