

KOBRE & KIM LLP

800 THIRD AVENUE
NEW YORK, NEW YORK 10022
WWW.KOBREKIM.COM

TEL +1 212 488 1200

NEW YORK
LONDON
HONG KONG
SHANGHAI
SEOUL
WASHINGTON DC
SAN FRANCISCO
MIAMI
CAYMAN ISLANDS
BVI

October 15, 2018

BY ECF

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

**Re: *United States v. Allison Mack,*
18 Cr. 204 (NGG)**

Dear Judge Garaufis:

We write respectfully on behalf of our client, Allison Mack, to request a modification of the conditions of her release.

Specifically, we respectfully request that the Court amend the home detention component of her conditions to permit Ms. Mack to leave her residence for up to three hours per week—with the specific days and times to be scheduled regularly and pre-approved by Pretrial Services—for “errand time,” *i.e.*, to purchase groceries, supplies, and other necessities. If Your Honor so approves, Ms. Mack will provide Pretrial Services proof of errand (*e.g.*, a shopping receipt) each

Hon. Nicholas G. Garaufis, U.S.D.J.

October 15, 2018

Page 2

time she leaves her residence for purposes of an errand pursuant to this requested modification.

We have conferred with Pretrial Services and the government, who both consent to the proposed amendment.

Respectfully yours,

/s/

William F. McGovern
Sean S. Buckley
+1 212 488 1210 / 1253

cc: AUSA Moira Kim Penza (by ECF)
AUSA Tanya Hajjar (by ECF)
Pretrial Services Officer Anna Lee (by email)
Pretrial Services Officer Elizabeth Brassell (by email)
Pretrial Services Officer Brenda Mercado (by email)