

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Casey Williams v. The Village of Junction City, et al.

Williams · No. 2:25-cv-1507 · Decided January 2, 2026

SUMMARY

The United States District Court for the Southern District of Ohio denies Plaintiff Casey Williams’s motion to seal the complaint and future pleadings referring to sealed Ohio criminal records. The court holds that Ohio’s state-court sealing statute does not overcome the strong federal presumption of public access to judicial records and that the motion fails to provide the document-specific, compelling reasons required by Sixth Circuit precedent.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Chelsey M. Vascura
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	January 2, 2026
DOCKET	2:25-cv-1507
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved to seal the Complaint and all subsequent pleadings that mention or discuss his sealed criminal records. The district court denied the motion.
STANDARD OF REVIEW	The court applied the Sixth Circuit's standard governing motions to seal judicial records, requiring the proponent to identify compelling reasons for secrecy and provide a detailed, document-by-document analysis supported by legal citations.
PRECEDENTIAL VALUE	Unknown; federal district court order
PARTIES	Casey Williams v. The Village of Junction City, Amy English, et al.

TOPICS

- public records
- civil procedure
- civil rights

PRACTICE AREAS

Civil procedure

Civil rights

QUESTIONS PRESENTED

1. Whether the Complaint and all subsequent pleadings referring to Plaintiff's Ohio-sealed criminal records should be filed under seal in federal court.
2. Whether Ohio Revised Code § 2953.32, standing alone, provides sufficient grounds to overcome the presumption of public access to federal judicial records.

HOLDINGS

1. A party seeking to seal federal judicial records must establish compelling reasons for secrecy through a detailed, document-by-document analysis supported by reasons and legal citations; Plaintiff's generalized reliance on the state sealing order did not satisfy that standard.
2. Ohio Revised Code § 2953.32 does not, by itself, provide sufficient grounds to overcome the presumption of public access to federal court records or require the federal court to seal pleadings containing references to records sealed by an Ohio court.

KEY QUOTATIONS

"There is a strong presumption in favor of public access to judicial records."

"Only for the most compelling reasons." (825 F.3d at 305)

"The proponent of sealing therefore must 'analyze in detail, document by document, the propriety of secrecy, providing reasons and legal citations.'" (825 F.3d at 305)

"Because Plaintiff relied solely on § 2953.32 as grounds for sealing the Complaint and subsequent pleadings referencing Plaintiff's criminal records, and because § 2953.32 does not provide sufficient grounds to overcome the presumption of public access to federal court records, Plaintiff's Motion (ECF No. 2) is DENIED."

FACTUAL BACKGROUND

Plaintiff's Complaint referenced criminal records that had been sealed by an Ohio court under Ohio Revised Code § 2953.32. Plaintiff sought to seal the Complaint and all later pleadings discussing those records. His claims placed the records and the conduct of officials involved in his prosecution at issue, and Ohio law permitted a law enforcement officer involved in the case to inspect the sealed records for use in defending a related civil action.

PROCEDURAL HISTORY

Plaintiff filed a civil action asserting retaliatory and malicious prosecution claims against officials involved in his prosecution. He then moved to seal the Complaint and future pleadings referring to criminal records sealed by an Ohio state court. The federal district court denied the motion because Plaintiff failed to provide document-

specific compelling reasons overcoming the presumption of public access, and Ohio Revised Code § 2953.32 did not independently require sealing in federal court.

DISPOSITION

other

CASES CITED

- Stanley v. Turner Oil & Gas Properties, Inc., No. 2:16-CV-386, 2017 WL 5068444, at *1 (S.D. Ohio July 24, 2017)
- Shane Grp., Inc. v. Blue Cross Blue Shield of Michigan, 825 F.3d 299, 305 (6th Cir. 2016)
- In re Knoxville News–Sentinel Co., 723 F.2d 470, 476 (6th Cir. 1983)
- White v. Wilberforce Univ., No. 1:16-CV-1165, 2017 WL 3537233, at *2 (S.D. Ohio Aug. 17, 2017)
- Rudd Equip. Co., Inc. v. John Deere Constr. & Forestry Co., 834 F.3d 589, 594–95 (6th Cir. 2016)
- Baxter Int’l, Inc. v. Abbott Labs., 297 F.3d 544, 548 (7th Cir. 2002)
- Morrison v. Bd. of Trs. of Green Twp., 529 F. Supp. 2d 807, 819 (S.D. Ohio 2007), aff’d, 583 F.3d 394 (6th Cir. 2009)
- Karl v. Bizar, No. 2:09-cv-34, 2009 WL 3644115, at *3–4 (S.D. Ohio Oct. 28, 2009)
- Raj Plastic Surgery, LLC v. Raj, No. 1:20-CV-00751, 2020 WL 4582690, at *2–3 (N.D. Ohio Aug. 10, 2020)

OPINION

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO EASTERN DIVISION CASEY WILLIAMS, Plaintiff, v. Civil Action 2:25-cv-1507 Judge Algenon L. Marbley Magistrate Judge Chelsey M. Vascura THE VILLAGE OF JUNCTION CITY, et al., Defendants. ORDER This matter is before the Court on Plaintiff’s Motion to Seal Complaint (ECF No. 2). Plaintiff seeks an order sealing the Complaint because it “contains details about sealed criminal records, which are confidential under Ohio Revised Code §2953.32(D).” (Id. at 2.)

Plaintiff also asks that “all subsequent pleadings that mention and discuss said sealed criminal records be accepted for filing under seal.” (Id.) There is a strong presumption in favor of public access to judicial records. Stanley v. Turner Oil & Gas Properties, Inc., No. 2:16-CV-386, 2017 WL 5068444, at *1 (S.D. Ohio July 24, 2017).

The Sixth Circuit has directed that documents filed with the Court may be placed under seal “[o]nly for the most compelling reasons.” Shane Grp., Inc. v. Blue Cross Blue Shield of Michigan, 825 F.3d 299, 305 (6th Cir. 2016) (quoting In re Knoxville News– Sentinel Co., 723 F.2d 470, 476 (6th Cir. 1983)). “A movant’s obligation to provide compelling reasons justifying the seal exists even if the parties themselves agree the filings should be sealed.” White v. Wilberforce Univ., No. 1:16-CV-1165, 2017 WL 3537233, at *2 (S.D.

Ohio Aug. 17, 2017) (emphasis in original) (citing *Rudd Equip. Co., Inc. v. John Deere Constr. & Forestry Co.*, 834 F.3d 589, 595 (6th Cir. 2016)). The proponent of sealing therefore must “analyze in detail, document by document, the propriety of secrecy, providing reasons and legal citations.” *Shane Grp., Inc.*, 825 F.3d at 305 (quoting *Baxter Int’l, Inc. v. Abbott Labs.*, 297 F.3d 544, 548 (7th Cir.

2002)). These reasons and legal citations must be sufficient for a district court to “set forth specific findings and conclusions which justify nondisclosure to the public.” *Rudd Equip. Co., Inc.*, 834 F.3d at 594. Here, Plaintiff’s Motion fails to meet the high standard set forth by the Sixth Circuit, asserting only that any documents referencing his criminal records (which have already been sealed by an Ohio court under Ohio Revised Code § 2953.32) should be kept private in federal court.

But Plaintiff himself has placed his criminal record at issue in this case by advancing claims for retaliatory and malicious prosecution against the officials involved in his prosecution. Indeed, § 2953.34(A)(4) permits inspection of records sealed under § 2953.32 by “a law enforcement officer who was involved in the case, for use in the officer’s defense of a civil action arising out of the officer’s involvement in that case.” Defendant Amy English, the Chief of Police for Junction City, is just such a law enforcement officer.

Under these circumstances, federal district courts have declined to seal documents filed on their own dockets simply because an Ohio court has sealed criminal records at the state level. See *Morrison v. Bd. of Trs. of Green Twp.*, 529 F. Supp. 2d 807, 819 (S.D. Ohio 2007), *aff’d*, 583 F.3d 394 (6th Cir. 2009) (declining to exclude evidence of criminal records sealed under § 2953.32 on summary judgment); *Karl v. Bizar*, No. 2:09-cv-34, 2009 WL 3644115, at *3–4 (S.D.

Ohio Oct. 28, 2009) (denying a motion to seal criminal records that had been sealed under § 2953.32, finding that to adopt the movant’s argument “would be tantamount to permitting a state court order to override a federal court’s power and discretion to maintain its own records”); *Raj Plastic Surgery, LLC v. Raj*, No. 1:20-CV-00751, 2020 WL 4582690, at *2–3 (N.D.

Ohio Aug. 10, 2020) (same). Because Plaintiff relied solely on § 2953.32 as grounds for sealing the Complaint and subsequent pleadings referencing Plaintiff’s criminal records, and because § 2953.32 does not provide sufficient grounds to overcome the presumption of public access to federal court records, Plaintiff’s Motion (ECF No. 2) is DENIED. IT IS SO ORDERED. /s/ Chelsey M. Vascura CHELSEY M. VASCURA UNITED STATES MAGISTRATE JUDGE