UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
	:	**CRIMINAL NO. 1:20-MJ-00127**
v.	:	
	:	
OLUDAMILARE OLUGBUYI,	:	
	:	
Defendant.	:	

UNOPPOSED MOTION TO EXTEND INDICTMENT DEADLINE

NOW COMES the United States of America, by and through the undersigned Assistant United States Attorney, and hereby moves this Court for an extension of the 30-day indictment deadline imposed by 18 U.S.C. § 3161(b), showing as follows:

On July 1, 2020 defendant Oludamilare Olugbuyi was served with a summons issued in connection with a federal criminal complaint. He was charged with violations of 18 U.S.C. § 1014 (False Statements to a Financial Institution). Olugbuyi is not detained and his initial appearance is set for July 22, 2020.

The Speedy Trial Act, 18 U.S.C. § 3161 *et seq.*, includes a 30-day arrest-to-indictment rule. Specifically, Section 3161(b) provides:

> Any information or indictment charging an individual with the commission of an offense shall be filed within thirty days from the date on which such individual was arrested or served with a summons in connection with such charges.

Here, Olugbuyi was arrested on July 1, 2020. The government must therefore charge him by indictment on or before July 21, 2020 (provided that a grand jury is in session).

The defense needs time to review discovery in order to determine whether it will explore a pre-indictment resolution of the matter. Accordingly, the government seeks an extension of the 30-day deadline, pursuant to Section 3161(h). The defendant is on notice of the pending

charges and the facts underlying those charges. Any delay in presenting the case to the grand jury would not prejudice the defendant. In addition, this extension is not sought for purposes of needless delay, but instead to afford the parties an opportunity to conserve the resources of the grand jury. Similarly, the public interest would be served by permitting a pre-indictment resolution that did not require significant grand jury or court resources, such that the ends of justice would be served and outweigh the interests of the defendant and public in a speedy trial.

WHEREFORE the United States requests that the Court extend the deadline imposed by 18 U.S.C. § 3161(b) until September 2, 2020.

Respectfully submitted,

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Dated: July 17, 2020