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United States v. Adedayo Ilori

No. 20-cr-0378 (CM) (S.D.N.Y.)

Letters and Exhibits Submitted on Behalf of Adedayo Ilori

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EXHIBITS

EXHIBIT 1

Letter from Adedayo Ilori

Dear Judge Liman:

I am writing you with the hopes that you will be lenient with regards to my case. The time that I have spent on home confinement have especially added a weighted prospective to my life as a whole. I cannot gamble or feel pressured to do anything illegal in my life going forward because I will always get the brunt end of the outcome and the shame associated with it.

My family have been supportive but I know deep down that everybody (including my kids) are ashamed of me and the situation that I have put myself in. They have been supportive, loving and great to me during this very challenging time and I humbly ask to be given a chance to make them proud as I had been doing before this.

For more than 10 years I have tried to overcome the temptation and peer pressure of getting involved in illegal activities and have built a successful Wellness business that I, my family and friends are proud of. I have a desire to help people transform themselves into their better version through fitness, and I love doing it because of the joy I get in assisting people change their mental well-being through their physical. I've built a stable relationship of business staff with some of the best wellness professionals in a few cities around the world that work with my provided clientele. But the peer pressure I suppressed came around in another form of a trusted person. I do not blame anyone but myself for relenting to what I teach my kids to stand up to. I am truly disappointed in myself; disappointed in the actions that led me to be arrested in front of my family at 6am in the morning. My 11 year old still asks me what the commotion that morning was about but I am too ashamed to fully explain what led to that morning. I've been learning through therapy and readings on how to tell him so he can learn from my mistakes, which I have plenty of. I hope to get a chance to be able to stand upright again in front of my children, family and friends.

Having had the time to reassess my life especially throughout the Covid-19 lockdown and my contracting the virus which made me deadly sick, I realized I wasn't as strong mentally nor physically as I thought. Repeating old mistakes in different forms, looking for validation from friends, peer pressure which is internally not healthy. When I was in jail between July 2019 and October 2019, my friend was the only one that came to visit me and tried to help with my bail, and I sort of felt indebted to him even though I shouldn't have. Afterwards I thought I was strong enough to walk away from him and the scheme, I now know he colluded with the CI to manipulate and pressure me to continue with the scheme. I would not be writing this letter if not for this manipulation and pressure directed from the CI that I was told was a high ranking Russian gangster. I also tried to sabotage the scheme by providing bad documents that I thought would be a way out. Unfortunately they kept the scheme going even with the bad documents I had provided for the first scheme after which I refused to provide any further documents for the second. I contest that my co-defendant continued with the scheme by himself (without my full knowledge or assistance) and the government knows this to be true. I felt tired and trapped, and my unfortunate reaction was to just sit back and be a pedestrian observer with the second scheme because of the threat of what may happen to me if I didn't. But I must take responsibility for my weakness, for the highest regards for others instead of myself and my future.

I have 3 great children I hope to see every day, to see them grow to be a much better version of me. I have a wife that loves me and believes that I can and will do better, so she supports me

knowing there are better days ahead. This colossal action has laid bare my life as not been for myself alone as I selfishly thought before, but it touches my retired mother in Nigeria that depends on me for her well-being financially and mentally, my uncle that's a university vice-Chancellor but depends on my generosity every so often because he hasn't been paid in months, my biological father that's recovering from 3 strokes that needs 24 hours house help to function in a country that barely has a functioning health care system, my extended family that looks up to me for whatever little I can provide in a failed state. I am extremely fortunate to be in this country and position to do the little I can for the few I can, and I hope you will give me the opportunity to improve on my life and the lives of my family by showing leniency.

I am trying to make amends any little way I can [REDACTED]

[REDACTED] I want to move forward out of this wretchedness that I have gotten myself and family into.

Thank you for taking the time to read this letter.

Adedayo Ilori

EXHIBIT 2

Letter from Aminat Bakare (Adedayo's mother)



09/07/2021.

Dear Judge,

REQUEST FOR LENIENCY.

I write to you on the behalf of my son Adebayo Adewale Ilori. Am his biological Mother.

To Start with, I want passionately Implore you not to feel bored or angry with my long writing.

Though I can see you, but I humbly plea that you listen to a sad and miserable Mother.

Thanks so much for this favour.

I raise my son solely as a single mother and I tried my best to give him good life. I am educated and a working class mother. His upbringing was fine and he attended the best school in my city, Ibadan Nigeria for is nursery primary and high school education. At the age of 11 I left him with my husband and the step grandmother to work in Saudi Arabia for a better and quality life for him. Prior we are very happy together despite the fact he didn't know his biological father because he was showered with love by my husband, He was in the boarding school but I widrew in from the boarding house because the seniors were bulling him and he was going to the same school – Government College Ibadan as a day student.

His stay with the Step – grandmother was very rough coupled with wickedness but he endured the situation because I always come home on vacation yearly but unfortunately the worst happened to him, he was abducted by unknown men to the family who posed to him as is father relation.

They convinced him that they were taking him to the father, but unfortunately he was taking to New York in united State of American where he had NO RELATIONS nor PARENT, so he was redeemed for some time until he managed to escape from them. From this point the problem of is life started, he had no parent nor relation to turn to for his livelihood Nor to go back to school. He therefore started struggling for his survival along the line many things could have gone wrong Meeting wrong people e.tc. but eventually he got himself a job, marry and started living a good life.

All this while I have no communication with him even I didn't attend his wedding because I was denied visa to experience this honourable day. IN 2012 he came to Nigeria briefly to visit me and fortunately this same year I was granted Green Card Visa and I started visiting him and the family regularly doing my vacation till 2017. I n 2017 I left him in New York to come to Nigeria briefly to come my siblings and to go back to US but unfortunately I meet very bad catasphronic situation three of my Junior Siblings where suffering from Malignant Cancer with no body to take care of them and I had no choice than to stay behind and take care of them.

The health issue of my siblings coupled with the outbreak of covid – 19 and my Own Health Issue kept me in Nigeria I lost two of my siblings to Cancer, One in February 14 2018 and the second one January 12 2020 and on my Own part I have GLAUCOMA AND RHEUMATOID ARTHRITIS'S. Unfortunately, by the time is could manage to go back to US he was not there, So I could not go to US because know body to support me health wise and other needs.

Overall Point is Dayo Adewale Ilori at always been my back bone my friend because he cares and loves me and my family. Doing Turbulent periods, he was there for us. Dayo has always been very gentle, calm, Kind, Quite, Hate Violence and Violence Atmosphere and is very well Principle.

I humble urge you Sir to temper justice with mercy for the sake of his family, his dad who eager to see him to apologize to him for not being there for him till now. It will do him and family good if you can magnanimously give him another chance, having realized his misdeeds and the need to get focused and discipline to embrace the glorious future. I want to come to U S before my Green Card Visa expires next year, 2022 and to be close to him because is all that I have. I am very lonely in Nigeria, because i am all alone by myself.

I will draw your Attention that since from age 11 years we have not really stay together ask a mother and Son should be, so please temper Justice with Mercy, so that I we can have time together before I die. Am getting Older and I have GLAUCOMA, heart problem and Rheumatic ARTHRITIS'S.

Sadly, too, his biological father has STROKE. He wants to see him and Apologize to him for the deserting him before he dies.

Sir, I want to humbly urge the court to release him on compassionate ground and /or mitigate the punishment. His absence from us has put his immediate family in serious s jeopardy. My son is a good and well – behaved young man who unfortunately has made poor decisions leading to the situation he now find himself. I have a strong belief that he would turn a new leaf if my plea for leniency is given positive consideration and approval

Do not hesitate to contact me on any information you may require from me concerning this issue

Yours respectfully,



Mrs Aminat I. Bakare.

EXHIBIT 3

Letter from Benjamin Ejelonu (Adedayo's uncle)



ADEKUNLE AJASIN UNIVERSITY

... building a 21st Century University, properly called!

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Faculty of Science
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Ondo State
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Dear Judge,

REQUEST FOR LENIENCY

I write to you on behalf of my nephew, Adedayo Adewale Ilori. Dayo was raised by her mother as a single mother, who tried hard to give him the best life could afford him. She has to travel to Saudi Arabia so as to enhance the family's financial status. While the mother travelled I have stay with Dayo in his step father's apartment with my sister's mother in-law. Dayo would chose to lie down on his stomach waiting for when food would come than going about begging for food. He was so humble and quiet, growing up as a young boy; also very respectful.

I have to leave home to the University hotel to write my Master's Examination, only to find out that he had been abducted by some unknown people to us on arriving from the University. After several months of search to no avail we have to give up trusting that one day we would gladly find him.

It was a year of turbulence searching for him in Nigeria not knowing he was far away in the USA. We got relieved when he called telling us his ordeal. Since then he had struggled to survive along the way all alone. He eventually got himself a job as a trainer and got married. A marriage and family he had strived to keep and maintain all this while.

I believe bad influence must have led him into some of these unfriendly, uncivil tendencies and behaviours as I could vouch for him having helped to nurture him while his mother was away in Saudi Arabia.

I humbly urge you Sir to temper justice with mercy to give him the reason to live again having experience much from his past. As his Uncle I have always been proud of him, but for the bad influences and communications, which I believed by now he had learned in a hard way the difference between Good and Bad.

I strong believe that if given a second chance he would not err again knowing the damning consequences of such breach of trust and confidence that he can be a good boy, a good man, a good son, a good brother, and a good husband and father again.

Dayo also has been of immense assistance to me in several ways both in the past and in recent times.

Sir, I want to humbly urge the court to release him on compassionate ground and/or mitigate the punishment. His absence from us has put his whole family in serious jeopardy. My nephew, I strongly believe is a good and well-behaved young man who inadvertently has made poor decisions leading to the situation he now found himself. I have a strong belief that he would bounce back to good life, becoming a good and dependable citizen of the great America again if my plea for leniency is given positive consideration and approval.

Dayo remains my good-nephew beyond Tomorrow!

Yours respectfully,

Ejelonu, B. C., PhD

Professor and Head, Department of Chemical Sciences.



EXHIBIT 4

Letter from Muslim Adesoye Bakare (Adedayo's step-father)

Your Honor,

My name is Muslim Adesoye Bakare, my address is [REDACTED]

[REDACTED] England.

Sir, I am writing for leniency in sentencing of my stepson Adedayo Adewale ILORI

I have known Adedayo for more than 40years, I married his mother when he was just one year and eleven months, so I can comfortably tell you that Dayo as always called is my son and he grew up under my tutelage before coming back to the United States of American.

Your Honour am aware of the gravity of his offence, but I still find it very hard to wrap my head around it, this is not the boy I brought up.

Dayo has been there for me and his family,(his wife Wunmi and their kids Teniola and Timilehin) helping in providing and taking care of the kids.

Your Honour not too long ago he lost his uncle to cancer and his Aunt also died leaving him with two nephews and one niece, mother and the 86years old grandmother, all this people depended on his support.

Your Honour Dayo has been working tirelessly to improve himself and to make himself a better person and he has also moved closer to God.

I plead with you to please temper Mercy with Justice while delivering your verdict sir, as I have no doubt that he has learnt his lessons.

Sincere yours,

Muslim Adesoye Bakare

[REDACTED]
[REDACTED]

EXHIBIT 5

Letter from Wunmi Fadipe-Ilor (Adedayo's wife)

Wunmi Fadipe-Ilori
[REDACTED]
[REDACTED]

July 12th, 2021

Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Dear Judge,

I am writing this letter to ask for leniency on behalf of my husband and father to my children, Adedayo Ilori. I hope that this can help you see what kind of person Adedayo is despite the transgressions that have led us all to this point. I feel strongly about Adedayo's future and i want to try and make you feel the same way.

I met Adedayo in June of 1999 and i've known him for over 22 years and he is truly a good person of strong moral character. i realize that may seem hard to believe, given the current circumstances, but it is true nonetheless. I have seen Adedayo go through many trials and tribulations during these years which we have been together and somehow he still manages to look at life from a positive perspective.

Adedayo and I have 2 kids together ages 11 and 15 and he has been nothing short of a great father in their lives. He is an amazing father and although that may be something you hear frequently, but i wish you could witness their relationship. Both with his 11 year old Son and 15 year old daughter. He helps to take them to school and picks them up. He assists them with their homework and as a Personal Trainer makes physical activity his way of bonding with the kids outside of their academic studies.

He's a good husband and friend to me and he extends himself in any capacity that i may require of him. I currently work as an Executive Assistant at an Investment banking Firm and have a 9 to 5 schedule that does not allow me to drop and pick up the kids without being late for work or having to leave early since the schooldays is over at 2:30pm. He steps up by moving his schedule around to make the children his priority while i'm at work. He pushes me to do more and this summer through his encouragement, i was able to finish my Bachelors with a degree in Economic from CUNY @ Queens College and currently studying for my investment licenses (Series 7 and 63) in becoming a Financial Advisor. He truly is beyond committed as a father and husband. Adedayo is truly my biggest support system and i truly rely on him.

I believe as a child your parents are the most important and influential people we can ever encounter. Ever since i could remember, i've looked up to my Mom and Dad. Whether for guidance, support, advice, or just a big hug. They have been my true friends and have always been there for me throughout my life. I want to provide the same for my kids. I do not want the void of their other to have a negative impact on their upbringing or for them to feel any less loved as a child because their father is unable to help raise them.

Adedayo is one of two siblings with his brother and Step Father residing in London, England. His Mother is a retired Nurse who currently resides in Nigeria along with his biological Father

who suffered 3 strokes and currently Immobile due to the illness. Adedayo does his best to help them in any capacity that he can. He has always been a helpful and thoughtful person. He's always willing to put others before himself. For the past 12 years, he has told clear of trouble and has focused on his Personal Training Business and his family.

Throughout the lockdown, he himself has had medical challenges that i'm afraid might be hard to manage if sent to prison. On top of contracting covid, we also had to deal with medical diagnosis that is still inconclusive along with his shoulder and knee surgeries that he is still waiting on for a date. My biggest fear is him falling ill while in prison and not being able to receive the care of his loved ones.

It is unfortunate that Adedayo has made some poor decisions which led us here and i am very disappointed with his choices. However, that does not overlook the good characteristics he has as a Son, Husband, father, friend, a person. I believe that as we move forward he will be a better person and this will serve a lesson that he can look back on and use as a teaching moment to younger ones. I also believe that everyone makes mistakes but we must learn from them. I recognize that Adedayo has made mistakes in the past and i sincerely ask that you please find it in your heart to show leniency while sentencing him and temper justice with mercy. Thank you for your consideration and thank you for taking the time to read this letter.

If you have any inquiries please contact me at anytime.

Sincerely,
Wunmi Fadipe-Ilori

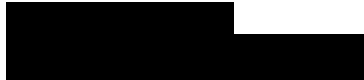
A black rectangular redaction box covering the signature area.

EXHIBIT 6

Letter from T.I.

(Adedayo's daughter)

[REDACTED]

August 11th, 2021

Judge
United States Courthouse 500 Pearl Street
New York, NY 11412

Dear Judge,

I am writing this letter to ask for leniency on behalf of my father, Adedayo Ilori. Additionally, I hope that this letter shows you what kind of person he is despite the offenses that have been charged against him. I feel strongly about my relationship with my dad and want him to be there for me in the future. I've seen my dad go through many obstacles during my lifetime and he still manages to be positive, joke around, and have fun.

My dad helps me with my homework, extracurricular activities, and personal issues that I may have. I also have a brother who is 11 years old and their relationship with each other is great. They go to the park, take walks and confide in each other. My dad has been nothing but a good father to me and my brother, so I hope you see the good in his heart.

My father, Adedayo Ilori is not only a dad but a son in law, a husband, an uncle, and a son. And still with all the people who rely on him, he still is able to nurture and love everyone. I also will be entering my second year of high school at Excelsior Preparatory High School which I plan on running track and field. Since my dad works as a trainer he will help and push me to be a great runner. And although my dad works in the field of fitness I know that he and my mom will push me to do my best academically too.

Therefore judge, I urge you to take into consideration how many people who know and love my dad want him to stay with us and keep his freedom. I can't imagine Christmas, a birthday, Easter, or any day without him. I'll miss him calling me to get up before 12:00 pm on the weekends or being at my track and field games. I hope this letter shows you how much my dad means to me and my family and how you should take into consideration who Adedayo is before charging him with any crimes.

Sincerely,

T [REDACTED] I [REDACTED]

EXHIBIT 7

Pictures of Adedayo and His Family





