

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

UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE NUMBER: 4:22-CR-84
	)	
BERNARD OKOJIE,	)	
Defendant	)	
	)	

**DEFENDANT BERNARD OKOJIE'S
RESPONSE TO GOVERNMENT'S MOTION IN LIMINE**

COMES NOW, BERNARD OKOJIE, Defendant in the above-styled action, by and through his undersigned counsel of record, and files this his response to the Government's Motion in Limine (Document 79) as follows:

1. Certain Records in this Case are Self-Authenticating:

Mr. Okojie has no authenticity objections as to any document for which notices and certificates of authenticity have been furnished.

2. Motion to Admit Certain Evidence at Trial:

Mr. Okojie's motion in limine (Document 75) references matters concerning his involvement with Brandon Richardson, and contends that these crimes were not included in the government's 404(b) notice; therefore, they should not be admissible in the present case. There has not been any repudiation by Mr. Okojie, either directly or through pleadings filed by counsel, of any matter in his proffer. Identifying in Defendant's motion in limine that the crimes involve Brandon Richardson as a party are different crimes than those contained in the indictment is not any material change from what Mr. Okojie has previously stated.

The government did not name or include in the present indictment any criminal acts

involving Mr. Okojie and Brandon Richardson. Brandon Richardson is not named directly or otherwise identified as any of the unnamed individuals in the indictment (Count One - Paragraph 27 of the indictment references Individuals 1 through 8 respectively and Paragraph 28 references Individuals 3, 5, 4, 6, 7, 1, 8, and 2. Count Two - Paragraph 31 references Individual 4.) The discovery materials and matters involving Mr. Okojie and Brandon Richardson, as can best be determined, are not included in the transactions identified by descriptions in the indictment.

No recording or transcript of Mr. Okojie's proffer has ever been provided and the only report included in the discovery materials was a summary of the interview.

3. Motion to Exclude Certain Argument and Evidence at Trial:

Mr. Okojie is not offering "negligence of a victim" as a defense.

Respectfully submitted, this 10th day of March, 2023.

/s/John J. Ossick, Jr.
Georgia Bar Number 555150
JOHN J. OSSICK, JR., P.C.
Post Office Box 1087
Kingsland, Georgia 31548
Telephone: 912-729-5864
E-mail: ossick@tds.net

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

UNITED STATES OF AMERICA	)	
	)	
v.	)	CASE NUMBER: 4:22-CR-84
	)	
BERNARD OKOJIE,	)	
Defendant	)	
	)	

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 10th day of March, 2023.

/s/John J. Ossick, Jr.
Georgia Bar Number 555150
JOHN J. OSSICK, JR., P.C.
Post Office Box 1087
Kingsland, Georgia 31548
Telephone: 912-729-5864
E-mail: ossick@tds.net