

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

UNITED STATES OF AMERICA	:	
	:	
	:	
v.	:	CASE NO. 21-CR- 107 (RDM)
	:	
	:	
BRUNO JOSEPH CUA,	:	
	:	
Defendant.	:	
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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 by its Minute Order on March 15, 2022.

1. In the last status report, the government discussed the state of both global discovery and case-specific discovery in this matter. Since that status report, the government has made three additional global productions, as well as some discrete items in the case-specific production, 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. The government expects such productions will continue as additional evidence in the government’s possession, custody and control is identified.
2. In the last status report, the parties reported that 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. The parties have now re-engaged in discussions regarding disposition of the case 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.

3. Given the additional discovery recently produced, outstanding global discovery expected in the coming weeks, and the parties' re-entry into plea negotiations, the parties ask for an additional 30 days to work towards a resolution in this matter.
4. Therefore, the parties ask for leave to submit another joint status report on June 15, 2022. If the parties have reached a decision regarding disposition of this matter, the parties will notify the Court prior to this date.

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 June 15, 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 June 15, 2022.

Respectfully submitted,

DATED: May 16, 2022

/s/ William E. Zapf
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of May 2022, I filed the foregoing with the Clerk of the United States District Court for the District of Columbia by using the CM/ECF system, which system I understand has provided electronic notice counsel of record.

Dated: May 16, 2022

/s/ William E. Zapf
William E. Zapf