



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

KMT/TH

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 18, 2022

By ECF

Catherine O'Hagan Wolfe, Clerk of Court  
United States Court of Appeals for the Second Circuit  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, New York 10007

Re: United States v. Raniere  
Docket No. 21-1795

Dear Ms. Wolfe:

The government respectfully submits this update in accordance with the Court's September 17, 2021 order (the "Order"), holding the above-captioned case in abeyance pending the outcome of the U.S. Attorney's Office for the Eastern District of New York's (the "Office") request for remission or restoration by the Attorney General's designee, the Department of Justice's Money Laundering and Asset Recovery Section ("MLARS"). As noted in the government's previous update letters, on or about March 8, 2022 the Attorney General and his designees at MLARS approved the remission petition submitted by the government on December 15, 2021. See 18 U.S.C. § 1963(g), 21 U.S.C. § 853(i), 28 C.F.R. Part 9.<sup>1</sup>

The government has been advised by the Clerk's Office for the Eastern District of New York that some victims have now received their restitution payments. Payments to the remaining victims have been processed and those victims will receive them in due course. Until that process is complete, the government respectfully submits that the existing stay is in the interests of the victims, the parties and judicial efficiency and therefore it should, consistent with the Order, be continued for 30 days, until August 16, 2022, at which time the government will provide a further update to the Court.

The government also writes in response to the defendant Keith Raniere's letter dated July 5, 2022, purporting to object to the distribution of funds to his victims. (CM/ECF Dkt. No. 60). As Raniere's current counsel notes in the letter, Raniere, through prior counsel,

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<sup>1</sup> As set forth in the Motion, the decision to grant remission or restoration lies within the sole and exclusive discretion of the Attorney General and his designees at MLARS.

