

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

v.

[1] PHILIP C. VOGEL, II,
[2] DEBRA J. MAIMONE,

Defendants.

:
:
:
:
:
:
:
:
:
:
:

Case No. 21-CR-289 (RDM)

**JOINT STATUS REPORT AND UNOPPOSED MOTION TO
EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT**

The United States of America, through counsel, and defendants Philip C. Vogel and Debra J. Maimone, through counsel, hereby submit their September 20, 2022, Joint Status Report pursuant to the Court's July 22, 2022, Minute Entry and state as follows:

1. The defendants in this case are charged by a five-count Information with violations of 18 U.S.C. §§ 641 and 2 (Aiding and Abetting the Theft of Property—\$1,000 or Less); 18 U.S.C. § 1752(a)(1) (Entering and Remaining in a Restricted Building); 18 U.S.C. § 1752(a)(2) (Disorderly and Disruptive Conduct in a Restricted Building); 40 U.S.C. § 5104(e)(2)(D) (Violent Entry and Disorderly Conduct in a Capitol Building); 40 U.S.C. § 5104(e)(2)(G) (Parading, Demonstrating, or Picketing in a Capitol Building)

2. The Government has provided defendants with the full FBI case file of this case for each of their cases. The Government has also provided defense counsel with access to a tour of the crime scene, which has been directed by the United States Capitol Police. Defense counsel has received the discovery and are in the process of reviewing it personally and with their respective clients. At present, there are no discovery disputes that require the intervention of the Court.

3. The parties remain engaged in good faith plea negotiations with the view towards a pretrial resolution. **The parties propose to allow the parties to file a subsequent joint status report approximately sixty days from today, specifically Monday, November 21, 2022, or thereabouts.**

4. Consistent with the attached proposed Order, the government requests, and the defendants through their counsel consent to the Court excluding all time between today and the next status report from calculation under the Speedy Trial Act.

MATTHEW M. GRAVES
United States Attorney
DC Bar No. 481052

A.J. KRAMER
Federal Public Defender
District of Columbia

By:



SEAN P. MURPHY
Assistant United States Attorney
Detailee, Capitol Siege Section
D.C. Bar No. 1187821
Torre Chardon, Ste 1201
350 Carlos Chardon Ave
San Juan, PR 00918
787-766-5656
sean.murphy@usdoj.gov

/s/

ELIZABETH MULLIN
Assistant Federal Public Defender
Attorney for Debra J. Maimone
D.C. Bar No. 484020
625 Indiana Avenue NW, Ste 550
Washington, D.C. 20004
202-208-7500
elizabeth_mullin@fd.org

/s/

ALLEN H. ORENBERG
The Orenberg Law Firm, P.C.
Attorney for Philip C. Vogel, II
D.C. Bar No. 395519
12505 Park Potomac Avenue, 6th Floor
Potomac, MD 20854
301-984-8005
aorenberg@orenberglaw.com