

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 have been engaged in negotiations and were originally tentatively scheduled for a pitch presentation in early June. However, that presentation did not occur and is now scheduled for early to mid-September due to the government's upcoming trial on August 12, 2024 and the subsequent closure of the federal courthouse due to the Democratic National Convention.
4. The government tendered a draft plea agreement to defendant Scott on February 27, 2024 and the defendant sat for a proffer in May 2024. Defense

counsel has requested a final 60 day status date within which to discuss the plea agreement with his client, and the parties intend to request a change of plea date on or before the next status date.

5. Accordingly, the parties respectfully request that the Court set a deadline for a status report in approximately 60 days, on or about October 5, 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: August 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
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