

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

**UNITED STATES OF AMERICA** :  
 :  
 :  
 v. : **Case No. 22-cr-185**  
 :  
 **YVONNE ST CYR,** :  
 :  
 :  
 **Defendant.** :

**JOINT MOTION TO CONTINUE AND  
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Miles Pope, counsel for Yvonne St Cyr (“the defendant”), hereby submit the following Motion to Continue and to Exclude Time Under the Speedy Trial Act. The parties request to continue the status hearing currently scheduled for August 23, 2022, for a period of approximately 60 days, and to exclude the intervening time under the Speedy Trial Act. In support of the Motion, the parties represent:

1. The defendant is before the Court charged in an indictment with offenses, including: Civil Disorder, in violation of Title 18, United States Code, § 231(a)(3) and (2); Entering and Remaining in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building, in violation of Title 18, United States Code, § 1752(a)(2); Disorderly Conduct in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of Title 40, United States Code, § 5104(e)(2)(G) (ECF No. 37).
2. The government continues to provide voluminous discovery to the defense and most recently made voluminous discovery production number 17.

3. The government has extended a plea offer, and the defendant is still determining whether to accept the plea or proceed to trial.
4. The defendant is out of custody and is compliant with pre-trial release conditions.
5. The defendant concurs with the request to delay the status hearing for 60 days.
6. The parties believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to provide discovery and defendant continues to review discovery. 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).
7. Therefore, the parties request the August 23, 2022, status hearing be continued for approximately 60 days, and that there is an exclusion of time under the Speedy Trial Act from August 23, 2022, through the next scheduled hearing date.
8. The defendant concurs with this request.

Respectfully submitted,

MATTHEW M. GRAVES  
United States Attorney

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