

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.

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 June 2, 2022.

1. Since the last hearing, the Government has produced an additional global production available to undersigned counsel via Relativity and Evidence.com.
2. Additionally, on June 15, 2022, 12 files consisting of approximately 30 hours of Metropolitan Police Department (“MPD”) Closed Circuit Television (“CCTV”) footage recorded by 2 cameras between the hours of 10:00 a.m. on January 6, 2021, and 2:00 a.m. on January 7, 2021, were shared to the defense by way of evidence.com.
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 also reviewed the materials produced at the Congressional Hearings regarding January 6th as to videos and the timeline of the events of that day which may assist in the defense of Mr. Chang.

5. Undersigned counsel has also just received voluminous medical records of Mr. Chang that will also assist in the defense of Mr. Chang.
6. Undersigned counsel has thoroughly reviewed the discovery but requires additional time due to the voluminous amount provided.
7. 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. Counsel are in the process of scheduling an in person conference to resolve some issues in this case.
8. Given the additional discovery recently produced and possible re-entry into plea negotiations, the parties ask for an additional 90 days to work towards a resolution in this matter.
9. 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 deadline before this Court. 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 the next scheduled Status Report set by this Honorable Court.

WHEREFORE, the parties ask for leave to submit another joint status report in 90 days from August 3, 2022. If the parties have reached a decision regarding disposition of this matter, the parties will file prior to this date.

Dated: August 2, 2022

Respectfully submitted,

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

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