

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TE DORA BROWN, and
CHRISTOPHER SCOTT

Case No. 23 CR 97

Judge Elaine E. Bucklo

JOINT STATUS REPORT

The UNITED STATES OF AMERICA, by MORRIS PASQUAL, Acting United States Attorney for the Northern District of Illinois, Victor P. Henderson, counsel for defendant Te Dora Brown, and Joshua B. Adams, counsel for defendant Christopher Scott, hereby provide this joint status report to the Court:

On February 15, 2023, the grand jury returned an indictment charging defendant Brown with 13 counts of wire fraud, and defendant Scott with 9 counts of wire fraud, all in violation of 18 U.S.C. § 1343. (R.1). Defendants self-surrendered on March 1, 2023 and the Court held initial appearances and arraignments for the defendants on that day. (R.8, 9). Defendants are currently on bond. (R.13, 14, 21).

The government has produced all discovery to defense counsel and obtained a protective order for that discovery (R.27).

As to defendant Te Dora Brown, counsel met and conferred in September 2023. During that meeting, defense counsel made the government aware of certain additional Rule 16 discovery in the case in defense counsel's possession. The government made a formal request for reciprocal discovery on November 8, 2023. As

of the time of this joint status report, the government is still awaiting the same.

As to defendant Christopher Scott, the government is currently drafting a plea agreement at the defense's request, and plans to tender the same before the end of the year.

Accordingly, the parties respectfully request that the Court set a deadline for a status report in approximately 90 days, on or about Friday, March 1, 2023, or on a date at the Court's discretion, and move the Court to exclude time through the date of the next status report pursuant to 18 U.S.C. § 3161(h) in the interests of justice and to allow time for continued negotiations between the parties.

Date: December 4, 2023

Respectfully submitted,

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Acting United States Attorney

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