

**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 February 10, 2022, collectively. The Court has also ordered parties to file a joint status report on or before February 10, 2022.

4. Since the last Joint Status Report, the parties have discussed and reviewed the facts of this case and begun plea discussions. Additionally, since December 27, 2021, the government has provided sensitive or highly sensitive discovery, termed Global Production No. 10, via USAFx. This discovery includes: (1) 10 videos from the House Recording Studio including an authenticity certificate and a related FBI report interview; (2) files from the DC Metropolitan Police Department's (MPD's) Electronic Surveillance Unit including reports and videos; (3) MPD's report of a specific U.S. Capitol Police Officer's use of force and accompanying attachments; (4) attachments to MPD's Investigative Reports concerning use of force; and (5) 10 videos from the Senate Recording Studio including an authenticity certificate and a related FBI report interview. These materials (Global Production 10) along with previous productions (Global Productions 8, 9 and portions of No. 2) have also been shared to the defense Relativity workplace. The government is in the process of transferring Global Productions Nos. 1 through 7 (previously provided via USAFx) to the defense Relativity workspace.

5. In addition to Global Production materials, on January 28, 2022, the following items among others were produced to the defense Relativity workspace: 8 sensitive audio files of Capitol Police radio communications and redacted transcripts; a spreadsheet listing start times of Arlington County Police pole camera videos; 18,484 anonymous tip files and related documentation to the MPD Tipline; 3 interview reports and 4 related files regarding Safeway Grocery stores and interstate commerce; and 3 sensitive files regarding the security of Vice President Pence. Defense counsel has been offered access to this defense Relativity workspace via the Federal Public Defender's (FPD's) office in DC. Through the FPD office, defense counsel also has access to evidence.com to access voluminous video files. Note, pursuant to protective

