Inner City Press

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
8:13 am, Jul 16, 2026
JEFFREY P. COLWELL, CLERK

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

UNITED STATES OF AMERICA, Plaintiff, v. ALPHA BA, Defendant.

Civil Action No. 1:26-cv-02947-CYC

MOTION OF INNER CITY PRESS TO INTERVENE FOR THE LIMITED PURPOSE OF OPPOSING RESTRICTION OF EXHIBITS A THROUGH J TO THE COMPLAINT (DKT. NO. 2)

Inner City Press, a news organization covering federal court proceedings and public access issues, respectfully moves to intervene for the limited purpose of opposing the Level 1 restriction of Exhibits A through J to the Complaint (Dkt. No. 2), filed June 30, 2026, and requests that this Motion be docketed. Inner City Press notes that this District's own public Notice of Restriction lists this restriction with an objection deadline of July 20, 2026 (FileID 5134, cod.uscourts.gov/Seal.aspx), and this Motion is timely filed in response to that notice.

This is a civil action by the United States to revoke Alpha Ba's citizenship under 8 U.S.C. § 1451. The Complaint itself is unrestricted and public. Every exhibit supporting it — the entire evidentiary basis for the government's request to strip a person of United States citizenship — was filed the same day as Level 1 Restricted, with no visible motion articulating any basis for restriction and no order making the particularized findings that restriction requires.

Under D.C.COLO.LCivR 7.2, restriction of court records requires an identification of the interest to be protected, an explanation of why that interest outweighs the public's interest in access, a finding that no less restrictive alternative would suffice, and a determination limited to the narrowest scope necessary. The Tenth Circuit's

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law requires no less: the presumption of public access to judicial records is overcome only by a significant interest, articulated with specificity, that outweighs it. Colony Ins. Co. v. Burke, 698 F.3d 1214, 1241 (10th Cir. 2012); Helm v. Kansas, 656 F.3d 1277, 1292 (10th Cir. 2011). Complaint exhibits are, if anything, entitled to the presumption at its height: they are the government's own evidentiary submission, filed to justify invoking the federal courts' power in the government's own civil enforcement action, in a case of obvious and substantial public interest — the revocation of a person's citizenship.

To the extent any exhibit contains material genuinely warranting protection, such as Social Security numbers or other information subject to Fed. R. Civ. P. 5.2, the remedy is targeted redaction, not restriction of ten exhibits in their entirety. Denaturalization proceedings, and the evidence offered to support them, have long been matters of public record; wholesale restriction of the government's entire exhibit set, imposed without any visible motion or order, is inconsistent with this District's own rule and with binding Tenth Circuit law.

This District's Own Practice Confirms the Relief Sought Is Administrable

Inner City Press respectfully notes that this District already maintains the practice that this Motion asks the Court to apply here: a public Notice of Restriction system, indexed by case, that states an objection deadline and invites review before restriction becomes final. That system produces real results. In Jones v. United Airlines, Inc., No. 1:24-cv-03013-NYW-NRN, Magistrate Judge N. Reid Neureiter, after a hearing prompted by an Inner City Press access request under that same notice practice, ordered 29 sealed exhibits re-filed with only narrow, targeted redactions rather than blanket restriction. And in Preciado v. RugsUSA, LLC, No. 1:25-cv-01243-CNS-KAS, an Inner City Press motion to intervene opposing restriction of summary judgment materials on similar grounds was docketed and remains pending before this Court. The practice this Motion invokes is not a novel request; it is this District's own established, working procedure, and Inner City Press asks that it be

applied with equal rigor to the restriction of an entire evidentiary record supporting the revocation of a person's citizenship.

Relief Requested

Inner City Press respectfully requests that the Court: (1) docket this Motion; (2) direct the government to file, within a time certain, either public versions of Exhibits A through J with only such redactions as Rule 5.2 requires, or a motion to restrict as to each exhibit individually, supported by the particularized showing D.C.COLO.LCivR 7.2 requires; and (3) permit Inner City Press to be heard, by letter or otherwise, before any continued restriction is ordered.

Dated: July 15, 2026

Respectfully submitted,

/s/

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June 2, 2026, Playground (UK), "Suno Fights Music Labels to Keep AI Training Track Count Secret," "This dispute has drawn intervention from Inner City Press (ICP), which is urging the court to deny Suno's request to keep documents containing the training tally confidential. Matthew Lee from ICP argues the information is of significant public interest,"

https://theplayground.co.uk/suno-fights-music-labels-to-keep-ai-training-track-count-secret/

April 6, 2026, New York Times, "Suspect in Hacking of Climate Activists Is Extradited to New York," by Karen Zraick, "His extradition to the United States from Britain was reported earlier by

Inner City Press," https://www.nytimes.com/2026/04/06/climate/forlit-exxon-dci-hacking-extradition.html