IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
v.	)	Criminal No. 25-10030-RGS-JCB
(1) SNIDERS JEAN-JACQUES, (2) GERMAN OLIVO, (3) JIM KELLY MICHEL, (4) TANYA PIERRE, and (5) ROSALIE CLEMENT-JACKSON	)	
Defendants		

JOINT INITIAL STATUS REPORT

Pursuant to Local Rule 116.5(a), the United States and defendants Sniders Jean-Jacques, German Olivo, Jim Kelly Michel, Tanya Pierre, and Rosalie Clement-Jackson state as follows:

(1) Status of Automatic Discovery and Pending Discovery Requests

At the defendants' respective arraignments, the government notified the Court of the complex nature of the discovery in this matter and the need for rolling productions. On March 24, 2026, the government made its first production, comprising more than 15,000 pages of automatic discovery and an index of the discovery. This production consisted of about half of the mortgage loan files the government has collected, search materials, and text chats between co-conspirators, among other items. The government anticipates making its next rolling production on or about April 30, 2026, which will include the remaining mortgage files in the government's possession, as well as additional text chats and apartment rental files.

The government has requested reciprocal discovery under Fed. R. Crim. P. 16(b) and Local Rule 116.1(d). There are no other pending discovery requests. Defendants have not yet produced any discovery to the government.

(2) Timing of Any Additional Discovery To Be Produced

As noted above, the government anticipates making a supplemental production on or about April 30, 2026, which will include the remaining mortgage files in the government's possession, as well as additional text chats and apartment rental files. The government anticipates a further rolling production on or about May 29, 2026, with borrowers/renters' true bank statements. Additionally, the government is still processing and reviewing electronic devices obtained during the execution of search warrants on defendant Jean-Jacques's person and residence and Jim Kelly Michel's person and will produce these materials on a rolling basis as they are processed and reviewed. The government is additionally collecting body camera footage from defendants' arrests. The government will provide additional discovery as it is received and processed pursuant to Local Rule 116.7.

(3) Timing of Any Additional Discovery Requests

Defendants are reviewing the materials produced thus far and have no current plans to make a discovery request, but reserve their rights to do so after having reviewed all the automatic and supplemental discovery produced by the government.

(4) Protective Orders

There is a protective order currently in place. *See* Dkt. 45.

(5) Pretrial Motions Under Fed. R. Crim. P. 12(b)

Defendants propose to file any motions under Fed. R. Crim. P. 12(b) at a time set at an interim status conference.

(6) Timing of Expert Disclosures

Should expert testimony prove necessary, the government agrees to make the requisite expert witness disclosures 60 days before trial, and the defendants agree to make reciprocal expert disclosures 30 days before trial.

(7) Speedy Trial Act Calculation

The Court excluded all time between defendants' respective initial appearances in this District and March 31, 2026 from the Speedy Trial clock. *See* Dkts. 30, 33, 36, 41. Accordingly, on the date of the scheduled status conference, no non-excludable delays will have elapsed, and 70 days will remain on the Speedy Trial clock.

(8) Timing of an Interim Status Conference

The parties request that the Court convene an interim status conference in approximately 60 days to give the defendants and their counsel sufficient time to review the discovery productions, including the forthcoming rolling productions. The parties ask the Court to exclude the period until that conference under 18 U.S.C. § 3161(h)(7) in order that the defendants may have adequate time to review discovery and formulate a discovery plan, if necessary. The defendants agree to exclude the time between March 31, 2026, and the date of the interim status conference from the Speedy Trial calculation.

In light of the status of the case, the parties agree that an initial status conference is unnecessary and request that the Court issue an order cancelling the initial status conference.

Respectfully submitted,

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Respectfully submitted,

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Date: March 24, 2026

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Dated: March 24, 2026

/s/ Kristen A. Kearney
Kristen A. Kearney