

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
	:	
v.	:	<b>Case No. 21-cr-139 (TNM)</b>
	:	
<b>RACHAEL LYNN PERT, and</b>	:	
<b>DANA JOE WINN</b>	:	
<b>Defendants.</b>	:	

**JOINT STATUS REPORT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Allen H. Orenberg, counsel for Dana Joe Winn, and Waffa Hanania, counsel for Rachael Pert (“the defendants”), hereby submit the following Joint Status Report:

Pursuant to the Court’s guidance at the last status hearing on April 8, 2021, the parties conferred and submit the following:

1. On June 8, 2021, Ms. Waffa Hanania, Esq. submitted her notice of appearance as attorney of record for defendant PERT, replacing Mr. Tony Miles, Esq. as counsel of record.
2. The government has contacted Ms. Hanania and conducted preliminary discussions concerning access to previously disclosed discovery as well as pending discovery.
3. The government is still in the process of formulating a plea offer for both defendants. The government is also working on providing additional discovery to both defendants’, to include a production of the majority of the FBI case-file.
4. The government conferred with counsel for both defendants on June 10, 2021. For the reasons stated above, to include new counsel being introduced to the case, ongoing discovery, and pending plea negotiations, the parties request the Court vacate the status

hearing set for July 2<sup>nd</sup>, 2021 and the parties submit a follow-up Joint Status Report in approximately 30 days.

5. For the reasons outlined in the Court's April 21, 2021 Order, the parties further believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to produce discovery, the defense continues to review discovery, and the parties work through plea negotiations. Therefore, the parties thus request a tolling of the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(7)(A), based on the factors described in 18 U.S.C. 3161(h)(7)(B)(i), (ii), and (iv). Therefore, the parties request an exclusion of time under the Speedy Trial Act from July 2<sup>nd</sup>, 2021, through the next scheduled status date.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney

By: \_\_\_\_\_ /s/

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\_\_\_\_\_ /s/

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\_\_\_\_\_ /s/

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