

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

SEAN CHARLES DUNN,

Defendant.

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Case No. 1:25-cr-252 (CJN)

JOINT PRETRIAL STATEMENT

The parties file the following pretrial statement pursuant to the Court’s Pretrial Scheduling Order, dated September 25, 2025 (ECF No. 13).

A. Joint Statement of the Case

Government’s Version:

The United States has charged Sean Charles Dunn by Information with an offense that allegedly occurred on August 10, 2025, in the 1400 block of U Street Northwest in Washington, D.C. Count One charges Mr. Dunn with forcibly assaulting, resisting, opposing, impeding, intimidating, or interfering with an officer or employee of the United States, that is, Customs and Border Protection Agent Gregory Lairmore, while he was engaged in or on account of the performance of his official duties. **Mr. Dunn denies these allegations and has pled not guilty.**

Defendant’s Version:

The United States **Attorney** has charged Sean Charles Dunn by Information with an offense that allegedly occurred on August 10, 2025, in the 1400 block of U Street Northwest in Washington, D.C. Count One charges Mr. Dunn with forcibly assaulting, ~~resisting, opposing, impeding, intimidating, or interfering with~~ an officer or employee of the United States, that is, Customs and Border Protection Agent Gregory Lairmore, while he was engaged in or on account

of the performance of his official duties. These statements are the government’s allegations, and nothing more. The government has the burden of proving its allegations beyond a reasonable doubt. Mr. Dunn has pled not guilty and denies the government’s accusations. ~~Mr. Dunn maintains his innocence.~~

Government’s Explanation: The government objects to the inclusion of “Attorney” since it is the United States that charged the defendant, and it is the United States that is the party to case.

Defense Explanation: Because no indictment has been returned by the people of the United States, the changes to the first sentence accurately reflect that the party charging the matter is the United States Attorney.

Government’s Explanation: The Information charges the defendant with assaulting a federal officer as well “resisting, opposing, impeding, intimidating, or interfering with” a federal officer. The instruction should include the same, here and throughout the instruction.

Defense Explanation: Based on the authorities cited in Mr. Dunn’s Motion in Limine, ECF No. 22, the misdemeanor simple assault charge does not include “resist, oppose, impede, intimidate, and interfere with” as an element.

Government Explanation: The purpose of the Statement of the Case is to provide short neutral statement of the facts. The Defendant’s additions go beyond that purpose and the instructions cover thoroughly cover the burden of proof and the significance (or lack thereof) of a criminal information.

Defense Explanation: The last sentences accurately reflect Mr. Dunn’s response to the allegations—that he is not guilty and the government will be unable to meet its burden at trial.

B. Joint Proposed Voir Dire

The parties’ proposed voir dire questions are submitted as Attachment 1.

C. Proposed Jury Instructions

The parties’ proposed jury instructions are submitted as Attachment 2.

D. List of Witnesses

The Witness List is submitted as Attachment 3.

E. Exhibit List

The United States' Exhibit List is submitted as Attachment 4.

F. Stipulations

The United States and the Defense do not anticipate any stipulations.

G. Proposed Verdict Form

The proposed Verdict Form is submitted as Attachment 5.

Respectfully submitted,

JEANINE FERRIS PIRRO
UNITED STATES ATTORNEY

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