



Conduct in a Capitol Building; and 7) 40 U.S.C. § 5104(d), Stepping, Climbing, Removing, or Injuring Property on the Capitol Grounds.

2. The government alleges that Mr. Faulkner damaged a particular window on the exterior of the U.S. Capitol. Despite the fact the window is on the exterior of the U.S. Capitol, upon information provided by the government, the allegedly damaged window is not in an area that can be accessed by the general public. Accordingly, to see the damage, counsel is required to take a guided tour while Congress is not in session coordinated through the U.S. Attorney's Office in order to visit the crime scene of the U.S. Capitol.

3. The U.S. Attorney's Office has set its next tour for August 14, 2021. Arrangements are still being finalized, but the government is attempting to allow for counsel to see the damaged window both from the inside and the outside.<sup>1</sup>

4. It is expected that viewing the scene will be helpful to the parties for further plea negotiations and/or trial preparation. The parties are still hopeful that a plea agreement can be reached. Mr. Faulkner agrees to exclude the time from now

---

<sup>1</sup> Undersigned counsel was able to take one of the guided tours of the U.S. Capitol in May of 2021. However, at the time, the U.S. Attorney's Office and/or the tour coordinators were unable to identify the specific damaged window at issue. This window at issue has been identified from discovery as window "S1CR4S." The only window that appeared to be damaged in the area (using the best educated guess that undersigned counsel could make given the limited information available) had a giant piece of plywood covered the exterior view, and the interior appeared to be in a locked office that was not accessible during the tour. It is counsel's understanding that the government is attempting to make arrangements to identify the window in dispute and to provide counsel access to the interior and exterior view of said window (hopefully without obstructions).

until the next status date under the Speedy Trial Act.

5. Accordingly, Troy Faulkner respectfully requests for the status hearing to be continued for approximately forty-five (45) days.

6. Defendant has spoken to AUSA Emory Cole who indicates that the government does not oppose this motion.

WHEREFORE, Defendant Troy Faulkner requests for the status in this matter to be continued for forty-five (45) days.

Respectfully submitted,

TROY FAULKNER  
By Counsel

          /s/ John L. Machado  
John L. Machado, Esq.  
Bar No. 449961  
Counsel for Troy Faulkner  
503 D Street, N.W., Suite 310  
Washington, DC 20001  
Telephone: (703) 989-0840  
E-mail: [johnlmachado@gmail.com](mailto:johnlmachado@gmail.com)

**Certificate of Service**

I hereby certify that a true copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system this 2nd day of August, 2021, which will send a notification of such filing (NEF) to the following to all counsel of record.

          /s/John L. Machado  
John L. Machado, Esq.  
Bar Number 449961  
Attorney for Troy Faulkner  
Law Office of John Machado  
503 D Street NW, Suite 310  
Washington, D.C. 20001  
Telephone (703)989-0840  
Email: johnlmachado@gmail.com