

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 submit this joint status report to the Court and represent as follows:

1. Defendant Brown is charged with 13 counts of wire fraud, and defendant Scott with 9 counts of wire fraud, in violation of 18 U.S.C. § 1343. (R. 1).
2. The government has produced all discovery to defense counsel.
3. The government tendered a draft plea agreement to defendant Scott on February 27, 2024. Defendant Scott requires time to review the plea agreement and for negotiations.
4. The government has conferred with counsel for defendant Scott and understands that counsel plans to make a production of reciprocal Rule 16 discovery to the government, then would like to schedule a pitch meeting. The parties last conferred on January 17, 2024 and counsel indicated that

the discovery was forthcoming. As of the date of this writing, counsel has not produced this discovery to the government.

5. Accordingly, the parties respectfully request that the Court set a deadline for a status report in approximately 90 days, on or about June 2, 2024, 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: March 4, 2024

Respectfully submitted,

MORRIS PASQUAL
Acting United States Attorney

By: /s/ Alejandro G. Ortega
ALEJANDRO G. ORTEGA
Assistant U.S. Attorney

/s/ Victor P. Henderson
VICTOR P. HENDERSON
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/s/ Joshua B. Adams
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