

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE. NO. 21-CR-141-RDM
	:	
	:	
MICHAEL SHANE DAUGHTRY,	:	
	:	
Defendant	:	

JOINT STATUS REPORT

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant, by and through his attorney, Timothy R. Saviello, Esquire (collectively, “the Parties”), respectfully submit this status report, as directed by the Court, and state as follows:

1. On February 19, 2021, the defendant, Michael Shane Daughtry was charged by way of information with (Count One) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Two) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); and (Count Three) Impeding Ingress and Egress in a Restricted Building or Ground and Aiding and Abetting in violation of Title 18 U.S.C. § 1752(a)(3) and 2. ECF 6.

2. The defendant has been out on bond since his arrest on January 15, 2021. Defendant remains compliant with conditions of release.

3. Since the Initial Appearance on March 8, 2021, the Court has ordered the exclusion of time from Speedy Trial calculations through December 28, 2021, collectively. The Court has also ordered parties to file a joint status report on or before December 28, 2021.

4. Since the filing of the last status report, the parties have begun plea negotiations. Additionally, the government has provided the defendant with substantial discovery via USAFEx. Such discovery includes: (1) 30 digital audio files of Metropolitan Police Department (MPD) radio transmissions; (2) a 673-page transcript of the MPD radio transmissions; (3) US Capitol Police (USCP) after-action reports, approximately 176 pages, redacted; (4) 159 documents largely consisting of FBI reports of interviews of law enforcement officers; (5) 2 new reports with 16 related exhibits of alleged wrongdoing by USCP; (6) 40 additional digital exhibits related to previously produced USCP OPR reports; (7) detailed zone maps of the U.S. Capitol area for body-worn cameras (BWC); (8) BWC summary spreadsheet tracker version; (9) a timeline of January 6, 2021 events from USCP; (10) 162 Use of Force reports from USCP; (11) 64 audio recordings of Virginia State Police radio communications; and (12) indexes for BWC files shared in Global Productions 6 and 8. The government has also filed two Memoranda Regarding Status of Discovery (ECF 33 and 34).

5. Parties are agreed to a 45-day continuance of this matter and to excluding the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. Parties are in active plea negotiations and believe this time will allow for further production and review of discovery and will facilitate resolution of this case short of trial.

Respectfully submitted,

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/s/
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