

TODD BLANCHE  
Deputy Attorney General  
BILAL A. ESSAYLI  
First Assistant United States Attorney  
ALEXANDER B. SCHWAB  
Assistant United States Attorney  
Acting Chief, Criminal Division  
IAN V. YANNIELLO (Cal. Bar No. 265481)  
GREGORY W. STAPLES (Cal. Bar No. 155505)  
DANIEL H. WEINER (Cal. Bar No. 329025)  
Assistant United States Attorneys  
1400/1500 United States Courthouse  
312 North Spring Street  
Los Angeles, California 90012  
Telephone: (213) 894-3667/3535/0813  
Facsimile: (213) 894-0142  
E-mail: ian.yanniello@usdoj.gov  
greg.staples@usdoj.gov  
daniel.weiner@usdoj.gov

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

DURK BANKS, et al.,

Defendants.

No. CR 24-621(B)-MWF

STIPULATION REGARDING REQUEST FOR  
(1) CONTINUANCE OF TRIAL DATE AND  
(2) FINDINGS OF EXCLUDABLE TIME  
PERIODS PURSUANT TO SPEEDY TRIAL  
ACT

**CURRENT TRIAL DATE:** 01/20/2026  
**PROPOSED TRIAL DATE:** 05/04/2026

Plaintiff United States of America, and defendant DEANDRE  
DONTRELL WILSON ("defendant WILSON"), both individually and by and  
through his counsel of record, Craig A. Harbaugh; defendant DAVID  
BRIAN LINDSEY ("defendant LINDSEY"), both individually and by and  
through his counsel of record, Robert A. Jones and Tillet J. Mills;  
and defendant ASA HOUSTON ("defendant HOUSTON"), both individually

1 and by and through his counsel of record, Shaffy Moeel, ("the  
2 Stipulating Defendants"), hereby stipulate as follows:

3 1. The First Superseding Indictment in this case was filed on  
4 November 7, 2024. Defendant DURK BANKS ("defendant BANKS") first  
5 appeared before a judicial officer of the court in which the charges  
6 in this case were pending on November 14, 2024. The Speedy Trial  
7 Act, 18 U.S.C. § 3161, originally required that the trial commence on  
8 or before January 23, 2025. Defendant WILSON first appeared before a  
9 judicial officer of the court in which the charges in this case were  
10 pending on November 15, 2024. The Speedy Trial Act, 18 U.S.C.  
11 § 3161, originally required that the trial commence on or before  
12 January 24, 2025. Defendant HOUSTON first appeared before a judicial  
13 officer of the court in which the charges in this case were pending  
14 on November 21, 2024. The Speedy Trial Act, 18 U.S.C. § 3161,  
15 originally required that the trial commence on or before January 30,  
16 2025. Defendant LINDSEY first appeared before a judicial officer of  
17 the court in which the charges in this case were pending on November  
18 22, 2024. The Speedy Trial Act, 18 U.S.C. § 3161, originally  
19 required that the trial commence on or before January 31, 2025.

20 2. On November 14, 2024, for defendant BANKS, the Court set a  
21 trial date of January 7, 2025. On November 15, 2024, for defendant  
22 WILSON, the Court set a trial date of January 7, 2025. On November  
23 21, 2024, for defendant HOUSTON, the Court set a trial date of  
24 January 14, 2025. On November 22, 2024, for defendant LINDSEY, the  
25 Court set a trial date of January 14, 2025.

26 3. On January 2, 2025, the Court continued the trial date to  
27 October 14, 2025 for all defendants and made relevant excludable time  
28 findings under the Speedy Trial Act.

1           4.     The Second Superseding Indictment was filed as to all  
2 defendants on May 1, 2025. On September 17, 2025, the Court  
3 continued the trial date to January 20, 2026 and made relevant  
4 excludable time findings under the Speedy Trial Act.

5           5.     All defendants are detained pending trial. The government  
6 estimates that its case-in-chief will last approximately two to three  
7 weeks. All defendants are joined for trial and a severance has not  
8 been granted.

9           6.     By this stipulation, the Stipulating Defendants move to  
10 continue the trial date to May 4, 2026. Additionally, the parties<sup>1</sup>  
11 move to set the following pretrial schedule:

12               a.     Defendants' reciprocal discovery deadline: March 9,  
13 2026

14               b.     Motions *in limine*, including motions regarding  
15 experts:

16                     i.     Motions due: March 16, 2026

17                     ii.    Oppositions due: March 30, 2026

18                     iii.   Optional replies due: April 6, 2026

19                     iv.   Hearing date/pretrial conference: April 13, 2026

20           7.     This is the third request for a continuance.

21           8.     The Stipulating Defendants request the continuance based  
22 upon the following facts, which the parties believe demonstrate good  
23 cause to support the appropriate findings under the Speedy Trial Act:

24               a.     All defendants are charged with violations of 18  
25 U.S.C. § 1958(a): Conspiracy and Use of Interstate Facilities to  
26

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27           <sup>1</sup> The parties, including counsel for defendant BANKS, met and  
28 conferred regarding the proposed briefing schedule and deadlines set  
forth below.

1 Commit Murder-For-Hire Resulting in Death; 18 U.S.C.  
2 §§ 2261A(2) (A), (B), 2261(b) (1): Stalking Resulting in Death; and 18  
3 U.S.C. §§ 924(c) (1) (A) (iii), (c) (1) (B) (ii), (j) (1): Use, Carry, and  
4 Discharge of Firearms and Machinegun, and Possession of Such  
5 Firearms, in Furtherance of a Crime of Violence, Resulting in Death.  
6 Discovery in this case includes, among other things, hundreds of  
7 gigabytes of digital evidence such as audio/video recordings,  
8 surveillance footage, and extractions of digital devices; and over  
9 30,000 pages of records and reports concerning murder and other  
10 violent acts, photographs, witness statements, and medical documents.

11           b. Due to the nature of the prosecution and the number of  
12 defendants, including the charges in the indictment and the  
13 voluminous discovery, this case is so unusual and so complex that it  
14 is unreasonable to expect adequate preparation for pretrial  
15 proceedings or for the trial itself within the Speedy Trial Act time  
16 limits.

17           c. Defense counsel represent that they have various  
18 substantive obligations which necessitate the continuance of the  
19 trial to May 4, 2026. The list of obligations for defense counsel is  
20 attached hereto as Appendix A and is incorporated as if fully set  
21 forth herein.

22           d. In light of the foregoing, counsel for the Stipulating  
23 Defendants also represent that additional time is necessary to confer  
24 with defendants, conduct and complete an independent investigation of  
25 the case, conduct and complete additional legal research including  
26 for potential pre-trial motions, review the discovery and potential  
27 evidence in the case, and prepare for trial in the event that a  
28 pretrial resolution does not occur. Defense counsel represent that

1 failure to grant the continuance would deny them reasonable time  
2 necessary for effective preparation, taking into account the exercise  
3 of due diligence.

4 e. The Stipulating Defendants believe that failure to  
5 grant the continuance will deny them continuity of counsel and  
6 adequate representation.

7 f. The government does not object to the continuance.

8 g. The requested continuance is not based on congestion  
9 of the Court's calendar, lack of diligent preparation on the part of  
10 the attorney for the government or the defense, or failure on the  
11 part of the attorney for the Government to obtain available  
12 witnesses.

13 9. For purposes of computing the date under the Speedy Trial  
14 Act by which defendants' trial must commence, the parties agree that  
15 the time period from the date this stipulation is filed to May 4,  
16 2026, inclusive, should be excluded pursuant to 18 U.S.C.  
17 §§ 3161(h)(7)(A), (h)(7)(B)(i), (h)(7)(B)(ii) and (h)(7)(B)(iv)  
18 because the delay results from a continuance granted by the Court at  
19 defendants' request, without government objection, on the basis of  
20 the Court's finding that: (i) the ends of justice served by the  
21 continuance outweigh the best interest of the public and defendant in  
22 a speedy trial; (ii) failure to grant the continuance would be likely  
23 to make a continuation of the proceeding impossible, or result in a  
24 miscarriage of justice; (iii) the case is so unusual and so complex,  
25 due to the nature of the prosecution and the number of defendants  
26 that it is unreasonable to expect preparation for pre-trial  
27 proceedings or for the trial itself within the time limits  
28 established by the Speedy Trial Act; and (iv) failure to grant the

1 continuance would unreasonably deny defendant continuity of counsel  
2 and would deny defense counsel the reasonable time necessary for  
3 effective preparation, taking into account the exercise of due  
4 diligence.

5 10. Defendant BANKS does not join in the stipulation to  
6 continue the trial in this matter. Nonetheless, the stipulating  
7 parties agree that, pursuant to 18 U.S.C. § 3161(h)(6), the time  
8 period from the date the stipulation is filed to May 4, 2026,  
9 inclusive, constitutes a reasonable period of delay for defendant  
10 BANKS, who is joined for trial with codefendants as to whom the time  
11 for trial has not run and no motion for severance has been granted.

12 ///

13 ///

1 11. Nothing in this stipulation shall preclude a finding that  
2 other provisions of the Speedy Trial Act dictate that additional time  
3 periods be excluded from the period within which trial must commence.  
4 Moreover, the same provisions and/or other provisions of the Speedy  
5 Trial Act may in the future authorize the exclusion of additional  
6 time periods from the period within which trial must commence.

7 IT IS SO STIPULATED.

8 Dated: January 5, 2026

Respectfully submitted,

9  
10 TODD BLANCHE  
Deputy Attorney General

11 BILAL A. ESSAYLI  
12 First Assistant United States  
Attorney

13 ALEXANDER B. SCHWAB  
14 Assistant United States Attorney  
Acting Chief, Criminal Division

15  
16 /s/  
IAN V. YANNIELLO  
17 GREGORY W. STAPLES  
DANIEL H. WEINER

18 Assistant United States Attorneys

19 Attorneys for Plaintiff  
20 UNITED STATES OF AMERICA  
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I am DEANDRE DONTRELL WILSON's attorney. I have carefully discussed every part of this stipulation and the continuance of the trial date with my client. I have fully informed my client of his Speedy Trial rights. To my knowledge, my client understands those rights and agrees to waive them. I believe that my client's decision to give up the right to be brought to trial earlier than May 4, 2026 is an informed and voluntary one.

  
CRAIG HARBAUGH  
Attorney for Defendant  
DEANDRE DONTRELL WILSON

12/19/25  
Date

I have read this stipulation and have carefully discussed it with my attorney. I understand my Speedy Trial rights. I voluntarily agree to the continuance of the trial date, and give up my right to be brought to trial earlier than May 4, 2026.

  
DEANDRE DONTRELL WILSON  
Defendant


12/19/25  
Date

\*Prior to preparation and filing of the stipulation, undersigned counsel advised all parties that counsel has a trial currently set for May 4, 2026 in *United States v. Henley*, Case No. 2:25-CR-211-FLA. Notwithstanding that disclosure, May 4, 2026 was the only trial date available that accommodated all defendants in this case, and the parties therefore agreed to that date.

Counsel notes that in *Henley*, counsel for other co-defendants (not counsel's own client) have moved to continue the trial, and the Court in that matter is expected to rule on or before January 6, 2026. Counsel submits this statement solely to disclose the potential conflict and to preserve the Court's discretion to address scheduling as appropriate should the conflict remain.

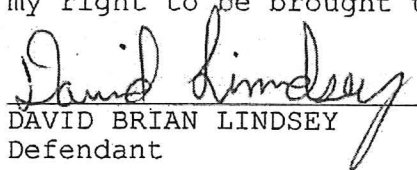


1 I am DAVID BRIAN LINDSEY's attorney. I have carefully discussed  
2 every part of this stipulation and the continuance of the trial date  
3 with my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than May 4, 2026 is an  
7 informed and voluntary one.

8   
9 ROBERT A. JONES  
10 TILLET J. MILLS  
11 Attorney for Defendant  
12 DAVID BRIAN LINDSEY


01/02/2026  
Date

13 I have read this stipulation and have carefully discussed it  
14 with my attorney. I understand my Speedy Trial rights. I  
15 voluntarily agree to the continuance of the trial date, and give up  
16 my right to be brought to trial earlier than May 4, 2026.

17   
18 DAVID BRIAN LINDSEY  
19 Defendant


01-02-2026  
Date

1 I am ASA HOUSTON's attorney. I have carefully discussed every  
2 part of this stipulation and the continuance of the trial date with  
3 my client. I have fully informed my client of his Speedy Trial  
4 rights. To my knowledge, my client understands those rights and  
5 agrees to waive them. I believe that my client's decision to give up  
6 the right to be brought to trial earlier than May 4, 2026 is an  
7 informed and voluntary one.

8   
9 SHAFFY MOEEL  
10 Attorney for Defendant  
11 ASA HOUSTON

12 12/28/2025  
13 Date

14 I have read this stipulation and have carefully discussed it  
15 with my attorney. I understand my Speedy Trial rights. I  
16 voluntarily agree to the continuance of the trial date, and give up  
17 my right to be brought to trial earlier than May 4, 2026.

18   
19 ASA HOUSTON  
20 Defendant

21 12/18/2025  
22 Date

# APPENDIX A

**Counsel for Defendant Wilson:**

1. United States v. Eugene Henley, 25-cr-211-FLA-1 (Eugene Henley), RICO/VICAR, trial date May 4, 2026;
2. United States v. Artuni, et al., 25-cr-434-JLS-3 (Davit Hazryan), RICO/VICAR, trial date August 4, 2026;
3. United States v. Aguilar, et al., 25-cr-413-AB-3 (Dennis Anaya Urias), death eligible matter, trial date July 21, 2026; and
4. United States v. Julian Pulido, et al., 25-cr-147-FLA-1, death eligible matter, trial date November 3, 2026.

**Counsel for Defendant Lindsey:**

1. United States v. Obando, 25-cr-146 (S.D. Texas), trial on January 20, 2026;
2. United States v. Rogers, 23-cr-96 (S.D. Texas), trial on February 9, 2026;
3. United States v. Snell, 24-cr-347 (S.D. Texas), trial on February 17, 2026;
4. State of Texas v. Williams, Case No. 23-1895-K368, trial on March 6, 2026;
5. United States v. Harris, 24-cr-565 (S.D. Texas), trial on March 16, 2026; and
6. United States v. Stokes, 25-cr-329 (S.D. Texas), trial on March 30, 2026.