

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

CASE NO.: 21-CR-703-RDM

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO CESAR CHANG,

Defendant.

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**JOINT STATUS REPORT**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the Defendant, Julio Cesar Chang, by and through undersigned counsel, now submit this Joint Status Report, requested by the Court at the last status hearing on April 8, 2022.

1. Since the last hearing, the Government has produced case-specific discovery and has made all prior global production available to undersigned counsel via Relativity and Evidence.com.
2. Additionally, several video uploads were made to the database disclosed to undersigned counsel in global discovery from April 11, 2022, through May 9, 2022.
3. Over 46,000 files have been uploaded to the Relativity database and over 24,000 video files have been disclosed through production in this matter.
4. Undersigned counsel has thoroughly reviewed discovery but requires additional time due to the voluminous amount provided.
5. The Government and undersigned counsel have engaged in several discussions regarding a plea in this matter and will continue to confer for a possible resolution.

6. Given the additional discovery recently produced and possible re-entry into plea negotiations, the parties ask for an additional 60 days to work towards a resolution in this matter.
7. The parties agree that due to outstanding discovery and ongoing plea negotiations, the ends of justice would be served by the exclusion of time under The Speedy Trial Act until the next filing before this Court on August 3, 2022. Mr. Chang waives his rights under The Speedy Trial Act and agrees to the exclusion of time for the period from today's status report through August 3, 2022.

WHEREFORE, the parties ask for leave to submit another joint status report on August 3, 2022. If the parties have reached a decision regarding disposition of this matter, the parties will file prior to this date.

Dated: June 2, 2022

Respectfully submitted,

By: /s/ Joseph S. Rosenbaum  
Joseph S. Rosenbaum, Esq.  
Florida Bar No. 240206

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