

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

UNITED STATES OF AMERICA

v.

No. 24-CR-421

YANA LEONOVA,

Defendant.

UNITED STATES'S STATUS REPORT

Magistrate Judge Faruqui has ordered that the government submit a daily report each day by 4:00 PM concerning the status of a new parole application for the defendant. The government reports as follows:

1. On December 8, 2025, the undersigned prosecutors contacted the Homeland Security Investigations (“HSI”), Parole and Law Enforcement Programs Unit (“PLEPU”) to request information about the process of applying for a Substantial Public Benefit Parole (“SPBP”) on behalf of defendant Yana Leonova. The SPBP would allow the defendant to have temporary status in the United States during the pendency of this criminal prosecution.

2. Later on December 8, PLEPU responded that the undersigned prosecutors or law enforcement agencies working on this matter should submit a SPBP request through the Parole Case Tracking System (“PCTS”), which is an online portal. The undersigned prosecutor has obtained access to this system. The application portal appears to require the submission of as many as six categories of supporting documents (including, possibly, letters of assurance from a prosecuting authority and a law enforcement authority).

3. On December 9, 2025, the undersigned prosecutor compiled the necessary

supporting documents for submission to DHS via the PCTS system. The undersigned prosecutor has requested that the Parole Coordinator for HSI's office in Reston, Virginia, advise as to (1) what obligations, if any, are to be assumed by the "Monitoring Officer/Agent" for purposes of the SPBP; and (2) whether the Pretrial Services Agency can be named as the "Monitoring Agent/Officer" for purposes of the SPBP. As of the time for submission of this report, the undersigned prosecutor has not received a response from the Parole Coordinator. Once those issues are resolved, the government will submit the SPBP application promptly—potentially as soon as December 10.

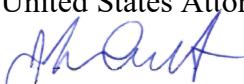
4. On December 9, out of an abundance of caution, the government submitted a provisional application for "deferred action" to DHS so that if the defendant is transferred to ICE custody the government will already have an application in place before the issuance of a removal order.

5. The United States will file a further status report by 4:00 PM on December 10.

Respectfully submitted,

JEANINE FERRIS PIRRO
United States Attorney

By:


JOHN W. BORCHERT (Bar No. 472824)
Assistant United States Attorneys
National Security Section
601 D Street, NW
Washington, D.C. 20530
Borchert: (202) 252-7679
John.Borchert@usdoj.gov

SEAN HEIDEN
Trial Attorney
National Security Division
U.S. Department of Justice
(202) 514-8106
Sean.Heiden2@usdoj.gov

December 9, 2025

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December 2025, I caused a copy of the foregoing to be served on counsel for the defendant, Anna Brown, Esq.



JOHN W. BORCHERT
Assistant United States Attorney