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 INTERIM STATUS REPORT

Pursuant to Local Rule 116.5(b), 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

The government produced automatic and supplemental discovery totaling just under 50,000 pages to all defendants on March 24, 2026 and April 30, 2026. These productions consist of mortgage loan files, apartment rental files, text chats between conspirators, and search materials. As discussed below, the government anticipates making its next rolling production on or about May 29, 2026, which will include bank and other financial records as well as additional text chat files.

Additionally, in early May 2026, the government produced body worn camera footage to individual defendants, as well as written or recorded statements they may have made to investigators (including, for defendant Sniders Jean-Jacques, the full iCloud return obtained pursuant to search warrant No. 24-mj-7416).

On April 30, 2026, counsel for defendant Jean-Jacques requested (a) any reports describing the events surrounding Jean-Jacques's arrest, as well as any searches conducted at that time; (b)

any reports documenting law enforcement's efforts to locate Jean-Jacques in order to effectuate his arrest; and (c) body worn camera footage from Jean-Jacques's arrest. As noted, the government has now produced the body worn camera footage from Jean-Jacques's arrest at the West Dixie Highway location, as well as body worn camera footage from the attempted arrest at the 156 NE Terrace location, to his counsel. The government is confirming whether any of the requested reports exist.

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 May 29, 2026, which will include bank and other financial records (including the borrowers/renters' true bank statements as well as defendants' bank statements and financial records), as well as additional text chat files.

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. The government expects to receive copies of these devices to begin its review on or about May 28, 2026 and anticipates producing materials from these devices in a subsequent production on or about June 30, 2026.

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 are reviewing the discovery materials and evaluating the merits of any motions under Fed. R. Crim. P. 12(b). Defendants do not have any motions under Fed. R. Crim. P. 12(b) at this time.

(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) Defenses of Insanity, Public Authority, or Alibi

No defendant intends to offer defenses of insanity, public authority, or alibi.

(8) Speedy Trial Act Calculation

The Court excluded all time between defendants' respective initial appearances in this District and May 26, 2026 from the Speedy Trial clock. *See* Dkts. 30, 33, 36, 41, 42, 53. Following issuance of the latest Order on Excludable Delay, the Court rescheduled the interim status conference from May 26, 2026 to May 28, 2026.

(9) Status of Plea Discussions and Estimated Length of Trial

The government is engaged in plea discussions with two of the defendants and will be reaching out to counsel for the remaining three defendants in short order. If the case were to proceed to trial, the government currently estimates that its case-in-chief would not exceed two weeks.

(10) Timing of an Interim Status Conference

As noted, the government is continuing to produce discovery, is engaged in plea negotiations with two of the defendants, and anticipates additional plea discussions in the following months. Accordingly, the parties request that the Court convene a further 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 May 26, 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 interim 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: May 20, 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: May 20, 2026

/s/ Kristen A. Kearney
Kristen A. Kearney