NONPRECEDENTIAL DISPOSITION
To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604

Submitted May 19, 2026*
Decided June 5, 2026

Before

DAVID F. HAMILTON, *Circuit Judge*

JOHN Z. LEE, *Circuit Judge*

JOSHUA P. KOLAR, *Circuit Judge*

No. 25-2159

UNITED STATES OF AMERICA, *Plaintiff-Appellee*,	Appeal from the United States District Court for the Central District of Illinois.
v.	No. 2:20-cr-20049-JEH-EIL-1
JEFFERY T. HENSON, SR., *Defendant-Appellant*.	Jonathan E. Hawley, *Judge*.

O R D E R

Jeffery Henson appeals the district court's denial of his motions to strike or seal the government's response to his motion to modify his conditions of supervised release. Because the district court acted within its discretion in denying the motions, we affirm.

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

In 2021, Henson pleaded guilty to multiple counts of wire fraud, money laundering, and aggravated identity theft, and was sentenced to 102 months' imprisonment and 3 years' supervised release.

In May 2025, a few months into his term of supervised release, Henson moved to modify his conditions of supervised release to permit (1) unsupervised travel from the Central District of Illinois to the Northern District; and (2) meeting, communicating, and interacting with convicted felons as part of his "legal consulting and advocacy business." The latter condition was a reference to a business he runs that advertises advocacy for incarcerated individuals and their families. *About Legal Advocation Center*, https://legaladvocationcenter.com/about/ (last visited May 11, 2026). The government opposed the modifications, citing, among other things, allegations from a recent pleading labeled "Amicus Curiae Brief" in Henson's criminal docket in which a nonparty accused Henson of using his business to defraud and deceive incarcerated individuals. But the district court already had struck the brief, so Henson moved to strike the government's response as an impermissible attempt to invoke claims from the stricken brief. On May 21, the district court granted Henson's motion to modify the supervised release conditions but denied Henson's motion to strike "in light of the granting of the Motion to modify conditions of supervised release."

Henson then followed with two more unsuccessful attempts to strike or seal the government's response. First, he filed a motion to reconsider, which the district court denied in a text order on May 22. He then filed a "renewed motion to strike" that asserted concerns of reputational harm. In a text order of June 30, the district court denied this motion, stating that "[n]othing in the Defendant's motion persuades the Court it should revisit its previous denial of the request to strike." Henson then filed a motion to seal the response, which the district court denied on July 2 as "a 3rd attempt … to obtain the same relief." On July 9, Henson filed his notice of appeal.

We note at the outset the government's contention that Henson's notice of appeal—filed on July 9—was untimely because it was outside the fourteen-day time limit of Federal Rule of Appellate Procedure 4(b)(1)(A), and neither his second motion to reconsider nor his motion to seal tolled his time to appeal. While the government is correct that it is too late for Henson to challenge the May orders (denying his initial motion to strike and his first motion to reconsider), Henson's notice of appeal was timely with regard to the July denial of his motion to seal. The government contends that Henson waived any challenge to the July order by devoting his brief to the initial denial of motion to strike, but we do not draw this distinction. Henson's arguments on appeal are substantively the same as those raised both in his motions to strike and his motion to seal, and the relief he has sought is effectively the same. Henson's brief does not frame these arguments as grounds to seal the filing, but we nonetheless may construe them as such, particularly given the broad construction we afford pro se litigants. *See Torres v. Brookman*, 155 F.4th 952, 957 (7th Cir. 2025) (citing *Erickson v. Pardus*, 551 U.S. 89, 94 (2007)).

On appeal, Henson raises a narrow procedural argument. He argues that the district court should have granted his motion to strike the government's response, which he says improperly reintroduced previously struck allegations by recounting claims from the amicus brief—namely, that his advocacy business had been used to defraud incarcerated individuals. We review the denial of Henson's motion for abuse of discretion. *Heng v. Heavner, Beyers & Mihlar, LLC*, 849 F.3d 348, 353 (7th Cir. 2017) (citation omitted).

The district court acted within its discretion in deciding not to strike or seal the government's response. None of the district court's orders addressed the merits of the amicus brief's allegations, nor did they purport to preclude the government from referring to them. Nothing prevented the government from mentioning these allegations, at least insofar as they related to Henson's requested modification that would allow him to restart his advocacy business. Under these circumstances, the district court's decision to deny the motion to strike did not lie "beyond the pale of reasonable justification under the circumstances." *Bernstein v. Bankert*, 733 F.3d 190, 216 (7th Cir. 2013) (citation omitted).

AFFIRMED