UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA

:

v. : Case No. 21-cr-147-1 (CKK)

.

CHRISTOPHER RAPHAEL SPENCER,

:

Defendant. :

JOINT STATUS REPORT AND MOTION TO CONTINUE STATUS CONFERENCE

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Jose German, counsel for Christopher Raphael Spencer ("the defendant"), hereby submit the following Joint Status Report. The parties also respectfully move the Court to continue the Status Conference currently scheduled for March 21, 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: Obstruction of an Official Proceeding, in violation of Title 18, United States Code, § 1512(c)(2) 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. 14).
- 2. Defense is still reviewing the voluminous discovery provided in the matter.

- 3. Following review of the discovery, it is expected the parties will engage in discussions to resolve the matter short of trial.
- 4. The parties believe it is in the interest of justice to toll the Speedy Trial Act while the government continues to provide discovery and the parties discuss resolving the matter. 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), as well as 18 U.S.C. § 3161(h)(1)(G).
- 5. Therefore, the parties request the March 21, 2022 Status Conference be continued for approximately 60 days, and that there is an exclusion of time under the Speedy Trial Act from March 21, 2022, through the next scheduled Status Conference.
- 6. The defendant is out of custody.
- 7. The defendant concurs with this request.

Respectfully submitted,

MATTHEW M. GRAVES United States Attorney

By:

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