

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

UNITED STATES OF AMERICA	:	
	:	CASE NO. 21-cr-454 (PLF)
v.	:	
	:	
ANTHONY PUMA,	:	
	:	
Defendant.	:	

JOINT STATUS REPORT

Pursuant to the Court's February 16, 2022, minute entry vacating the March 23, 2022 status conference and requesting a joint status report within 14 days after the Court issues an opinion on the defendant's motion to dismiss, Anthony Puma, through undersigned counsel, and the United States, through undersigned counsel, respectfully files this Joint Status Report to inform the Court of the following:

- 1) Government counsel and defense counsel are currently engaged in plea discussions. Specifically, the government has offered a plea to Count One of the Indictment, charging the defendant with a violation of 18 U.S.C. § 1512(c)(2), Obstruction of an Official Proceeding. The government estimates that the defendant's guideline range is 15 to 21 months.
- 2) On March 23, 2022, defense counsel requested that the government consider a plea to a misdemeanor and furnished the government with a list of comparable cases for the government to review. The government needs additional time to review those cases and discuss defense counsel's proposal with supervision.

- 3) In light of the need to allow parties to complete plea discussions, both parties request that the Court set a status conference in the month of May 2022. Both parties are available the weeks of May 9, May 16, or May 23.
- 4) The government is up to date with its discovery obligations, having produced case-specific discovery to defense counsel, as well as twelve global productions.
- 5) 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 for the reasons outlined above.

Respectfully Submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

s/Maria Jacob (with consent)
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CERTIFICATE OF SERVICE

I, Amanda Jawad, certify that on this 1st day of April 2022, I caused a copy of the foregoing Joint Status Report to be filed through the Electronic Case Filing (“ECF”), which will send a notice to all parties of record.

s/Amanda Jawad
Amanda Jawad
Assistant United States Attorney