UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

IN THE MATTER OF THE SEARCH OF ONE RESIDENCE IN WASHINGTON, D.C. UNDER RULE 41	SW No. 26-SW-318 (MJS) **FILED UNDER SEAL**

THE UNITED STATES OF AMERICA'S SECOND SUPPLEMENTAL *EX PARTE* BRIEF IN SUPPORT OF AFFIDAVIT FOR SEARCH WARRANT

At approximately 10:33 a.m. on Friday, October 2, 2026, the government applied to the Court under Federal Rule of Criminal Procedure 41 for a warrant to search the premises known as [redacted] (the "Target Location") for "[a]ll records and information that constitute fruits, contraband, evidence, and instrumentalities of violations of [redacted], those violations involving Ilhan Nur Said Elmi a/k/a Ilhan Abdullahi Omar, and occurring between 1980 to the present (the "Target Offenses"). Application, Attachment B, at 1. The government requested that the Court swear it out on Monday, October 5. After several inquiries as to the status of the warrant, the Court stated that it would get to it on Tuesday, October 6, 2026. [redacted].

Just after midnight on October 7, the government submitted to the Court via email an *ex parte* brief [redacted] specifically arguing that (1) "nothing about the requested search warrant and the case it services implicates the Speech or Debate Clause"; (2) the Court should "apply to the requested search warrant involving Congresswoman Omar the same standard it applied to the one it granted"