

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

CHRISTOPHER MICHAEL ALBERTS,

Defendant.

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Case No. 21-cr-26 (CRC)

**GOVERNMENT'S MOTION FOR LEAVE TO FILE
SURREPLY TO DEFENDANT'S MOTION TO DISMISS**

The United States respectfully requests leave to file a surreply in response to Defendant's reply in support of his motion to dismiss, ECF No. 65. Defendant Christopher Alberts relies on the Supreme Court's recent opinion in *New York State Rifle & Pistol Assoc. Inc. v. Bruen*, 142 S. Ct. 2111 (2022), which was issued after the Government filed its response brief, in further support of his motion to dismiss Counts Three, Four, Six, Nine, and Ten of the superseding indictment. *See* ECF No. 65 at 2-5. He also raises additional arguments, omitted from his initial motion, in support of his request to dismiss Counts One, Two, Five, Seven, and Eight. *See Id.* at 5-7. Because Alberts misinterprets *Bruen* and offers a new and radical view of the First Amendment unsupported by relevant precedent, the Government requests leave to submit the attached surreply.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

/s/ Jordan A. Konig
JORDAN A. KONIG
Supervisory Trial Attorney, Tax Division,
U.S. Department of Justice
Detailed to the U.S. Attorney's Office
P.O. Box 55, Washington, D.C. 20044
202-305-7917 (v) / 202-514-5238 (f)
Jordan.A.Konig@usdoj.gov