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December 5, 2018

BY ECF

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:

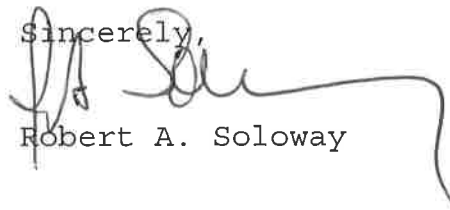
In response to the government's letter raising the issue of a potential conflict of interest (see ECF No 210), Nancy Salzman consents to a *Curcio* hearing. The irrevocable trust described in the government's letter has provided funding for our client's reasonable legal fees and expenses. No limitation upon the exercise of counsel's judgment, discretion, or strategies, nor upon the choice of our client's counsel, have ever been imposed by the trust or exerted upon counsel in any manner by anyone. Counsel has from the commencement of our representation exercised completely independent judgment and operated entirely free of any trust-related constraints. We have assurance that state of affairs will continue throughout the pendency of the case. We have no divided loyalty in this matter as counsel, and the trust has imposed no interference of any kind on counsel's duty of zealous advocacy and full allegiance to our client.

Notwithstanding these facts, we have discussed the nature of the possible conflict-of-interests that may arise sometimes in situations in which a third-party payor finances a criminal defendant's legal fees and costs. While, as stated, we strongly believe that there is no conflict of interest in this matter, our client is prepared to waive any potential conflict, and we therefore consent to a *Curcio* hearing and appropriate inquiry

should the Court grant the government's application.

We await the Court's ruling in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Soloway', with a long horizontal flourish extending to the right.

Robert A. Soloway

cc: All Counsel
(Via ECF)

RAS:sc