

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	Criminal No. <u>17-cr-20238-SHL</u>
Plaintiff,)	
)	
vs.)	
)	
BABATUNDE MARTINS, et. al.,)	
)	
Defendants.)	

UNITED STATES' MOTION FOR CERTIFIED COPIES

Comes now the United States Attorney for the Western District of Tennessee through his duly authorized assistants, and in moving this Court to unseal the indictment in the above-styled cause, would show this Court the following:

1. The indictment in the instant case was returned August 23, 2017. The unredacted copy of the indictment is sealed.
2. The United States is preparing to extradite Ayodeji Ojo, one of the individuals named in the indictment, from Nigeria, and will need certified copies of the unredacted indictment, as well as certified copies of the arrest warrant for Ojo, to provide to the extraditing authorities.
3. It is the policy of this District that indictments bearing the signature of the grand jury foreperson be filed under seal, and redacted copies posted for the public record. Therefore, the United States cannot move to have the document unsealed.
4. It is the policy of this District that personally identifiable information, such as the

identifiers on an arrest warrant, not be made publically-available. Therefore, the United States cannot move to have the document unsealed.

5. The District Clerk's Office has declined to provide certified copies of the unredacted indictment and the warrant for the arrest of defendant Ayodeji Ojo.
6. The United States is in need of these documents to meet the requirements of the extraditing country, and further, anticipates that it will need additional copies of the unredacted indictment, docketed at Record Entry (RE-3), going forward as other foreign co-defendants are apprehended.
7. The United States also anticipates that it will require certified copies of arrest warrants for the remaining defendants at some time in the future.
8. WHEREFORE, PREMISES CONSIDERED, the United States moves this Court to order the District Clerk's Office to provide certified copies of the unredacted indictment and arrest warrants in this case to the United States upon request.

Respectfully submitted,

D. MICHAEL DUNAVANT
United States Attorney

By: /s/ Debra L. Ireland
Assistant United States Attorney

CERTIFICATE OF SERVICE

I, Debra L. Ireland, Assistant United States Attorney, do hereby certify that a copy of the foregoing Motion was forwarded by electronic means, via the Court's Electronic Filing System to all attorneys of record in this case.

This 14th Day of January, 2020.

/s/ Debra L. Ireland
Assistant United States Attorney