

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 FOR SUBSTANCE OF PROMISES
OR PLEA BARGAINS BETWEEN
WITNESSES AND GOVERNMENT**

COMES NOW, BERNARD OKOJIE, Defendant in the above-styled action, by and through his undersigned counsel of record, and moves the Court for the substance of any and all statements or discussions had with any of the witnesses, confidential informants, or unindicted co-defendants herein or with any such person's counsel indicating a promise or a suggestion of leniency, compensation, assurance not to prosecute, agreement to proceed on only certain counts of an indictment, representations with respect to yet uncharged misconduct, or any benefit accruing to said individuals whatsoever in exchange for their cooperation, assistance or testimony at the trial herein, as well as any probations, paroles, pending charges or other offenses known to the government which have not been charged, as same relate to a government witness' motive for testifying on their behalf.

The evidence of any such representations by the government or which the government will make at any future time is discoverable pursuant to the Due Process Clause of the Fifth and Fourteenth Amendments to the Constitution, and the withholding

of any such evidence constitutes a denial to the Defendant herein of his Constitutionally protected rights to due process and fundamental fairness in the criminal proceedings not brought against them. *Giglio v. U.S.*, 405 U.S. 150 (1972); *Brady v. Maryland*, 373 U.S. 83 (1963).

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

s/John J. Ossick, Jr.
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