

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  
MOTION TO DETERMINE VOLUNTARINESS OF STATEMENTS**

COMES NOW, BERNARD OKOJIE, Defendant in the above-styled action, pursuant to *Jackson v. Denno*, 378 U.S. 368, 84 S.Ct. 1774, 12 L.Ed.2d 908(1964) and prior to trial and moves this Court to grant him a hearing to determine the voluntariness of any statements made by him to law enforcement officers after his arrest, if any were made. Currently counsel is not aware of any such statements having been made and files this motion and recognizes that it should only apply if it is determined that any statements were obtained. In support of his motion, Mr. Okojie states:

1.

If the government, by and through the United States Attorney, attempts to introduce into evidence at trial, oral admissions, written statements, and/or tape recordings of statements made by Mr. Okojie to law enforcement officers while in custody, those statements, if any were made, may incriminate Mr. Okojie and would have been made in the absence of counsel and may have been made without any intelligent or knowing waiver of counsel.

WHEREFORE, if the United States Attorney attempts to introduce any statements made by Mr. Okojie while in custody, he prays for a *Jackson v. Denno* hearing to determine the voluntariness of the statements in the totality of circumstances and to determine the validity of any waiver of counsel prior to the interrogation. Mr. Okojie also prays that he be granted a hearing prior to trial to determine whether the statements were voluntarily given.

Respectfully submitted, this 15<sup>th</sup> day of September, 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 15<sup>th</sup> day of September, 2022.

/s/John J. Ossick, Jr.  
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