

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

UNITED STATES OF AMERICA,)	
)	
v.)	No. 21-CR-499 EGS
DANIEL SCOTT,)	
)	
Defendant.)	
<hr/>		

**UNITED STATES’ MOTION TO DISMISS
INDICTMENT AND SUPERSEDING INDICTMENT**

The United States of America, through the U.S. Attorney for the District of Columbia, hereby moves for leave of this Court to dismiss the indictment and superseding indictment in this case without prejudice pursuant to Federal Rule of Criminal Procedure 48(a). *See* Fed. R. Crim. P. 48(a) (“The government may, with leave of court, dismiss an indictment . . .”). The defendant does not oppose this motion.

Over the last year, the government has conducted parallel investigations of Mr. Scott and another defendant, Christopher Worrell, in case number 21-CR-292, before Judge Royce C. Lamberth in this Court. Pieces of evidence uncovered during that investigation, including video evidence from Mr. Worrell’s digital devices and encrypted communications recently reviewed by the government, indicate a high degree of overlap between Mr. Worrell’s and Mr. Scott’s cases. Mr. Scott and Mr. Worrell are each members of the same chapter of the Proud Boys organization in Southwest Florida. They were together for most of the day on January 6, 2021, including during their conduct that forms of the basis of the charges in their respective cases. And they had significant communications with each other both prior to and after January 6, 2021 and on the day itself, during the time of the conduct that forms the basis for their charges.

For these reasons, Mr. Scott was recently joined with Mr. Worrell in a second superseding indictment in Mr. Worrell's case. All of the charges present in the indictment and superseding indictment in this case were charged against Mr. Scott in the second superseding indictment in case number 21-CR-292, with the exception of the misdemeanor charge under 40 U.S.C. § 5104(e)(2)(D), on which the government will not be proceeding against Mr. Scott. The government will proceed on the charges against Mr. Scott in case number 21-CR-292.

The United States therefore requests that this Court grant the United States' motion for leave to dismiss without prejudice the indictment and superseding indictment in this case. A proposed order is attached to this motion.

Respectfully submitted,

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

/s/ William Dreher
WILLIAM DREHER
D.C. Bar No. 1033828
Assistant U.S. Attorney
U.S. Attorney's Office
Western District of Washington
700 Stewart Street, Suite 5220
Seattle, WA 98101-1271
(206) 553-4579