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

UNITED STATES OF AMERICA,	)
Plaintiff,	)
vs.	) No. 16 CR 438-1
ARTEM VAULIN	) Honorable John Z. Lee
Defendant.	)

## **DEFENDANT VAULIN'S MOTION FOR A STATUS CONFERENCE**

Defendant Artem Vaulin, by and through his undersigned counsel, respectfully requests that the Court schedule a status conference in this matter so that the parties may apprise the Court of recent developments in the Polish extradition proceedings and to discuss the status of Defendant's pending motion to dismiss the indictment. In support of this motion, Defendant states as follows:

- 1. As the parties previously informed the Court, on or about February 22, 2017, the Polish trial court determined that Mr. Vaulin is eligible for extradition to the United States on all counts. Mr. Vaulin, however, has appellate rights available to him of which he may avail himself.
- 2. Significantly, on or about May 18, 2017, based on Mr. Vaulin's health issues and the need to obtain proper treatment and care, the Polish court granted Mr. Vaulin bail. Thus, Mr. Vaulin is now free on a secured bond. His release from custody has dramatically increased his ability to communicate with his attorneys in the United States.
- 3. Mr. Vaulin and his counsel in the United States recently have engaged in discussions with the government to determine if the parties can resolve this matter, or at least certain significant issues like, for example, issues relating to the proper calculation of the

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sentencing guidelines and/or the possibility of an agreement for bond should Mr. Vaulin decide to

voluntarily surrender to the United States authorities and appear before this Court to resolve the

pending charges.

4. Undersigned counsel believes that a ruling on Mr. Vaulin's pending motion to

dismiss some or all of the charges in the indictment would facilitate and greatly influence the

parties' ability to resolve this matter, or at least a great many of the issues attendant thereto.

WHEREFORE, Defendant Vaulin respectfully requests that the Court schedule a status

conference in this matter.

Dated: June 14, 2017

Respectfully submitted,

/s/ Theodore T. Poulos

Theodore T. Poulos

Marty Basu

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