

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 INTERVIEW GOVERNMENT
INFORMANTS PRIOR TO TRIAL**

COMES NOW, BERNARD OKOJIE, Defendant in the above-styled action, by and through his undersigned counsel of record, and moves this Court for an order requiring the government to provide him, through counsel, with the identity and present location of all unindicted co-conspirators who the government expects to call as witnesses against him at trial, who are alleged to have participated in the acts forming the basis of the above indictment so that counsel can attempt to interview them in preparation for hearings on Mr. Okojie's motions and for trial; or, in the alternative, to make them available at a time and location convenient to counsel as soon as reasonably possible.

Mr. Okojie further requests that the Court order the government to refrain from obstructing any efforts by his counsel to interview these persons or from discouraging them from consenting to an interview by his counsel.

In the instant indictment, Mr. Okojie is the only named defendant; however, the indictment refers to "co-conspirators, known and unknown", but does not identify anyone as an unindicted co-conspirator. While the indictment references Individual 1", "Individual 2", "Individual 3", "Individual 4", "Individual 5", "Individual 6", "Individual

7", and "Individual 8", they are not alleged to be parties to any conspiratorial agreement.

WHEREFORE, Mr. Okojie respectfully prays that this Court issue an order requiring the government to inform his counsel of the identity and current address of any and all unindicted co-conspirators, or, in the alternative, to make them available at a time and location convenient to counsel for purposes of counsel requesting an interview, and for such other and further relief as this Court may deem just and proper.

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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