

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

KARL DRESCH
Defendant

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Case No. 21-mj-

UNDER SEAL

GOVERNMENT’S MOTION TO SEAL THE ARREST WARRANT, CRIMINAL COMPLAINT AND RELATED DOCUMENTS AND TO DELAY ENTRY ON THE PUBLIC DOCKET OF THE FILING OF THIS MOTION TO SEAL

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, respectfully moves this Court to place under seal the Arrest Warrant, the Criminal Complaint with its supporting Statement of Facts, any ancillary documents, this Motion to Seal, any Order granting this Motion to Seal and to delay entry on the public docket of the filing of this Motion to Seal and Order of the Court. In support of this motion, government submits as follows:

On January 15, 2021, the Court issued an Arrest Warrant based on a Criminal Complaint and its supporting Statement of Facts charging the above captioned defendant with violating 18 U.S.C. § 1752(a)(1) and (2) (Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority), 40 U.S.C. § 5104(e)(2)(G), (F) (Violent Entry and Disorderly Conduct on Capitol Grounds), and 18 U.S.C. § 1512(c) (Obstruction of Congress). Public disclosure of the existence of the Arrest Warrant and other materials at this time might alert the defendant that he is wanted for criminal charges, and this presents the risk that the defendant might attempt to destroy potentially incriminating evidence. In addition, upon learning of the warrant, the defendant might flee. At this time law enforcement is continuing to investigate not only

DRESCH but other individuals who might have participated with him in the charged conduct. These are compelling reasons for the sealing of these documents.¹ Accordingly, the United States requests that this Court grant the accompanying proposed order.

WHEREFORE, for the foregoing reasons and for any other such reasons as may appear to the Court, the government respectfully requests that the Court grant this motion and enter the attached proposed order.

Respectfully submitted,

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Dated: January 15, 2021

¹ See *Washington Post v. Robinson*, 935 F.2d 282, 289 n.10 (D.C. Cir. 1991) (noting situations when compelling reasons exist for sealing documents filed with the Court and postponing entry of filings on public docket).