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January 22, 2019

BY ECF

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

Re: United States v. Raniere et. al.,
including Nancy Salzman
18 Cr. 204 (NGG)

Dear Judge Garaufis:

David Stern and I represent Nancy Salzman in the above-referenced matter. I write with the consent of the government and pretrial services seeking a modification of Ms. Salzman's current bail conditions. Presently, Ms. Salzman's bail conditions include a restriction prohibiting her from having contact with her co-defendants outside the presence of "her" counsel. However, for the purpose of trial preparation, it is respectfully requested that this condition be modified to permit Ms. Salzman to meet with her co-defendants in the presence of counsel for *either party*, as opposed to requiring the presence of the undersigned or co-counsel, Mr. Stern.

The government, by AUSA Moira Penza, and Pretrial Services Officer Michael Dorn have no objection to this request.

Please contact my office if Your Honor has any questions regarding this request. The Court's time and attention to this matter is appreciated.

Respectfully submitted,

/ s /

Robert Soloway

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cc: All counsel (by ECF)
Pretrial Services Officer Michael Dorn (by email)
Pretrial Services Officer Kendra Rennie (by email)