

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

AMIR A. FAGAN, DEMOND EDWARDS,
and CHASHONN TONEY

Case No. 26 CR 291

Hon. Keri L. Holleb Hotaling

GOVERNMENT'S NOTICE OF FACTUAL CORRECTIONS

The UNITED STATES OF AMERICA, by its attorney, ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, respectfully notifies this Court of factual corrections to its brief filed on June 30, 2026. Dkt. No. 30. Each of these corrections is non-substantive, and summarized as follows:

1. The chart on page 14 of the brief indicates that UC-1's recording device was for both audio and video. In fact, while the device was equipped for both audio and video recording, a malfunction in the device prevented recording of the audio portion, so the device only recorded video.

2. The brief, at page 19, states that "[s]everal of the vehicles activated their police lights and sirens to identify themselves as law enforcement." In fact, only one law enforcement support vehicle was equipped with lights and a siren, namely, the first law enforcement vehicle that approached the Dodge Dart, as described on pages 19-20 of the brief.

3. Footnote 10 (page 19) is incorrect. The video recordings support the conclusion that, aside from Amir Fagan, all of the other individuals who arrived in

the Dodge Dart attempted to flee the scene in the Dodge Dart before it became disabled, and the occupants thereafter fled on foot.

The undersigned apologizes to the Court and the parties for these errors and submits this notice to correct the factual record.

Respectfully submitted,

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By: /s/ Timothy J. Chapman
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