

SHER TREMONTE LLP

March 15, 2019

VIA ECF

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

Re: *United States v. Raniere, et al.*, 18 Crim. 204 (NGG)

Dear Judge Garaufis:

I write on behalf of Kathy Russell to respectfully request a temporary modification of Ms. Russell's bail conditions to allow her to travel to Georgia to visit her sister from Friday, March 22, 2019 to Saturday March 30, 2019. Ms. Russell would fly into and out of Atlanta and would stay in Watkinsville, Georgia, just outside of Athens, Georgia. If permission is granted, the details of her itinerary would be provided to Pre-Trial Services.

The government and Pretrial Services do not object to this request.

I appreciate the Court's consideration.

Respectfully submitted,

/s/ Justine A. Harris

Justine A. Harris

cc: All Counsel (via ECF)