

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

**UNITED STATES OF AMERICA**

v.

**JONATHANPETER ALLEN KLEIN and  
MATTHEW LELAND KLEIN,**

**Defendants.**

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**Case No. 21-CR-237 (RDM)**

**JOINT STATUS REPORT**

The United States of America, by and through its attorney the United States Attorney for the District of Columbia, defendant Jonathanpeter Allen Klein, by and through his attorney Michelle M. Sweet, Esq., and defendant Matthew Leland Klein, by and through his attorney Eugene Gorokhov, Esq., provide this Joint Status Report to the Court.

1. On January 25, 2023, upon consideration of the parties' Joint Status Report filed the same day, Doc. 139, the Court directed the parties to file a further joint status report on or before April 27, 2023. The Court also tolled the defendants' Speedy Trial rights in the interest of justice from January 27, 2023 until April 27, 2023.

2. Since filing the last Joint Status Report, the government has continued to provide global discovery to the defendants in the Capitol Riot related cases.

3. It is the government's position that, at present, the case specific materials discoverable at this time have been tendered and/or made available to the defendants. The government will continue to produce such items as they become available.

4. The parties require additional time to discuss a potential resolution of this matter short of trial.

5. In addition, given the volume of discovery that has been and is expected to be produced, the defendants need additional time to meaningfully review such discovery and determine how best to proceed in this matter, including making decisions regarding the filing of pretrial motions.

6. This case was recently reassigned to the undersigned Assistant U.S. Attorney, who appeared in this matter on January 25, 2023. Government counsel requires additional time to meaningfully engage in plea negotiations with the defendants.

7. The parties request that the Court set this matter for an additional Joint Status Report to be filed on or before July 26, 2023, by 12:00 p.m.

8. The parties agree that time should be excluded under the Speedy Trial Act from April 27, 2023 through July 26, 2023, in the interests of justice for the reasons previously provided by the Court.

9. Neither defendant is in pretrial custody and this request for additional time is not made for the purposes of causing unnecessary delay.

10. The undersigned Assistant U.S. Attorney has received permission from counsel for both defendants to file this Joint Status Report.

Respectfully submitted,

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DC Bar No. 481052

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