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October 19, 2018

Honorable Nicholas G. Garaufis
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Nancy Salzman
18 Cr. 204 (NGG)

Dear Judge Garaufis:

I together with David Stern represent Nancy Salzman in this matter. I write with the consent of the government seeking a modification of the conditions of our client's bail. The modified conditions submitted on consent for the Court's consideration are the following:

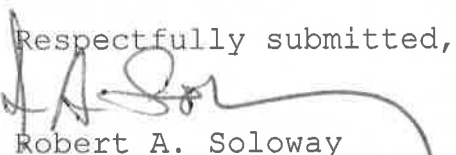
Nancy Salzman is subject to home detention. She is permitted to leave the home for attorney visits, court dates, medical appointments, and religious services. She can also leave the house 2 days per week for 90 minutes each day for exercise and for shopping for food and other necessities, with advance notice to pre-trial. She may leave the home one additional day per week, for 120 minutes, for exercise and for shopping for food and other necessities, with advance notice to pre-trial.

Ms Salzman may not directly or indirectly associate or have contact with – except in the presence of her attorneys – current or former employees of, or independent contractors for Nxvim (including Nxvim's affiliated entities) or any individual that she knows to be a current or former member of DOS, or any individual who is currently or was actively working toward a career path within NXIVM on the stripe path, subject to reasonable exceptions agreed upon by the parties.

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In all respects not inconsistent with the above, the parties request that the bail conditions remain as fixed by this Court on July 25, 2018 (Docket Entry of July 26, 2018).

Thank you very much for your consideration.

Respectfully submitted,

Robert A. Soloway

cc: AUSAs Moira Kim Penza and Tanya Hajjar
(by ECF)

Pre-Trial Services Officer Anna Lee
(by email)

RAS:sc