

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.

No. 18-cr-204 (NGG)

**NOTICE OF MOTION FOR
SEVERANCE OF DEFENDANTS**

PLEASE TAKE NOTICE that, upon the attached Affidavit of Hector J. Diaz, counsel for Defendant Lauren Salzman, affirmed on January 9, 2019, and upon the accompanying Memorandum of Law, Defendant Lauren Salzman will move this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an order pursuant to Rules 12(b)(3)(D) and 14(a) of the Federal Rules of Criminal Procedure: (1) severing the trial of Defendant Lauren Salzman from the trial of co-defendants Keith Raniere and Allison Mack; and (2) for such other relief as the Court deems just and proper.

Please take further notice that Defendant Lauren Salzman hereby joins Defendant Keith Raniere's Motion to Suppress Evidence and Request for Hearing Pursuant to *Franks v. Delaware*.

Dated: January 9, 2019
Phoenix, Arizona

Respectfully submitted,

/s/ Hector J. Diaz
Hector J. Diaz
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