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BY ECF

March 11, 2020

Re: *United States v. Ilori*, No. 20 Mag. 2482 (S.D.N.Y.)

The Honorable Ona T. Wang
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Dear Judge Wang:

We represent Adedayo Ilori in the above-captioned matter and write, with the consent and agreement of the Government, to seek a modification to the conditions of Mr. Ilori's release.

On March 4, 2020, Mr. Ilori was arrested in connection with bank fraud allegations, and ordered to be released on a $100,000.00 Appearance Bond secured by two financially responsible persons. Among other conditions of his release, Mr. Ilori is subject to home detention secured by electronic monitoring and is under supervision by the Pretrial Services Office of the Southern District of New York.

We write to respectfully request that Mr. Ilori's conditions of release be altered such that his Appearance Bond may be co-signed by only one financially responsible person, Mr. Ilori's wife and mother of his children, Wunmi Ilori. Mrs. Ilori is scheduled to be interviewed by the United States Attorney's Office this afternoon and we anticipate that she will be approved as the sole co-signer of Mr. Ilori's Appearance Bond. Further, as noted above, we have spoken with Assistant U.S. Attorneys Cecilia Vogel and Tara LaMorte, who consent to this request, as well as with Pretrial Services Officer Josh Rothman, who also does not object to this request.

Mr. Ilori reserves his rights to seek a further revision of his conditions of release at a later date.

Respectfully submitted,
/s/ Brooke E. Cucinella

Brooke E. Cucinella

cc: Counsel of Record (by ECF)