

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

<b>UNITED STATES OF AMERICA</b>	:	
	:	<b>CASE NO. 1:21-cr-454-PLF</b>
<b>v.</b>	:	
	:	
<b>ANTHONY PUMA,</b>	:	
	:	
<b>Defendant.</b>	:	

**JOINT MOTION TO VACATE STATUS HEARING, TO SCHEDULE PLEA HEARING,  
AND TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, by and through his counsel, respectfully move this Court to vacate the status hearing currently scheduled for June 29, 2022 and schedule a plea hearing for August 30, 2022, and to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) from June 29, 2022 until August 30, 2022. In support of this motion, the government states as follows:

1. The defendant was charged by criminal complaint on May 25, 2021, on charges of Obstruction of an Official Proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) & 2; Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority, in violation of 18 U.S.C. § 1752(a)(1); Knowingly Engaging in Disorderly or Disruptive Conduct in any Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2); Violent Entry and Disorderly Conduct on Capitol Grounds, in violation of 40 U.S.C. § 5104(e)(2)(D); and Willfully and Knowingly Parading, Demonstrating, or Picketing in any of the Capitol Buildings, in violation of 40 U.S.C. § 5104(e)(2)(G). The defendant was indicted on the same charges on July 7, 2021.

2. The government has engaged in a substantial production of discovery, including FBI records, electronic device and search warrant records, and video footage. The parties have

also engaged in substantial discussions regarding possible resolutions short of trial. On June 27, 2022, counsel for the defendant informed counsel for the government that the defendant wishes to accept a plea offer made by the government. Accordingly, the parties anticipate that the defendant will enter into a plea agreement with the government.

3. The parties respectfully request that the status hearing in this case currently scheduled for June 29, 2022, be vacated, and that a plea hearing be scheduled on August 30, 2022, subject to the Court's continued availability on that date.

4. The government further moves, pursuant to 18 U.S.C. § 3161(h)(7)(A), to exclude time under the Speedy Trial Act in the interests of justice from June 29, 2022 until August 30, 2022. This additional period is necessary to allow the government to revise and finalize the plea paperwork; to allow the defendant to review and execute the plea agreement; and to allow the defendant's counsel to prepare the defendant for the plea colloquy. Therefore, the government respectfully submits that the ends of justice served by such exclusion would outweigh the best interest of the public and the defendant in a speedy trial.

5. Counsel for the government has conferred with defense counsel regarding this motion. I am authorized to state that the defendant joins the motion and waives his rights under the Speedy Trial Act.

WHEREFORE, the government and the defendant respectfully move that the status hearing in this case currently scheduled for June 29, 2022 be vacated; that a plea hearing be scheduled on August 30, 2022, subject to the Court's continued availability on that date; and that the time from June 29, 2022 until August 30, 2022 be excluded from computation under the Speedy Trial Act.

June 28, 2022

Respectfully submitted,

MATTHEW M. GRAVES  
UNITED STATES ATTORNEY  
D.C. Bar No. 481052

By: /s/ Francesco Valentini  
Francesco Valentini  
D.C. Bar No. 986769  
Trial Attorney  
United States Department of Justice, Criminal Division  
Detailed to the D.C. United States Attorney's Office  
601 D Street NW  
Washington, D.C. 20530  
(202) 598-2337  
francesco.valentini@usdoj.gov