

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. 21-cr-589-RDM
	:	
JOSEPH IRWIN and	:	
JOHN JOSEPH RICHTER,	:	
	:	
Defendants.	:	

JOINT STATUS REPORT

This Joint Status Report is filed pursuant to the Court's oral order entered during the arraignment held on April 3, 2023 (*see* Docket 4/3/23). The parties submit the following status report for the Court's consideration:

1. John Joseph Richter was first charged by complaint on February 17, 2023 (*see* Case No. 1:23-mj-038-MAU);
2. On March 2, 2023, the grand jury returned a Third Superseding Indictment charging both Joseph Irwin and Mr. Richter with violations of 18 U.S.C. §§1512(c)(2), 1752(a)(1), 1752(a)(2), and 40 U.S.C. §§5104(e)(2)(A), 5104 (e)(2)(D), 5104(e)(2)(G) (ECF No. 54);
3. After the arraignment, counsel for Mr. Richter filed a notice of discovery demand & *Brady* letter (ECF No. 59);
4. On April 9, 2023, the government filed an unopposed motion for a protective order as to Mr. Richter (ECF No. 60), and the Court entered that protective order on April 11, 2023 (ECF No. 61);
5. On or about April 14, 2023, Mr. Richter's counsel received voluminous discovery from the government;

6. During the week of April 24, 2023, Mr. Richter's counsel flew to Florida to meet with Mr. Richter in person, discuss the case, review discovery and answer questions;
7. Mr. Richter and his counsel need additional time beyond the current trial date of August 14, 2023, in order to:
 - a. Continue the process of reviewing the discovery;
 - b. Conduct additional investigation;
 - c. Perform additional legal research;
 - d. Obtain various records and evidence;
 - e. Meet with government counsel to discuss all aspects of the case including potential plea offers as well as discovery, potential stipulations and other trial concerns; and
 - f. Conduct additional attorney-client meetings to discuss all aspects of this case;
8. For these reasons, Mr. Richter anticipates filing a motion to continue the August 14, 2023, trial date.

DATED: May 12, 2023

Respectfully submitted,

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

By: /s/ Ashley Akers
ASHLEY AKERS
Trial Attorney
U.S. Department of Justice
Detailed to the D.C. U.S. Attorney's Office
601 D Street, N.W.
Washington, D.C. 20530
Tel: (202) 353-0521
Email: Ashley.Akers@usdoj.gov

/s/ Chastity R. Beyl
CHASTITY R. BEYL

/s/ Aaron Dyke
AARON DYKE
Western Ky Federal Community Defender
200 Theatre Building
629 Fourth Avenue
Louisville, Kentucky 40202
Tel: (502) 584-0525
Counsel for Defendant Joseph Irwin.

s/ Matthew Campbell
Federal Public Defender
Office of the Federal Public Defender
1336 Beltjen Rd., Suite 202
St. Thomas, USVI 00802
Tel: (340) 774-4449
Email: Matt_Campbell@fd.org
Counsel for Defendant John Joseph Richter