

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

**UNITED STATES OF AMERICA**

**v.**

**WEEKS, ET AL,**

**Defendants**

:  
:  
:  
:  
:  
:  
:

**CASE. NO. 21-CR-00247-TFH**

**JOINT MOTION TO CONTINUE OCTOBER 6, 2021 STATUS CONFERENCE**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendants, by and through their attorneys, Matthew Kachergus and Richard Landes, (collectively, “the Parties”), respectfully submit this status report, as directed by the Court, and state as follows:

1. On March 24, 2021, the defendants were charged by way of indictment. Specifically, Bradley Weeks was charged with the following: (Count One) Obstruction of an Official Proceeding in violation of 18 U.S.C. § 1512(c)(2); (Count Two) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Three) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); (Count Four) Disorderly Conduct in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(D); (Count Five) Parading, Demonstrating, or Picketing in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(G). Jonathan Daniel Carlton was charged with the following: Count Two) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Three) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); (Count Four)

Disorderly Conduct in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(D); (Count Five) Parading, Demonstrating, or Picketing in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(G).

2. Defendants are on bond and remain compliant with their conditions of release.

3. On March 5, 2021, based on the current status of the ongoing COVID-19 pandemic, the Chief Judge issued Standing order 21-10, which set procedures for resuming criminal trials for until August 31, 2021. Further, the Court found that “for those cases that cannot be tried consistent with those health and safety protocols and limitations, the additional time period from March 15, 2021 through August 31, 2021 is excluded under the Speedy Trial Act as the ends of justice served by the continuances to protect public health and safety and the fair rights of a defendant outweigh the best interest of the public and any defendant’s right to a speedy trial, pursuant to 18 U.S.C. 3161(h)(7)(A).”

4. On July 29, 2021, the parties appeared by video for a status conference and agreed to exclude time from the STA calculation until the next status conference on October 6, 2021.

5. On August 25, 2021, in recognition of the current high rate of transmission of the Delta variant in the District of Columbia, Chief Judge Howell issued Standing Order 21-47, limiting the number of jury trials that may be conducted at one time until at least October 31, 2021 and prioritizing trials with detained defendants. Further, the Court found that “for those cases that cannot be tried consistent with those health and safety protocols and limitations, the additional time period from August 31, 2021 through October 31, 2021 is excluded under the Speedy Trial Act as the ends of justice served by the continuances to protect public health and safety and the fair rights of a defendant outweigh the best interest of the public and any defendant’s right to a

speedy trial, pursuant to 18 U.S.C. 3161(h)(7)(A).”

6. Discovery in this matter is ongoing; government counsel has provided most discovery specific to the defendants’ cases to defense counsel and has apprised defense counsel of the status of outstanding discovery matters.

7. Parties are agreed to a 60-day continuance of this matter and to excluding related time from the Speedy Trial Act.

Respectfully submitted,

CHANNING D. PHILLIPS  
Acting United States Attorney  
DC Bar No. 415793

By: /s/ Anne Veldhuis  
Anne Veldhuis  
Trial Attorney, detailed to the  
United States Attorney's Office for the  
District of Columbia  
CA Bar No. 298491  
555 Fourth Street, N.W.  
Washington, D.C. 20530  
415-307-6722  
anne.veldhuis@usdoj.gov

/s/  
Matthew R. Kachergus  
Sheppard, White, Kachergus & Demaggio,  
P.A.  
215 Washington Street  
Jacksonville, FL 32202  
904-356-9661  
mkachergus@sheppardwhite.com

/s/  
Richard Landes  
Office of Richard Landes  
736 2<sup>nd</sup> Street N.  
Jacksonville Beach, FL 33602  
904-343-4556  
rjlandes@gmail.com