

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

21 Cr. 746 (MKV)

-against- :

ADEDAYO ILORI, :

DEFENDANT'S
SUPPORTING
DECLARATION

Defendant. :

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Adedayo Ilori hereby declares under penalty of perjury pursuant to 28 U.S.C. 1746, that the following is true and correct:

1. I am the Defendant in this matter. I am represented by Peter E. Brill, Esq.
2. This declaration is respectfully submitted in support of the motions filed in this matter. I am not a lawyer, and I rely on Mr. Brill for legal counsel. Mr. Brill drafted this document based upon information I provided to him.
3. On October 8, 2021, I was in the driver's seat of my co-defendant's car, a 2021 Mercedes sedan, which was legally parked.
4. To my knowledge, the occupants of this vehicle cannot access the trunk of the vehicle from the passenger compartment. As this was not my vehicle, I was not aware of all of the items in the vehicle.
5. While parked, I was approached by federal agents who told me to exit the vehicle. I complied with their directions.

6. At no time did I give the agents permission to search my person or any part of the vehicle. I understand the agents had a search warrant for my person and “the area within [my] immediate reach,” as per the warrant.

7. I was outside of the vehicle when agents searched me, the passenger compartment of the vehicle, and the trunk of the vehicle.

8. I do not believe that certain items alleged to have been recovered from my person were actually in my possession. For example, I do not recognize the items bearing the name Jonathan Herttua. I do not believe I had three telephones on my person, either.

9. I am not familiar with the items alleged to have been recovered from the trunk of the vehicle. The trunk of the vehicle was not in my immediate reach. It was not open while I was in control of the vehicle, nor was it open when I was asked to exit the vehicle.

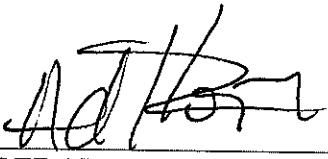
10. The seizure of items from the trunk was unlawful and all evidence that resulted from the search of the trunk should be suppressed.

11. I am respectfully requesting a hearing so that the location of items alleged to have been removed from my person and from the other areas of the car can be laid out in more detail to determine if my Constitutional rights have been violated.

12. I ask the Court to grant my attorney’s motions in all other respects.

13. I have not included every detail of the events surrounding my arrest in this declaration.

Dated: May 12, 2022



ADEDAYO ILORI