IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 23 CR 97
	)	
	)	Judge Elaine E. Bucklo
	)	
TE DORA BROWN,	)	
	)	
Defendant.	)	

UNOPPOSED **MOTION FOR TRAVEL AND TO MODIFY CONDITIONS OF RELEASE**

Defendant, Te Dora Brown, by and through her attorney, Victor P. Henderson, respectfully requests that this Court approve travel relating to business as described below and to modify the conditions of her release to allow subsequent travel to be approved by pre-trial and without the need to seek leave of Court. In support thereof, Ms. Brown states as follows:

1. Ms. Brown was charged with wire fraud (Docket No. 1).

2. Ms. Brown pleaded not guilty on March 1, 2023 (Docket No. 9).

3. The conditions of Ms. Brown's release restrict her travel to within the Northern District of Illinois (Docket No. 13).

4. Ms. Brown earns her living, in part, by engaging in entrepreneurial presentations, which require her to travel.

5. She has three upcoming trips in 2023. To wit:

Place	Dates
Jackson, MS	April 18 – April 20
Bronx, NY	April 29 – April 30
Houston, TX	May 11 – May 14

6. She would like approval to take these trips.

7. In addition, Ms. Brown would like to modify the conditions of her release so that she can travel within the continental United States without seeking leave of Court. Instead, she would only need to obtain the approval of her pre-trial officer, John Riehl

8. On or around April 10, 2023, counsel for Ms. Brown, Victor P. Henderson, communicated with pre-trial services officer, John Riehl. He does *not* oppose this motion.

9. On or around April 10, 2023, counsel for Ms. Brown, Victor P. Henderson, communicated with AUSA Alejandro G. Ortega, who also informed counsel that he does *not* oppose this motion.

WHEREFORE, Ms. Brown respectfully requests that her conditions of release be modified so that she can travel within the continental United States without needing to seek permission from the Court, provided that pretrial has approved her travel, and she also seeks approval of the three trips listed above and for such other and further relief as this Court deems just.

DATED: April 11, 2023

Respectfully submitted,

By: /s/ Victor Henderson
Attorney for Te Dora Brown

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CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2023, I electronically filed Defendant's ***UNOPPOSED*** **MOTION FOR TRAVEL AND TO MODIFY CONDITIONS OF RELEASE** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Victor P. Henderson