

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 12 CR 567-1
v.)	
)	Honorable Suzanne B. Conlon
WILLIAM MASTRO, et al.)	
)	

**GOVERNMENT'S AGREED MOTION TO SET A CHANGE OF PLEA DATE
FOR DEFENDANT WILLIAM MASTRO**

The United States of America, by its attorney, Gary S. Shapiro, Acting United States Attorney for the Northern District of Illinois, respectfully moves this Court to set a date for a change of plea hearing for defendant William Mastro. In support of this motion, the government states as follows:

1. On July 24, 2012, the Special February 2011-1 Grand Jury returned a 16-count indictment against defendants William Mastro, Doug Allen, Mark Theotikos and William Boehm. Defendant William Mastro was charged in Count One of the Indictment with mail fraud, in violation of Title 18, United States Code, Sections 1341 and 2.

2. William Mastro, his attorneys and the attorneys for the government have signed a written plea agreement.

3. The parties respectfully request a date in early February 2013 to appear before your Honor for a change of plea hearing with respect to defendant William Mastro.

4. The undersigned attorney has been in communication with Jacqueline

Jacobson, one of the attorneys for defendant William Mastro. Attorney Jacobson has stated that she agreed with the government's request to set a date for a change of plea hearing and has specifically requested a date in February 2013.

5. Since the undersigned attorney is scheduled to be on trial beginning February 19, 2013, in *United States v. Moudry*, 12 CR 395, the government respectfully requests a date in early February 2013.

WHEREFORE, for the foregoing reasons, the United States respectfully requests that this Court set a change of plea hearing for defendant William Mastro in early February 2013.

Respectfully submitted,

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