

Renaissance One
Two North Central Avenue
Phoenix, Arizona 85004-2391
602.229.5200
Fax 602.229.5690
www.quarles.com

Attorneys at Law in
Chicago
Indianapolis
Madison
Milwaukee
Naples
Phoenix
Tampa
Tucson
Washington, D.C.

Writer's Direct Dial: 602.229.5274
E-Mail: hector.diaz@quarles.com

February 4, 2019

BY ECF

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

RE: United States of America v. Lauren Salzman, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We are writing to you on behalf of our client, Lauren Salzman ("Ms. Salzman"), to respectfully request modifications to the Court's Order Setting Release Conditions ("Bail Order"). *See* 18 Cr. 204 (NGG) Docket No. 91, Order Setting Conditions of Release, filed July 27, 2018. As discussed below, Ms. Salzman respectfully requests that the Court: (1) modify the non-association conditions of Ms. Salzman's pretrial release; and (2) extend the time period in which Ms. Salzman may have daily in-person visitation with her mother, Nancy Salzman, at her mother's residence to April 29, 2019.

1. Non-Association Conditions

At Ms. Salzman's Bail Hearing on July 27, 2018, the Court entered, in substance, the following conditions on the record, which prevented Ms. Salzman from having contact with certain groups of individuals associated with NXIVM and DOS ("non-association conditions"):

Lauren 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 NXIVM (including NXIVM's affiliated entities), individuals whom she knows or believes to be a current or former members 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. Ms. Salzman is not permitted to provide counseling services to anyone who

Honorable Nicholas G. Garaufis
February 4, 2019
Page 2

is employed, trained, or who has taken courses through NXIVM, DOS or is a current or former member of DOS. *See, e.g.*, Transcript of L. Salzman Arraignment dated Jul. 27, 2018. The Court permitted Ms. Salzman to have contact with her mother, co-defendant, Nancy Salzman, her sister, Michelle Salzman, and her brother-in-law, Ben Myers. (*See, e.g., id.*, DKT. 115, DKT. 117, Order dated Aug. 29, 2018.)

Ms. Salzman respectfully requests that the Court modify her non-association conditions of pretrial release as follows:

Lauren Salzman may not directly or indirectly associate or have contact with—except in the presence of her attorneys—any of the following categories of individuals: (1) individuals listed on the Coach List, (2) current or former employees of, or independent contractors for NXIVM (including NXIVM's affiliated entities), (3) individuals whom she knows or believes to be a current or former members of DOS, and (4) anyone on the Jane and John Doe list of alleged victims of the offenses identified in the superseding indictment, subject to reasonable exceptions agreed upon by the parties. Ms. Salzman is not permitted to provide counseling services to anyone who is employed, trained, or who has taken courses through NXIVM, DOS or is a current or former member of DOS. Ms. Salzman is permitted to have contact with her mother and co-defendant, Nancy Salzman, her sister Michelle Salzman, and her brother in law Ben Myers.

We believe this proposed modification of Ms. Salzman's non-association conditions is consistent with the Court's Memorandum and Order dated January 15, 2019 (DKT. 286).

2. Extension of the Daily In-Person Visitation Period with her Mother

Ms. Salzman also respectfully requests that the time period in which she may have daily in-person visitation with her mother, Nancy Salzman, at her mother's residence from 9:00 A.M. to 6:00 P.M be extended to April 29, 2019. (The current in-person visitation period expires on or about February 4, 2019). (DKT. 225, 238).

Throughout this matter, the Court has allowed Ms. Salzman to have daily in-person visitation with her mother, Nancy Salzman, at her mother's residence so that Ms. Salzman may care for her mother. Nancy Salzman is still continuing "to recover from recent surgeries" (DKT. 214), and she is still receiving medical treatment for her medical condition. Correspondingly, Ms. Salzman wishes to maintain her regular care for her mother. Therefore, and for the reasons set forth in Ms. Salzman's prior requests for modification of release conditions filed under seal (DKT. 115, 148, 183), Ms. Salzman requests this additional daily in-person visitation with her mother from 9:00 A.M. to 6:00 P.M. be extended to April 29, 2019.

Counsel has spoken with the government and Pretrial Services, and they have no objection to these proposed modifications. If Your Honor so approves, Ms. Salzman will

Honorable Nicholas G. Garaufis
February 4, 2019
Page 3

coordinate with her Pretrial Services Officers to arrange for her continued daily in-person visitation with her mother.

We appreciate the Court's consideration of these requests. Should Your Honor have any questions, we will make ourselves available at a date and time convenient to the Court.

Very truly yours,

/s/

Hector J. Diaz
Andrea S. Tazioli
602.229.5274

HJD:vl

CC: All Counsel (by ECF)