

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TE DORA BROWN, and
CHRISTOPHER SCOTT

No. 23 CR 97

Judge Elaine E. Bucklo

**UNOPPOSED MOTION FOR PROTECTIVE ORDER
GOVERNING DISCOVERY**

Pursuant to Fed. R. Crim. P. 16(d) and 18 U.S.C. § 3771(a), the United States of America, by JOHN R. LAUSCH, JR., United States Attorney for the Northern District of Illinois, moves for the entry of a protective order, and in support thereof states as follows:

1. The indictment in this case charges defendants with wire fraud, in violation of 18 U.S.C. § 1343.
2. The discovery material to be provided by the government in this case includes particularly sensitive information, including information that discloses the identity of other witnesses, subjects, and targets of this ongoing investigation into bank fraud, bank bribery, wire fraud, and money laundering, among other offenses. Accordingly, the unrestricted dissemination of this information could adversely affect law enforcement interests and the privacy interests of third parties.
3. The government has discussed the proposed protective order with defense counsel, who do not oppose the entry of the proposed protective order.

WHEREFORE the government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted,

JOHN R. LAUSCH, JR.
United States Attorney

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