

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

UNITED STATES OF AMERICA	:	
	:	
v.	:	CASE NO. 21-cr-722 (TFH)
	:	
RAFAEL RONDON, and	:	
	:	
MARYANN MOONEY-RONDON,	:	
	:	
Defendants.	:	

**UNOPPOSED MOTION TO CONTINUE STATUS HEARING
AND TO EXCLUDE TIME UNDER SPEEDY TRIAL ACT**

The United States of America, by and through the United States Attorney for the District of Columbia, respectfully moves this Court to continue the status hearing currently scheduled for April 20, 2022 for approximately 60 days until on or about June 20, 2022, and to exclude time under the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(7)(A) from April 20, 2022 until the date of the next status hearing in this case. In support whereof, the government states as follows:

1. The defendants were charged by criminal complaint on September 2, 2021, on charges of Theft of Government Property, in violation of 18 U.S.C. §§ 641 & 2; Obstruction of an Official Proceeding, in violation of 18 U.S.C. § 1512(c)(2); Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2); Entering and Remaining in the Gallery of Congress, in violation of 40 U.S.C. § 5104(e)(2)(B); Entering and Remaining in Certain Rooms in the Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(C); and Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D). They were arrested on October 1, 2021. On December 8, 2021, the defendants were indicted on counts of Obstruction of an Official Proceeding, in violation of 18 U.S.C. §§ 1512(c)(2) & 2; two counts

of Theft of Government Property, in violation of 18 U.S.C. § 641 & 2; Entering and Remaining in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(1); Disorderly and Disruptive Conduct in a Restricted Building or Grounds, in violation of 18 U.S.C. § 1752(a)(2); Entering and Remaining in the Gallery of Congress, in violation of 40 U.S.C. § 5104(e)(2)(B); Entering and Remaining in Certain Rooms in the Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(C); Disorderly Conduct in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(D); and Parading, Demonstrating, or Picketing in a Capitol Building, in violation of 40 U.S.C. § 5104(e)(2)(G).

2. The government has produced a substantial volume of defendant-specific discovery, including several hours of audio recordings of the defendants' voluntary interviews, search warrant returns, and the FBI case file. The government is in the process of producing forensic images of the defendants' seized electronic devices. In addition, the parties have engaged in preliminary discussions regarding possible resolutions of the case short of trial.

3. The parties respectfully request a continuance of approximately 60 days, until on or about June 20, 2022, to facilitate the discovery process and plea discussions between the parties.

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 April 20, 2022 until the date of the next status hearing in this case, to be determined by the Court. This additional period is necessary to allow the defendants to fully review the discovery in the case, and to allow the parties to engage in discussions regarding possible resolutions of the case. Therefore, the government respectfully submits that the ends of justice served by such exclusion would outweigh the best interest of the public and the defendants in a speedy trial.

5. Counsel for the government has conferred with defense counsel for both defendants regarding this motion. The defendants do not oppose the motion to continue the status hearing or to exclude time under the Speedy Trial Act.

WHEREFORE, the government respectfully moves that the status hearing in this case currently scheduled for April 20, 2022 be continued for approximately 60 days until on or about June 20, 2022, and that the time from April 20, 2022 until the date of the next status hearing in this case be excluded from computation under the Speedy Trial Act.

Respectfully submitted,

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