

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)

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