

SHER TREMONTE LLP

August 20, 2018

**VIA ECF**

Moira Kim Penza  
Tanya Hajjar  
Karin K. Orenstein  
U.S. Attorney's Office, E.D.N.Y.  
271 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *United States v. Raniere et al.*,**  
18 Crim. 204 (NGG)

Dear Ms. Penza, Ms. Hajjar, and Ms. Orenstein:

I write to apprise the government that my law partner, Michael Tremonte, clerked for the Hon. Nicholas G. Garaufis in 2000-2001 and has a close personal relationship with the judge. To address any potential concerns as to bias, we are screening Mr. Tremonte from any involvement in the above-referenced case, including taking steps to ensure that he does not have access to any files or confidential information relating to this matter and does not participate in any substantive discussions relating to our representation of Kathy Russell.

Very truly yours,

/s/ Justine A. Harris  
Justine A. Harris

cc: All counsel of record (via electronic means)