

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

UNITED STATES OF AMERICA)

v.)

CR. NO. 21-425 (CRC)

KENE BRIAN LAZO)

JOINT STATUS REPORT

Kene Brian Lazo, through undersigned counsel, and the United States, through undersigned counsel, respectfully files this Joint Status Report to inform the Court of the following and request a status conference in 60 days:

- 1) The government counsel and defense counsel have conferred recently on the case.
- 2) On September 28, 2021, the government provided 128 files in discovery, which compromise the bulk of the discovery most directly relevant to Mr. Lazo. The government is still in the process of disclosing global discovery in this case and others.
- 3) The government is also in the process of providing a plea offer in this case and expects to provide counsel with a written agreement by the end of this week.
- 4) Defense counsel needs time to review the forthcoming discovery and potential plea offer with Mr. Lazo.
- 5) Both counsel requests 60 days to update the Court on the status of discovery and the plea offer.
- 6) The parties agree that the exclusion of time under the Speedy Trial Act is warranted until the next hearing date and jointly request that the Court exclude the time between today's date and the next status conference. The parties further request that the Court find that the time period is excludable under 18 U.S.C. § 3161(h)(7), because the ends of justice

served by the granting of this continuance outweigh the best interests of the public and the defendant in a speedy trial

Respectfully Submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/
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