

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
	:	
v.	:	<b>CASE NO. 21-CR- 107 (RDM)</b>
	:	
	:	
<b>BRUNO JOSEPH CUA,</b>	:	
	:	
<b>Defendant.</b>	:	
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**JOINT STATUS REPORT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Bruno Joseph Cua, by and through his attorney, William Zapf, now submit this joint status report, requested by the Court at the last status hearing on January 14, 2022.

1. At the last hearing, the government discussed the state of both global discovery and case-specific discovery in this matter. Since that hearing, the government has made two additional global productions, and has made all prior global productions available on the defense instances of Relativity and Evidence.com. At this juncture, over 34,000 documents and over 24,000 video files have been disclosed to the defense in global discovery.
  
2. In the near future, the government expects to make additional global productions, which should include, *inter alia*, the scoped results of search warrants conducted on other Capitol Siege defendant’s electronic devices and social media accounts, recorded

custodial interviews of Capitol Siege defendants, and additional materials in the custody and control of the FBI that may be relevant to Mr. Cua.

3. The government is willing to continue discussions regarding disposition of this matter, though the plea offer previously extended was rejected on the record on October 26, 2021, prior to the filing of motions in this case. There is currently no plea offer outstanding.
4. At the last hearing, defense counsel represented they would continue to work with the government on outstanding discovery issues.
5. The government and the defense have had conversations regarding a possible plea in this matter and will continue to work to determine if this case can be resolved short of trial. No agreement has been reached thus far, however, and a plea does not appear imminent.
6. Given the additional discovery recently produced, outstanding global discovery expected in the coming weeks, and possible re-entry into plea negotiations, the parties ask for an additional 60 days to work towards a resolution in this matter.
7. Therefore, the parties ask for leave to submit another joint status report on May 16, 2022. If the parties have reached a decision regarding disposition of this matter, the parties will file prior to this date.
8. The parties are in agreement that, due to outstanding discovery and ongoing plea negotiations, the ends of justice would be served by exclusion of time under The Speedy Trial Act until the next filing before this Court on May 16, 2022. Mr. Cua

waives his rights under the Speedy Trial Act and agrees to the exclusion of time for the period from today's status report through May 16, 2022.

Respectfully submitted,

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BY:           /s/                                  
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