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**REVISED SENTENCING MEMORANDUM**

BY ECF

March 1, 2022

The Honorable Lewis J. Liman
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY, 10007

Re: *United States v. Ilori,* No. 20-cr-378 (S.D.N.Y.)

Dear Judge Liman:

We respectfully submit this supplemental sentencing memorandum on behalf of our client, Mr. Adedayo Ilori, the defendant in the above-captioned action ("Mr. Ilori" or "Adedayo").

As described in our initial sentencing memorandum,[1] Mr. Ilori pled guilty to Count 1 of the Indictment, which charges him with conspiracy to commit wire fraud and mail fraud in violation of 18 U.S.C. § 1343 and 18 U.S.C. § 1341 relating to a scheme in which the conspirators submitted fraudulent business loan applications across interstate lines with the intent not to repay the loans. Mr. Ilori also admitted to the conduct charged in Count 5 of the Indictment, which charges him with agreeing with his co-defendants and others to launder the proceeds obtained from the fraudulent business loan applications through a bank account opened using a stolen identity in violation of 18 U.S.C. § 1343 and § 1341. On April 8, 2021, Mr. Ilori pled guilty pursuant to a plea agreement in which the parties, at that time, stipulated to a United States Sentencing Guidelines (the "Guidelines") range of 51 to 63 months (the "Guidelines Range").

On October 8, 2021, ahead of the scheduled sentencing, a search warrant was executed against Mr. Ilori and he was subsequently arrested for alleged violations of his pretrial release. The Government asserts that it had been investigating a series

[1] We submitted an initial sentencing memorandum on behalf of Mr. Ilori on September 29, 2021. *See* Dkt. No. 97.

of loans fraudulently obtained through the United States Small Business Administration Paycheck Protection Program ("PPP") by a man named Chris Recamier, which led them to Mr. Ilori. Dkt No. 99. Mr. Ilori was indicted on December 9, 2021 for his involvement in the alleged PPP scheme. The indictment charged Mr. Ilori and co-defendant Mr. Recamier with six offenses, including wire fraud in violation of 18 U.S.C. § 1343. *See* Case No. 21-cr-00746, Dkt No. 6. This case is currently pending before Judge Mary Kay Vyskocil.

Despite these developments, we respectfully request that the parties proceed with the sentencing hearing on March 3, and focus on the charges to which Mr. Ilori pled guilty, rather than the allegations made in connection with the new case, which is pending before Judge Vyskocil, for the reasons explained in further detail below. We also submit additional argument on what constitutes a fair and appropriate sentence for Mr. Ilori in light of his limited role in the latter aspects of the loan scheme for which he is charged in this action.

## I. The Conduct At Issue In Mr. Ilori's Case Pending Before Judge Vyskocil Should Be Litigated Separately

At sentencing, the Court should not hear evidence pertaining to Mr. Ilori's alleged violations of pretrial release because they involve conduct and evidence that is at issue, and that Mr. Ilori intends to dispute, in the case pending before Judge Vyskocil.

The Government has informed us that Mr. Ilori's purported violations of his pretrial release include that Mr. Ilori purchased coffee using a debit card in the name of an alleged victim of the PPP scheme and that Mr. Ilori was observed driving a Mercedes leased by Mr. Recamier using the identity of a different alleged victim, among other things. These allegations are closely intertwined with the PPP loan scheme at issue in the second case (the "PPP Case"), and the weighing of evidence regarding this conduct—and Mr. Ilori's defense of that alleged conduct—should be handled in Judge Vyskocil's courtroom rather than as part of this sentencing proceeding.

Mr. Ilori makes this request for a number of reasons. First, it would be premature—and likely prejudicial—to require Mr. Ilori to devise a legal strategy to challenge the evidence in the PPP Case at this time. While we have reviewed discovery provided to us by the Government and consider the evidence pertaining to Mr. Ilori to be primarily circumstantial, we are not representing Mr. Ilori in his case before Judge Vyskocil. Further exacerbating our concern is the fact that Mr. Ilori has only been able to meet with this attorney in the PPP Case once so far (last week), and has not had the opportunity to review the Government's discovery because of, among other reasons, the impact of the national lockdown. *See* Steven Rodas, *N.J. prisons, halfway houses suspend visits due to COVID omicron wave*, NJ.com (Jan. 7, 2022), https://www.nj.com/coronavirus/2022/01/nj-prisons-halfway-houses-suspend-visits-due-to-covid-omicron-wave.html.

We cannot predict how Mr. Ilori's attorney will advise him to proceed in that case and moreover, we do not want to be in the position of providing conflicting advice or raising arguments that ultimately contradict his legal strategy before Judge Vyskocil. We also suffer from the inherent limitations that a pending criminal case would inevitably impose on a hearing that would proceed before it including, but not limited to, our inability to call certain witnesses. As one example, we have reason to believe that Mr. Recamier, Mr. Ilori's co-defendant in the PPP Case, has made statements that contradict the Government's view of the evidence relating to that case. Mr. Recamier's lawyer, however, has explained that, given the pending charges, he cannot at this time put in an affidavit or testify. Moreover, any presentation of evidence on the PPP scheme in this Court would be duplicative of the forthcoming criminal proceedings before Judge Vyskocil. Accordingly, Mr. Ilori does not seek to have a *Fatico* hearing at this time, as he intends to defend himself against the charges in the PPP Case in connection with that case, and respectfully asks that his sentence in this case be limited to the conduct for which he pled guilty.

## II. The Proposed Sentence Is Fair In Light Of The Circumstances Of Mr. Ilori's Involvement In The Offense

For the reasons set forth here and in our initial sentencing submission, we respectfully request that the Court impose a sentence pursuant to the United States Sentencing Guidelines (the "Guidelines") of 30 months. While we recognize that Mr. Ilori has a criminal history, while Mr. Chancy did not, it is our position that this range is appropriate given Mr. Ilori's role in the offense conduct, especially when viewed vis-à-vis Mr. Chancy who received a sentence of 30 months.

Pursuant to 18 U.S.C. § 3553(a)(1), this Court must consider the nature and circumstances of the offense in determining an appropriate sentence. As explained in his initial sentencing memorandum, Mr. Ilori does not deny that he engaged with Mr. Chancy and an undercover agent (the "UC") to submit fraudulent business loans. In evaluating Mr. Ilori's culpability, however, this Court should consider Mr. Ilori's role in the scheme as a whole, especially as compared to Mr. Chancy. While Mr. Ilori was involved in preparing certain, $5,000 loan applications in January 2020, he was not actively involved in the loan applications submitted in February 2020, and overall, his role was much less central to the scheme than that of Mr. Chancy. PSR ¶¶ 32, 37.[2]

Mr. Ilori was not present at the February 2020 meetings between Mr. Chancy, the CS, and others regarding additional loan applications and the opening of an allegedly fraudulent bank account to launder those proceeds. On February 18, 2020, Mr. Chancy and the confidential source ("CS")—not Mr. Ilori—met and discussed four loan applications (of $250,000 per loan) that Mr. Chancy intended to submit to the UC. *Id.* ¶¶ 36, 37; *see also* Compl. ¶ 14(a). Then, Mr. Chancy—not Mr. Ilori—emailed

[2] Mr. Ilori's limited involvement in the scheme is reflected in the PSR. Even under the Government's best set of facts, Mr. Ilori is responsible for preparing two of the five loans in the first set, and only one of the loans in the second set. PSR ¶ 42.

four loan applications to the UC, including one listing Mr. Chancy as the loan applicant. PSR ¶ 37. Mr. Chancy also mailed the applications to the UC at a mailbox in Manhattan. Compl. ¶ 14(b). Mr. Ilori did not.

On February 26, the CS and Mr. Chancy met at the HSBC Bank where Mr. Chancy worked. PSR ¶ 39. Mr. Ilori was not present. While Mr. Chancy may have called Mr. Ilori asking him if he had an identity to be used to open a fraudulent bank account, Mr. Ilori disputes providing Mr. Chancy with the Missouri identification card that Mr. Chancy had on his personal cellphone. *Id.* ¶ 39. Immediately after the meeting between Mr. Chancy and the CS, the CS met with co-conspirator Michael Albarella (a manager at HSBC) and discussed opening a fraudulent bank account to launder the loan money. *Id.* ¶ 40. On February 27, Mr. Chancy, the CS, Mr. Albarella, and another undercover agent ("UC-2) met at the HSBC bank to open the fraudulent bank account. PSR ¶ 41. Again, Mr. Ilori was not present.

In addition, Mr. Ilori is absent from a number of telephone calls and text messages between Mr. Chancy, on the one hand, and the CS or UC, on the other hand, coordinating the submission of the February 2020 loan applications and receipt of the loan proceeds. *See, e.g.*, USAO_0000603 (recording of February 17, 2020 telephone call between Mr. Chancy and the CS); USAO_0000633 (recording of February 24, 2020 telephone call between Mr. Chancy and the CS regarding opening an account); USAO_000625 (recording of March 2, 2020 telephone call between Mr. Chancy and the CS regarding receipt of loan proceeds). Similarly, text messages between Mr. Chancy and the UC indicate that Mr. Chancy—not Mr. Ilori—primarily coordinated the scheme involving the $250,000 loans. For example, on February 19, 2020, Mr. Chancy sent a text message to the UC confirming he emailed the UC emails the loan packages, and Mr. Chancy followed up with the UC the next day about the loan term sheets. *See* USAO_000742; USAO_0016705-07; USAO_0016718.

Moreover, Mr. Ilori's limited role in the February 2020 loan applications and bank account is consistent with the fact that Mr. Chancy wanted to restrict Mr. Ilori's continuing involvement in the scheme. *See, e.g.*, USAO_0000377 (recording of January 13, 2020 telephone call between Mr. Chancy and CS in which Mr. Chancy asks the CS not to deal with Mr. Ilori); USAO_0000408 (recording of January 16, 2020 telephone call between Mr. Chancy and CS discussing cutting Mr. Ilori out of the scheme).

Relatedly, with respect to loss amount, the value of the first set of January 2020 loans was $20,000. PSR ¶ 33. By contrast, the value of the second set of loans was reportedly $1,000,000. PSR ¶ 38. Considering the value of the loans attributed to Mr. Ilori's involvement in the first scheme, his Guidelines range would be only 15 – 21 months.[3]

[3] Even assuming the Government's best theory of the facts, Mr. Ilori is responsible only for the preparation of two, $5,000 loans and one, $250,000 loan. PSR ¶ 42. This would result in Guidelines range for Mr. Ilori of 41 – 53 months.

Mr. Chancy received a sentence of 30 months. *See* Dkt. No. 92; *United States v. Frias*, 521 F.3d 229, 236 n.8 (2d Cir. 2008) (district court may consider similarities and differences among co-defendants when imposing a sentence). Mr. Chancy was responsible for bringing Mr. Ilori into the scheme in the first place and—unlike Mr. Ilori—was directly involved in all of the loan packages at issue in January and February 2020. For these reasons, we submit that a sentence of 30 months is appropriate.

## III. Mr. Ilori Experiences PTSD Symptoms That Contribute to His Behavior And He Expresses Motivation to Participate In Treatment

In executing "perhaps the most difficult task of a trial court judge," the Second Circuit has ask sentencing judges to "have some understanding of 'the diverse frailties of humankind'" and to exercise "a 'generosity of spirit, that compassion which causes one to know what it is like to be in trouble and in pain.'" *United States v. Singh*, 877 F.3d 107, 121 (2d Cir. 2017) (citations omitted). To aid this Court in gaining a fuller understanding of who Mr. Ilori is, we submitted our initial sentencing memorandum which describes the reasons why his history and characteristics warrant leniency. *See* Ex. A.

In addition, we submit a report from psychiatrist Eric Goldsmith, M.D., who conducted a psychiatric evaluation of Mr. Ilori to assess his overall psychiatric condition following his second arrest for alleged fraud. *See* Ex. A (Dr. Goldsmith Report). Dr. Goldsmith has diagnosed Mr. Ilori with "complex PTSD" and concluded that Mr. Ilori evidences "dissociative symptoms" which "can best be understood as can be best understood as identification with the state of mind that he had as a child, when he was exposed to deprivation and traumas and forced to survive." *Id.* at 4–5. Dr. Goldsmith's expert opinion is that "[w]ith ongoing treatment, Mr. Ilori's trauma-based symptoms will improve and his risk for criminal recidivism will be reduced." *Id.* at 6. Dr. Goldsmith reports that Mr. Ilori "is motivated to participate in mental treatment." *Id.*

## IV. Conclusion

For all the foregoing reasons, we respectfully ask that the Court impose a sentence of 30 months.

Respectfully submitted,

*/s/ Brooke Cucinella*

Brooke Cucinella

cc: Counsel of record (via ECF)

# Exhibit A

Eric Goldsmith, M.D., LLC

The American Board of
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Diplomate in Psychiatry
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# PSYCHIATRIC REPORT

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|---|---|
| **EXAMINEE:** | **ADEDAYO ILORI** |
| **CASE:** | **1:20-cr-00378-LJL** |
| **DATE OF BIRTH:** | **December 26, 1978** |
| **DATE OF REPORT:** | **February 24, 2022** |

**PURPOSE OF EVALUATION:** Kate Wheelock, attorney with Simpson Thacher & Bartlett LLP, representing Adedayo Ilori, requested that I conduct a psychiatric evaluation of her client. Mr. Ilori has been charged under two separate indictments. He has been indicted on the charges of conspiracy to commit mail and wire fraud and related charges stemming from events which occurred March 2019 through March 2020. He has also been charged on a 2nd indictment, accused of a fraud related to the COVID-19 Payment Protection Program (PPP). A psychiatric assessment was requested to address Mr. Ilori's overall psychiatric condition and make treatment recommendations.

**PSYCHIATRIC OPINION:** It is my opinion, to a reasonable degree of psychiatric certainty, that Adedayo Ilori evidences trauma-related symptoms. As a child, Mr. Ilori was exposed to multiple and repeated traumatic events. As a result of childhood traumas, Mr. Ilori evidences distressing feelings of shame and guilt. He has deficits in his capacity to effectively communicate and he emotionally shuts down. He evidences impairments in his capacity to form attachments to others. He evidences dissociative symptoms. His behavior appears to be a regression to his childhood, where he was forced to survive. Mr. Mr. Ilori's behavior can best be understood in the context of his trauma-related symptoms. Mr. Ilori can benefit from a trauma-based psychotherapy treatment to assist him in working through his trauma-based symptoms. I recommend that the treatment be phase-based or sequential in nature starting with the development of a trauma narrative collaboratively documented by Mr. Ilori and his trauma therapist. Therapy will be helpful in addressing cognitive restructuring, with a focus on adjusting his distorted self-image and improving his self-esteem. Skills-based therapeutic interventions will be helpful in improving his attachments and diminishing disassociation. With ongoing therapy, Mr. Ilori's risk of criminal recidivism will be reduced.

**SOURCES OF INFORMATION:**

- Video interviews with Adedayo Ilori on January 25 and 31, 2022 for a total of approximately 4.5 hours. Mr. Ilori was in a private room at the Essex County Jail, this examiner was in his office located at 420 Madison Avenue, New York, NY.
- Telephone interview with Mr. Ilori's wife, Wunmi Fadipe-Ilori on February 4, 2022 for approximately 1.5 hours.

- Review of Federal Indictments.
- Review of September 29, 2021 Sentencing Memo prepared by Brooke E. Cucinella, attorney with Simpson Thacher & Bartlett LLC.
- Review of Letters and Exhibits submitted on behalf of Adedayo Ilori.

**CONFIDENTIALITY:** Mr. Ilori was informed that the purpose of the interviews was to provide a psychiatric assessment to his attorneys and the court. Mr. Ilori understood the limits of confidentiality. He understood that a treatment relationship was not being established.

**CLINICAL HISTORY:** Adedayo ("Dayo") Ilori is a 43-year-old married American-born Nigerian man who is currently housed at the Essex County Jail. He is not receiving mental health treatment. He is not being prescribed psychotropic medications. He has been incarcerated for the past four months after violating the terms of his release. He has subsequently received a second federal indictment. Mr. Ilori has no previous history of receiving mental health treatment. He has no history of chronic medical problems. He has no history of alcohol or substance abuse problems.

Mr. Ilori was born in California. When he was approximately 1-year-old, he relocated with his mother to Nigeria, Africa where his parents were from. Mr. Ilori reports that he was raised in poverty in Nigeria by a single mother. He reports having a stressful childhood. He reports feeling abandoned by his biological father. He reports being exposed to several traumatic and violent events during his childhood in Nigeria. He says the country at that time was an unlawful place. He reports that many times there were threats against he and his family's life. He says that his mother had communicated to him that, "She would do anything to protect us, keep us safe even if it meant she would be raped." Mr. Ilori says, "As a young child I had to find a way to survive, to cope with this dangerous place."

When Mr. Ilori was approximately 11 years old, he says his mother who is a trained nurse relocated to Saudi Arabia for work in a hospital. Mr. Ilori reports that he was left to be raised by his stepfather and stepfather's parents. Mr. Ilori reports that his mother sent money back to Nigeria for his welfare but his stepfather "found a way to squander the money on girlfriends." Mr. Ilori reports that he did not benefit from the money sent by his mother. He reports that his stepfather and stepfather's parents were emotionally abusive to him. He says he and his stepfather shared a bedroom; and often his stepfather brought women back to the home where he engaged in sexual activity while Mr. Ilori was in the room. Mr. Ilori says that culturally he was expected to not complain and, "As a man I had to deal with it."

Mr. Ilori reports that once a year his mother returned to Nigeria where they were reunited. Mr. Ilori reports that when his mother returned to Nigeria, his stepfather once again engaged in the same abusive behavior. Mr. Ilori reports that his stepfather used money, sent by his mother and earmarked for Mr. Ilori, to feed and clothe his girlfriend's children. Mr. Ilori says that during his childhood and adolescence, "I had to keep a lot of secrets." Mr. Ilori says these traumas all left him feeling emotionally and psychologically "numb." He says that he experienced his stepfather and stepfather's parents as not caring about the possible negative effects on him from their behaviors.

Mr. Ilori reports that he was educated in Nigeria through the age of 15 when he took the opportunity to relocate to New York. Mr. Ilori had no mentors or family in New York. He reports at the age of 16, he was subject to a sexual trauma when an adult man attempted to engage him in forced oral sex. He reports that he was able to fight off the predator. He says later he was physically attacked by the same predator and his life was threatened if he were to disclose to the authorities what had occurred.

Mr. Ilori reports that he was first arrested in New York at the approximate age of 18 for "buying stamps with bad checks". Mr. Ilori reports that he plead guilty and served 12 months in jail, during which time he received his GED. After being released from jail, Mr. Ilori reports that he resided with a friend and enrolled in the Kingsborough Community College. He says he took business administration and accounting courses. However, he reports that he ran into financial difficulties and could not pay the tuition costs. Mr. Ilori reports that he was incarcerated for the second time on violation charges when he used a stolen credit card to purchase a computer. Prior to the violation, Mr. Ilori had met his would-be wife, Wunmi. Mr. Ilori reports that in 2005, following his release from his incarceration he married Wunmi. Wunni has worked as an executive assistant for a financial company. Their first child was born in 2006. Mr. Ilori reports that with the help of Wunmi, he pursued a career as a personal trainer and began to build clientele at the Crunch Gym. Mr. Ilori reports that while Wunmi was pregnant, he was arrested for using a fraudulent credit card.

Mr. Ilori returned to jail. His first child was born while he was incarcerated. Wunmi reports to this examiner that their daughter was approximately 3 years old when Mr. Ilori was released from prison and returned to their home. Mr. Ilori reports that he was able to successfully return to his work as a personal trainer. That history is confirmed by Wunmi. Mr. Ilori reports that he achieved a level of success with his career as a trainer. He had a number of clients and eventually developed his own business, "Define by Dayo." He says the company was geared toward wealthy clients who traveled. He reports partnering with a concierge service where he provided personal training to people visiting New York City. He also had standing clients, who he trained in their homes or personal gyms. Mr. Ilori reports that his second child, a son, was born in 2010.

However, Mr. Ilori evidenced chronic difficulties with his communication skills. He reports, after a few years of marriage, finding himself being more distant from Wunmi. He did not understand his disengagement. Marital problems ensued and they separated. Mr. Ilori's son was approximately 2 years old at the time of the separation. Mr. Ilori began a new relationship with Rahel. She became pregnant and gave birth to Mr. Ilori's third child. Mr. Ilori's communication difficulties did not improve. By 2018, he was more distant from Rahel. He says he felt disconnected. They eventually separated and Mr. Ilori lived on his own. He continued to maintain relationships with all three of his children. In 2019, he reports having discussions with his codefendant, Herode, and he once again engaged in fraudulent criminal activity. Mr. Ilori was re-arrested in February 2020.

Wunmi reports to this examiner that after receiving a call that Mr. Ilori was once again arrested, she posted bail for him, and Mr. Ilori returned to live with her and the children. She says that they resumed their relationship.

Wunmi Fadipe-Ilori reports to this examiner that she has compassion for her husband's difficulties. She says, "I have an understanding of his childhood experiences." She reports that although her husband could not often talk about his childhood experiences in Nigeria, she knew that it was traumatic. She reports that during their relationship, she has attempted to support her husband's ambition to pursue his career as a personal trainer. She reports that he was very successful at his career but engaged in repeated self-destructive behaviors. She says Dayo, "is not good at talking. He does not communicate. He shuts down." Wunmi reports that her husband loves his children and he strives to be the father to them, which he had never had.

**MENTAL STATUS EXAMINATION:** Adedayo Ilori appears much the same on both interview dates. On the video, Mr. Ilori appears dressed in appropriate jail-issued fatigues. He is neat and well groomed. There are no odd behaviors or mannerisms. He is calm, pleasant and cooperative. He reports his mood as "up and down." There is no evidence of suicide thinking. He has no history of poor impulse control or suicide behaviors. He reports being hopeful for the future. He shows fledging insight over his self-destructive behaviors and is open to beginning psychotherapy treatment. His thought processes appear organized and goal directed. There is no evidence of psychotic symptoms. He is well related. There was no evidence of manic mood symptoms. His speech is non-pressured. He is alert and oriented with no gross memory deficits.

**DIAGNOSIS:** Features of complex PTSD.

**FORMULATION:** Adedayo Ilori is a 43-year-old American-born Nigerian man who until the age of 15 resided in Nigeria. He was initially raised by a single mother. His mother re-partnered and when he was approximately 11 years old, she relocated to Saudi Arabia where she worked as a nurse. Mr. Ilori resided in Nigeria with his stepfather and stepfather's parents.

Mr. Ilori reports that he grew up in poverty. He reports that he was exposed to repeated incidents of threatened violence. He reports the family was threatened. He says it was a lawless country. While his mother lived in Saudi Arabia, Mr. Ilori shared a bedroom with his stepfather. Mr. Ilori reports that his stepfather had a series of women who he invited back to their bedroom. His stepfather engaged in sexual activity with these women while Mr. Ilori was made to endure the inappropriate activities. He was expected not to disclose the trauma. Mr. Ilori reports that his mother sent money to Nigeria for his welfare; however, the money did not find its way to him. Mr. Ilori reports that his stepfather spent the money on his girlfriends, including feeding and clothing his girlfriend's children. Mr. Ilori reports that culturally he was expected to find ways to take care of himself and not complain about his circumstances.

Mr. Ilori recognizes that his exposure to early childhood traumas left him emotionally detached and mistrustful. He has evidenced difficulties sharing intimate details with his partners. He is described as being emotionally withholding and unable to effectively communicate his feelings. Mr. Ilori evidences dissociative symptoms. Under stressful times, he has engaged in self-destructive behaviors. They can be best understood as identification with the state of mind that he had as a child, when he was exposed to deprivation and traumas and forced to survive.

Complex PTSD is differentiated from the psychiatric diagnosis of PTSD, which stems from trauma that could be a singular event. Complex PTSD is associated with persistent ongoing childhood traumas. Individuals may not develop full diagnostic criteria for PTSD, but show disturbances in interpersonal relationships, emotional regulation, dissociative behaviors and a disturbed self-image. Individuals with complex PTSD evidence difficulties with the capacity to effectively communicate and form attachments. They are mistrustful of intimate partners and as a result are identified as having difficulty communicating their feelings and developing trust.

Adedayo Ilori evidences several symptoms consistent with complex PTSD. His criminal behavior can best be understood as a trauma-based symptom. He was exposed to persistent childhood traumas and forced to survive on his own at an early age. His later engagement in fraudulent criminal behaviors appears in part to have occurred in the context of an experience of detachment from his current professional and personal life. He evidences a distorted perception of reality. Wunmi reports that as a family there were financially comfortable; yet Mr. Ilori held the distorted perception that they were on the brink of financial ruin. He behaves as if he were a traumatized child in Nigeria, desperate to survive.

Adedayo Ilori recognizes that his traumatic past has negatively affected his judgement and decision making. He appreciates the need to make changes and is motivated to participate in mental treatment. Mr. Ilori can benefit from trauma-based therapy to treat his complex PTSD symptoms. His treatment will need to be phase-based or sequential in nature starting with the development of a trauma narrative collaboratively documented by Mr. Ilori with the assistance of a trauma therapist. Mr. Ilori will achieve great benefit from naming his many traumas, which he was exposed to as a child. This will assist him in developing an understanding of the effects of the traumas on his behavior. The next phase of treatment will include a cognitive restructuring to assist him in working through the negative effects of trauma and improving his self-image and difficulties with intimate attachments. Therapy should assist him in developing better ways to communicate and engage in a mindfulness practice. With ongoing treatment, Mr. Ilori's trauma-based symptoms will improve and his risk for criminal recidivism will be reduced.

Respectfully submitted,

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Diplomate in Psychiatry, with Added Qualification in the Subspecialty of Forensic Psychiatry, A.B.P.N.
Clinical Assistant Professor of Psychiatry, New York University Langone School of Medicine

EG/pm