



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*

August 10, 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 encloses a proposed order of restitution in accordance with the Court's supplemental sentencing statement and order of July 20, 2021. Exhibits A and B to the proposed order, which are submitted under separate cover, contain victim information, including names, which the government respectfully submits should be filed under seal. In addition, as Exhibit B contains victim mailing addresses, the government respectfully requests that it be filed ex parte and under seal, but that that appropriate personnel of the Clerk's Office and the United States Attorney's Office should have access to it in order to make the required distributions.

Respectfully submitted,

JACQUELYN M. KASULIS
Acting United States Attorney

By: /s/
Tanya Hajjar
Assistant U.S. Attorney
(718) 254-7000

Enclosures

cc: Counsel of Record (by ECF and email)
United States Probation Officer Jennifer G. Fisher (by email)

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

[PROPOSED]
ORDER OF RESTITUTION

- against -

Criminal Docket No. 18-204 (NGG) (S-2)

KEITH RANIERE,

Defendant.

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WHEREAS on June 19, 2019, a jury convicted the defendant Keith Raniere, (hereinafter, the “Defendant” or “Raniere”) of racketeering, racketeering conspiracy, wire fraud conspiracy, forced labor conspiracy, sex trafficking conspiracy and two counts of sex trafficking.

1. This order of restitution is incorporated by reference to the Judgment imposed on October 30, 2020. See ECF Docket Entry Nos. 969, 1072, 1073.

2. The defendant is directed to pay restitution to the 21 victims named, and in the amounts listed, in Exhibits A and B to this order (“Victims 1-21”). Exhibits A and B shall be kept under seal and Exhibit B ex parte, until further order of this court, except that appropriate personnel of the Clerk’s Office and the United States Attorney’s Office shall have access to it in order to make the distribution required by this order.

3. Restitution is due immediately as to Victims 1-19 listed in Exhibits A and B. As to Victim 20 and Victim 21, restitution is due by July 20, 2022. The total

restitution amount to be paid is \$3,460,336.06. See 18 U.S.C. § 3612(f). Monthly payments shall be made to the Clerk of the Court, United States District Court, 225 Cadman Plaza East, Brooklyn, N.Y. 11201. The payment instrument shall reference the case name and number, as set forth above.

4. The defendant shall pay interest on any fine or restitution of more than \$2,500, unless the fine is paid in full before the fifteenth day after the date of the judgment, unless waived or modified by the court. See 18 U.S.C. § 3612(f).

5. The defendant shall notify the court and the Financial Litigation Unit of the United States Attorney's Office, Eastern District of New York of any material change in the defendant's economic circumstances that might affect the defendant's ability to pay restitution. See 18 U.S.C. § 3664(k).

6. The restitution imposed is a lien in favor of the United States on all property and rights to property of the person fined as if the liability of the person fined were a liability for a tax assessed under the Internal Revenue Code of 1986. The lien arises on the entry of judgment and continues for 20 years or until the liability is satisfied, remitted, set aside, or is terminated under subsection 18 U.S.C. § 3613(b). See 18 U.S.C. § 3613(c).

7. The Clerk is directed to distribute restitution payments to the victims at least once per year to the extent funds are available to distribute. Restitution to Victims 1-19, as listed in Exhibits A and B, should be prioritized and paid in full before restitution is paid to Victims 20 and 21. After Victims 1-19 are paid in full, then the Clerk of the Court should distribute payments pro rata to Victims 20 and 21.

8. The United States Department of Probation and the United States

Attorney's Office are directed to provide to the Clerk whatever assistance is necessary to assure prompt distribution of restitution payments. The Clerk is directed to mail a copy of this Order and Exhibits A and B to the Criminal Assistant United States Attorney assigned to the instant case and the Financial Litigation Unit of the United States Attorney's Office of the Eastern District of New York.

Dated: Brooklyn, New York
August __, 2021

THE HONORABLE NICHOLAS G. GARAUFIS
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK