



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 & EMAIL

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:

Pursuant to the Court's May 20, 2022 Order (Dkt. 30) and Individual Rules, the Government, on behalf of the parties, respectfully submits the enclosed joint proposed voir dire, requests to charge, and verdict form. The parties are in agreement as to these submissions. The parties respectfully request leave to supplement these charges and submit revised proposals where necessary to reflect the actual evidence at trial and the rulings of the Court.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/
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cc: all counsel of record (by ECF & email)