

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

UNITED STATES OF AMERICA,

v.

RYAN SAMSEL,

Defendant.

)
)
) **Criminal No. 1:21-cr-00537-TJK**
)
)
)
)
)
)

JOINT STATUS REPORT

The United States of America, jointly with the undersigned counsel for Defendant Ryan Samsel, pursuant to the Court's October 29, 2021, Minute Order, provides this status report concerning Mr. Samsel's request for medical records.

The Government continues to agree that Mr. Samsel should have his medical records. Since this Court's October 28, 2021, Status Conference, Defense Counsel have been provided 107 pages of records from the Northern Neck Regional Jail. These records contain some medical information, but lack records related to Mr. Samsel's treatment by third-party providers, including after the incident that occurred at Northern Neck on October 12, 2021. And Defense Counsel have been provided with no additional medical records since October 28, 2021, despite Mr. Samsel's having received treatment both at Northern Neck as well as by third-party providers.

In addition, since October 28, 2021, Defense Counsel has been provided no additional records from any other facility to have housed Mr. Samsel since his arrest, including: The DC Correctional Treatment Facility, the Rappahannock Regional Jail, and/or the Central Virginia Regional Jail. Again of note, Defense Counsel have not been provided with records from a number of third-party providers following treatment at those facilities.

In addition, since Mr. Samsel has been at NNRJ, as well as previously in CVRJ (*see* ECF 50 at 2), he has been continuously held in 24/7 hour lockdown since 09/10/21.

The defense has compiled a list of records that have not been provided. That list is as follows:

- 03/21/21 records related to the alleged assault and any follow up records, including any treatment Mr. Samsel received from third-party providers, EMT records, and/or incident reports and related records;
- 07/15/21 CVRJ records provide a medical log note, in relevant part “lumps in chest need glandectomy... Records received.” (page 34 of 42 pages) To date, those records have not been provided;
- 07/27/21 CVRJ records provide a medical log note “was seen at RRJ and referred to vascular surgery...” (page 38 of 42 pages). To date, RRJ records have not been provided;
- 08/19/21 CVRJ records reference Mr. Samsel having had an electromyography. To date, any records evidencing the same have not been provided;
- 09/15/21 records related to the incident with correctional officers and any follow up records, including any treatment Mr. Samsel received from third-party providers, EMT records, and/or incident reports and related records;
 - There is a log note dated 09/22/21 that provides: “Inmate returned from the hospital after being sent for a synocopal episode. Discharge notes a likely concussion from a previous injury. EKG and Glucose are normal. CT Head shows no [fracture] or bleeding in the brain. Copy of CT scan attached...” To date, the records referenced in this note (or any other records related to this treatment) have not been provided;
- 09/23/21 CVRJ records reference Mr. Samsel having had an MRI. To date any records evidencing the same have not been provided;
- 09/23/21 CVRJ records reference a transport for a Mammogram at the Breast Care Center and a comment regarding Bilateral gynecomastia as benign. These records appear to be provided in part;
- 09/28/21 CVRJ records reference a transport for Mr. Samsel to receive a Physical Therapy Consult at Spectrum Physical Therapy. To date, no physical therapy records have been provided and Defense Counsel understand that Mr. Samsel was not permitted to retain documentation of the recommended physical therapy exercises;
- 08/05/21 CVRJ records reference Mr. Samsel having undergone a Venogram. To date any records evidencing the same have not been provided;

- 10/12/21 records related to the alleged assault and any follow up records, including any treatment Mr. Samsel received from third-party providers, EMT records, and/or incident reports and related records;
 - Of note, there is a 10/13/21 Nursing Progress Log Note, which provides: “dried blood on face,” “from the right ear down the jawline,”... “two hematomas on/ the left side of the inmate’s face around the eye are visible”... “heavy swelling with bruising across the back of hand and wrist,...” “I called Dr. Dudley on the incident, giving him all the information stated above. He stated, Transportation can take him, EMS is not needed for this incident. ... to take him to VCU Tappahannock Emergency Department;”
 - However, 10/13/21 Discharge Records from VCU Tappahannock are only provided in limited part, which reflect: “*Concussion/ head injury*” and “nondisplaced fracture through the posterior aspect of the superior left orbital wall and a right inferior orbital blowout fracture appears chronic” and “clinical indication: injury or trauma; sprain or strain and swelling (edema); wrist; Right; Injury details; Assaulted.” These records reflect only a summary of tests, including a CT of the Head, Facial Bones and Cervical Spine, but, to date, complete records for this treatment have not been provided; and
- 11/04/21 records related to an EEG Mr. Samsel received have yet to be provided.

[SIGNATURE ON NEXT PAGE]

Dated: November 8, 2021

Respectfully submitted,

/s/ April Nicole Russo

April Nicole Russo (PA 313475)
Assistant United States Attorney
555 Fourth Street, NW
Washington, DC 20530
(202) 252-1717
april.russo@usdoj.gov

/s/ Stanley E. Woodward, Jr.

Stanley E. Woodward, Jr. (DC 997320)
BRAND WOODWARD LAW, LP
1808 Park Road NW
Washington, DC 20010
202-996-7447 (telephone)
202-996-0113 (facsimile)
Stanley@BrandWoodwardLaw.com

/s/ Danielle Rosborough

Danielle Rosborough (DC 1016234)
Trial Attorney, National Security Division
United States Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530
202-514-0073
Danielle.Rosborough@usdoj.gov

/s/ Juli Z. Haller

Juli Z. Haller, (DC 466921)
The Law Offices of Julia Haller
601 Pennsylvania Avenue, N.W., Suite 900
Washington, DC 20004
Telephone: (202) 729-2201
HallerJulia@outlook.com

Counsel for the United States of America

Counsel for Defendant Ryan Samsel

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
UNITED STATES OF AMERICA,)	
)	Criminal No. 1:21-cr-00537-TJK
v.)	
)	
RYAN SAMSEL,)	
)	
Defendant.)	
_____)	

CERTIFICATE OF SERVICE

On November 8, 2021, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which will automatically send electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.
Stanley E. Woodward, Jr. (D.C. Bar No. 997320)
BRAND WOODWARD LAW, LP
1808 Park Road NW
Washington, DC 20010
202-996-7447 (telephone)
202-996-0113 (facsimile)
Stanley@BrandWoodwardLaw.com

Counsel for Defendant Ryan Samsel