



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

MKM:TH
F. #2017R01840

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 12, 2021

By ECF

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

Re: United States v. Keith Ranieri
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter to notify the Court regarding a potential conflict involving counsel for defendant Keith Ranieri. On June 30, 2021 and July 2, 2021, Jeffrey H. Lichtman, Esq. and Marc A. Fernich, Esq. filed notices of appearance on behalf of the defendant Keith Ranieri. The government has been advised that the legal fees for Mr. Lichtman and Mr. Fernich, who represent Ranieri in connection with proceedings related to restitution before the Court as well as his pending appeal, are being paid by the defendant Clare Bronfman.

Ranieri was previously advised of, and waived, a nearly identical potential conflict relating to Bronfman's payment of Ranieri's legal fees, see ECF Docket Entry No. 443 (Curcio hearing relating to payment of legal fees by the CDF Irrevocable Trust). The government respectfully requests, in an abundance of caution, that the Court obtain the

