

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

United States of America v. Chang Hoon Lee

Lee · No. Crim. A. No. 26-14 (JDB) · Decided January 29, 2026

SUMMARY

The court addresses the government's request to stay a magistrate judge's order releasing Chang Hoon Lee pending review under 18 U.S.C. § 3145(a). Rather than grant a stay pending appeal, the court imposes an administrative stay of Lee's release until February 4, 2026, orders that he be held without bond, and sets a deadline for his opposition to the government's appeal.

CASE DETAILS

COURT	United States District Court for the District of Columbia
WRITING FOR THE COURT	John D. Bates
JURISDICTION	United States District Court for the District of Columbia
DECIDED	January 29, 2026
DOCKET	Crim. A. No. 26-14 (JDB)
DISPOSITION	other
PROCEDURAL POSTURE	The government moved for review of a magistrate judge's order releasing Lee on conditions and sought temporary detention pending review and appeal. The district court declined to grant a merits-based stay pending appeal on the incomplete record but entered a short administrative stay of the release order.
STANDARD OF REVIEW	The court had authority to review the release order under 18 U.S.C. § 3145(a). Because the government sought a stay pending appeal, the court considered the stay framework described in <i>Nken v. Holder</i> , while emphasizing that the administrative stay was a temporary procedural measure rather than a merits determination.
PRECEDENTIAL VALUE	Published
PARTIES	United States of America v. Chang Hoon Lee, also known as Daniel Lee

TOPICS

- bail
- appellate procedure
- criminal procedure
- interlocutory appeal

PRACTICE AREAS

criminal procedure

pretrial detention

federal appellate procedure

QUESTIONS PRESENTED

1. Whether the District Court for the District of Columbia had jurisdiction under 18 U.S.C. § 3145(a) to review a magistrate judge's release order entered in the Central District of California.
2. Whether the government was entitled to a stay pending appeal of the magistrate judge's release order.
3. Whether the court should enter a short administrative stay to preserve the status quo while it considered the government's appeal and Lee's opposition.

HOLDINGS

1. The court with original jurisdiction over the prosecution, rather than the district where the magistrate judge sits, has authority under 18 U.S.C. § 3145(a) to review an order releasing a defendant. Because the prosecution was pending in the District of Columbia, this Court had jurisdiction to review Lee's release order.
2. The court declined to grant the government a stay pending appeal because the record was incomplete and both parties had not yet briefed the request.
3. The court granted an administrative stay of Lee's release until February 4, 2026, and ordered that Lee be held without bond until that date or further order.

KEY QUOTATIONS

“An administrative stay allows a court to “freeze legal proceedings until the court can rule on a party’s request for expedited relief.””

“Such a stay merely “buys the court time to deliberate” and “permit[s] time for briefing.””

“It is not a reflection of the Court’s view of the merits.”

FACTUAL BACKGROUND

Lee was charged with conspiracy to distribute and possession with intent to distribute at least 500 grams of a substance containing methamphetamine and/or cocaine. He was arrested in the Central District of California on January 28, 2026, and a magistrate judge released him on conditions after denying the government's request for pretrial detention. The government sought review and temporary detention, noting that the charged felony carries a statutory presumption of detention.

PROCEDURAL HISTORY

Lee was arrested in the Central District of California and appeared before a magistrate judge on January 28, 2026. The magistrate judge denied the government's motion for pretrial detention and ordered Lee released subject to conditions, staying the ruling until January 30. The government then sought review of the release order and temporary detention in the District of Columbia, where the prosecution was pending. The district court

granted the temporary-detention motion in part by staying Lee's release until February 4, 2026, and directed Lee to file an opposition by February 2.

DISPOSITION

other

CASES CITED

- United States v. El Edwy, 272 F.3d 149, 154 (2d Cir. 2001)
- Nken v. Holder, 556 U.S. 418 (2009)
- M.M.V. v. Barr, 459 F. Supp. 3d 1, 4 (D.D.C. 2020)
- United States v. Texas, 144 S. Ct. 797, 798 (2024) (Barrett, J., concurring)
- Middle E. Broad. Networks. v. United States, No. 25-5150, 2025 WL 1378735, at *1 (D.C. Cir. May 7, 2025)

OPINION

United States v. Lee

PER CURIAM.

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

v. Crim. A. No. 26-14 (JDB)

CHANG HOON LEE,

also known as “Daniel Lee,” Defendant.

MEMORANDUM OPINION & ORDER

Chang Hoon Lee is charged with conspiracy to distribute and possession with intent to distribute 500 grams or more of a substance containing methamphetamine and/or cocaine. He was arrested in the Central District of California on January 28, 2026. The same day, Lee had his initial appearance before a magistrate judge, who held a detention hearing and denied the government’s motion for pretrial detention, releasing Lee on various conditions of release. The magistrate judge stayed her ruling until January 30, 2026. In the interim, the government asks this Court to issue a temporary stay of Lee’s release pending the outcome of the government’s motion for review of the detention decision, filed today in this Court. See Motion for Temporary Detention Pending Review and Appeal of Release Order (ECF No. 7); Motion for Review and Appeal of Release Order (ECF No. 8). This Court has jurisdiction to review the initial release order under 18 U.S.C. § 3145(a), which provides that “[i]f a person is ordered released by a magistrate judge . . . the attorney for the Government may file, with the court having original jurisdiction over the offense, a motion for revocation of the order or amendment of the conditions of release.” The court with “original jurisdiction” over the offense is the “court in the district in which the prosecution is pending, not the court in which the magistrate judge sits.” United States v. El Edwy, 272 F.3d 149, 154 (2d Cir.

2001). This Court has original jurisdiction over Lee's case and, accordingly, may review the release order. The Court will not grant the government a stay pending appeal at this juncture, due to the lack of a full record on which to base such a decision. See *Nken v. Holder*, 556 U.S. 418 (2009) (outlining four factor test for a stay pending appeal). Indeed, "a stay is an exercise of judicial discretion, and whether to grant it depends upon the specific circumstances of the case." *M.M.V. v. Barr*, 459 F. Supp. 3d 1, 4 (D.D.C. 2020). To be sure, at this preliminary posture, the government raises serious arguments in support of detention—for example, Lee is accused of a felony that carries a presumption of detention. See 18 U.S.C. § 3142(e)(3)(A). But without briefing by both parties, the Court will not grant the government the requested relief. Instead, the Court will enter an administrative stay. An administrative stay allows a court to "freeze legal proceedings until the court can rule on a party's request for expedited relief." *United States v. Texas*, 144 S. Ct. 797, 798 (2024) (Barrett, J., concurring). Such a stay merely "buys the court time to deliberate" and "permit[s] time for briefing." *Id.* It is not a reflection of the Court's view of the merits. See *Middle E. Broad. Networks. v. United States*, No. 25-5150, 2025 WL 1378735, at *1 (D.C. Cir. May 7, 2025). Administrative stays must be tailored to their purpose, and so must necessarily be short. It thus would be improper to grant such a stay for the duration of the pending appeal of the magistrate judge's order. The current stay expires on January 30, 2026. This will not provide sufficient time for the Court to consider the government's appeal and any opposition by the Defendant, now due by February 2, 2026. Accordingly, this Court will stay Lee's release until February 4, 2026. *** Upon consideration of [7] the motion for temporary detention pending review and appeal, and the entire record herein, the government's motion is hereby GRANTED in part, and the prior release order is hereby STAYED until February 4, 2026. It is further ORDERED that Defendant be held without bond until that time or further order of this Court. It is further ORDERED that the Defendant file any opposition to [8] the government's appeal by not later than February 2, 2026, at 5 PM, Eastern Time. SO ORDERED. /s/

JOHN D. BATES

United States District Judge Dated: January 29, 2026