## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

.

v. : Criminal No. 21-cr-175-4 (TJK)

:

CHARLES DONOHOE,

:

Defendant.

## JOINT STATUS REPORT

The United States of America, by and through the United States Attorney for the District of Columbia, and Defendant Charles Donohoe ("Donohoe"), by and through his counsel, respectfully file this joint status report pursuant to the Court's Order of July 11, 2022.

On April 8, 2022, Defendant Charles Donohoe appeared before this Honorable Court and entered a plea of guilty to Counts One and Six of the Second Superseding Indictment. As set forth in the Plea Agreement, Donohoe's estimated Sentencing Guidelines range is 70 – 87 months. ECF 335 at \*4. Pursuant to the terms of the Plea Agreement, Donohoe agreed to cooperate with the Office of the United States Attorney for the District of Columbia, including full, complete and truthful testimony at any future trial or court proceeding. *Id.* at \*7.

As of the date of this filing, the parties do not anticipate that Donohoe's cooperation will be complete prior to December 12, 2022. The parties hereby propose to file another joint status report on or before December 12, 2022, which status report can provide a further update on the anticipated timeline for the completion of Donohoe's cooperation. As of this filing, Donohoe remains incarcerated, and the parties do not seek any change in Donohoe's terms of confinement at this time.

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

By:

JASON B.A. MCCULLOUGH
D.C. Bar No. 998006; NY Bar No. 4544953
ERIK M. KENERSON
Ohio Bar No. 82960
NADIA E. MOORE, NY Bar No. 4826566
On Detail to the District of Columbia
Assistant United States Attorneys
601 D Street, N.W.
Washington, D.C. 20530
(202) 252-7233 //
jason.mccullough2@usdoj.gov

/s/ Gasen McCulleugh

By:

CONOR MULROE, NY Bar No. 5289640 Trial Attorney U.S. Department of Justice, Criminal Division 1301 New York Ave. NW, Suite 700 Washington, D.C. 20530

(202) 330-1788 Conor.Mulroe@usdoj.gov

/s/ Cener Mulree