

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

UNITED STATES OF AMERICA

v.

SAMUEL LAZAR,

Defendant.

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Case No. 21-cr-525 (ABJ)

JOINT STATUS REPORT

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and Hope Lefeber, counsel for Samuel Lazar (“Defendant”), hereby submit the following Joint Status Report. In the event of the Press Coalition refiling a motion to unseal case 21-cr-071, the parties do not object, but respectfully move the Court for 30 days to redact documents for public filing before the case is unsealed. In support of the Motion, the parties represent:

1. On March 8, 2022, as part of a plea agreement, Defendant waived indictment and plead guilty to a Superseding Information charging Assaulting, Resisting, or Impeding Certain Officers as a Felony and Aiding and Abetting, in violation of 18 U.S.C. §§ 111(a) and (b) and 2. (sealed Case No. 22-cr-071). His plea agreement contemplated cooperation with the government.
2. On March 17, 2023, the Court sentenced Defendant, principally, to 30 months incarceration as part of a sealed proceeding wherein Defendant’s cooperation with the government was discussed.

3. On April 20, 2023, the Press Coalition filed a motion on Docket 21-cr-525 to unseal any plea or change of plea made by Defendant; any sentencing by the Court; the transcript of any sentencing hearing; any memoranda or other filings made in connection with a sentencing hearing; any related motion to seal, response thereto; and any sealing order, which the Court denied without prejudice to refile. (Press's Motion.)
4. On September 13, 2023, Defendant was released from Bureau of Prison custody, having served his sentence.
5. The parties anticipate a forthcoming, renewed motion to unseal by the Press Coalition.
6. The parties do not object to the unsealing of case 22-cr-071 now that Defendant has been released from the Bureau of Prisons. However, the parties request that upon the filing of a renewed motion to unseal by the Press Coalition, the parties be allowed 30 days to respond and to redact portions of documents that explicitly discuss Defendant's cooperation. The parties respectfully request the redacted documents be filed on the (then unsealed) docket. This is because public dissemination of the information the Defendant supplied could impair or interfere with ongoing investigations and because Defendant named individuals responsible for criminal conduct who may not have been charged.
7. The parties respectfully submit 30 days to redact the documents is appropriate as counsel for the government will be engaged in trial in Syracuse, NY in early October and counsel for Defendant is out of the country until mid-October.
8. The defendant is out of custody.
9. The defendant concurs with this request.

