



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

June 22, 2022

BY ECF

The Honorable Mary Kay Vyskocil
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *United States v. Adedayo Ilori & Chris Recamier,*
S1 21 Cr. 746 (MKV)**

Dear Judge Vyskocil:

The Government respectfully writes to inform the Court that, this morning, a grand jury returned the enclosed Superseding Indictment against Adedayo Ilori, the defendant. This Superseding Indictment is substantially identical to the initial Indictment filed in this case, but it differs in three minor ways: (1) defendant Chris Recamier, who has pleaded guilty is not charged as a defendant in the Superseding Indictment; (2) the Superseding Indictment includes allegations triggering the statutory enhancement under 18 U.S.C. § 3147, which applies where individuals like Ilori commit federal offenses while on federal bail; and (3) the Superseding Indictment clarifies the specified unlawful activities involved in the money laundering conspiracy charged in Count Six.

Respectfully submitted,

DAMIAN WILLIAMS
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By: /s/

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cc: all counsel of record (by ECF)