



**U.S. Department of Justice**

*United States Attorney  
District of Maryland*

Leo J. Wise  
Assistant United States Attorney  
Leo.Wise@usdoj.gov

Suite 400  
36 S. Charles Street  
Baltimore, MD 21201-3119

DIRECT: 410-209-4909  
MAIN: 410-209-4800  
FAX: 410-962-3091

March 28, 2017

The Honorable James K. Bredar  
United States District Court for the District of Maryland  
101 West Lombard Street  
Baltimore, Maryland 21201

Re: *United States v. Gondo, et al.* Cr. No. JKB 17-206

Dear Judge Bredar

The Government submits this letter in response to the Court's Order of March 23, 2017 (Document Number 102). As directed by the Court, the Government writes to provide the Court with (1) the status of the case, specific to each defendant, and (2) the Government's projection as to when this case will be ready for an in-court scheduling conference.

As to the status of the case, specific to each defendant, all defendants have made initial appearances on the indictment and all defendants but Defendant Jenkins have been arraigned on the indictment. Counsel for Defendant Jenkins and the undersigned are in discussions to determine a date for an arraignment of Defendant Jenkins. All defendants have been detained pending trial. Counsel for all defendants have executed discovery agreements and discovery has been provided to all defendants.

As to the Government's projection as to when this case will be ready for an in-court scheduling conference, the Government requests that it be allowed to provide the Court with a status update in 60 days as to the posture of the case. The Government is currently meeting with and in on-going discussions with defense counsel concerning discovery, including assisting defense counsel with any technical issues they may have accessing the discovery, and concerning the facts uncovered in the course of the investigation and contained in the discovery. These discussions are being held in order to determine whether defendants will resolve their cases through guilty pleas or will proceed to trial.


At their initial appearances, all defendants sought and received appointment of counsel from the Criminal Justice Act Panel. Since that time, Defendants Gondo, Hendrix, Hersl and Jenkins retained counsel. As a result, not all defense counsel have had the same amount of time within which to review discovery and assess the facts obtained in the course of the investigation.

In addition, the Government is currently in plea negotiations with multiple defendants. Plea negotiations began in this case on March 5, 2017 following the arrests of all defendants on March 1, 2017.

An additional 60 days will allow discussions between the Government and counsel for all Defendants, including plea negotiations, to continue.

Very truly yours,

Rod J. Rosenstein  
United States Attorney

By:   
Leo J. Wise  
Derek E. Hines  
Assistant United States Attorneys

cc: all counsel of record (via ECF)