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VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

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

**Victim Statement Responding to Defendant Bronfman's
Proposed Modification of Bail Conditions**

Dear Judge Garaufis:

We write, pursuant to 18 U.S.C. § 3771(a), on behalf of our clients, numerous individuals who were victims of and/or witnesses concerning crimes charged in the Superseding Indictment in the above-referenced criminal proceeding before this Court, as well as others who were – and in some instances still are – victims and/or witnesses to crimes not yet charged and other wrongdoing by members of the conspiracies described in filings by the United States in this matter. Specifically, we write to express the concerns of our clients regarding a proposed modification to Defendant Clare Bronfman's bail conditions set forth in the August 20, 2018 letter to the Court submitted by Ms. Bronfman's counsel, Susan Necheles and Kathleen Cassidy. This proposed modification would eliminate the current restriction prohibiting Ms. Bronfman from having contact with current and former members and persons associated with NXIVM except her immediate family (her sister, Sara, and brother-in-law, Igtet Baset, are current members, and her mother has participated in NXIVM programs in the past). For the reasons set forth below, our clients strongly oppose any such modification.

First, our clients – which number in the dozens – are former NXIVM members and the proposed modification would enable Ms. Bronfman to contact these persons, directly or indirectly through other NXIVM-related persons. Our clients have lived in fear of Ms. Bronfman, indeed some have been traumatized directly by her actions. Several of our clients are currently facing completely baseless criminal charges in Mexico instigated by Ms. Bronfman and her co-defendant Raniere and persons acting on their behalf. There can be no mistake that these charges are part of a concerted effort to intimidate and silence witnesses, because letters sent to our clients from Mexican attorneys representing NXIVM expressly demanded their silence. These letters are only the most recent example of Ms. Bronfman’s efforts to abuse the legal system in order to intimidate and silence witnesses and/or punish persons who have spoken out against NXIVM and Raniere. In or around June 2017, Ms. Bronfman made false statements to the Vancouver, Canada police department in order to initiate a criminal investigation of two of our clients who had been severely traumatized by horrific acts by NXIVM on them in Albany, NY. In earlier episodes, Ms. Bronfman has (among other things) (i) perjured herself in a civil proceeding; (ii) made false statements to local law enforcement and/or directed the falsification of evidence in order to instigate a baseless criminal investigation; (iii) directed the falsification or destruction of evidence in another civil proceeding; and (iv) directed, participated and financed the prosecution of numerous completely meritless legal proceedings aimed at punishing critics and silencing witnesses, going to extreme lengths such as interfering in bankruptcy proceedings to attempt to prevent the discharge of persons who would not have filed for bankruptcy but for the fact that defending against Bronfman and Raniere’s reign of vexatious litigation terror had impoverished them.

The direct victims of all of the above are our clients, and the *in terrorem* effect of this possibly unprecedented systematic abuse of the legal system on virtually everyone who has left NXIVM over the years, including our clients, cannot be understated. It has been widely reported that Ms. Bronfman spent millions, likely tens of millions, pursuing, harassing, intimidating and punishing her perceived enemies in what her counsel characterizes as someone merely exercising her right to seek recourse from “adverse parties” in legitimate litigation. None of these persons were “adverse parties” until Ms. Bronfman, Mr. Raniere and NXIVM by unleashing a stream of vexatious litigation and baseless criminal complaints – and in these several dozen proceedings, not a single court found a single claim asserted by NXIVM or its associates to have any merit whatsoever. Nor were Ms. Bronfman and Mr. Raniere acting alone in these efforts. Current and former members of the NXIVM community assisted Ms. Bronfman and Mr. Raniere, perjuring themselves, falsifying and destroying evidence, maintaining “enemies” lists, directing private investigators who, at times, crossed ethical and perhaps legal boundaries, attempting to unlawfully procure the financial and banking records of federal judges, and orchestrating campaigns to utterly terrorize witnesses in order to drive them deep into hiding and to stay underground.

Ms. Bronfman stands accused of crimes including acts intended to advance NXIVM's goal of persecuting its perceived "enemies." But everyone who takes issue with NXIVM and Raniere is, to Ms. Bronfman, an enemy, and they are legion. Ms. Bronfman financially sponsored human medical experiments conducted on well over one-hundred people, many of whom were severely traumatized, some of whom are among our clients. Ms. Bronfman is not to be trusted. We have no doubt her counsel are sincere, but we believe them to be poorly informed. Even Ms. Bronfman's representations concerning her assets appear to us to be potentially deficient. For years Ms. Bronfman has had a substantial interest in a number of California properties and, although ownership appears to have been shuffled around amongst a number of LLCs, we believe based upon information we have recently received that Ms. Bronfman is still a principal owner of these properties, which likely are worth millions of dollars.

Our point is simple: there are a significant number of persons, including victims of the charged crimes and other crimes perpetrated by the defendants in this proceeding, and witnesses thereto, who do not feel safe with even the prospect that Ms. Bronfman will be able to freely communicate with NXIVM-affiliated persons. And there is no reasonable restriction that can alleviate this completely rational fear. Unfortunate as it is that Ms. Bronfman is cut off from her only friends, it was her choice to cut herself off from her larger family and the world at large, and for the time being, it is entirely appropriate to keep safeguards in place that, while perhaps imposing upon her a finite period of solitude, protect a large number of people to whom she is a very real threat.

We thus respectfully request that the Court reject Ms. Bronfman's proposed modification of this aspect of her bail conditions.

Very truly yours,



Neil L. Glazer