

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 and had a follow up meeting on December 12, 2024. Based on these meetings, the government and counsel for defendant Brown require a small amount of additional time to negotiate and attempt to reach a resolution in this case.
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, but continue to anticipate that the case will resolve short of trial.

5. Government counsel is beginning an approximately 2-3 week trial on January 21, 2025 which requires preparation. For this reason, government counsel is requesting a 60-day status date, instead of 45 days.
6. Accordingly, the parties respectfully request that the Court set a deadline for a status report in approximately 60 days, on or about February 28, 2025, 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.

Respectfully submitted,

MORRIS PASQUAL
Acting United States Attorney

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

Date: December 30, 2024

/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