



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

EAG:TH  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 23, 2021

By ECF

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

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to request (i) that the defendant Keith Raniere's response to the government's restitution submission (ECF Docket Entry No. 1018 (the "Raniere Filing")) remain under seal and (ii) that the Court remind counsel for Raniere of their continuing obligations to exercise great care to ensure that future filings containing sensitive victim information are appropriately filed under seal and impose sanctions in the event of any future violations.

As the Court is aware, the Raniere Filing was filed publicly after midnight today, March 23, 2021. The Raniere Filing contains the full names of victims and sensitive victim information, including medical records, in contravention of the Court's orders in the above-captioned case. (See Protective Order, ECF Docket Entry No. 1001; Order Designating Victim Discovery Material, ECF Docket Entry No. 838.) This morning, the undersigned contacted Steven A. Metcalf II, Esq., counsel for Raniere, who stated that counsel had intended to file the Raniere Filing under seal and that the public filing was a technical error. The government acknowledges that the first page of the Raniere Filing notes that it was to be filed under seal and credits counsel's statement that the violation of the protective order entered by the Court was inadvertent. The government also expresses its grateful appreciation to the Court for ordering the prompt removal of the Raniere Filing from the public docket.

