

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

TE DORA BROWN

No. 23 CR 97

Honorable Elaine E. Bucklo

THE GOVERNMENT'S WITNESS LIST¹

I. WITNESSES WHO WILL BE CALLED

1. Special Agent Lydia Sizemore. U.S. Secret Service Special Agent Sizemore is the case agent, and she participated in investigation and surveillance in this case.

2. Small Business Administration representative. An SBA representative will explain the EIDL application process and SBA policies.

3. John Stout. SBA-OIG Special Agent Stout is another case agent who helped identify the fraudulent EIDL applications.

4. IRS representative. An IRS representative will confirm the tax-filing status and authenticity of the employer identification numbers of each of the businesses that applied for PPP and EIDL loans.

5. Illinois Secretary of State representative. A representative of the Illinois Secretary of State will confirm whether multiple purported Illinois-based businesses/entities receiving EIDLs and PPP loans were registered in Illinois.

¹ This list reflects the government's best sense, as of the date of filing, of the witnesses it will or may call at trial. The government will supplement or modify this list if circumstances warrant it.

6. Illinois Department of Employment Security representative. A representative of the Illinois Department of Employment Security will confirm whether multiple purported Illinois-based businesses receiving PPP and EIDL loans were registered with IDES.

7. Illinois Department of Revenue representative. A representative of the Illinois Department of Employment Security will confirm whether multiple purported Illinois-based businesses receiving PPP and EIDL loans were registered with IDES.

8. Records Custodians. The government may call records custodians for any of the records subject to the government's motion to admit business records pursuant to FRE 902(11).

Respectfully submitted,

ANDREW S. BOUTROS
United States Attorney

By: /s/ Mary Katherine McClelland
MARY KATHERINE McCLELLAND
QUINN FORD
Assistant United States Attorneys
219 South Dearborn Street, 5th Floor
Chicago, Illinois 60604
(312) 353-5300

Dated: May 6, 2026