Simpson Thacher & Bartlett LLP

425 LEXINGTON AVENUE
NEW YORK, NY 10017-3954

TELEPHONE: +1-212-455-2000
FACSIMILE: +1-212-455-2502

Direct Dial Number
+1-212-455-3070

E-mail Address
Brooke.Cucinella@stblaw.com

BY EMAIL

June 23, 2020

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

Re: *United States v. Ilori*, 20 Mag. 2482 (S.D.N.Y.)

Dear Judge Wang :

We represent Defendant Adedayo Ilori in the above-captioned case. We write to request, with the consent of the Government and Pre-Trial Services, a modification of Mr. Ilori's conditions of release. On March 4, 2020, Mr. Ilori was ordered released on a $100,000 Appearance Bond secured by two financially responsible persons. Among other conditions of his release, Mr. Ilori is subject to home confinement secured by electronic monitoring and is under supervision by the Pretrial Services Office of the Southern District of New York. On March 11, 2020, this Court, with the consent of the Government, approved a modification to the conditions of his release such that his Appearance Bond could be co-signed by only one financially responsible person. Wunmi Ilori, Mr. Ilori's wife, was approved as the sole co-signer of Mr. Ilori's Appearance Bond.

We respectfully request that Mr. Ilori's conditions of release be altered to allow his attendance at his daughter's graduation on Thursday, June 25, beginning at 10 am, at PS232 Walter Ward School, 153-23 83rd St, in Howard Beach, New York. The school is taking special Covid-related precautions, including inviting one family at a time in to the auditorium to celebrate each individual graduate. His attendance at this meaningful event is at the request of (and of utmost importance to) his daughter. Mr. Ilori will be under monitoring throughout the event and will check in with his Pretrial Officer before he leaves for the event and after he returns home. We have conferred with his Pretrial Officer, Joshua Rothman, as well as Assistant U.S. Attorneys Cecilia Vogel and Tara LaMorte, who have advised that they consent to Mr. Ilori's attendance at his daughter's graduation.

Thank you for your consideration.

Respectfully submitted,

/s/ Brooke Cucinella
Brooke Cucinella

cc: AUSA Cecilia E. Vogel
AUSA Tara M. LaMorte