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September 26, 2018

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. Raniero, et al.*, 18-cr-204 (NGG)

Dear Judge Garaufis:

We write to respectfully request that Ms. Bronfman's conditions of release be modified to increase one of the three weekly sessions in which she is allowed to leave her home for exercise or grocery shopping from 90 minutes to 120 minutes. Both the Government and Pretrial Services consent to this requested modification. Ms. Bronfman will coordinate the specifics of her whereabouts during this 120 minutes with her Pretrial Services Officer if this request is approved by the Court.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar (via ECF)
Pretrial Services Officer Anna Lee (via email)