

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL,
LAUREN SALZMAN, and NANCY SALZMAN,

Defendants.

Case No. 1:18 Cr. 00204-NGG

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the attached Declaration of William F. McGovern, counsel for Defendant Allison Mack, dated November 16, 2018, the exhibit appended thereto, and the accompanying Memorandum of Law, Defendant will move this Court, before the Honorable Nicholas G. Garaufis, at the United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an order, pursuant to Rule 12(b)(3)(B)(ii) and (v) of the Federal Rules of Criminal Procedure, dismissing the Superseding Indictment, or in the alternative, an order directing the government to provide a bill of particulars, and for such other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that Defendant hereby joins the following Motions: (i) Clare Bronfman, Kathy Russell, and Nancy Salzman's Motion to Dismiss Count One of the Superseding Indictment; (ii) Lauren Salzman's Motion to Dismiss Racketeering Acts Seven of the Superseding Indictment; and (iii) Keith Ranieri's Motion to Dismiss Racketeering Act Eight of the Superseding Indictment.

Dated: November 16, 2018
New York, New York

Respectfully submitted,
KOBRE & KIM LLP

/s/ William McGovern

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