## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA :

v.

:

JEFFREY SABOL, : CRIMINAL NO. 21-CR-35 (EGS)

PETER FRANCIS STAGER, : UNDER SEAL

:

MICHAEL JOHN LOPATIC, SR.,

.

CLAYRON RAY MULLINS,

:

JACK WADE WHITTON,

:

LOGAN JAMES BARNHART,

:

RONALD COLTON MCABEE,

:

MASON JOEL COURSON, and

:

JUSTIN JERSEY,

.

Defendants. :

## MOTION TO DOCKET REDACTED THIRD SUPERSEDING INDICTMENT

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 the attached redacted version of the Fourth Superseding Indictment.

In support thereof, the government states as follows:

1. On November 17, 2021, the Court granted the government's motion to seal the Third Superseding Indictment; the Arrest Warrants for Mason Joel Courson and Justin Jersey (the

"newly indicted defendants"); the government's motion to seal; the order granting the government's motion; and any related materials. The present motion is a related material.

- 2. On the morning of December 2, 2021, Justin Jersey, the ninth defendant in the indictment and one of the newly indicted defendants, was arrested. Mason Joel Courson, the eighth defendant in the indictment and the other newly indicted defendant, has not yet been arrested.
- 3. To facilitate the public's presumptive right of access to court proceedings, *see Washington Post v. Robinson*, 935 F.2d 282, 288 (D.C. Cir. 1999), and the dissemination of the Third Superseding Indictment to the eight defendants who have been arrested or presented, the government respectfully moves the Court to direct the Clerk to publicly docket the attached redacted version of the Third Superseding Indictment. This version redacts references to Mason Joel Courson, who has not yet been arrested, and the charges against him.

WHEREFORE, the United States respectfully requests that this Court issue an Order directing that the Clerk of the Court immediately publicly docket the attached redated version of the Third Superseding Indictment and the executed arrest warrant for Justin Jersey, but not the unexecuted warrant for Mason Joel Courson.

Respectfully submitted,

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