

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. As to defendant Te Dora Brown, the government and counsel for the defendant sat for a pitch meeting on November 5, 2024. Counsel for the defendant has requested a follow up meeting at the U.S. Attorney's Office with his client, which the parties hope to hold in early December. After that meeting, the parties will likely be in a position to inform the Court how the case against defendant Brown will proceed.
4. As to defendant Scott, the government tendered a draft plea agreement to defendant Scott on February 27, 2024. The defendant and the government have been and continue to be engaged in engaged in discussions and

negotiations and require additional time to do so.

5. The parties note that at the request of the parties, the Court granted the parties an additional day to file this status report today, November 15, 2024.
6. Accordingly, the parties respectfully request that the Court set a deadline for a status report in approximately 45 days, on or about December 30, 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: November 15, 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
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/s/ Joshua B. Adams
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