

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 and counsel for defendant Brown conferred on May 2, 2024. Counsel for defendant Brown will be requesting a pitch meeting with the government and will schedule the same as soon as practicable.
4. The government tendered a draft plea agreement to defendant Scott on February 27, 2024. Counsel conferred on May 6, 2024 and defense counsel indicated the defendant's willingness to sit for a proffer. The parties are attempting to schedule the proffer for the week of May 13 or 20, 2024.
5. Accordingly, the parties respectfully request that the Court set a deadline

for a status report in approximately 90 days, on or about August 4, 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: May 6, 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
Counsel for defendant Te Dora
Brown

/s/ Joshua B. Adams
JOSHUA B. ADAMS
Counsel for defendant Christopher
Scott