

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	Crim. No. 21-CR-301 (TJK)
	:	
STEPHEN HORN,	:	
<i>Defendant.</i>	:	

JOINT STATUS REPORT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and defendant Stephen Horn, by and through his attorneys, Marshall Ellis, Esq., and Charles Haskell, Esq. (collectively, “the Parties”), respectfully submit this joint status report, as directed by the Court, and state as follows:

1. On September 2, 2021, the Court held a status conference in this matter.
2. During the status conference, the government represented it had tendered a plea offer to Horn on July 2, 2021, which would require him to plead guilty to Count Four of the Information (violation of 40 U.S.C. § 5104(e)(2)(G)). The government stated the Parties had engaged in numerous discussions about the offer, but had not reached an agreement.
3. The government also represented it would keep the pending plea offer open until September 16, 2021, and that if Horn did not accept the offer by then, the government would withdraw it. The government also stated that Horn should not expect any future offer to be as lenient as that one.
4. During the status conference, the Court granted a continuance of the status conference until December 1, 2021. The Court also ordered the exclusion of time between September 2, 2021, and December 1, 2021, from the computation of time within which a trial date

must commence under the Speedy Trial Act, 18 U.S.C. § 3161, *et seq.*, making an ends-of-justice finding that excluding time was warranted.

5. The Court further ordered the Parties to file a joint status report as to the status of plea discussions by September 17, 2021.

6. On September 16, 2021, counsel for Horn informed the government that Horn had rejected the pending offer, and made a counteroffer. That same date, the government rejected the counteroffer.

7. There is currently no pending plea offer. But the government informed Horn's counsel it will remain open to further discussions until the next status conference.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 17, 2021, I served a copy of this pleading on all parties to this matter through the Court's electronic case files system, and that counsel for Stephen Horn have authorized me to file this joint status report.

/s/ Seth Adam Meinero

SETH ADAM MEINERO

Trial Attorney

Detailee