

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

UNITED STATES OF AMERICA)
)
v.) CASE NUMBER: CR422-0084
)
BERNARD OKOJIE,)
Defendant)

**DEFENDANT BERNARD OKOJIE'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTIONS**

COMES NOW, BERNARD OKOJIE, Defendant, by and through his counsel of record, and moves this Honorable Court for a thirty (30) day extension of time in which to file motions and pretrial pleadings.

In support thereof, Mr. Okojie states as follows:

1.

Undersigned counsel was appointed to represent Mr. Okojie on June 22, 2022.

(Document 13)

2.

Count One of the Indictment alleges conspiracy to commit wire and bank fraud in violation of 18 U.S.C. §1349, claiming that:

- A. Mr. Okojie submitted “no less than ten different EIDL applications to the SBA on behalf of various businesses purportedly owned and operated by OKOJIE.”
- B. Mr. Okojie submitted “at least eight EIDL applications to the SBA on behalf of various business purportedly owned and operated by individuals” other than Mr. Okojie; and

C. Mr. Okojie submitted “one or more PPP applications”.

3.

Count Two of the Indictment alleges wire fraud in violation of 18 U.S.C. §1343 and 2.

4.

Count Three of the Indictment alleges a money laundering conspiracy in violation of 18 U.S.C. §1956(h) concerning the wire and bank fraud schemes and conspiracy charged in Counts One and Two of the Indictment.

5.

The Indictment also contains a forfeiture allegation.

6.

While no co-conspirators are named in the Indictment, the Indictment alleges that at least eight other individuals had some involvement in these financial transactions alleged in Count One.

7.

Defense counsel was initially furnished significant discovery materials on July 19, 2022 at the Initial Appearance and has received additional productions with the most recent furnished on August 12, 2022.

8.

Upon defense counsel’s request at the Initial Appearance, the Court extended the filing time for pretrial motions and in its Order that stated “All pretrial motions shall be filed on or before August 18, 2022.” (Document 21)

9.

As discovery materials have been reviewed, it now appears that the factual matters described in these materials and the potential legal issues in this case are more involved than initially expected, and as a consequence more time is necessary to determine and prepare pretrial motions. Mr. Okojie's counsel requests that he be granted a thirty (30) day extension of time in which to file motions.

10.

Counsel has conferred with Assistant United States Attorney Jonathan Porter, who is prosecuting the case, and Mr. Porter has given his permission for counsel to represent to the Court that he does not oppose the extension of time.

11.

Mr. Okojie is not requesting this extension of time to delay or unduly prejudice these proceedings.

WHEREFORE, Mr. Okojie respectfully requests that the Court grant his Motion and extend the time to file motions for thirty (30) days from August 18, 2022 until September 17, 2022.

Respectfully submitted, this 15th day of August, 2022.

/s/John J. Ossick, Jr.
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CERTIFICATE OF SERVICE

This is to certify that I have this day served all parties in this case in accordance with the directives from the Court Notice of Electronic Filing (“NEF”), which was generated as a result of electronic filing.

This 15th day of August, 2022.

/s/John J. Ossick, Jr.
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