

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MICHAEL RABBITT, et al.

No. 25 CR 693

Judge April M. Perry

NOTICE OF INTENT TO NARROW CONSPIRACY CHARGE

The United States of America, by ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, hereby provides notice of its intent to narrow the conspiracy charged in Count One of the Indictment.

1. On October 23, 2025, a federal grand jury returned an indictment charging the remaining four defendants in this case with conspiring to (a) prevent by force, intimidation, and threat, Agent A, a United States law enforcement officer, from discharging the duties of his office, and (b) injure him in his person or property on account of his lawful discharge of the duties of his office, and while engaged in the lawful discharge thereof, and (c) injure his property so as to interrupt, hinder, and impede him in the discharge of his official duties, in violation of 18 U.S.C. § 372. Dkt. 1.

2. On February 26, 2026, the government advised this Court and the defendants that it intended to narrow the scope of the conspiracy charge by eliminating one or more of its three prongs. The Court therefore directed the government to confer with defense counsel about which subsection(s) of 18 U.S.C. § 372 it intends to proceed upon at trial with respect to each defendant, and whether

there are any true threats the Government intends to argue with respect to each defendant. Dkt. 89.

3. Pursuant to the Court's order, the government advised the defendants on March 12, 2026, that it intended to proceed only on the first clause of 18 U.S.C. § 372, namely, the force and intimidation prong, and to further eliminate the charge that the defendants conspired to threaten Agent A in preventing him from discharging his duties. Specifically, the government provided notice to the defendants that it intends to narrow its proof at trial regarding Count One to the charge that the remaining defendants:

“Conspired with one another and others, known and unknown, to prevent by force and intimidation, Agent A, a United States law enforcement officer, from discharging the duties of his office.”

4. The government therefore intends to present evidence at trial to prove the violation of only the foregoing subsection of 18 U.S.C. § 372.

Respectfully submitted,

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