

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

UNITED STATES OF AMERICA

v.

STEVE OMAR MALDONADO,

Defendant

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CASE. NO. 21-CR-176-CJN

**JOINT MOTION FOR CONTINUANCE
AND JOINT STATUS REPORT**

The United States, by and through its attorney, the United States Attorney for the District of Columbia, and Defendant, by and through his attorney, Elizabeth Mullin (collectively, “the Parties”), respectfully request a 30-day continuance of this matter and also submit a joint status report, and state as follows:

1. On March 3, 2021, the defendant, Steve Omar Maldonado, was charged by way of indictment with (Count One) Obstruction of an Official Proceeding and Aiding and Abetting in violation of Title 18 U.S.C. §§ 1512(c)(2), 2; (Count Two) Entering and Remaining in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(1); (Count Three) Disorderly and Disruptive Conduct in a Restricted Building or Grounds in violation of Title 18 U.S.C. § 1752(a)(2); (Count Four) Entering and Remaining in the Gallery of Congress in violation of Title 40 U.S.C. § 5104(e)(2)(B); (Count Five) Disorderly Conduct in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(D); and (Count Six) Parading Demonstrating, or Picketing in a Capitol Building in violation of Title 40 U.S.C. § 5104(e)(2)(G). ECF 9.

2. The defendant has been out on bond since his arrest on February 12, 2021. Defendant remains compliant with conditions of release.

3. Since the defendant's arraignment on March 15, 2021, the Court has (collectively) ordered the exclusion of time from Speedy Trial calculations through May 6, 2022. The Court has also ordered a status hearing on May 6, 2022, at 4:00pm.

4. Since March 7, 2022, the filing of the most recent status report, defense counsel has been advised that the following items among others, have been produced (under Global Productions 12 and 13) to the defense Relativity workspace: over 250 FBI interviews of Capitol and Metropolitan Police officers and associated exhibits (889 files total); 3 search warrants and related materials for 63 Facebook accounts; 2 search warrants and related materials for Google account subscriber information and location data from the Capitol and restricted perimeter; an application and related orders for basic subscriber information and call records for devices present within the Capitol on January 6, 2021; a search warrant and related Facebook materials for accounts associated with 2,087 advertising identifiers; 10 search warrants and related materials for anonymized location data collected by ten data aggregation companies; 6 search warrants and related materials pertaining for cell tower data from Verizon, AT&T, and T-Mobile/Sprint; video footage from a French news agency; several MPD files regarding arrest paperwork, BOLO material and tips; and several USCP files regarding emails, prisoner processing, event chronology and abandoned property. Defense counsel has access to this defense Relativity workspace via her own office, the Federal Public Defender's (FPD's) office in DC. Through her office, defense counsel also has access to evidence.com to access voluminous video files. Note, pursuant to protective order in this case (ECF 16), parties remain complaint with discovery designated as Sensitive or Highly Sensitive.

5. Additionally, since the last filing, Federal Public Defender Elizabeth Mullin has

replaced Shelli Peterson in representing the defendant. Given Ms. Mullin will need time to review discovery and learn the particulars of this case, defense counsel requests a 30-day continuance.

6. Parties are agreed to a 30-day continuance of this matter and to excluding the time within which the trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq. Parties have begun plea negotiations and believe this time will allow for further production and review of discovery and will facilitate resolution of this case short of trial.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney
D.C. Bar No. 481052

/s/

GRACIELA R. LINDBERG
Assistant United States Attorney
Texas Bar No. 00797963
11204 McPherson Road, Suite 100A
Laredo, Texas 78045-6576
956-754-9350
graciela.lindberg@usdoj.gov

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

Elizabeth Mullin
Assistant Federal Public Defender DC
625 Indiana Avenue, N.W., Suite 500
Washington, D.C. 20004
(202) 208-7500
Elizabeth_Mullin@fd.org