

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	
	:	
<b>v.</b>	:	<b>Case No. 21-cr-512 (PLF)</b>
	:	
<b>MATTHEW THOMAS PURSE,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT STATUS REPORT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and counsel for Matthew Thomas Purse (“the defendant”), hereby submit the following Joint Status Report:

1. On August 6, 2021, the government obtained an indictment, ECF 9, charging the defendant with violations of 18 U.S.C. §§ 1512(c)(2) and 2, 1752(a)(1) and (a)(2), and 40 U.S.C. §§ 5104(e)(2)(D) and (e)(2)(G).
2. Based on negotiations between the parties, the United States extended a formal plea offer to the defendant on March 3, 2022. The defendant has not accepted the offer.
3. The United States continues to provide global discovery (i.e., discovery that is not specific to this case) to the defense.
4. The parties have continued to discuss a resolution of this case; however, the defense intends to file the motion mentioned during the March 3 status conference seeking to dismiss the indictment.
5. With the approval of this Court, the defense will file its motion on or before March 31, 2022. The United States has no objection to the March 31, 2022 filing date, and with the agreement of the defense, will file its response within 21 days from the date the

