

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. On September 20, 2024, counsel for defendant Brown produced to the government approximately 350 pages of previously undisclosed documents in support of a pitch request. The government requires time to review them, and both counsel for the government and for defendant Brown have previously scheduled travel during the month of October. Accordingly, the parties have scheduled a pitch meeting for November 5, 2024, after which they will be in a position to inform the Court how the case will proceed.
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. Counsel conferred on October 7, 2024, and counsel for defendant Scott has requested a final status date to discuss the plea agreement with his client.

5. Accordingly, the parties respectfully request that the Court set a deadline for a status report in approximately 45 days, on or about Thursday, November 21, 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: October 7, 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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