

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK

3 - - - - - X
4 UNITED STATES OF AMERICA, : 18-CR-204 (NGG)
5 PLAINTIFF, :
6 -against- : United States Courthouse
7 KEITH RANIERE, : Brooklyn, New York
8 DEFENDANT. : Tuesday, October 27, 2020
9 : 11:00 a.m.
10 - - - - - X

11 TRANSCRIPT OF CRIMINAL CAUSE FOR SENTENCING
12 BEFORE THE HONORABLE NICHOLAS G. GARAUFI
13 UNITED STATES DISTRICT COURT JUDGE

14 A P P E A R A N C E S:

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Proceedings recorded by Stenographic machine shorthand,
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P R O C E E D I N G S

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(In open court.)

THE COURTROOM DEPUTY: Criminal cause for
sentencing, United States versus Keith Raniere.

Counsel, would you state your appearances.

MS. HAJJAR: Good morning, Your Honor.

Tanya Hajjar and Mark Lesko for the Government. And with us
at counsel table is Special Agent Michael Lever of the FBI.

THE COURT: Good morning.

MR. AGNIFILO: Good morning, Your Honor.

THE COURT: Good morning.

MR. AGNIFILO: Marc Agnifilo and Teny Geragos
sitting at counsel table with Keith Raniere. We also have
Paul DerOhannesian and Danielle Smith in the second -- in

1 the first row there and there, Your Honor (indicating).

2 THE COURT: Good morning, everyone.

3 MR. AGNIFILO: Thank you, Your Honor. And Keith
4 Ranieri is with us this morning, as well.

5 THE COURT: Yes. And the defendant is present.

6 Good morning, Mr. Ranieri.

7 Before we begin the proceedings, I would like to
8 extend some thanks to those who helped us put together this
9 proceeding under the circumstances of the pandemic in such a
10 way that we can minimize the danger to everyone here in the
11 courtroom and in the courthouse.

12 And I would like to thank Chief Judge Mauskopf,
13 who has overseen efforts of the Court to resume operations,
14 with the assistance of the science, the experts, and the
15 staff.

16 I would like to thank Magistrate Judge Scanlon,
17 who was the magistrate judge assigned to this case.

18 In addition, I would like to thank the clerks'
19 office and the IT Department, in particular, for making the
20 arrangements for this courtroom and all of the overflow
21 courtrooms that are being used. And I understand that we
22 are using six overflow courtrooms for this proceeding so we
23 can maximize the ability of the public to be present and
24 observe the proceedings.

25 In addition, I would also like to thank

1 District Executive Eugene Corcoran, and his staff,
2 especially Ogoro Francis-McLeish, who dealt with all of the
3 issues of the staging this particular courtroom with
4 Plexiglas and other devices.

5 I would like to thank the U.S. Marshals, Vincent
6 DeMarco, and his staff; as well as the members of my
7 chamber's staff, my clerks, and Joseph Reccoppa, my
8 courtroom deputy/case manager.

9 That having been said at this time, I will
10 proceed. This is the sentencing of Keith Raniere who was
11 convicted by a jury on June 19th, 2019 of numerous counts.

12 And the materials that I have reviewed for this
13 sentencing are as follows: There is a presentence
14 investigation report that I will refer to generally as the
15 PSR, dated January 29th, 2020; the defendant's objections to
16 the PSR of March 11th, 2020; the Government's responses to
17 the defendant's objections to the PSR, March 25th, 2020; the
18 addendum to the PSR, April 8th, 2020; the Government's
19 sentencing memorandum, dated August 27th, 2020; the
20 defendant's sentencing memorandum, including objections that
21 remain to the PSR, dated September 19th, 2020; the
22 Government's response to the defendant's sentencing
23 memorandum, dated October 9th, 2020; letters in support of
24 the defendant and victim-impact statements. And I think
25 that covers everything.

1 All right. If there's anything else that I have
2 not mentioned that I should be considering, please advise
3 the Court.

4 MS. HAJJAR: No, Your Honor.

5 THE COURT: Anything else?

6 MR. AGNIFILO: No, Your Honor.

7 THE COURT: All right. Thank you very much.

8 I remind everyone that we are all going to wear
9 masks. Sometimes we forget and then we get reminded. We
10 are all going to wear masks throughout the proceedings,
11 including any statements that are made by victims or anyone
12 else.

13 And at this point, I want to move on to the
14 calculation of the Guidelines in this case. Now, as I said,
15 I have the defendant's objections which are folded into the
16 sentencing memorandum, and I have considered them and the
17 Government's responses and I am ready to rule on these
18 objections.

19 Does anyone have anything else to say about the
20 objections that has not already been placed in the record
21 for me to consider?

22 MR. AGNIFILO: Not from us, Your Honor. We gave
23 the Court a fairly fulsome presentation of about 15 or 16
24 pages of our sentencing memo, and we have nothing to add.

25 THE COURT: Okay. Could you move that microphone

1 to you, sir?

2 MR. AGNIFILO: Yes.

3 THE COURT: Thank you, Mr. Agnifilo.

4 MR. AGNIFILO: Should I try again?

5 THE COURT: Try again.

6 MR. AGNIFILO: Yes.

7 THE COURT: People are listening --

8 MR. AGNIFILO: Yes.

9 THE COURT: -- in other rooms.

10 MR. AGNIFILO: Absolutely.

11 So we included a fairly fulsome series of
12 objections to the Guideline Calculation that was set by the
13 probation department. We, as you said, folded that into our
14 sentencing memorandum between Pages 65 and the end of the
15 sentencing memo, and we have nothing to add to those
16 objections, Your Honor. Thank you.

17 THE COURT: Thank you very much.

18 Anything from the Government?

19 MS. HAJJAR: No, Your Honor.

20 THE COURT: All right. Very well.

21 The probation department recommends that I
22 calculate the total offense level of Mr. Ranieri's sentence
23 as 52. The Government agrees with the PSR's calculation.
24 Mr. Ranieri objects to numerous aspects of the PSR and
25 suggests that the correct offense level is 37. For the

1 following reasons, I find that the appropriate offense level
2 is 49.

3 Let me begin by addressing Mr. Ranieri's
4 objections to the PSR's Guidelines Calculations.

5 First, Mr. Ranieri objects to the application of a
6 4-point role enhancement under the Sentencing Guideline
7 Section 3B1.1(a), which applies, quote, "if the defendant
8 was an organizer or leader of a criminal activity that
9 involved five or more participants or was otherwise
10 extensive," end quote." The Second Circuit has held in
11 *United States v. Ivezaj, I-V-E-Z-A-J, 568 F.3d 88,*
12 *Second Circuit (2009)*, that when calculating the Guidelines
13 for a RICO offense, a Section 3B1.1 role enhancement should
14 be applied to the base level, quote, "on the basis of the
15 defendant's role in the overall RICO enterprise," end quote,
16 rather than, quote, "on the basis of his participation in
17 discrete racketeering acts." End quote.

18 Mr. Ranieri asks this Court to distinguish the
19 Second Circuit's holding in *Ivezaj* on the grounds that this
20 case, unlike *Ivezaj*, does not involve a, quote, "traditional
21 organized crime enterprise," end quote, engaging in violent
22 criminal acts.

23 That argument lacks merit because the
24 Second Circuit's analysis in that case was not based upon
25 the, quote, "traditional," end quote, nature of the

1 enterprise at issue or the violent nature of the predicate
2 acts.

3 Rather the Second Circuit's conclusion that,
4 quote, "it makes little sense to allow a defendant who acts
5 in a leadership capacity in a wide ranging criminal
6 enterprise to have his official level adjusted," end quote,
7 based on his agreed participation in each predicate
8 racketeering act applies with equal force in this case.

9 Accordingly, I reject Mr. Ranieri's objections to
10 the application of the four-point role enhancement in
11 Paragraphs 181, 189, 197, 203, 209, 215, 221, 228, and 252
12 of the PSR.

13 Next, Mr. Ranieri objects to two aspects of the
14 calculations of Counts 1 and 2, Racketeering Act 2, which
15 concerns the sexual exploitation of Jane Doe 2. First, he
16 objects to the application of a two-level increase subject
17 to Sentencing Guidelines Section 2G2.1(b)(2)(A), for an
18 offense that involved the commission of a sexual act or
19 sexual contact. He argues that the offense at issue
20 involves the pornographic photographs that he took of
21 Jane Doe 2 when she was a minor, and that because the
22 photographs themselves do not depict a sexual act or sexual
23 contact, the two-level increase is improper, notwithstanding
24 evidence that Mr. Ranieri did engage in an illegal sexual
25 relationship with Jane Doe 2 beginning when she was 15 years

1 old.

2 Both the Second Circuit and at least one other
3 Circuit Court have determined that the Guidelines allow for
4 a base offense level to increase under
5 Section 2G2.1(b)(2)(A) on the basis of a Defendant's sexual
6 contact with the victim in grooming her for the offense,
7 even where the photographs that are the subject of the
8 offense depict no sexual contact. I find that the trial
9 records establishes by a preponderance of the evidence that
10 Mr. Ranieri took these photographs in the context of an
11 ongoing sexual relationship, through which Mr. Ranieri
12 groomed her for the offense of conviction. I, therefore,
13 find that the two-point increase applies.

14 I agree with Mr. Ranieri's objection to a
15 two-level enhancement on Racketing Act 2 subject to
16 Sentencing Guidelines Section 2G2.1(b)(5), which applies if
17 the defendant was the minor's parent, relative, or legal
18 guardian, or if the minor was otherwise in the defendant's
19 custody or care. While Jane Doe 2 was living in
20 NXIVM-affiliated housing with adults other than her parents
21 in November of 2005, she was not living with Mr. Ranieri.
22 This enhancement seems to be aimed particularly at
23 situations in which the defendant is either the victim's
24 parent or guardian or else plays an analogous custodial
25 role. While Jane Doe 2 was entrusted to the care of the

1 NXIVM community, led by Mr. Ranieri, I do not think the
2 record demonstrates that Mr. Ranieri took on the kind of
3 custodial role contemplated by the Guidelines. I,
4 therefore, decline to apply this enhancement.

5 I also agree with Mr. Ranieri that the record does
6 not support a two-level enhancement on Racketeering Acts
7 9(a) and 9(b), which concern the trafficking of Jane Doe 4,
8 on the grounds that she suffered serious bodily injury.
9 While the circumstances of Jane Doe 4's confinement clearly
10 had a serious adverse effect on her physical health,
11 including the denial of medical care for a severe toothache,
12 and on her mental health, I find that the bodily injury she
13 suffered was not of the type or severity contemplated by the
14 Guidelines in providing for this enhancement.

15 I disagree with Mr. Ranieri's objection to the
16 cross-reference of the sex trafficking Guidelines on
17 Counts 1 and 2, Racketeering Act 12(b), and Count 6, which
18 concern the forced labor of Jane Doe 5. Mr. Ranieri argues
19 that the cross-reference creates a problem of double
20 counting, but Mr. Ranieri is also being sentenced for sex
21 trafficking of Jane Doe 5. But as the Second Circuit has
22 made clear, the Guidelines sometimes allow the Court to,
23 quote, "apply multiple Guidelines provisions based on the
24 same underlying contact for that is the result clearly
25 intended by Congress and the Sentencing Commission," end

1 quote.

2 In this case, the so-called double counting that
3 Mr. Ranieri objects to is contemplated by the Sentencing
4 Guideline Section 2H4.1(b)(4)(B), and is a Guidelines
5 calculation that, quote, "involves double counting in a
6 literal sense, but does not involve impermissible double
7 counting," end quote.

8 I agree with Mr. Ranieri that the Government has
9 not established by a preponderance of the evidence, that
10 either Sylvie or additional DOS Victim 1 were victims of sex
11 trafficking or a conspiracy to commit sex trafficking. I
12 therefore decline to include those acts in the Guidelines
13 Calculations.

14 I disagree with Mr. Ranieri that he's entitled to
15 a three-point reduction under the Sentencing Guideline
16 Section 2X1.1(b)(1) with respect to his conviction attempted
17 sex trafficking of Jane Doe 8. Section 2X1 -- 2X.1(b)(1)
18 provides for a three-point reduction in the case of attempt
19 convictions, quote, "unless the defendant completed all the
20 acts the defendant believed necessary for successful
21 completion of the substantive offense," end quote.

22 For the offense of conviction of sex trafficking,
23 that exception would, therefore, apply if Mr. Ranieri
24 completed all the acts he believed necessary to, quote,
25 "recruit, entice, harbor, transport, provide, obtain,

1 maintain, patronize, or solicit," end quote Jane Doe 8 of
2 purposes of engaging in commercial sex acts, regardless of
3 whether Jane Doe 8 actually performed those acts.

4 I find that the preponderance of the evidence
5 supports such a finding. The evidence at trial established
6 that, in approximately November 2016, Jane Doe 8 was
7 recruited into DOS, which she was told was a, quote,
8 "women's-only organization," end quote. Her recruitment
9 follow a pattern in which Mr. Raniere directed, quote,
10 "first line," end quote, DOS slaves to recruit their own
11 slaves, and instructed them to conceal from the recruits
12 that he was involved with DOS in any way. Shortly after
13 being recruited, Jane Doe 8 was given a, quote, "special
14 assignment," end quote by her, quote, "masters," end quote
15 to, quote, "seduce," end quote, Mr. Raniere, and allow
16 Mr. Raniere to take a photograph to prove she had completed
17 the, quote, "assignment," end quote. I find Jane Doe 8's
18 testimony credible, and reject Mr. Raniere's contention that
19 she somehow, quote, "misunderstood the assignment to sleep
20 with Mr. Raniere," end quote.

21 Thus, while Jane Doe 8 ultimately refused to
22 engage in a sex act docket with Mr. Raniere, I find that the
23 preponderance of the evidence establishes that Mr. Raniere,
24 quote, "completed all the acts he believed necessary for
25 successful completion of the substantive offense," end

1 quote. Accordingly, a three-point reduction under
2 Section 2X1.1(b)(1) is not warranted.

3 I disagree with Mr. Ranieri's objection to a
4 five-level enhancement under the Sentencing Guidelines
5 4B1.5(b)(1) for engaging in a, quote, "pattern of activity
6 involving prohibited sexual conduct," end quote. Under the
7 Guidelines, a defendant engages in a pattern of activity
8 involving prohibited sexual contact, quote, "if on at least
9 two separate occasions the defendant engaged in prohibited
10 sexual conduct with a minor," end quote.

11 The evidence establishes that Mr. Ranieri began a
12 sexual relationship with Jane Doe 2 in or about September
13 of 2005, when she was 15 years old. The evidence also
14 established that, on at least two occasions, Mr. Ranieri
15 took photographs of Jane Doe 2 constituting child
16 pornography. That is sufficient to establish a, quote,
17 "pattern of activity involving prohibited sexual conduct,"
18 end quote, and the enhancement under 4B1.5(b)(1) is the
19 therefore warranted.

20 Having addressed Mr. Ranieri's objections to the
21 PSR's Guidelines calculation, I will now calculate the
22 Guidelines range for Mr. Ranieri's sentence, using the 2018
23 Guidelines Manual.

24 On Count 1(a) for Visa Fraud, the
25 base offense level is a 19 and a four-point role enhancement

1 applies for an adjustment, adjusted total of 23.

2 Counts 1 and 2, Racketeering Acts 1(a) and 1(b),
3 for Conspiracy to Commit Identity Theft and Unlawfully
4 Possess Jane Doe 1's Identification, the base offense level
5 is 19 and a four-point role enhancement applies, for an
6 adjusted total of 23.

7 On Counts 1 and 2, Racketeering Acts 2 and 4, for
8 Sexual Exploitation of Jane Doe 2 on November 2nd, 2005, the
9 base offense level is a 32. I apply a two-level increase
10 because Jane Doe 2 was older than 12 but younger than 16, a
11 two-level increase because the offense involved sexual
12 contact and a four-point increase for the defendant's
13 leadership role, for an adjusted total of 40.

14 On Counts 1 and 2, Racketeering Acts 3 and 4, for
15 sexual exploitation of Jane Doe 2 on November 24, 2005, the
16 computation is the same as the one I just described, which
17 is an adjusted offense level of 40.

18 On Counts 1 and 2, Racketeering Acts 5(a) and 5(b)
19 for Conspiracy to Commit Identity Theft of James Loperfido,
20 the base offense level is 19 and a four-point role
21 enhancement applies for an adjusted total of 23.

22 On Counts 1 and 2, Racketeering Acts 5(a) and 5(c)
23 for Conspiracy to Commit Identity Theft of Edgar Bronfman,
24 Sr. the base offense level is a 19 and four-point role
25 enhancement applies for an adjusted total of 23.

1 On Counts 1 and 2, Racketeering Act 6, for
2 Conspiracy to Alter Records for Use in an Official
3 Proceeding, the base offense level is 19 and a four-point
4 role enhancement applies for an adjusted total of 23.

5 On Counts 1 and 2, Racketeering Act 7, for
6 Conspiracy to Commit Identity Theft of Jane Doe 3, the
7 base offense level is a 19 and a four-point role enhancement
8 applies, for an adjusted offense level of 23.

9 On Counts 1 and 2, Racketeering Acts 9(a) and
10 9(b), for Trafficking and Document Servitude of Jane Doe 4,
11 the base offense level is 22 and I apply a three-level
12 increase because the victim was held in peonage or
13 involuntary servitude for over a year, and a four-level
14 increase for the defendant's leadership role, for an
15 adjusted total of 29.

16 On Counts 1 and 2, Racketeering Act 10, for
17 Extortion, the base offense level is a 19 and a four-level
18 role enhancement applies, for an adjusted offense level of
19 23.

20 On Counts 1 and 2, Racketeering Act 12(a), and
21 Counts 8 and 9 for Sex Trafficking of Jane Doe 5, the
22 base offense level is a 30 and a four-level role enhancement
23 applies, for an adjusted total of 34.

24 On Counts 1 and 2, Racketeering Act 12(b), and
25 Count 6, for Forced Labor of Jane Doe 5, the

base offense level is a 32 and four-point role enhancement applies for an adjusted total of 36.

On Counts 1 and 2, Racketeering Act 14, for Conspiracy to Commit Identity Theft of Jane Doe 7, the base offense level is 19 and a four-point role enhancement applies for an adjusted total of 23.

On Counts 1 and 7 for Wire Fraud Conspiracy, the base offense level is 19 and a four-point role enhancement apply, for an adjusted total of 23.

On Counts 1, 8, and 10 for Attempted Sex Trafficking of Jane Doe 8, the base offense level is a 34 and a four-level role enhancement applies, for an adjusted total of 38.

I then compute the multiple count adjustment, which requires that I assign one unit to the group with the highest offense level, and one additional unit to each group that is equally serious or 1-4 levels less serious.

The two groups are related to sexual exploitation of Jane Doe 2 have a highest adjusted offense level at 40. I assign one unit to each of those groups, one unit to the group covering sex trafficking and forced labor of Jane Doe 5 and one unit to the group covering attempted sex trafficking of Jane Doe 8. That yields a total of four units. I then take the greater of the adjusted offense levels, which is 40 and increase the level by four points,

1 based on the unit calculation. That would yield a Total
2 Offense Level of 44.

3 Finally, because the offense of conviction is a
4 covered sex crime, the defendant engaged in a pattern of
5 activity involving prohibited sexual conduct, the defendant
6 is not a career offender, and Section 4B1.5(a) of the
7 Guidelines does not apply, I increase the offense level by
8 five points, to total of 49. The Total Offense Level is
9 therefore 49.

10 Having determined the Total Offense Level, I will
11 now calculate the Guidelines Range. The defendant is in
12 Criminal History Category 1, and thus his Total Offense
13 Level -- and his Total Offense Level is 49. Using the
14 Guidelines table, I calculate that the applicable Guidelines
15 range is life imprisonment.

16 And that's the Court's decision. And the defense
17 has its objection.

18 MR. AGNIFILO: Thank you, Your Honor.

19 THE COURT: And if there are any objections from
20 the Government?

21 MS. HAJJAR: No, Your Honor.

22 THE COURT: All right.

23 All right. At this time, we will move on to
24 victims' statements. We have 15 victim statements that will
25 be made either in person or by video or audio. And we'll

1 begin with the victim statement by Camila. Okay. Is Camila
2 in the room or do we have to escort her.

3 MS. HAJJAR: She's being escorted in, Your Honor.

4 THE COURT: Thank you.

5 (Pause in proceedings.)

6 THE COURT: Okay. Good morning, ma'am. Are you
7 Camila?

8 CAMILA: I am.

9 THE COURT: All right. Please leave your mask on
10 you will be heard. Thank you very much. You may proceed
11 when you are ready.

12 CAMILA: Good morning, Your Honor. I'll start by
13 introducing myself. My name is Camila, but most people call
14 me Cami. I understand that the case that concerns me and my
15 name has been mentioned repeatedly throughout the trial, but
16 I was not here and I was not heard.

17 THE COURT: Could you lower the microphone a
18 little and speak slowly and take all the time you need,
19 please.

20 CAMILA: Thank you.

21 THE COURT: Thank you.

22 CAMILA: During this trial I was advised by my
23 lawyer not to speak with the Government and to stay
24 invisible. But I have recognized the power I hold and I am
25 ready to retain my voice and stand up for myself.

1 As for the individuals that I am here to speak
2 about, it is difficult for me to utter his name. I will
3 only refer to him as "Keith." I am rebuilding my life and I
4 will not bring him forward into my future. This man that
5 you are about to sentence had a deep invest in my life that
6 I am not sure I can fully quantify or qualify.

7 It has taken me a long time to begin to process
8 the trauma he caused by his attempts to control my mind and
9 my world. He tried to replace my voice with his own, my
10 thoughts with his self-serving ideas. He twisted my mind
11 for so long that finding the strength and clarity to tell my
12 story has been a slow and painful journey. And even now I
13 realize that I still have a long road ahead of me.

14 I am here because I am someone's daughter, sister,
15 and friend, and I know that if it was my own daughter,
16 sister, or friend it would be completely unacceptable for
17 her to have been inducted into that situation; therefore, I
18 am standing up for that girl that was someone's daughter and
19 I am saying it is unacceptable that she was in this
20 situation. It is wrong that she had to live through
21 everything she did, and it is unforgivable that it lasted 12
22 years.

23 You want me to believe that my only value came
24 from having self-doubt. I now realize I am stronger than he
25 ever allowed me to know I was. He tried to control me

1 because he knew that the knowledge I had about him and his
2 actions toward me made him vulnerable.

3 I met him when I was just 13, and from the start,
4 I did not feel comfortable around him. I would even try to
5 avoid being in the same room as him, but the adults around
6 me would get mad at me for being rude and push me back
7 towards him. This felt like a violation and a betrayal from
8 the very people that were supposed to protect me.

9 The very first time I was left to have a
10 conversation alone with him, we talked about how I placed
11 second on my eighth-grade spelling bee contest. I continued
12 to avoid him after that for some time, but years later, he
13 told me how he knew I was special from the moment he met at
14 13.

15 He first had sex with me on September 18, 2005.
16 He would expect me to celebrate September 18th as our
17 anniversary together every year. That first time, which was
18 my first time, I was 15. He was 45. This was after a few
19 months of him asking me to go on walks in the middle of the
20 night, which he would bring up topics of a sexual nature
21 escalating in detail over time and asking me flippant
22 questions about my sexual history, of which I had none. He
23 told me keep it all a secret, immediately severing me from
24 my family and friends and effectively making himself my only
25 resource.

1 Beginning at that time, he would ask me to
2 sneak -- sneak out of the house that I was living in to meet
3 him at places where we were isolated as well as from
4 everyone else so that he could have sex with me. He would
5 often take me to his executive library where he would ask me
6 to take my clothes off before coming up the stairs to the
7 loft as he watched. During these secret meetings when I was
8 still 15, he took naked pictures -- naked pictures of me.
9 The experience of being photographed is seared into my
10 memory. As a 15-year-old that is not something you easily
11 forget. He would have with me some type of sexual contact
12 during every meeting. He wanted to take a picture with no
13 exception.

14 While he hid our sexual relationship from others,
15 he explained it to me by telling me I was very mature for my
16 age, and the flattering and the romance of hearing that when
17 you're a teenager; I know now that it was false. I was a
18 child. I also know that it was no excuse to rob me of my
19 youth or to interrupt my life the way he did. He used my
20 innocence as -- my innocence to do whatever he wanted with
21 me, not just sexually but also psychologically. He
22 manipulated me into what he wanted for his own reasons, for
23 his own pleasure.

24 He was calculated and methodical in the way he
25 tricked me into a relationship and the way he manipulated me

1 for every second of my life. He groomed me in his eyes. He
2 shaped -- he shaped my being to his liking, or mine, he
3 said.

4 Today I still have trouble identifying the lines
5 between a normal relationship and an abusive one. Even the
6 times with him that could have been perceived as smooth and
7 conflict-free, I now realize were the other side of the
8 abuse. I had to become good at figuring out how to stay in
9 his good graces by pleasing him and doing exactly what he
10 wanted me to do, and I did. I became the best. He had made
11 himself my only lifeline and I was not going to mess with
12 that. I learned that survival is instinctive, even in the
13 most twisted circumstances.

14 He was involved in and controlled every aspect of
15 my life. When I was 17, he directed that I overstay my
16 visa. At the time I was too young to understand why he
17 wanted this to happen, but I now realize why. I realize
18 that he was using my status on his lap to strip me of all
19 options and in doing so, deprive me of my freedoms. I was
20 not old enough to consciously consent or understand how he
21 was taking away my rights. I regret listening to him and
22 trusting him.

23 In 2011 he put me up in an apartment in the
24 neighborhood. It was clear that just like our relationship,
25 no one could know about it. He romanticized it by -- and

1 told me it would be our home, but in reality, he spent
2 almost no time there. He expected me to be available for
3 sex all the time. He would come in the house, have sex, and
4 leave.

5 As a result of my living situation and the secrecy
6 surrounding it, I became even more isolated and withdrawn.
7 My family and friends started describing me as mysterious,
8 and while at first they were curious and inquisitive about
9 my life and whereabouts, eventually they stopped asking. I
10 became unreachable to my parents, my brother, and friends
11 until I had no one that would worry about me, no friends to
12 check up on me. I felt abandoned for the longest time. I
13 didn't see it then, but he cut me off from anyone that could
14 ever help me.

15 In addition to manipulating me for his sexual
16 relationship, he emotionally and psychologically abused me.
17 I battle with the effects of his manipulation to this day.
18 He exerted an intense amount of pressure on me regarding my
19 weight, which resulted in an eating disorder that has been a
20 lifelong battle and has caused me ongoing health problems.
21 When I was 15, I was a normal teenager who had a normal
22 relationship with food and exercise, but he destroyed that.
23 As soon as we started having sex, he started asking me my
24 weight every single day, and this continued into my
25 adulthood.

1 As you can see, I'm 5'5," and his goal for me was
2 to weigh 100 pounds or less. Today I try not to think about
3 my weight, but I still hear his voice in my head and it
4 continues to be a daily struggle.

5 After experiencing threatening physical symptoms
6 because of the eating disorder, some of which I have yet to
7 fully recover from, I asked for outside professional help,
8 but his answer was always, lose the weight first. These are
9 words that -- these are words that were burned into my
10 memory because of the desperation and the hopelessness that
11 I felt being met with such a heartless response. He told me
12 that he knew better than doctors anyway and always denied me
13 any medical care. Now I believe he never let me seek
14 medical attention to make sure our relationship stayed a
15 secret.

16 Each attempt to distance myself from him was met
17 with resistance, and the worst part started when I tried to
18 break up with him. I wanted a normal life and to be in a
19 normal relationship. I believed in what he said before, If
20 you ever want to go, I support you. But when I tried to
21 leave, I learned that was a lie. He had told me the only
22 value I contributed to the relationship was my purity. I,
23 therefore, thought that if I became impure inside, he would
24 let me go, so I had another relationship. But he did not
25 let me go. It only got worse. He punished me emotionally,

1 psychologically, and sexually. I had no one to reach out to
2 for help. He acted happy, loving, and caring when I started
3 falling back in line, but as soon as I pressed it again and
4 decided to leave, he would become a monster. He knew the
5 things that mattered most to me and what I feared and used
6 both to control me.

7 He drove me to the point of a suicide attempt with
8 his cold-mind games. That night when he finally, in a state
9 of shock with blood running down my arms, one of the first
10 things out of his mouth was, Do you know how bad it could
11 have been for me if you had killed yourself? His first
12 thought was always of himself and the potential exposure of
13 his secret, even when I was in extreme distress.

14 He acknowledged that the right thing would be for
15 me to go to a hospital and be placed under psychiatric
16 evaluation. I would have welcomed that help and a break
17 from his cruelty. Instead, he asserted his capability that
18 he could help me better than any trained professional. He
19 continued the mind games and did not allow me to seek
20 outside help. I really thought he would let me go after
21 that. Instead, he tighten his grip and brought in more
22 people to keep me in check. It felt like I would never be
23 free. There was no way out.

24 I hold scars on my body from him that can never be
25 erased. They carry immense emotional and psychological

1 pain. They are a reminder of his cruelty and manipulations.
2 He knew exactly what he was doing. He even asked me at some
3 point if having his initials on my body would keep me from
4 being with other people. He drew pleasure from knowing he
5 had marked me. I was his.

6 Even when I got up the courage to cover his mark,
7 it has not been enough to disguise the pain and shame that
8 it reminds me of. To realize that someone knowingly hurt
9 your body and drew pleasure from it is a difficult thing to
10 come to terms with; and maybe it's not something that is
11 ever meant to feel okay. To brand someone you allegedly
12 care for should never be normal.

13 I left in 2017 thanks to my sister. When I walked
14 away I had the mind of a 15-year-old in the body of a
15 27-year-old. I missed out on the incredibly basic things
16 people learn in their youth, so I was completely unarmed and
17 unable to cope. Even after I left, I was still constrained
18 by him. I was distrustful of almost everyone, including my
19 own family; and sometimes had moments of confusion where I
20 felt unsure I was -- that it was right of me to leave. I
21 felt completely alone.

22 Because of him I lacked documentation of legal
23 status, even in Mexico. Because of him I had no formal work
24 experience and no higher education, which has really
25 constrained my ability to find work. It's hard to explain

1 to potential employers how I came to suddenly enter the
2 workforce at 29 with such a limited résumé and no
3 references.

4 It was not until a few months after his arrest
5 that I began to truly break free of his control. And even
6 now, the effects of his abuse live on. While the emotional
7 instability has finally ended, I continue to carry scars,
8 physical and emotional and psychological to this day.
9 Because he manipulated me into a sexual relationship, I
10 carry the pain and shame of aborting a child at his
11 direction, which is something that would haunt me every day
12 and a wound that will never heal.

13 I also have cervical dysplasia, which is a
14 precancer in my cervix from the HPV virus. Every step of
15 the procedure has been traumatic because it reminds me of
16 the way in which he violated my being. The lasting effects
17 of his abuses of me include threatening my ability to have a
18 family in the future in a normal manner and having to deal
19 with long-lasting medical effects. I want to move on, but
20 he has damaged me in so many ways.

21 His infliction of stress on me from his actions
22 have made it hard for me to maintain a job. I still have
23 heart palpitations. I still have scars on my body. I still
24 struggle to have a healthy relationship with food, exercise
25 and body image, and I still struggle to understand what a

1 loving, healthy relationship with another person should look
2 like. I still don't have a normal concept of family because
3 of how he manipulated us away from each other. And because
4 of the secrecy, he never allowed me to form real
5 friendships.

6 I am working hard to live a normal life, but I
7 feel the mental and emotional and physical consequences of
8 his abuse every single day. I will never be the same. I
9 never got to live like a normal teenager. I never went on a
10 date until I was 29. I never went to college. I never --
11 and this is where I go blank because I missed so much of my
12 own life, I find it difficult to even conceptualize what I
13 have missed.

14 As I stand here, the gravity of what he did to me
15 becomes more and more clear, and I fail to understand it
16 sometimes. He hid his abuse behind ideas and concepts of
17 nobility, but there is nothing noble about abusing a child,
18 abusing his authority, and taking advantage of me, my mind,
19 my body, my spirit, my trust. He demanded loyalty, but was
20 loyal to no one but himself. He left me weak, confused, and
21 completely unarmed. He claimed to build me up, to love me
22 selflessly, yet, he kept me blind and lost, controlling
23 everything around me, including my perception of the world
24 and myself.

25 You see, what everyone got to see was a

1 soft-spoken charismatic man, but I've seen a different side
2 of him. I know that other side of him. I know who he
3 becomes when he's losing control of you. I know the
4 manipulation, the obsessions, the lies, and how he blurred
5 the lines of right and wrong to serve his own benefit.

6 There has been a difficult -- it has been
7 difficult to rebuild myself but not impossible. I am and
8 will continue to grow stronger than he ever allowed me to
9 know I was. Even now, he continues to lie in an attempt to
10 save himself. He talks himself in circles trying to
11 redefine principles to justify his actions. But I think
12 he really -- if he truly believed those principles he claims
13 to live by, he would have honored those, and told the truth
14 instead refusing to take accountability for the heinous
15 crimes he has caused.

16 Your Honor, there is no outcome where I get the
17 time back and the opportunity that's lost -- I lost, nothing
18 that can be done or said to make me trust another human
19 being the way I did before I met him. I believed in the
20 goodness of people and giving them the benefit of the doubt,
21 but that is exactly how he got away with so much.

22 Respectfully, I ask the Court to take my 12 years of abuse
23 and the effects of that abuse that I continue to experience
24 today into consideration in sentencing him.

25 The hardest part of my story is over. Keith

1 didn't break me. I stand here today, now I can do my story
2 justice. I will not stand idly by. I will not let somebody
3 else tell my story. That is why I am here, to prevent him
4 from almost destroying someone else ever again.

5 Thank you, Your Honor.

6 THE COURT: Thank you. You may be seated.

7 (Continued on the next page.)

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1 THE COURT (Continuing): The next victim statement
2 is from Sarah Edmondson, who appears from video.

3 MS. EDMONDSON: This is not a victim impact
4 statement. This is a survivor statement.

5 Keith, you tried to steal me from my husband. You
6 tried to blackmail me. You tried to enslave me. You tried to
7 ruin my life and the lives of my friends, but you failed.
8 Your brand of your initials on my body is gone. I had it
9 removed with plastic surgery.

10 But I can't help but wonder what would have happened
11 if I spent my 30s in a legitimate organization; one led by a
12 true humanitarian. Instead of a monster who demonstrated his
13 entire life mission is to destroy as many people as possible.

14 You used the trust that people had in me and my
15 bright light as a recruitment tool for your personal harem and
16 your insatiable desire for destruction.

17 In a curriculum that you said taught personal
18 responsibility, you have taken none. You are not a leader or
19 a mentor or a guru. You are a liar, a parasite, and a
20 grifter; all the thing that's projected onto women.

21 Despite what you tried to teach us in the
22 curriculum, it turns out there is a definition of evil. It's
23 you, what you have done and continue to do from prison and in
24 this very moment. But your con has come to an end. The world
25 sees your lies. And if there is ever any justice, the world

1 will never see your face in public again.

2 Thank you to the Court for your time. Your Honor,
3 you've saved many lives and my husband and I thank you very
4 much.

5 THE COURT: The next victim is Mark Vicente
6 appearing by video.

7 MR. VICENTE: Your Honor, beyond Keith Raniere's
8 crimes as documented in your court, there are moral crimes
9 this man has committed; specifically against those that were
10 under his care. People like myself.

11 The crimes were willful and intended to cause
12 maximum damage. There are the physical things Raniere has
13 done to people: Coerce them to starve themselves, sleep
14 deprivation, cutting them off from their friends and families,
15 closing doors on their life and career opportunities,
16 shunning, terrorism by litigation, branding, triangulating his
17 students against each other, maliciously squandering the
18 child-bearing years of dozens of women, convincing people that
19 he knew better than their doctors resulting in them foregoing
20 medical treatment they should have had.

21 These are all terrible things. But it's the
22 psychological and existential injuries which will continue for
23 the rest of our lives, that I find the most heinous.

24 Keith Raniere, you have done irreparable harm to
25 people's psyches, to their self-esteem, their belief in

1 themselves, and their experience of sanity and well-being,
2 their quality of existence.

3 I believed in you. I believed in your mission,
4 because I thought it was the same as mine. Finding out the
5 truth about you and your actual motives turned my world upside
6 down. You broke goodness. You cracked the firmament of my
7 belief in nobility and honor and righteousness.

8 I do not know how to repair it. I do not know if it
9 can ever be made whole again. I fight every day to try to
10 recapture something that now feels lost.

11 This is not by accident on your part. When I was
12 writing the film Carbon Crimes, you wanted me to create a
13 female character of innocence and good will. Someone who
14 worked for a leader she believed in with all her might. She
15 then finds out he's in fact a very bad man with very bad
16 intent, using everyone's perception of goodness for his own
17 ends. You described to me how it would break someone like
18 that and how she would never be able to heal from it. She
19 would never be able to find goodness again. She would be
20 forever poisoned; goodness will be forever poisoned.

21 You knew exactly what you were doing to me and many
22 others. And the loss and pain is incalculable. And the worse
23 part, the truly sick part of this is, in that trauma, the
24 desolation of my psyche, is your greatest joy.

25 As the founder of the Society Of Protectors, you told

1 us constantly to man-up, to strip ourselves of everything, to
2 find our true self. You told us on a daily basis how in the
3 worst circumstances we can find joy.

4 Remember how you quoted Albert Camus, "In the midst
5 of winter I found there was within me an invincible summer."
6 And yet, here you are suffering about how miserable you've
7 been in prison without your comforts.

8 Your ideology was all false bravado and boastful
9 lie. You made us believe we were constantly failing, a
10 standard you were wholly incapable of meeting yourself. You
11 just wanted to destabilize our psyches as much as possible so
12 that in our growing psychosis you would be the savior watching
13 us get worse and worse. Like poisoning us and watching us die
14 slowly. Our happiness wasting away, that is your true joy.

15 You could have at least had the decency to admit
16 what you wanted was so very primitive. How cruel to convince
17 women that sex with you would heal their sex abuse trauma.
18 How childish and devious to use principle and honor as a cover
19 for a teenage fantasy of getting a group of women to give you
20 a blow job. How shallow are you?

21 Clearly, your joy does come from the external world
22 after all. You were just seeking infantile comfort.

23 It turns out, contrary to your lawyer's assertions,
24 you do need coercion to get sex.

25 You and your followers need to ask yourselves one

1 important question, how did Keith Allen Ranieri cause this.
2 Stop being a victim. Stop suffering.

3 The world's reaction to your self-appointed
4 omnipotence did not cause your present circumstances; your
5 evil did.

6 You will never know true love. You have to
7 calculate everything: Kindness, compassion, awe, morality,
8 weeping at pure goodness.

9 While I will struggle for the rest of my life with
10 what you've done to my mind and my soul, I can feel all those
11 things you cannot. My morality is intrinsically mine. Your
12 emptiness is yours for ever and ever.

13 Your Honor, I spent 12 years studying this man. He
14 has a belief that he's the next evolution of human kind,
15 beyond worldly ethics and morality, far superior to this
16 Court. He thinks he breathes the rarefied air of an awakened
17 genius, but he's none of those things. He is a malicious,
18 petty, evil and dangerously vengeful sociopath who thrills at
19 our pain. And yet barely a glimmer of that excitement is
20 visible on his blank face and his dormant eyes.

21 He has been a lascivious little toddler with too
22 much power and zero accountability. He has stolen hundreds of
23 years from all his victims and poisoned their existence,
24 poisoned my existence. And he needs to be held accountable.

25 Thank you for your time.

1 THE COURT: All right before we proceed any further,
2 anyone here is using an iPhone or iPad or a computer please
3 put it away or leave. That's everyone. Thank you very much.

4 The next victim is Ivy Nevares, who is speaking by
5 audio transmission.

6 MS. NEVARES: Your Honor, I'm Ivy Nevares. I'm
7 speaking freely about my experiences with Keith Raniere.

8 I met him during my first ESP workshop in 2001.
9 Although I was already indoctrinated, my instincts hadn't been
10 worn away.

11 I didn't realize at the time that the course work
12 showed his fascination with criminal psychologically;
13 specifically swindling and sociopathy. He even created a
14 worse class of sociopaths he called Suppressives, and later
15 Luciferians for added drama.

16 He showed up for Q&A at the end of the fifth day.
17 He asked him during that first encounter, 'You seem to know a
18 lot about these Suppressives, how do I know you're not one of
19 them?' He smiled coyly, 'Because they can't hold value, they
20 can only destroy.'

21 I would normally have caught the black and white
22 fallacy were not for the narrative that had been pushed on me
23 by his adoring women already, who were already criminally
24 bound. Like thousands of others I innocently believed him to
25 be sincere.

1 Ten months and several workshops later, Raniere
2 asked for a lifetime personal and professional commitment. I
3 could be with no other men and work for no other person or
4 company. I knew something was off early on. He spoke too
5 much and too highly of himself and claimed to have mystical
6 powers no one should question. I was too embarrassed to ask
7 why he spoke of mysticism while publicly claiming to be a
8 scientist.

9 One of his most preposterous claims is that he had
10 to have sex constantly, lest the spiritual energy consume him
11 to the point of death. I would like to ask him now, your
12 Honor: You've presumably gone two-and-a-half years without
13 sex since your arrest. How is it that you're still alive?

14 One of the cornerstones of Raniere's model is that
15 ethical civilization can only be achieved, and I quote,
16 "through mutually consented honest trade." The consent cannot
17 exist along side honesty. And that right there was a loop
18 hole he relentlessly exploited.

19 I consented to an intimate relationship with him,
20 but I never consented to being lied to, manipulated or abused.
21 I never consented to being held captive by a dependence
22 inducing system that he architected. I never consented to
23 having his flying monkeys gaslight, exploit, harass, threaten
24 and attack me around the clock under his direction simply
25 because I refused to comply.

1 I would like to address Raniere directly. That
2 fateful October you weren't asking for fidelity; you were
3 asking for blind obedience. You weren't offering a type of
4 marriage; you were opening the door to countless unwritten
5 contracts whose conditions became ever moving targets, but
6 whose penalties you and your women were quick to enforce.

7 You asked me what I wanted from you. And I said, to
8 know true love. You instead subjected me to 17 years of
9 indentured servitude and your own perverted monstrosities.
10 Had I known all of this going on, I would have never followed
11 you.

12 The force of Raniere's world rests on a flippant
13 double-edged sword he wields to benefit those who shield and
14 finance his criminal appetite and to cripple those who refuse
15 to do so. He shunned me for the better part of eleven years
16 and ordered others to do the same, because I could not or
17 would not meet his extreme demands.

18 A decade before DOS existed, Raniere's already
19 tormenting me with the practices the women would later take
20 on. One year after I put myself through hell to weigh his
21 desired 95 pounds, he shunned me because I had a handful of
22 pumpkin seeds breaking my 400-calorie limit. That night he
23 said his leaving me hurt him more than it did me.

24 Your Honor, the defendant you see before you today
25 is a sadistic pathological liar.

1 Raniere said, and I quote, "Things are most
2 maneuverable when they are most unstable." That is exactly
3 how he managed to subject me and others to systematic abuses.
4 He kept us sleep-deprived, blackmailed, exploited,
5 traumatized, and malnourished.

6 One year I completed 45-day fast to prove to him
7 that I cared about our relationship enough. What was his
8 response? That I wanted to break the fast because I was weak
9 and had no character. So he ordered me to extend it an
10 additional ten days. And I did, with the best of intentions,
11 but it was never enough. Nothing ever was.

12 Many of us experienced PTSD from Raniere's so-called
13 writing drills. I found out where he came up with the idea
14 during an SOP training. In a video he said a person close to
15 him had lost a brother to murder. And that the body wasn't
16 discovered until ten days after his death. That was my
17 brother, Fernando. How dare you desecrate my brother's death
18 as justification to torture countless women.

19 I come from a Mexican family. And Raniere knew that
20 having children is important to me. So he bated me with
21 promises of his first born child. I was very clear early on,
22 I said, if you father a child with someone else I will not
23 raise hell. I will not destroy you. I will simply slip away
24 quietly. He agreed to be truthful about it. And instead he
25 instructed the other women in the inner circle to lie to my

1 face about his children for years even after he was arrested.

2 I'm relieved to know one of his youngest victims has
3 finally denounced him. But it makes me sick to think he was
4 raping a child and sleeping were her sisters when he was
5 living with me swearing he wasn't sleeping with anyone else.

6 These very acts alone demonstrate his crazed
7 misogyny. In February 2015, Kristin Keffe, Ranieri's
8 long-time ally emailed me shortly after she defected with
9 their son. She said Ranieri was hoping I would commit
10 suicide. When I sent him the e-mail he replead, and I quote,
11 "Can you see she's not a bright light."

12 I spent several years contemplating Kristin's
13 accusation because I refused to believe it was true. Recently
14 I learned she said that on walks with Ranieri he asked
15 gleefully, "Do you think Ivy's going to commit suicide?"

16 When we first met, Ranieri was intensely curious
17 about my cutting myself and having suicidal thoughts as a
18 teenager. I shared with him that in my early 20s I foolishly
19 imagined that if my ideal partner left me, it would be best
20 for me to leave this world. He used the first six years of
21 our relationship to become that ideal man. He lived with me,
22 lavished me with gifts and attention, much to the displeasure
23 of the other women. One fine day he began shunning me, while
24 he flaunted other women in public and barred me from walking
25 on the same street as them.

1 I will address him again. You often cited that
2 Ayn Rand quotes, "A viler or evil than to murder a man is to
3 sell him suicide as an act of virtue." Was my potential
4 suicide your ultimate experiment?

5 I see now you exploited my dependence on a mate and
6 suddenly marginalized me. Do you think that would have driven
7 me to commit suicide? No matter the abuse, no matter the
8 intensity of betrayal, I never came close to considering that
9 option. The gift you have your ultimate betrayal to me was
10 realizing that no man is ever worth losing my life over; much
11 less a sick predator like you.

12 In our professional relationship Raniere violated
13 every single work-related principal he preached. Specifically
14 that work raises self-esteem only when it's justly
15 remunerated; otherwise it's enslavement.

16 Yet it wasn't enslavement when it came to me. No
17 one in the organization ever gave him as much time and resolve
18 as I did. Yet he and his and lazy women claimed that I was
19 the one who owed him.

20 Raniere was hiding in Mexico the day I found the
21 courage to end our relationship. I asked Nancy Salzman to
22 relay the breakup in person, but she lied to me and refused do
23 so on three separate times. I want him to know I left him on
24 January 15, 2018.

25 Alas, Raniere's day of reckoning has finally come.

1 This is my last message to him. As a writer you cautioned me
2 to use my skill honorably. And that with the stroke of a pen
3 I could irrevocably affect the character of those I wrote
4 about.

5 Your own actions have rewritten your character.
6 There is no damage I can do in this respect. I do not speak
7 as a jilted lover; on the contrary, I'm grateful my defiance
8 created a distance between us.

9 I don't care that you had children with other women.
10 I care that you lied to me about it. And I'm not brainwashed.
11 I've come to these conclusions myself after uncovering the
12 myriad of lies you used to entrap me.

13 The last sympathy I felt for the man I fell in love
14 with died with your lawyer's sentencing memorandum. You have
15 no remorse over what you've done. You blame your victims and
16 direct your flying monkeys to create insults to legitimate
17 social movements as you try to fight your imaginary injustice.

18 We are as you and made justice blind our platforms
19 to which your co-conspirators Nicki Clyne, Eduardo Asunsolo,
20 and others commit professional and social suicide every day.
21 They just don't know it yet.

22 It is with a very careful stroke of my pen that I
23 say and mean every word here. You are and will forever be
24 remembered as the most dangerous predator at all. May you
25 live long enough in prison to know the hell you put me and

1 others through.

2 THE COURT: The next victim statement is from Tony
3 Natalie.

4 MS. NATALIE: Thank you, your Honor.

5 Today is October 27, 2020. On October 27, 1999, 21
6 years to the day, I was forced to file bankruptcy because of
7 you. God has a sense of humor, doesn't he -- or she. Then
8 came years of relentless litigation, harassment, stalking, not
9 just against me but against my family, and that didn't end
10 until after your arrest. All I wanted to do was leave and be
11 able to move on with our lives, but you don't know how to let
12 go of anyone, do you. It was either fight back or die. I
13 chose to fight, but at a very high price to me and my family.

14 Both my mother and father died weeks apart, thinking
15 you were going to be putting me in jail. My brother John, you
16 remember him don't you, he fought very hard to stop you. He
17 was right, you are the boogeyman.

18 I saw you and your Prefect for exactly what the
19 world sees you as today, evil. Your goal was to break me and
20 you failed. I'm standing hear today to tell you, you didn't
21 break me. I'm stronger than you are.

22 In your desire to destroy, you destroyed yourself.
23 Your obsession to control and dominate women, look around,
24 Keith, it's women who took you down.

25 My mother would say, in order for Keith to be with

1 you he had to be normal, he had to try. Then you found Nancy,
2 a person that checked all your Machiavellian boxes, your
3 second in command. You're lazy, Keith. You always had to
4 have around you to do your dirty work, you still do.

5 Your calling card, the smartest man with a 240 IQ,
6 what a joke. But Nancy came with one of her own, the number
7 two NLP expert in the world. Using her NLP skills to create
8 your pandemonium. And she was willing to help you perpetuate
9 all your ridiculous lies, such as you're a celibate monk. A
10 lie you and your inner circle wove into the fabrics of
11 people's beliefs for years. It's the lies and the Bronfman's
12 money that created your cult kingdom.

13 Sending me gaslighting letters from Milton's
14 Paradise Lost, begging me to come back. I was Lucifer, and
15 you God. And when that didn't work, you created a module, The
16 Fall. I was the suppressive you used by name as an example
17 that needed to be destroyed, and what people feared the most
18 they would become. You even stole that term from Scientology.
19 There is nothing original about you.

20 It didn't work. They woke up and they reached out.
21 You pointed them in my direction. I said a thousand times, he
22 doesn't draw bad people, for the most part he draws good
23 people that want to make a difference. No one joins a cult.
24 As soon as they see the crack in the plate, they are gone.
25 They are to be brave enough to look.

1 Everyone builds their own postulate world. For some
2 people, it's a real heaven; for other people a real hell.
3 What does your world look like right now, Keith?

4 A genius, what a joke. You are diabolical, small
5 man, a master manipulator. And now that's over.

6 I ask this Court to sentence you to life in prison
7 and put you in a place where you're not allowed to have
8 contact with the outside world or anyone. You need to be
9 locked away as they locked away Charles Manson. As anyone can
10 see, you and your flying monkeys won't stop until you're gone.

11 The victims of your abuse should finally be able to
12 have peace and closure. Do something decent before you die,
13 Keith. Tell the Snyder family what really happened to their
14 daughter.

15 You're dangerous and soulless. And it frightens me
16 there are still people out there willing to do your bidding.

17 The last thing you said to me was, "The next time I
18 see you, you'll be dead or in jail." You were wrong, again,
19 you're in jail, and I pray to God that's where you will die.

20 I want to thank this Court for their time.

21 THE COURT: Thank you. The next victim statement is
22 from Barbara Bouchey.

23 MS. BOUCHEY: Thank you, your Honor. I'm not so
24 nervous today.

25 THE COURT: Just raise the mic. Thank you.

1 MS. BOUCHEY: Keith, hi, been a long time.

2 I read the glowing testimonials about you. I too
3 could have written one for the many benefits gained from you
4 in my days at NXIVM. However, what if a woman is married to a
5 man deemed a pillar of the community and 85 percent of the
6 marriage is good, but 15 percent is really bad. Within five
7 months he cons her out of her life savings, vowing to pay her
8 back, secretly abuses her, conceals his affairs with many
9 women, and sexually abuses them too including a 15 year old.
10 He then directs these women to conspire with him to deceive
11 her and to spread negative propaganda calling her crazy. And
12 any time she questions, they blame her and shame her for even
13 daring to ask. All the while, he extorts her value, time and
14 money to feed his selfish addictions and build his empire.

15 Finally, she cannot tolerate the abuse any more and
16 she leaves him. He fears though that she will tell the truth
17 about the abuse, and that she discovered that he's the wolf
18 behind the sheep's clothing. So he lies to cover up his
19 abuse. And to silence her, he hunts her like an animal,
20 misusing the court's and the authorities relentlessly
21 litigating her on trumped charges, has her passport removed so
22 she cannot feel safe in her own country. And for what?
23 Because she broke up with you and told the truth about it?

24 Keith, you claim to be the most ethical, honorable
25 and noblest of men. Is it ethical to overlook the husband's

1 abuse? No, it would not. That is why you were sitting here
2 today. Being held accountable and facing possible lifetime in
3 prison, which is what I think you deserve for what you did to
4 me and to others.

5 I read your 96-page motion and declaration of
6 innocence. You claim we do not understand your goodness and
7 philosophy to help human kind, followed by your denigration of
8 the witnesses here in this courtroom, stating that they lied,
9 they rewrote history all for hidden agenda to extort money
10 from the deep pockets of the Bronfman's.

11 Keith, why is it that I'm the elephant in the room?
12 Never mentioned. Why aren't I not in the 96 pages? No where.
13 Could it be because you know that you cannot claim those
14 things about me? Or given that I'm not one of the eighty
15 ex-members suing you. And with your decade-long attempt to
16 wrongfully accuse me failed, that mentioning me would only
17 further point to your obsessive lunacy.

18 It is you who has the bad intent who desperately
19 lied about me, concealing that you are a wolf, a predator, and
20 cleverly used good-intention people, like me, as your sheep's
21 clothing.

22 When I left, Kristin said it was like a snap. You
23 became obsessed with silencing me, lest anyone believe me.

24 Did you know that I listened to the audio, where you
25 masterfully wove a fantastical tale to everyone about why I

1 left? You claimed I tried to extort \$2 million. Don't you
2 think it's time to tell the truth, Keith? It was you who
3 asked me to invest 25,000. And you who asked me to lend you
4 25,000 to test your mathematical formula on commodities. And
5 you assured me I would not lose more than that. But you lied.
6 And you margined it and you exposed me to risk. With the
7 account in my name and you as the trader, I was forced to
8 cover \$1.7 million of your losses. You then feigned innocent.

9 And not knowing that this could ever happen, another
10 lie. Which I learned after I left because you did the same
11 thing with Pam's money. There you were crying, vowing to pay
12 me back, saying you were responsible knowing that I never
13 signed up for that.

14 You and Nancy promised me every year to pay me back.
15 Your inner circle espoused you were a man of your word, and
16 that I have no reason to worry. But there was always an
17 excuse every year, wasn't there, Keith, for not paying me
18 back. Then you shame me to asking for repayment of my own
19 money, a loan now, because a true humanitarian would not be so
20 selfish to ask for their money.

21 You lied to the community and then claimed this was
22 a gift. You then conned Claire with your lie and placed her
23 on the NXIVM board two weeks after I left. Then you had to
24 her go to my hometown, VA, to try to get me arrested, falsely
25 saying that I tried to extort this money from her. When that

1 didn't work, you launched an avalanche of litigation for eight
2 years dragging into 14 lawsuits, four states, had me arrested,
3 removed my passport, had Clare launch investigation on my
4 Financial Planning Ethics Board with their 29 salacious
5 allegations, including extortion. Additionally, you used
6 other board members to file extortion charges against me in
7 Mexico, having bribed a judge hoping to toss me into a dark
8 prison never to be to be seen again.

9 THE COURT: Please slow down a bit.

10 MS. BOUCHEY: Did you get it all, Keith, or do you
11 want me to repeat it?

12 THE COURT: Please go ahead.

13 MS. BOUCHEY: You bribed a judge in Mexico to toss
14 me into a dark prison hoping never to see me again.

15 I was driven into filing bankruptcy defending
16 against your lies, which took me until two years ago to pay
17 off.

18 And so, Keith, shall we summarize the facts, or
19 data, as you call it?

20 I got every one of your vexatious litigations
21 dismissed with no wrongdoing cited. I got my Financial
22 Planning Board's investigation closed with the overwhelming
23 evidence that I provided proving Clare's salacious allegations
24 were false. I got that criminal charge dropped.

25 And there was never any extortion charge or

1 investigation started in the United States because authority
2 realized it was complete bogus.

3 However, you did get that bogus charge filed charged
4 in Mexico. And I'm sure that you would be surprised to know
5 right now that your ex-Mexican board members have come out of
6 the fog. And right now, as we speak, they are arranging to
7 have those criminal charges dropped.

8 And so, every devious plot and plan to destroy me
9 and falsely accuse me has failed. Where you did not fail was
10 to assassinate my character with a non-stop headline news
11 stories that reported your lies portraying me an unethical
12 financial adviser, criminal extortionist, unfit to manage my
13 own financial affairs let alone that of my clients.

14 I took the brunt of your -- I took the brunt of your
15 vengeance for eight years, being bludgeoned, because I was
16 unwilling to go quietly into the night. No matter how much
17 you terrorized me, I did not surrender. And I never gave up
18 trying to expose you had and hold you accountable and bring
19 you to justice this day.

20 A terrorist is defined as a person who uses unlawful
21 of violations of intimidation in pursuit of their own aims.
22 That's who you are, a terrorist. A wolf, a predator, a
23 criminal, and unethical human being. You no longer can hide
24 in plain sight and are now being seen for the predator that
25 you are.

1 There was a time when I once loved you, and dearly,
2 thinking you were my soulmate. I thought we shared common
3 goals of empowering others in making a difference in the
4 world. I gave you everything that I had my life, my work, my
5 efforts, my resources for what I believed was a mutual vision.
6 Often you would tell me I was your greatest risk. Never made
7 sense to me at the time, but it does now. I'm your black
8 swan. That rare person causing the extreme event that would
9 have severe outcomes that cannot be predicted beforehand and
10 can cause catastrophic consequences.

11 Keith, you may have broken my heart, irreparably
12 damaged my once impeccable reputation built over decades,
13 emptied my bank account once valued at 5 million, decimated my
14 career. Once was I an esteemed leader in my industry, you
15 drove me out of my hometown where I was once a pillar of my
16 community to seek refuge in another state because of my town
17 folks shunned me, unknowingly believing your lies. Then you
18 forced me into hiding, where I had to live anonymously in fear
19 of what next plot you can get away with in acting upon me. I
20 was alone, isolated and afraid.

21 Today, I may only own a 13-year-old car and my
22 furniture, but you were never able to diminish my spirit. And
23 I still possess the depth of my character. I have and always
24 have and will uphold the truths and my integrity. I stand
25 here before you a stronger, resilient, more encouraged woman.

1 I'm a better person today. My understanding, compassion,
2 forgiveness, and empathy runs deep within me like a river.
3 I've been filled with grace after going to hell and back many
4 times.

5 I've had many dark nights of the soul not knowing if
6 I could survive another day or false headline news story.
7 Many years I had to choose between needed medical care, paying
8 attorneys, or rent, uncertain if I could support myself. You
9 may have destroyed everything that took me decades to build,
10 but you did not destroy me.

11 I forgave you a long time ago for your unspeakable
12 betrayal, deceit, lies, manipulation, extortion of my value,
13 intent to destroy me because I believed that right now you are
14 not of sound mind, you are delusional and unable to see the
15 evil intent that is within you.

16 I will pray for you and your soul every day. May
17 God help you find your way back to your soul. May you spend
18 the rest of your life in prison, and hopefully maybe you'll
19 reflect or journal on all the damage and abuse you inflicted
20 upon me and others.

21 As for me, like a butterfly after it struggles to
22 survive the war zone of the chrysalis, it emerges to spread
23 its wings now having the strength to fly. And so do I.

24 Thank you, your Honor.

25 THE COURT: The next victim statement will be made

1 by Susan Dones.

2 MS. DONES: Thank you, your Honor, members of the
3 prosecution, the defense team, and Keith Raniere for hearing
4 my statement.

5 My name is Susan Dones. I was number of ESP/NXIVM
6 from December 2000 to April 2009.

7 Where do you start with a man who calls himself
8 innocent but his entire adult life has gotten away with a
9 great deal of criminal activity. Raniere calls him a
10 humanitarian but has done so many inhumane things to people.

11 Raniere calls the justice system as one of the most
12 important things about our country but has spent years using
13 it as a weapon in an attempt to destroy his enemies who dares
14 to tell truth about his repulsive and criminal activities.
15 Now when he's about to face his sentencing, he's pulled out
16 all the stops in an attempt once again get out of trouble by
17 using his believers to wreak havoc upon court by crying wolf
18 about a fair trial and evidence tampering.

19 I have suffered from night terror dreams for years
20 after leaving NXIVM. I also suffer from PTSD and anxiety. My
21 night terrors mostly stopped within a few months of you being
22 arrested. My night terrors started back up when your group of
23 believers started an attempt to get your sentencings delayed
24 and get you a new trial. We deserve our closures and to have
25 you sentenced.

1 Keith you have been pampered by a group of mostly
2 women who attended to your every need. You have treated them
3 as slaves for food, clothing, money, covering your gambling
4 debts, criminal activities, pimping women for you, just to
5 name a few. Then you turn around and abuse them physically,
6 emotionally and spiritually. You have entangled them into
7 your web of mind-bending abuse, and if they dare to break free
8 you send your pack of wolves in to gain control over them, do
9 your dirty work, and keep them in line.

10 If they leave quietly, you smear them within the
11 NXIVM community, a thief, an extortionist, et cetera. If they
12 dare to speak out, a lawsuit or two awaits them. This shows
13 others to keep their mouths shut or else.

14 Each passing year when you are not stopped by
15 authorities your behavior got worse until finally you created
16 DOS, which was the final tipping point at stopping you with
17 your reign of terror.

18 Keith, you're an evil man. Who put together an army
19 of powerful soldiers to keep your prisoners in line. The fact
20 that you've had access to your believers while at MDC is
21 beyond me. This needs to be stripped from you from this day
22 forward. Who knows what you will create next using them as a
23 weapon of destruction.

24 Your victims, us, should not have to worry. About
25 what -- should not have to worry. We need to be safe and not

1 worry about what you will do if you have the ability to
2 continue to use them.

3 I have a video from our three-day meetings that we
4 had with you where you have stated that you have had people
5 killed for your beliefs. I have been afraid of that. Will I
6 be one of them?

7 I came in to ESP during the early years. There was
8 just the 16-day program. Back then there was no Google to
9 search who you were; had there been, I would have walked away
10 just because of the CBI days, where over 25-plus U.S.
11 attorneys came after you for your Ponzi scheme and that New
12 York state shut you down.

13 There was a reason you were not the owner of NXIVM,
14 you had been barred from running anything close to an MLM, but
15 NXIVM was another Ponzi scheme set up like an MLM.

16 Everyone knows you ran NXIVM. It was you, Keith, no
17 one did anything without your approval. But you set it up as
18 if Nancy Salzman was the owner and ran it.

19 At the time I took my training, ESP was brand new.
20 I took the second 16-day company offer, training offered by
21 the company. It was looking for people to open up satellite
22 centers. I was with an entire group from another training
23 program who had come to learn about the so-called new
24 technology and this new business adventure. I opened the
25 first offsite center in Tacoma, Washington, not knowing you

1 were running a Ponzi scheme. It was very cleverly covered up.
 2 I don't think your entire staff knew it was a Ponzi scheme.
 3 Only those closest to you in your very inner circle, maybe
 4 only those who had been with you for years at this point knew.

5 You got your entire leadership, your wolf pack, to
 6 lie to you -- lie for you. You were sleeping with students
 7 and your entire executive board, gambling in the commodities
 8 market, borrowing money from students long before the
 9 Bronfman's came in, for your margins call.

10 All the while having everybody telling us that you
 11 were an ethical man. This is not ethics in most people's
 12 opinion, not mine. Had I known the truth, I would have walked
 13 out day one.

14 When I started to catch on to things were not right,
 15 I started to ask questions. In return I got emotionally
 16 abused; but not by you, by your wolf pack. You're not even
 17 man enough to come to me directly. You were too busy enjoying
 18 your women and sleeping off late night volley ball. You sent
 19 your women after me while you lived your pampered lifestyle.

20 Luckily for me I lived in the Pacific Northwest and
 21 I had a strong enough sense of myself. That was my saving
 22 grace for me not to fall prey to your mind-bending games. I
 23 know that pissed you off.

24 I was deeply in debt from setting up my center and I
 25 loved training the 16-day program. I had enough control over

1 my center, so I stayed. I took the beatings and I worked to
2 get out of debt.

3 But that wasn't enough for you. I was asked to take
4 more and more trainings; and if I didn't, there were stiff
5 consequences. My different sources of income would get cut
6 off and my debt grew. You got more and more abusive by
7 sending in more wolves.

8 You knew I didn't like you, trust you, and that you
9 would never be my master. What you did like was my work ethic
10 and my ability to get things done, so you used me until you
11 could replace me in the Pacific Northwest.

12 I started to find out more things on the Internet,
13 asked too many questions. Your thirst for women was clear,
14 and I became a problem for you, and the abuse got worse.

15 You set up to poison the people closest to me that I
16 had anger issues and I might be a suppressive. You and your
17 wolves created problems at my center where there really wasn't
18 one. I saw you do the same thing with Barbara Bouchey in
19 Albany at the same time that she was questioning things about
20 you too.

21 (Continued on the next page.)
22
23
24
25

1 MS. DONES (Continuing.): My final straw with the
2 company is when Nancy Salzman had a meltdown in front of me at
3 her house. She told me everything, as if I was her priest.
4 She told me about the NXIVM cartel, the cash of millions
5 coming over the border from Mexico and that you were not going
6 to pay taxes on that cash which only leaves money laundering,
7 as Mexico was NXIVM's cash cow. That day I knew two things
8 had to happen. I had to figure out my escape plan as I was
9 not going to support NXIVM's illegal activities. And that by
10 leaving and knowing that I knew this information I was going
11 to end up in trouble. I figured that you were either going to
12 come after me with a phoney lawsuit as you had done so many
13 times with other people or, worse, that you were going to kill
14 me. I was scared for my life.

15 When I left NXIVM you pressed criminal charges
16 against me for extortion because I asked for my commissions
17 and my book of business that I created in the Pacific
18 Northwest, the value that you got paid on for nine more years
19 until NXIVM got shut down. You inherited Barbara Jeske's book
20 of business when she died. That was part of my book of
21 business. Mine, it just disappeared into thin air as if I had
22 done nothing for nine years and that profit went into your
23 pocket.

24 Then you abused me more by filing a lawsuit against
25 me and my wife in our bankruptcy court. All of that debt was

1 NXIVM's debt. It took two years of my life, because I
2 couldn't work a full-time job because I was a pro se
3 defendant. So I picked up work on the weekends because court
4 is closed on weekends. You and your Legal Aid person filed
5 over 230 claims against us and Clare Bronfman paid for seven
6 attorneys against two pro se defendants. You deposed everyone
7 in our case that were defectors against NXIVM claiming that it
8 was a conspiracy, which was a projection on your part.

9 Keith Raniere, you are a dangerous man. You formed
10 an army within the MDC. You were caught with several burner
11 phones. You set up a Ponzi scheme under Nancy Salzman's name.
12 You were then found guilty of horrible crimes and your
13 disgrace of humanity smacks of a man that's not fit to be in
14 society ever. My hope is that this judge requires that you
15 are cut of all ties of anybody that has ever been in NXIVM.
16 This is the only way that I believe that your believers that
17 still follow you will ever have a chance of having a final --
18 or will ever have a chance of having a normal life because
19 they will not get the daily dose of their master and the rest
20 of us can finally live in the peace that we deserve, for many
21 of us. You have a saying that those that have the most joy
22 win. Let me tell you today that we here are winning.

23 Thank you, Your Honor.

24 THE COURT: Thank you.

25 The next witness statement is from Kristin Keeffe.

1 MS. KEEFFE: Your Honor, my history with NXIVM began
2 when I was in my late twenties. I was one of the original
3 five students enrolled by Keith Raniere and Nancy Salzman.

4 At first I thought it was great and I loved it, as
5 Keith and Nancy introduced what they said was a revolutionary
6 intellectual process for students to remove negative reactions
7 to adverse stimuli in their lives. They called it exploration
8 of meaning, EM. What I didn't know at the time was the EM
9 methodology was an extremely sensitive and psychologically
10 invasive psychotherapeutic practice, which Keith and Nancy
11 developed by culling from various modes of psychotherapy and
12 hypnosis.

13 As a child, I suffered a traumatic neck injury and
14 an appendectomy that went horribly wrong. I was acutely ill
15 thereafter for many years. As an adult, these experiences
16 didn't impact my life other than the occasional feeling of
17 existential isolation. Upon starting EM sessions, these
18 childhood memories came up significantly as the foundation of
19 all EM's is the revisiting of painful childhood memories.
20 What I didn't know was reliving a childhood trauma over and
21 over again, hundreds of times over several years with
22 unlicensed, improperly experienced or educated therapists,
23 such as Keith and Nancy, could be so deeply damaging to every
24 aspect of my life. As Doreen Tehrani, an occupational health
25 and counseling psychologist specializing in post-traumatic

1 stress explains:

2 "If a trauma victim is debriefed in a state of high
3 emotion, the process can increase the arousal to the point of
4 overload trapping the sensory impressions of the trauma in the
5 brain."

6 After starting EM sessions, I began to experience
7 extreme anxiety, alternating with feelings of
8 depersonalization and derealization in my day-to-day living.
9 I had night terrors and what seemed like overnight I developed
10 a horrible eating disorder and gained a lot of weight. I had
11 inexplicable chronic pain that grew worse and worse as days
12 wore on. I was experiencing symptoms of psychological abuse
13 in the therapeutic context resulting in Post Traumatic Stress
14 Disorder. Making me relive these childhood traumas over and
15 over again, with no relief, was cruel and inhumane. It made
16 me extremely vulnerable to predation by Keith, Nancy, and
17 later Clare Bronfman. Before that, I was an otherwise
18 happy-go-lucky person. I was hardworking and kindhearted. I
19 didn't have lofty goals. I was never very materialistic. I
20 studied Buddhism, I meditated every day. I just wanted to do
21 something good with my life and I was very trusting.

22 These monsters got their hooks into me and did
23 everything they could to wreck my peace of mind and sense of
24 wellbeing. To make me their slave. Keith is such a good liar
25 and so manipulative and cunning, I couldn't see what was

1 happening to me.

2 There is no question that people benefited from
3 NXIVM trainings and the EM process. Keith can help people
4 when he wants to, that's part of his cruelty. He does good
5 things for a select few and then points to their successes as
6 a way to cover for torture of others, especially women.

7 Keith singled me out as a target early on and I
8 witnessed Keith target other women for torture, too. Once he
9 jokingly said, instead of Executive Success Programs, Inc.,
10 the company should called Shattered Souls, Inc., and he
11 laughed. It took me many sorrowful years before I could see
12 what was happening with Clare and Nancy always looking to
13 cement their power and status, and there was no amount of harm
14 they weren't willing to perpetuate or look the other way on,
15 for Keith. Always pointing to the latest wealthy person, or
16 actress or doctor, who was giving NXIVM an endorsement. "Look
17 how successful they are. They love us. Look at the good
18 results they're getting."

19 "The problem is you," they would say.

20 Then behind my back, they would tell lies and
21 disparage me throughout the community and cut me off at my
22 knees so I couldn't protest.

23 Your Honor, you need to understand. Keith and
24 Nancy, they were our therapists. We trusted them and in that
25 role they had so much power over our lives.

1 To the people who are supporting Keith now, I say
2 this: For every person who benefited, how many were harmed?
3 Have you asked yourselves that or is it just that you got what
4 you wanted so screw anyone who didn't.

5 Your Honor, I can't possibly go through all the
6 atrocities that were done to me or what I witnessed in ten
7 minutes. I have submitted a much longer statement describing
8 my history and the harm. I will just touch on a few more
9 things now.

10 I was hired by Keith and Nancy to assist with
11 NXIVM's legal affairs. As part of my job, I had to weigh at
12 or below 128 pounds, a size 2 in pants, and there was always
13 enormous pressure put on me to be in Keith's good graces which
14 meant sex and 100 percent obedience to his every wish.
15 Sometimes, to shame me, he would make me report how much I
16 weighed publicly. What kind of employer does all of that?

17 When Clare Bronfman joined NXIVM, she and Keith
18 spent eleven years, eleven years, trying to prove her father
19 Edgar Bronfman was behind an illegal conspiracy to destroy
20 Keith and NXIVM, and anyone close to him, including me. Every
21 problem Keith had, large or small, was always Edgar Bronfman's
22 fault somehow. For a long time I couldn't see it for what it
23 was, a lie they told, a manipulation to instill fear and
24 control me. It infected every area of my life and all of my
25 decisions. I watched Clare give Keith tens of millions of

1 dollars a year, pretending she was making loans to cover the
2 expense of her investments, when in fact, Keith and Nancy were
3 using Claire's money to offset his expenses so they could
4 stockpile cash for themselves with Claire's blessing. At one
5 point, Nancy showed me two and a half million dollars in cash
6 in a safe in her house, "for Keith" she said. Money she never
7 reported or filed taxes on. The stockpiling of cash went on
8 the whole time I was in NXIVM and they still have this money
9 stashed somewhere.

10 Keith and Nancy make outrageous claims about the
11 health benefits of Rational Inquiry and the EM process. NXIVM
12 should have been should down for this alone. When I began to
13 feel very sick myself, Keith and Nancy took turns telling me
14 my symptoms were because I needed more EMs, I was a
15 hypochondriac, I didn't eat properly, I didn't want to work my
16 issues, it was all in my head. I almost died for a massive
17 hemorrhage. I was pregnant with Keith's baby and I had
18 cancer, and they were telling me my symptoms were all in my
19 head. At one point I literally had only minutes to live
20 because I hadn't gotten proper medical treatment. I was
21 living with Keith, with all of his degrees and all of his
22 intelligence, and you think didn't know I was sick? Or Nancy?
23 Of course they knew. They wanted me to die. When I didn't
24 die, they threatened me that Mr. Bronfman and Keith's enemies
25 would harm my baby so no one could no he was the father. I

1 was so brainwashed into being terrified of Mr. Bronfman, I
2 agreed to this. It was all a lie.

3 One day Nancy said to me, "Let's face it, your son
4 Gaelyn doesn't have a father," so I wouldn't pursue making
5 Keith pay child support. Imagine me sitting in Nancy's house,
6 where she had millions of dollars squirrelled away for Keith,
7 which I had seen, and she gaslit me into accepting it was okay
8 for Keith to take zero responsibility personally or
9 financially for Gaelyn. While I was battling cancer, no less.

10 Not long after Clare ruthlessly followed suit. Even
11 with all of my compliance they were never satisfied. At one
12 point, Clare informed me she would no longer pay me my full
13 salary and instead took control of all my finances. I would
14 have to ask her permission to buy food and household items
15 like I was a child. And God forbid I disagreed.

16 One time I got into an argument with Keith about
17 Clare and NXIVM's continued litigation of Barbara Bouchev. I
18 said it was wrongful and I was fired and shunned by the
19 community. They put so much pressure on me to be submissive
20 and never object to anything. Eventually Clare threatened me
21 into accepting my job back, accepting a much lower pay of
22 \$13,000 a year and no benefits. I couldn't live on that and
23 she knew that, and I couldn't say no, I was her prisoner.

24 For years I subconsciously normalized this abuse,
25 which I understand now is common trait of abuse victims. It's

1 a survival mechanism. It was hard for me to break free.

2 Finally, one day a thought broke through my mind,
3 What if this isn't about me? I reevaluated all my experiences
4 objectively and I quietly investigated the companies. I
5 discovered some degree of fraud happening at every level of
6 the organization and I was horrified. Every level. I thought
7 this is a RICO action waiting to happen. I tried to be brave.
8 I went to the New York State police barracks to report
9 everything to an investigator I knew. I told him about the
10 crimes that were happening, including Daniela's imprisonment
11 and the Canaprobe Investigation. I begged him to check on
12 Adrian and Camila to see if they were okay. As I was giving
13 my statement NXIVM's attorneys called the investigator and
14 said, "We know Kristin is there." He was spooked and I
15 panicked, I could barely think straight. Keith and Clare must
16 have bugged my phone, or my computer, and tracked me there.

17 There I was at the police and they knew I might
18 provide evidence of a real, indisputable, pattern of criminal
19 activity and I did. I said to the investigator, "I can't ever
20 go back there now." He agreed. He said they're like the
21 mafia, but worse. Gaelyn and I ran away and went into hiding.
22 We had to abandon our small home and our beloved pets. I
23 don't even have any baby pictures of Gaelyn.

24 Despite my best efforts, mysteriously, the State
25 Police didn't pursue their investigation into NXIVM. I never

1 dreamed in a million years they would happen. I
2 underestimated Clare and the NXIVM's attorneys' corruptness
3 and their willingness to lie and discredit me as a witness, or
4 to intimidate the State Police investigator, or both.

5 Without State Police support I was unprotected and
6 powerless. This was a terrifying and extremely distressing
7 time for me, and hard on my son, but what else could I do? I
8 would not let Gaelyn become a shattered soul and I could not
9 associate in any way with Keith's criminal activity. Keith
10 had tried to kill us once. I was afraid. We traveled to
11 south Florida, managed to save up for a year. One night I
12 started receiving a barrage of frightening text messages from
13 an unknown person, stating they knew my real identity and
14 threatening to expose me to Keith. I felt like I was having a
15 heart attack. I called several friends for help, including a
16 couple named Mike and Julie who said, "Why don't we come and
17 pick you up and get you out of there?" I said, "Yes, please."
18 My desire to run was strong. I told Gaelyn we were going on
19 vacation and my friends picked us up. I had to quit my job
20 and abandon our apartment. Little did I know, Mike and Julie
21 were working for Clare Bronfman and were paid by Clare to
22 infiltrate our life and cause us harm. Their colleague
23 Michelle had sent me the threatening text. Clare paid the
24 investigator's over \$400,000, plus attorneys' fees, to find
25 me. Keith didn't want Gaelyn, he and Clare just wanted to

1 harm me, him and me, in retaliation for going to the police.
 2 I later learned they hacked my bank account, my medical
 3 records, my IRS records, all of my on-line accounts,
 4 everything. They attempted to infiltrate Gaelyn's school and
 5 Clare filed false criminal charges against me, pretending I
 6 had stolen a computer containing NXIVM trade secrets.
 7 Eventually, we managed to give Mike and Julie the slip, but I
 8 was never the same after that. I dare not have a phone,
 9 computer, car, health insurance, bank account, anything in my
 10 name which made our survival difficult.

11 I tried to continue to do the right thing and I
 12 cold-called various attorneys specializing in mass tort
 13 litigation to represent NXIVM victims, even though I wasn't in
 14 contact with any victims yet. I met Neil Glazer from Kohn
 15 Swift, and after a year educating him about the crimes of
 16 NXIVM, he agreed to represent NXIVM and DOS victims pro bono.
 17 When the EDNY opened its investigation, I shared everything I
 18 knew up through two weeks before trial. If EDNY hadn't
 19 stepped in, God knows what have happened to Gaelyn and me. I
 20 will be forever grateful.

21 In March of this year, in the wake of the COVID-19
 22 pandemic, I attempted to enter into a private settlement
 23 agreement for child support with Keith Raniere once and for
 24 all. I have -- with my underlying health condition, COVID-19
 25 would be a certain death sentence if I catch it. I and my son

1 are worthy and deserving of child support from Keith and we
 2 were always worthy and deserving. I have been able to make a
 3 new life for my son, but overcoming all of this adversity I
 4 have faced has been really hard. I tried to settle this
 5 privately with Keith to the avoid the pain of all of this. As
 6 to be expected, despite six months of promises by Keith saying
 7 he would pay the child support, he has made no attempt to pay.
 8 And because of Keith, Clare and Nancy are still up to no good,
 9 comitting tax evasion and lying about Keith's money, there is
 10 little I can do than ask this court for help.

11 I hope and pray, Your Honor can see the totality of
 12 the damage Keith Raniere has wreaked on me and my son. I can
 13 never get back the 20 years of hell he has subjected me to and
 14 my mind and body are forever scarred. My son will never get
 15 back the years of childhood spent in hiding because of all of
 16 Keith crimes. We and all of Keith victims deserve justice.

17 Thank you.

18 THE COURT: Ms. Keeffe, are you represented by an
 19 attorney in these negotiations over child support?

20 MS. KEEFFE: Yes.

21 THE COURT: All right. And is he represented by an
 22 attorney?

23 MS. KEEFFE: Yes.

24 THE COURT: Who is the attorney you are represented
 25 by?

1 MS. KEEFFE: William Dreyer (phonetic).

2 THE COURT: And who is the attorney that Mr. Raniere
3 is represented by?

4 MR. AGNIFILO: He spoke to me, Judge. I had
5 conversations with Mr. Dreyer. I can elaborate when I speak.

6 THE COURT: All right, if you would please.

7 MR. AGNIFILO: Yes.

8 THE COURT: Thank you very much, ma'am.

9 Nicole, please; victim statement.

10 NICOLE: Good afternoon, Your Honor. You may
11 recognize me from testifying at the trial. I am Nicole.
12 Though I could stand up here for hours and tell you about the
13 fear, confusion and pain the defendant has caused me, you have
14 heard my testimony and you have read my impact statement. So,
15 for the sake of time, I'm going to keep it brief.

16 To Keith's defense: What I have learned from my
17 experience and from the Me-Too Movement is that it's pretty
18 standard for women speaking up against men in powerful
19 positions to be called a liar, to be accused of speaking out
20 for the sole reason of some kind of pay out, or my favorite,
21 to be accused of "wanting it."

22 Mr. Agnifilo, I have handed over to the FBI, to the
23 Government and subsequently to the defense every piece of
24 evidence that I had in my possession, whether it made me look
25 bad or not. I sat up here for 17 hours over three days and

1 answered all of the questions that you and the Government
 2 asked of me. You, yourself, questioned me for six hours
 3 straight. I have at every moment through the investigation
 4 and trial done nothing but tell my truth and my experience.
 5 Therefore, I have had enough of you continuing to placate your
 6 client and attack my integrity. I am not a dollar sign for
 7 your high-paid firm nor am I just another Jane Doe in a case.
 8 I am a human being. I am a woman, a daughter, a friend, a
 9 sister, an aunt. I am someone trying to put their life back
 10 together after it was horrifically upended and derailed. Let
 11 me do that in peace. So if you want to keep fighting for your
 12 client after sentencing today, go ahead. That is, of course,
 13 your right, but leave me, Daniela and all of the other women
 14 who have testified against Keith out of it. We did our job.
 15 Find a better way to do yours.

16 To Keith: You cannot imagine the courage it takes
 17 to testify because you do not possess it. You and your few
 18 existing followers hide behind your lawyers and cowardly
 19 proclaim your innocence while we have stood up here,
 20 testified, and actually faced the cross-examination that comes
 21 from speaking out. In one of the recent legal filings you
 22 quote Ayn Rand and claim that what you were doing was paving
 23 new roads. But dehumanizing people is not new. Slavery is
 24 not new. Misogyny is not new. Psychology and self awareness
 25 are also not new concepts. I have been routinely amazed in

1 the last three years of studying psychology, at University, at
 2 ho many known theories you have tried to say were your own and
 3 not only tried to claim as your own, but charge unprecedented
 4 prices to learn. Like you hide behind your lawyers, you have
 5 hidden behind great thinkers and great writers your entire
 6 life, and the sick part is that you steal these great words
 7 and ideas and you twist them for your own ends and your own
 8 ends are not about humanity, but about power and sexual
 9 domination.

10 You hide behind titles like guru and spiritual
 11 teacher and nonviolent leader, but you are none of those. You
 12 call yourself a nonviolent leader, but holding collateral is
 13 violent. Branding women unknowingly with your initials is
 14 violent. Sexual coercion, manipulation and abuse is violent.
 15 It violates the body and it violates the soul. Your kind of
 16 violence is not always outward and it is not always obvious,
 17 which is why I believe you got away with it for so long, but
 18 it is equally if not more damaging for it poisons the person
 19 from the inside out. Though I was not a child when this
 20 happened to me, Cami was, and how many countless others over
 21 the years have you begun to groom as children, Keith. This is
 22 not persecution for revolutionary ideas. This is justice for
 23 how your behavior has crossed well established lines within
 24 the law. We all agree on that fact. You were convicted by a
 25 jury on every single many count. Today we simply get to

1 discuss the length of punishment.

2 You continue, without an ounce of remorse, to say
3 that you stand by DOS, that it was good for women. I say it
4 was the worst, most terrifying, most degrading, most confusing
5 thing I have ever experienced in my life. From day one you
6 and Allison lied to me about what was really going on, slowly
7 trapped me in a situation I would have never agreed to had I
8 known even a sliver of the whole truth. You told me on our
9 first walk, after I found out about that DOS was not a women's
10 mentorship but actually something you had created, you told me
11 that as my Grand Master you could command me to have sex with
12 you; that you could have, if you wanted to, command me to have
13 sex with you while I was blindfolded and tied to a table.
14 That is not choice. That is not good for any woman. In that
15 moment, and several more like it in the following months, it
16 was only my collateral and the fact that I was told there was
17 no way out of the commitment that kept me from spitting in
18 your face.

19 A couple of months after you were arrested some
20 evidence was filed. As I read the pages of text messages, I
21 became more and more nauseated until I got to the messages
22 about DOS. This is a message that you sent to a first line
23 slave, quote:

24 "I think it would be good for you to own a fuck toy
25 sex slave for me, that you could groom and use as a tool to

1 pleasure me." End quote.

2 I cannot accurately explain the pain that I felt
3 reading those words. Like someone had taken a knife, stabbed
4 me in the stomach, and gutted me from the inside out. I could
5 barely breathe. I could barely see from the tears streaming
6 openly down my face, but I forced myself to keep going. The
7 interaction ended with you saying, quote:

8 "Having one or two young slaves devoted to reviving
9 my body sexually to produce more energy would help. It would
10 be their 24/7 job." End quote.

11 DOS was never supposed to be sexual. It was a
12 women's mentorship. And while the sexual abuse ended up being
13 the most horrific part of the experience, it was also the part
14 that kept me sane. For no matter how much you and Allison
15 messed with my mind, I knew at the core of my being it was not
16 okay. I had never agreed to give up the right to my body. I
17 had never agreed to anything sexual, ever. When the demands
18 of DOS became more sexual and uncomfortable, I was, as I'm
19 sure you remember, told that I was not only supposed to do and
20 support you in whatever way you wanted, but that I was not
21 allowed to speak about my relationship or assignments with you
22 to anyone. If I did, I would be punished. This led to sexual
23 encounters that I would never have agreed to, that would have
24 never happened, had I not be blackmailed. Without the threat
25 of my collateral being released, I would have never accepted

1 any part of this sick and twisted arranged marriage
2 circumstance I was manipulated with. I would have never been
3 in Albany in the first place.

4 For months after I left, I had been trying to tell
5 myself that some part of DOS had been real, that some aspect
6 had actually been about my growth, but here it was in these
7 text messages staring me straight in the face. It had never
8 been about growth or strength or women's empowerment. It had
9 never been about me or my future at all. It had always been
10 about this. DOS was about your sexual pleasure and your sense
11 of power. I was one of those fuck toy sex slaves. That was
12 me. That was what little regard you held my entire life. My
13 dreams, my goals, my family, all of the things that I was and
14 am capable of achieving meant nothing to you. My life meant
15 nothing to you.

16 I was one of those objects for you to have on call
17 24/7. It was in that moment that I realized who you truly
18 were. It was in that moment where all the lies and
19 gas-lighting and manipulation were finally stripped away and
20 everything became career, and in that moment something inside
21 of me broke.

22 I have carried so much shame about what happened and
23 shame is a powerful thing to keep a person quiet. But you
24 know that, don't you, Keith? For shame and doubt are weapons
25 that you wield with precision. They are a way, along with

1 lawsuits, that you re-victimize your victims so they stay
2 quiet. It has taken me three years and a substantial amount
3 of space from your manipulation for me to realize that the
4 shame that has been weighing so heavily on my shoulders is not
5 mine to carry. It is yours.

6 I did not break the law, Keith. You did. You are
7 sitting here today facing a life sentence because of the
8 choices and actions that you have continually and repeatedly
9 made over decades. You have no one to blame but yourself.

10 Your Honor, those text messages from Keith that I
11 referred to were sent to a first line slave on October 1st,
12 2015. That is one year and four months before I was
13 introduced to the idea of a women's organization group. That
14 is eight months before I naively walked into the NXIVM Source
15 acting class, having just arrived in New York City. Allison
16 was teaching that Source class. What I did not know then, but
17 I do know now was that she was already at this point one of
18 Keith's slaves, that while she taught this acting class she
19 was also simultaneously scanning for vulnerable young
20 candidates to become one more of Keith's slaves. This kind of
21 premeditation on both Keith and Allison's part, as well as
22 Keith's calculated manipulation, his gas-lighting lies and his
23 coercive ill intent, is why this man deserves life behind
24 bars. Furthermore, he has said in his own words that he has
25 absolutely no remorse, that he stands by everything he has

1 done. This leads me to strongly believe that he would and
2 will do it again if he is given the chance. This is not
3 someone who is safe. This is someone who is a danger to
4 society.

5 There may be one or two women that have recently
6 claimed that they were okay with being blackmailed, that they
7 are happy being slaves. However, this is completely
8 irrelevant to this case and to this sentence. This case is
9 not about women who are happy being slaves; it is about
10 protecting all of the young women in the world who do not,
11 under any circumstances, want to unknowingly become the slave
12 of a man. It is about protecting the young women who may be
13 susceptible to the lies and manipulations that lure them in
14 until they are trapped in an abusive and desperate situation.

15 My hope is that cases like this and Jeffrey
16 Epstein's, Lawrence Ray's and Harvey Weinstein's, change the
17 ways that young girls and women value themselves. The
18 sentence that you give today for this trial won't rid the
19 world of predators. We will always have predators, but it
20 will remove one predator from the streets and that means
21 something. And maybe, maybe, it will slide the needle just a
22 little bit further in the right direction so that when a young
23 girl or woman feels uncomfortable she feels powerful enough to
24 say it out loud. That her response is not, "This is just the
25 way things are," but instead is, "No. No, this is not okay.

1 No, I will not deal with this kind of abuse, objectification
2 or illegal behavior." My hope is that her instincts will tell
3 her to walk away or tell her that it is safe to go to the
4 authorities, that she won't bottle up the shame, but instead
5 she will know that her voice, her opinion and what she is
6 experiencing matters.

7 For me, this has never been about vengeance. All I
8 wanted was to get my life back and to help in any way that I
9 could to make sure that no woman ever had to experience
10 anything like this at Keith or Allison's hands again. That is
11 the gift and the responsibility that you have, Your Honor. No
12 one can erase my scars, emotional or physical. What happened
13 to me has already happened. But what you can do is give this
14 man a life sentence. What you can do is make sure that this
15 kind of manipulation and abuse at this man's hands will never
16 happen to anyone again.

17 Thank you.

18 THE COURT: Thank you.

19 The next victim statement is from India.

20 INDIA: Hello, Your Honor.

21 I'm going to address you. You stole seven years of
22 my life from me that I will never get back.

23 Yet, just last night, I bolted up from sleeping as I
24 do most nights since leaving the cult, gripped with fear of
25 your words, the unwanted touch. The horror of healing -- the

1 horror of hearing his voice in the darkness, telling me to
2 wait naked until he would appear, unwanted, uninvited, I was
3 totally frozen, leaving my body so I didn't have to be with
4 you when you would rub your fingers across my brand, me not
5 knowing it was your monogram and you would gaze and smile at
6 it. The unimaginable shame of waiting naked, like a piece of
7 meat, a branded, brainwashed sex slave as I have been known in
8 the media because of you.

9 Will I always feel like this? I don't know, but I
10 do know I have wanted to end my life numerous nights since
11 leaving, believing your words that I was weak, without
12 substance, no sense of self. I have been left with little to
13 no self worth for a while, wondering if anybody would even
14 miss me or if I mattered at all. But I also know I will be a
15 victim of Keith Raniere for the rest of my life, but I don't
16 need to live as one.

17 I am here because you exploited me. You have
18 coerced and manipulated me, sexually, financially, physically
19 and mentally. You tried to destroy my family by turning me
20 against my own mother, telling me in your own words that did
21 she was a psychopath, pulling me back into hell that was
22 painted as sanctity. You are a sexual predator and you raped
23 me, forcing me to engage in sexual acts with blackmail
24 compounding over me.

25 When you touched me, I recoiled, blaming myself like

1 I was defective and broken. I felt obligated to engage with
2 you because of the blackmail and saying no to your advances
3 meant consequences and punishment from Allison Mack.

4 Forced stays in Albany turned into permanent
5 relocation and restriction of my travel and autonomy.

6 You are cruel and you are racist, coming up with
7 nicknames for all of us women, referring to Michelle as the
8 N-word and laughing as you instructed Allison Mack to refer to
9 her as the N-word as well. One of the most cruel acts I've
10 ever witnessed, encouraging Allison to punish any of us who
11 stood up against her, every action orchestrated by you. A
12 woman who once desired a career in social justice now happily
13 refers to herself as your slave.

14 The brand. You are a liar and a sadist, getting
15 pleasure from watching on our skin burn with your initials
16 while we innocently accepted your lives. Lies of love,
17 bonding, rising above pain for a greater good. No, you are
18 just a deviant, trying to mask yourself as a lamb. Just let's
19 call it what it is because everyone can see it now.

20 I trusted you. You told me you had my best
21 intentions, but you hurt me. There are some of the ways --
22 here are some of the ways that I was affected during my time
23 in NXIVM and in DOS. I was put on a restricted-calorie diet
24 for over a year. I was permitted only limited sleep. A
25 constant mix of praise and verbal abuse became my normal life.

1 I was instructed to be 106 pounds and needed to lose 20 pounds
2 without any consideration for my health or wellbeing.

3 You played doctor and I was your human science
4 experiment. This caused me to lose my period, threatening my
5 ability to reproduce because I became so thin. I still suffer
6 from medical issues because of this, all because you wanted me
7 to look like I was twelve years old; a girl, hungry, weak and
8 easy to manipulate. I had no idea of these perverted desires
9 of yours and would often just put myself to bed because I was
10 in extreme hunger pains.

11 I was making little to no money the entire seven
12 years I was in NXIVM. A time when many others would be
13 building a career or getting an education, and I spent nearly
14 a hundred thousand dollars on your curriculums and related
15 expenses.

16 I was branded with a cauterizing pen. This
17 extremely painful procedure lasted 30 minutes and took months
18 to heal. I may have to live the rest of my life with Keith's
19 initials seared into my flesh and I'm not sure if I will ever
20 be able to put that fully behind me. I don't need to look at
21 the brand to remember the abuse, I just have to close my eyes
22 to remember. I hear yours and Allison's words.

23 I was also instructed to write damaging documents
24 against my own mother from Clare Bronfman and Nancy Salzman,
25 who instructed me to sue my mother. I was also required to

1 recruit other women into DOS and I was punished if I did not.

2 I was also instructed to seduce Keith as a test to
3 my loyalty. Supposedly, this would show me I was willing to
4 push against my fears and experience what it feels like to be
5 rejected. This is how they manipulated me into thinking it
6 was for my own growth. This turned into dozens of sexual
7 encounters with a man I was not attracted to. I would never
8 have consented to this if I wasn't being blackmailed or
9 threatened with my collateral if I did not obey. I did not
10 join ESP to be abused and enslaved. I was gaslit and coerced.

11 I still hear yours and Allison's words: "Everything
12 I do for you is for your own good." "You're a bad master."
13 "You are weak." "You let people walk all over you," when I
14 wouldn't punish the people I was forced to recruit.

15 "You are an entitled little Princess. You don't
16 know who you are, you have no sense of self, and if you don't
17 do this you will never grow." "You are good at being a slave,
18 those skills come naturally to you."

19 I experienced emotional humiliation from people who
20 said they were my friends, and psychological punishment if I
21 could not complete what was being demanded of me by Allison
22 and Keith. I was also physically isolated and instructed to
23 stay in Albany for months at a time. Although they told me I
24 was free, I could not actually go home when I wanted because
25 of the all the consequences if I did so. This caused great

1 strain on me and my family and my friendships at home. I was
2 estranged and being told that it was for my benefit to stay in
3 Albany and return home. After leaving this group, I've
4 experienced both physical and mental damage including panic
5 attacks, extreme anxiety, digestive issues, as well as
6 physical pain in my body that amplifies with stress and
7 suicidal thought.

8 Keith Raniere is without remorse. I know that,
9 despite everything he might say now, he is not capable of
10 changing. I see this clearly now, as he instructs his
11 loyalists to defend him from prison. To me it is only fitting
12 that he gets a permanent sentence as his damage is permanent
13 on me and so many others. It's bad enough to be physically
14 raped, which he did, but Keith is also the type of predator
15 who targets and degrades the entire fabric of his victims'
16 lives. He takes everything that is good and destroys it. I
17 would like to never have to live in fear of Keith Raniere
18 again, and know that no other man or woman will be able to be
19 victimized by him or his cohorts. Your Honor, that is why I
20 am asking for life, a permanent sentence. Thank you.

21 (Continued on the next page.)
22
23
24
25

1 THE COURT: The next victim statement is from Jane
2 Doe.

3 JANE DOE: Good morning, Your Honor.

4 THE COURT: Hello, you may proceed.

5 JANE DOE: I am very grateful to have the
6 opportunity to be heard. I was enrolled in Executive Success
7 Programs in 2007 to join an Organization for the Development
8 of Human Potential, and I was led to believe this was the
9 ultimate humanitarian community.

10 I met Keith Raniere during my first time in V Week.
11 I came to V Week for nine years in a row. In 2009, the World
12 Ethical Foundation Consortium took place in downtown Albany.
13 And I flew from Mexico to experience a truly outstanding even
14 where international figures spoke through their expertise
15 about different world difficulties and we spent days trying to
16 figure out possible solutions to these issues, like the
17 violence in Mexico, or how to empower women, to mention a
18 couple. Literally we would end up around 3 in the morning
19 working up ideas to make this world a better place to live.
20 And the cherry on top, His Holiness the Dalai Lama had flown
21 all the way to Albany to give tribute to Keith's ethical
22 teachings. It was just a bliss.

23 During ten years I was a coach teaching ETHOS
24 classes twice a week, coming to all Albany for all the
25 second-level trainings available. I took Family Values,

1 Anatomy of Mind and Body, Breaches, Mobius, Characterization,
2 Human Pain, Ascension, Jness 1, 2, 3, 4, 5, 6, 7, 8, 9, 10 --

3 THE COURT: Excuse me. You have to go much more
4 slowly.

5 JANE DOE: I'm sorry.

6 THE COURT: Please slow down.

7 JANE DOE: Thank you.

8 During ten years I was a coach teaching ETHOS
9 classes twice a week, coming to Albany for all the
10 second-level trainings available. I took Family Values,
11 Anatomy of Mind and Body, Breaches, Mobius, Characterization,
12 Human Pain, Ascension, Jness 1, 2, 3, 4, 5, 6, 7, 8, 9, and
13 10. I paid for 11, but I didn't come anymore. Society of
14 Protectors 1 and 2; Ethicist 1, 2 and 3; The Source, and I
15 became a source trainer; The Knife of Aristotle and I was an
16 analyst for almost two years; Platform 3/4, later known as
17 Reverence. I trained myself to perform EMs, taking the EM
18 tech training many times. Actually, some of these trainings I
19 took even five times. I came to Coach Summits, supported,
20 personally and economically, projects like In La'Kech in
21 Mexico, which was an organization designed to end violence in
22 my country. Along with more coaches, we trained a six-month
23 ETHOS program designed specifically for IBERO University in
24 Mexico City. The reason why I mention all this is because I
25 want to make clear the level of commitment that I had. By the

1 way, I never received a dollar for my work, just the number of
2 what I was going to receive. But that money never reached my
3 pocket.

4 In retrospect, I can see a pattern of close people
5 to Keith like Loreta Garza telling me that Keith wanted to
6 train me personally to become an enrollee for philanthropists
7 to sponsor his projects, or Clare Bronfman wanting me to come
8 to Fiji for a training, or to Albany for a few months to take
9 Keith's trainings, which eventually I ended up doing.

10 In December 2012, right after Ascension training was
11 over, Nancy Salzman approached me saying that Keith wanted to
12 meet with me the next day, to which I said I couldn't because
13 I had a booked flight. Just a few hours later, Laura Salzman
14 called me saying that it was truly an honor that Keith wanted
15 to spend time with me, that people flew from all over the
16 world to see him. And I knew this was true; His Holiness the
17 Dalai Lama was a perfect example. So I stayed, and we became
18 closer. I felt very privileged.

19 In V Week 2015, Keith asked me to stay for a few
20 days after Coach Summit was over. I did, and we began an
21 intimate relationship. After that, he would text me hearts
22 and I love yous, and I would gladly correspond. I was deeply
23 in love very fast. I couldn't believe this was actually
24 happening. I felt special and honored. He was incredibly
25 sweet and kind. He told me that what he wanted the most for

1 me was to take away my suffering and my ignorance so I could
2 be as joyous as possible. He asked me to be discreet about
3 our relationship, which I understood and upheld. I had no
4 clue by then, he had other relationships.

5 Just a month after, during the last day of Jness 7,
6 Daniela Padilla, who was the person that had EMed me for
7 years, and therefore was aware of my strengths and weaknesses
8 in a very deep way, approached me and invited me to what was
9 Keith's ultimate creation and input for humanity, the purpose
10 of all his previous work. This circle was just for a few
11 truly committed women. But in order to know more about this,
12 I needed to get collateral, to state that I would keep a
13 secrecy vow about what I was going to find out, and that this
14 collateral, which had to be sexual content, only made me
15 stronger.

16 Just both of them were going to see it and I was in
17 a relationship with him, so I did. And so she explained to me
18 that this circle worked with a master-slave dynamic with the
19 purpose of getting rid of our female pride through obedience,
20 that it was a lifetime vow and a commitment to my personal
21 growth and ethics. It was edgy. But I was so in love, and
22 Keith's techniques have always been edgy, so I made this
23 uncomfortable feeling my personal issue, as I had always been
24 led to believe in ESP.

25 Later that same month, during Society of Protectors

1 2, Keith asked me if I wanted to have a child with him. He
 2 told me I was the perfect woman to bear his child because I
 3 had no attachments of motherhood with my personal value, which
 4 I knew was true, and so my fantasy of becoming a mother
 5 strongly began. He also asked me to keep this affair private,
 6 which I did. I always knew he was the grand master of this
 7 women's vow, it was never hidden from me.

8 The ultimate knowledge never came. Only the request
 9 for more and more collateral, and the ever-growing
 10 uncomfortableness of absolute obedience. Daniela Padilla told
 11 me that the next time I was in Albany, I was going to be
 12 tattooed, just like every woman in this circle, a small tattoo
 13 that symbolized four elements. I told Daniela I didn't have
 14 tattoos and I didn't want one. Her answer was "it's not a
 15 question." Before I came to Albany and get what I now know to
 16 be a branding with Keith's initials, Daniela Padilla used my
 17 collateral to thwart me, I had been blackmailed. This was the
 18 worst night of my life.

19 My choices were to stay in DOS, uphold my commitment
 20 to the Vow and obey someone that had just blackmailed me and
 21 therefore I couldn't trust anymore, leave DOS having my
 22 collateral released and causing irreversible damage to people
 23 I love and admire the most and absolutely lose my life the way
 24 I had built it, or just end my life. There was no choice I
 25 had that wasn't a horrifying nightmare. So the next day I

1 quit DOS. My collateral wasn't released, but the fear of
2 knowing any given moment it would be truly hell on Earth. My
3 professional career is public, which made it even worse. And
4 although I believed it was the right decision to leave, I was
5 so scared, I didn't want to piss anyone off, because I didn't
6 want my collateral out. From this point on, a silent feeling
7 of shame and guilt began growing.

8 I still truly believed Keith was noble and innocent
9 from Daniela's dark intent. I just couldn't see the truth.
10 It was so well hidden, it was impossible for me to see. For
11 months, he tried to convince me to come back to DOS, but I
12 didn't, which meant that Daniela could release my collateral
13 to make me uphold my word. He said he didn't believe she
14 would release it, but the vow was all about upholding one's
15 word, and the consequence of leaving was having your
16 collateral released. I felt I was living on a minefield. It
17 was daily terrorism.

18 Eventually, I left the Stripe Path, too.

19 A few months after, I was invited to a radio show to
20 talk about differences between women and men. And as soon as
21 it was over, I received phone calls from two Mexican senior
22 proctors telling me that Nancy Salzman was in Mexico City and
23 she needed to talk to me, so I came to see her. She said that
24 it was only because she knew that I was special to Keith that
25 she hadn't called her lawyers on me, that I had just breached

1 my contract speaking about ESP tech, and that it was illegal.
 2 I never mentioned neither ESP nor Keith nor anyone in the
 3 interview. But she said that if I wanted, she could train me
 4 personally to become a spokesperson for the company. I
 5 declined the offer, because it felt like a trap.

6 It wasn't until the New York Times article broke
 7 about the branding that I realized slowly the whole entire
 8 truth. By that time I was having panic attacks during the
 9 night, a lack of meaning of my life, and trust issues that
 10 still haunt me.

11 I am speaking today because if no one had ever
 12 spoken out, I would have stayed silent for the rest of my
 13 life, in a dark place with the fear of any given day having my
 14 collateral out. I was used and manipulated for ten years, ten
 15 years that I just can't recover. My innocence and my strong
 16 will to better things in the world was used against me. Keith
 17 used the highest virtues of humanity as weapons against
 18 ourselves.

19 I'd like to address Keith directly now.

20 From a spiritual level, I feel so much compassion
 21 for you. It must be so dark and lonely, and I feel truly
 22 sorry for you. From human to human, you abused me
 23 tremendously. You played with my motherhood, my love, my
 24 passion and my desire to do good, and with my loyalty to my
 25 highest values. You are an abuser and you deserve to be in

1 prison. If you had it your way, I would have been your
2 prisoner forever. You used to tell me that freedom and
3 slavery are irrelevant as one gains a sense of self beyond
4 one's decisions and that both are actually the same. That is
5 why to reach higher levels of awareness, of living awareness,
6 have always required absolute obedience, that even total
7 devotion to a stranger or false guru, if done completely
8 without pride, leads to enlightenment, and the antidote for
9 pride is humiliation. The most productive humiliation is
10 obtained through obedience and it leads to true freedom.
11 Well, now you have that opportunity in your hands, and it
12 seems there is no choice left for you.

13 Thank you for giving me this time to speak.

14 THE COURT: Very well.

15 The next victim statement is from Adrian.

16 MR. ADRIAN: Your Honor, I'm Adrian. I'm Cami's and
17 Daniela's and Mariana's brother.

18 Thank you for providing me with the opportunity to
19 share my statement in today's hearing.

20 I arrived to the Albany NXIVM community from Mexico
21 with my parents and my little sister when I was 15 years old.
22 She was around 14 years old at the time. My older two sisters
23 had already been part of the community for a few years.

24 From the beginning, Keith was sold to me as a
25 teacher, a leader and basically was perceived as a flawless

1 man by his community. I looked to him as a mentor, someone
2 who could help me achieve my goals.

3 At that time, I had no reason not to believe him, I
4 was so young. If I had any doubts, questions or hesitations,
5 he had a group enablers, his inner circle, who helped him blur
6 the lines between the truth and lies. The lies allowed him to
7 portray this fake persona, one that pretended to be a genius,
8 a scientist a humanitarian that cared deeply about people. He
9 lived in that blur.

10 I supported him loyally, dedicated my life to his
11 vision, defended his character. I worked countless hours
12 filming him so that the world could see how good of a person
13 he was. He seemed to be so misunderstood by the media and his
14 perceived enemies.

15 I saw him as a friend. With the help of his
16 never-ending and highly expensive trainings, he knew
17 everything about me. He knew my fears. He knew my mistakes.
18 He knew my desires to be a businessman. He knew my family is
19 everything to me. He knew I trusted him. But most
20 importantly, he knew how naive I was. He used my truth
21 against me in a way that I can only describe as cruel and just
22 plain messed up.

23 He played me for 16 years. The whole time, abusing
24 my sisters and other community members right under my nose.

25 Keith Raniere began to prey on my 14-year-old sister

1 as soon as she arrived to his community. Immediately, she was
2 given special attention. He gave her his personal phone
3 number so that they could talk in private. She was allowed to
4 go into his houses and spend one-on-one time with him. With
5 the help of his inner circle, like Nancy Salzman, Pamela
6 Cafritz, Karen Unterrainer and many others, she began to be
7 sexually groomed for Keith Raniere. She was asked to keep it
8 a secret.

9 He began separating her from her friends and family
10 so that she no longer had a support system outside of him.
11 She became guarded and private: Always busy, always broke,
12 never having time for family, always on call, and always on
13 diets.

14 Growing up, we were very close. Towards the end of
15 my time in NXIVM, we barely spoke. Even though we lived in
16 the same neighborhood, we barely saw each other. Until this
17 day, I don't know where she lived while she was in Albany.

18 I've learned that Keith had sexual relationships
19 with all three of my sisters, sometimes during the same time
20 frame.

21 One of my biggest regrets in life was supporting
22 Keith Raniere in upholding what he called my sister "ethical
23 breach plan," which lasted years and culminated in a cruel and
24 heartless punishment of being locked up in a room for about
25 two years.

1 I was told by Keith directly that she was a
2 psychopath and that she just liked to play games. I thought I
3 was helping her. At times I begged her to continue with her
4 plan. I was told to leverage our relationship because family
5 was all she cared about, so I threatened to cut off my
6 relationship with her if she didn't stick with the plan, it
7 was so important that she healed her breach with Keith.

8 It wasn't until years after that I found out what
9 her actual breach was. All of this waste and torture because
10 she liked another man.

11 He tried to break everything that she cared about.
12 He turned her own family against her, labeled her a
13 suppressive and a psychopath. He tried to take away every
14 resource that she needed to succeed or even survive in life.
15 Her own family and friends completely shunned her for six
16 years. Some continue to shun her.

17 I was told to keep her situation a secret from the
18 community because people wouldn't understand. Most members
19 outside of the inner circle never found out what happened to
20 her. For them, she just vanished. But in reality, she was
21 sent back to Mexico with little to no money and no papers.

22 After my mom left NXIVM, I shunned her for three
23 years. Even if she tried to contact me, I wouldn't allow her
24 to come back into my life, all because she no longer supported
25 Keith and his teachings. His enablers would tell me how

1 honorable I was being for supporting Keith in this way,
2 reinforcing his indoctrination.

3 Throughout my time in the community, whenever I
4 would have a reaction or if I was asked to do something that
5 didn't feel right, I would direct it towards getting an
6 exploration of meaning. I realize now that it detached and
7 desensitized me to my gut feelings and my conscious.

8 Chaos follows Keith everywhere he goes, but he spins
9 it to make himself out to be a victim, a martyr. All of his
10 charades during and after his trial are prime examples of how
11 he tries to dodge any responsibility for his actions. He
12 continues to show no remorse whatsoever towards his victims.

13 Keith Ranieri has negatively impacted my life in so
14 many ways.

15 Before being part of NXIVM, my family was close. He
16 destroyed my family. For three years, I didn't speak to my
17 mother and for six years I didn't speak to my sister out of my
18 support for Keith. I will never be able to get that time back
19 with them. Now my father and oldest sister have shunned me
20 for about two years. They continue to believe his lies. My
21 family hasn't been whole in a long time.

22 I've gone into debt taking his intensives; a lot of
23 my work was either underpaid or never paid.

24 I've lost so much time, especially when I was asked
25 to go into hiding for about a year. The Albany Times Union

1 wanted to interview me because they were trying to expose
 2 Keith, so I was told to go into hiding. At the time I was
 3 afraid because I no longer had a legal immigration status. I
 4 had lost my status because they told me not to go back to
 5 Mexico to renew my visa. They promised me they would take
 6 care of it if I stayed. That turned out to be a lie. They
 7 knew I was here illegally and they used that to their
 8 advantage. I was completely dependent on them. My time in
 9 isolation was a dark time. I was very depressed. I felt like
 10 I had no life whatsoever. I considered ending my life.

11 My entire four years of marriage have had an
 12 undertone of him; navigating, surviving and trying to love
 13 each other through the trauma. The guilt and the shame of
 14 being a part of his experiments, the wasted time, the triggers
 15 that we both carry, the concerns of being able to pay for
 16 things, trust issues, getting rid of NXIVM's indoctrinations
 17 that was drilled in us for so many years. It's a lot.

18 I want to express my gratitude towards the
 19 government, the prosecution and everybody involved for giving
 20 me a chance at a normal life. I know it doesn't sound like
 21 much, but after so many years of chaos and abuse, I look
 22 forward to being able to move on and rebuild my life.

23 In conclusion of my statement, I want to read a
 24 quote to Keith. "Every lie we tell incurs a debt to the
 25 truth. Sooner or later, that debt is paid."

1 Keith, your time has come. You deserve to lose
2 every ounce of freedom and luxury you have stolen from others.
3 I look forward to the day your name will be forgotten.

4 Thank you, Your Honor, for your time.

5 THE COURT: The next victim statement is from
6 Adriana.

7 MS. ADRIANA: Your Honor, my name is Adriana. Thank
8 you for the opportunity to read this letter to Keith Raniere.

9 Excuse me.

10 Keith, your trial and the verdict handed down by the
11 grand jury where you were found guilty all of charges are a
12 triumph of true love, a love that you do not know, a love that
13 surrounded you for years and you never touch it.

14 The greatest crime that a human being can commit is
15 to hinder, stop, manipulate and influence in a negative and
16 deceptive way the spirit, the development and the expansion of
17 the consciousness of another human being.

18 In your case, the majority of your victims are
19 women. In this way, you raped and denigrated my three
20 daughters, lying, manipulating and deceiving them as well as
21 me, my son and their father. You have consciously committed
22 this hideous, scandalous and inhumane crime and will
23 consciously live accordingly.

24 Some time ago, I was afraid to leave my own
25 existence. Immature and fragile, out of my center, is that I

1 came to you in search of answers. I found with that even
2 imagining myself, lies, deceptions, manipulations, blackmail,
3 perversions, malevolence disguised as empathy, compassion,
4 consideration and true knowledge.

5 You wanted to eliminate me and my family. You
6 separated us. You deprived me of my experience of being a
7 mother. I was not there for my children, and I am really
8 sorry. It is impossible that you can think about my pain of
9 losing my family in life. You will never be able to restore
10 it. It was required that I die in life to my fear and be
11 reborn in love and truth in life to realize the monster that
12 you are.

13 Also, it is true that in biology we are alike.
14 There is a great difference between us. The difference that
15 exists between those of us who believe in family, justice,
16 love, evolution, development and you is that you do not harbor
17 a minimum awareness of the self. But on the contrary, inside
18 you only harbor violence, lies, fear, loneliness and emptiness
19 with an intense impulse to destroy all the beauty that
20 surrounds you. You, you are part -- only part of the beast.
21 And that beast against justice that we, the human beings of
22 this new humanity, enforce. You are the antithesis of love.

23 Now you are who you have chosen to be by your
24 actions. Even if you close your eyes, there is a justice and
25 God exercises it through the Honorable Judge Nicholas

1 Garaufis, representative of society, the prosecutors and the
2 law. How many years, Keith? 20? 30? Maybe you will spend
3 your whole life in prison. Maybe.

4 Listen carefully to what I am now telling you,
5 Keith. I, Adriana, being a human being, being a woman, a
6 daughter, a mother of this new paradigm shift of planet Earth,
7 I tell you that no matter how much they dictate to you, your
8 sentence has no proportion to the damage you have caused to my
9 family and dozen of other families. The true proportion will
10 come with time, when you totally disappear from our lives,
11 from our thoughts, from our interactions with friends and
12 strangers, when someone mentions you and remembers you as the
13 beast of darkness that you are and the pain of your actions
14 will no longer exist in our hearts. Maybe generation will
15 pass.

16 I already told you once, it is not from me that you
17 have to ask for forgiveness. I already forgave you in my
18 forgiveness. It is to them, my children. My children. And
19 if you ever realize how you damaged them, you will fall to
20 your knees and beg for forgiveness, each one. And maybe in
21 this way you will find the return to your soul.

22 Three of my children have found the way back to
23 their essence, as I have. My heart knows that the father of
24 my children and my youngest daughter will one day be
25 themselves again and she will bring her son into the family if

1 she wants. I am certain that consciousness surpasses
2 genetics. In this way, her son will be fine.

3 And in that consciousness, it is true that along
4 with us, some women and men who experienced themselves in your
5 hell will become more and more luminous in the action of
6 living a more loving life with ourselves, that whenever we
7 make a conscious decision to know who we are and what we want
8 for ourselves, death does not exist.

9 Thank you, Your Honor.

10 THE COURT: You are welcome.

11 The next victim statement is from Daniela.

12 MS. DANIELA: Good afternoon.

13 I already testified at length in your trial, Keith,
14 before this court about some of the things that you did to me
15 and to my family.

16 You took ten years of my life, from 16 to 26, and
17 time is the only easy metric because I cannot quantify what
18 you did to me in any other terms.

19 You abused my innocent body, you broke my able mind
20 and you set my family against me. You took and broke every
21 single piece of me.

22 I survived. But not because you were merciful, but
23 because I was resilient. However, I will never know what my
24 life would have been like without all this pain and horror you
25 inflicted upon me.

1 I find relief in knowing this is over. I find
2 relief in forgetting about you. And this is the last time you
3 will hold my attention.

4 And I believe it will be similar for the public at
5 large. I believe people will forget about you. They might
6 think you're interesting today, but that will fade. Like the
7 once-interesting smartest man in the world, when the con is
8 clear and the con-man is exposed, it's all very obvious and
9 boring stuff. You're just a liar.

10 Today people are fascinated by your monstrosity. I
11 agree, your viciousness is remarkable. And you may be the
12 criminal du jour, but you are, unfortunately, not the only
13 cruel and depraved man, not the only abuser in this world. I
14 am not qualified to use fancier words to describe your
15 condition, but I know you are not the only person like this,
16 and thus you are but one more criminal in a category of
17 criminals. Nothing special.

18 You are a vicious monster when facing me, when
19 facing my little sister, but a lying coward when facing
20 justice. You are weak and you're pathetic. In the rigor of a
21 court of law, word against word, fact against fact, you are
22 ridiculous.

23 The one interesting conversation to be had after all
24 this has nothing to do with you, and it is this: How does
25 someone fall prey to this? And for me, the lesson here is

1 only one. We must teach our children about people like you.
2 Not about you, about people like you.

3 Because you, Keith Raniere, your words will
4 disappear, your name will disappear. All memory of you will
5 disappear.

6 I would like to address the Court now, if I may.

7 I want to thank this court for listening to me
8 during trial and now. I am very appreciative of the justice
9 system of the United States of America. Testifying was hard,
10 but it was a privilege. It is not lost on me that many
11 victims of crimes are never heard and never see justice.

12 For me, to be heard was enough.

13 In addition to that, it's been a rectifying
14 experience to see the exacting precision of the law dissect
15 the crimes, the methods and the nonsense of Keith Raniere.
16 This process has been soothing to my mind and has brought me
17 peace.

18 And last, as the Court sentences Keith Raniere, I
19 would like to remind them he showed me no mercy, he showed my
20 little sister no mercy. He deserves no mercy.

21 Thank you.

22 THE COURT: At this time we will have a statement be
23 read by Ms. Hajjar.

24 MS. HAJJAR: Thank you, Your Honor.

25 I can never fully explain how much damage Keith

1 Raniere has caused me and so many others. The psychological
2 impact of his twisted teachings permeate my brain even after
3 more than two years of consistent therapy. His sexual abuse
4 and humiliation of me lives in my body and wreaks havoc with
5 my soul if I am not completely diligent. Nightmares fill my
6 head almost weekly and the things he taught me to think about
7 myself have made me neglect my health and cause myself undue
8 pain on countless occasions.

9 But potentially worst of all, he continues to
10 manipulate people I once called friends. He continues to try
11 to force his message on the world to try to put himself above
12 God and to control as many people as he can. Keith Raniere
13 has framed inexcusably disturbing acts as beneficial to the
14 recipient. He has caused people to believe that victims don't
15 exist so he can victimize people in plain sight. His
16 commitment to serving his own agenda no matter the cost to
17 persons in front of him is beyond revolting.

18 I believe Keith Raniere needs help and that he is
19 unsafe to society. I pray that Keith Raniere can transform
20 himself in prison, far away from anyone who he could try to
21 manipulate or control.

22 THE COURT: Ms. Hajjar, does that conclude the
23 statements of the victims?

24 MS. HAJJAR: It does. Thank you, Your Honor.

25 THE COURT: All right. At this time we are going to

1 take a break until 2:45 p.m., at which point we will move on
 2 to the consideration of the factors under 18 United States
 3 Code, Section 3553(a). In order for the Court to impose a
 4 sentence that is sufficient but not greater than that
 5 necessary to fulfill the purpose of sentencing, we will hear
 6 from the defense, we will hear from the government, and we
 7 will afford the defendant to make a statement as well.

8 When we return, please sit in the location where you
 9 are currently seated, and we will begin promptly at 2:45.

10 Thank you.

11 (Lunch recess taken.)

12 (Continued on the next page.)

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A F T E R N O O N S E S S I O N

--oo0oo--

THE COURT: All right. Continuing with the sentencing of Keith Raniere, and Counsel and the defendant are all present.

So at this time, the Court will consider, as I have calculated the sentencing range, I am now going to turn to fact that are outlined in *18 United States Code Section 3553(a)*. Under *Section 3553(a)* I must consider several factors in imposing the sentence, including the nature and circumstances of the offense, the defendant's history and characteristics, the need for the sentence to reflect the seriousness of the offense, promote respect for the law and to provide just punishment for the offense, the need for the sentence to afford adequate deterrence, and the need to protect the public.

And in connection with that obligation, I will hear from the parties and then I will hear from the defendant, if he wishes to make a statement. I will start with the defense.

You may go ahead.

MR. AGNIFILO: Thank you, Your Honor. May it please the Court. Members of the Government and everyone

1 who has come to court today.

2 I read each -- I'm going to stand over here so I
3 can see Your Honor more clearly.

4 THE COURT: Yes, just move the microphone.

5 MR. AGNIFILO: Thank you.

6 THE COURT: Thank you.

7 MR. AGNIFILO: Yes, thank you.

8 I read every letter that every person submitted,
9 both from the prosecution and the letters that we submitted
10 in Keith Raniere's behalf. I listened very, very closely to
11 the people who spoke very powerfully this morning and this
12 early afternoon. And I'm trying to find the words and the
13 themes that I think could possibly, even at this late hour,
14 reach Your Honor and convince Your Honor somehow not to
15 sentence Keith Raniere to a life sentence.

16 I am very mindful of the amount of hurt and deep
17 pain that is expressed by people in the letters and as they
18 spoke to the Court earlier today. And I've been trying to
19 find a way to describe it, to explain it, and I think if one
20 reads all of the letters, well over 100 letters on both
21 sides, considerably more than that, in fact, and if one
22 considers the trial testimony, the first thing one sees, I
23 submit, is that this was a community once upon a time. That
24 once upon a time there was a community in Clifton Park and
25 the surrounding areas that many, many people loved, believed

1 in, and believed was doing good. And I think that is the
2 first step in the analysis that I would like to try and ask
3 the Court to take with me in understanding some of the very
4 powerful statements that were made here today.

5 People loved NXIVM. Mark Vicente when he
6 testified went on and on about he loved NXIVM. So many of
7 the different people who testified at trial, some of whom
8 are here today, testified they could have done other things
9 in their lives, but they chose to forego those other things
10 and they chose to join this community in Albany under the
11 tutelage, the leadership, the vanguardship of Keith Raniere,
12 because they believed in it and they loved it and they
13 trusted him, Judge. That is such an important part of this
14 whole analysis. They trusted Keith Raniere. They looked up
15 to Keith Raniere. And they were absolutely sure that Keith
16 Raniere had their best interest at heart.

17 In trying to find the right word, because
18 sometimes the right word can help with the analysis, I
19 thought long and hard and I thought of a word being the
20 perfect word, in my opinion, the word, if you believe the
21 Oxford English Dictionary, it was the word that was first
22 used in year 1275 and the word is "betray." And the
23 original meaning, the definition of the word "betray," is to
24 deliver more people to the enemy by treachery, the meaning
25 of the word "betray." And I think it's a useful way to

1 analyze some of the things that happened in this case.

2 First, your people. This is very close community.
3 They were all together. They believed they were all united
4 in interests. They believed they were all united in
5 interests doing something truly special, doing something
6 that they generally thought was advancing the cause of
7 humanity. This is not a group of ne'er-do-wells looking
8 to sort of just self-aggrandize and do things that don't
9 have important ends in and of themselves, it's the exact
10 opposite, and NXIVM attracted terrific people.

11 I think it was Toni Natalie earlier today who said
12 that Keith surrounded himself with good people, and that
13 just seemed to actually be the case. There's no question
14 about it. I can say that the people that I've met, some of
15 whom testified at the trial, Judge, some of whom spoke this
16 morning to Your Honor, I thought were outstanding people. I
17 thought they were loving, wonderful, sweet, good people,
18 each and every one of them. I haven't met a bad person yet.
19 And these were good people who came here for the best of
20 reasons, for the best of reasons and they sacrificed much to
21 be in this community. And what has happened is they have
22 reached the conclusion that Keith Raniere betrayed them.

23 Now, I think it's very important that we stop for
24 a second and take note of all the things they didn't say.
25 No one says, because it could not be validly said, that

1 Keith Raniere was cruel to them at the time. No one said at
2 the time, I knew that this is -- he was being mean to me.
3 He was being abusive to me at the time. He was doing things
4 that were mean-spirited to hurt me at that time. What they
5 all say was something very, very different and it's only
6 really understandable through the lens of betrayal.

7 What they're saying is, I believe now, I believe
8 now, that he was abusing me then. I believe now that he was
9 cruel to me then. I believe now his intentions were bad
10 then. That's a very different thing, Judge. A very
11 different thing, because that is something that can be
12 influenced. And I know everybody seems to be waiting for me
13 or Mr. Raniere when he addresses Your Honor to say, I had
14 bad intent all the time. The whole while, I was abusing
15 everybody, I had bad intentions. I wanted to hurt them.
16 He's never going to say it. He's never going to say it,
17 because he doesn't believe it. He doesn't believe it,
18 Judge. As he sits here today, he doesn't believe it.

19 Do I think having done this for as long as I have
20 that maybe his best shot at avoiding a life sentence is for
21 him to say it? Yeah. Maybe that's the best thing to say,
22 that maybe Your Honor doesn't give him a life sentence. But
23 it just wouldn't be true from his perspective. And we are
24 sentencing him based on his perspective --

25 THE COURT: No. We are not sentencing him on a

1 perspective. We are sentencing him -- I am going to
2 sentence him on his behavior.

3 MR. AGNIFILO: I agree.

4 THE COURT: On his illegal behavior, which cannot
5 be justified taking, for instance, Camila who, for some
6 reason, was convinced that she should not testify at the
7 trial by a lawyer who convinced her it was in her interest
8 not to make herself available, which is a whole 'nother
9 issue.

10 But had she testified, it would have taken the
11 jury ten minutes to convict him, because what he did to her,
12 and she is totally believable, is at the behest of her
13 father who brought her to Albany from Mexico, she was
14 groomed from age 13 to age 15, and then she was seduced by
15 Mr. Ranieri and kept in an apartment and used for his sexual
16 pleasure. That is the fact. That is not imagination, that
17 is not a perception, that's a problem for your client. That
18 is what he did.

19 MR. AGNIFILO: Judge, I understand.

20 THE COURT: So we are not here to discuss how he
21 felt or how it seemed. We are here to discuss how should he
22 be punished for what he did.

23 MR. AGNIFILO: I don't --

24 THE COURT: So let's get past that.

25 MR. AGNIFILO: I agree wholeheartedly.

1 THE COURT: Okay? The jury ruled. It was the
2 jury's decision.

3 MR. AGNIFILO: I understand.

4 THE COURT: I am just here to enforce the jury's
5 will. So let's move on.

6 MR. AGNIFILO: Yeah.

7 There's one I think is important to point out,
8 Camila wasn't available to us either after she got a lawyer.
9 So it was not --

10 THE COURT: Didn't you recommend the lawyer to
11 her?

12 MR. AGNIFILO: We gave her a list of lawyers, and
13 she didn't like the first two and she liked the last one.
14 And that's what happened, Judge. And that's --

15 THE COURT: And how was that lawyer compensated;
16 do you know?

17 MR. AGNIFILO: I -- I don't know. It was -- it
18 was said in -- in her -- she said in her written statement
19 how she believed the lawyer was compensated.

20 THE COURT: Which was?

21 MR. AGNIFILO: Judge, I had nothing to do with
22 this.

23 THE COURT: Well, I am just saying -- I am asking
24 the question. I am not saying you did that. I am just
25 saying he was compensated, according to her, by this --

1 MR. AGNIFILO: Yeah.

2 THE COURT: -- \$13.8 million --

3 MR. AGNIFILO: Right.

4 THE COURT: -- irrevocable trust created by Clare
5 Bronfman. That is the impression that the Court has.

6 MR. AGNIFILO: I think that's probably right.

7 THE COURT: Yeah.

8 MR. AGNIFILO: I think that's probably right.

9 But if -- if -- I mean, I'm the only one standing
10 here, and what my moral and legal obligation is, if someone
11 wants a lawyer, to give them a number of names. That's what
12 I did. And she didn't like two, and she did like one, and
13 that was the last time we ever spoke to her.

14 THE COURT: I see.

15 MR. AGNIFILO: And -- and, Judge, I can also add,
16 if there was a problem with any of this, which there isn't,
17 because I don't do the wrong thing, and I didn't do the
18 wrong thing here --

19 THE COURT: I am just telling you that if -- it
20 has a certain sense, it creates a certain sense that someone
21 who clearly was so terribly wronged by this man, decided not
22 to speak up at the time, that raises issues.

23 MR. AGNIFILO: And if there --

24 THE COURT: And that is separate and apart from
25 this trial.

1 The point I am making, the principal point here,
2 she came here and validated what this -- what the
3 prosecution provided to the jury, and the jury found by --
4 beyond a reasonable doubt happened to her.

5 MR. AGNIFILO: Right.

6 THE COURT: All right?

7 So it is about what happened to her. So I do not
8 want to talk about theory. I have heard enough about
9 Mr. Ranieri's theories. I am talking about the facts.

10 MR. AGNIFILO: Judge --

11 THE COURT: Let's get down to the facts.

12 MR. AGNIFILO: But -- but --

13 THE COURT: He says he is innocent. You are his
14 lawyer, you said he is innocent on his behalf, and he may
15 say it when he speaks, if he does.

16 Let's move on.

17 MR. AGNIFILO: Okay. I'm -- I'm talking about
18 intent, and so I'm not -- I'm not trying to not talk about
19 it --

20 THE COURT: How is it -- excuse me. Pardon me.

21 What about intent -- what do you think the intent
22 is if you have a 13-year-old girl and a 43-year-old man and
23 two years -- and that girl is being spoken to and a
24 development of a relationship is occurring, and then two
25 years later, she is having sex at age 15 with a 45-year-old

1 man?

2 MR. AGNIFILO: Well, Judge, first -- first of
3 all --

4 THE COURT: I am just wondering what do think the
5 intent is of the 45-year-old man?

6 I was once a 45-year-old man.

7 MR. AGNIFILO: So was I.

8 THE COURT: And now I am a 72-year-old man.

9 MR. AGNIFILO: Judge --

10 THE COURT: And I -- and I have a pretty good
11 sense of these things because like I have been around the
12 block. So do not treat me, this Court, as if it is not the
13 intent to do what he did. It was not a mistake. He kept
14 doing it. Please.

15 MR. AGNIFILO: Judge, in terms of the --

16 THE COURT: Why don't you talk about the factors?

17 MR. AGNIFILO: Judge --

18 THE COURT: I am interested in the factors.

19 MR. AGNIFILO: Okay.

20 THE COURT: I am interested in the factors. I am
21 not interested in your explication of whether he intended to
22 have sex with this woman.

23 MR. AGNIFILO: Judge, I -- first of all --

24 THE COURT: You are not in front of a jury, you
25 are in front of the Judge now on the sentencing.

1 MR. AGNIFILO: I know.

2 THE COURT: I am not going to tolerate spending
3 time as to what his intent was when he seduced a 15-year-old
4 girl. We are not going there. It is just -- it is an
5 insult of the intelligence of anyone who listens. And I
6 just want you to understand, I am not tolerating it.

7 So go on.

8 MR. AGNIFILO: The point I'm trying to make,
9 Judge, is he did a lot of good things in his life. That's a
10 heartland 3553 factor. He did a lot of good things to the
11 curriculum. I'm sure Your Honor read all of the letters we
12 submitted from people who still support him and believed in
13 what he is doing. And they are not flying monkeys. They're
14 nice people. They're good people, just like the people who
15 have decided to leave NXIVM and have a different view.
16 They're all nice people. They're all people who wanted to
17 improve themselves and to improve humanity. That's who they
18 all are, including the people who wrote those letters saying
19 that all the wonderful things that he did, all of the
20 wonderful things he did with the community.

21 The Tourettes project, we have letters on that,
22 Judge. We have letters from people who had Tourettes, and
23 who no longer suffer from the -- from the effects of
24 Tourettes, and they credit the -- Keith Raniere and Nancy's
25 work in that regard. And that's what they say. They wrote

1 these letters to the Court, and I think that's a very
2 important factor.

3 Another factor, and we go through this in our
4 sentencing memorandum, is the Mexican Peace Initiative. The
5 Mexican Peace Initiative, we have letters from certain
6 people who lived in Mexico who have first-hand information
7 about the work that Keith Raniere and others did to try and
8 stop the kidnappings in Mexico, including someone who lived
9 in a small, run-down poor community in Mexico for a period
10 of 18 months and tried to show this small town in Mexico
11 that they could sort of organize a community and take care
12 of each other and live together and make their lives better.
13 And this was all inspired by Keith Raniere.

14 And my point, Judge, and I think it's an important
15 point, I think it's a very important point just what we had
16 this morning, is that people believed in this work. They
17 believed in him, and now they feel betrayed. And now they
18 look back at what happened back then through a different
19 lens, and I don't think it's accurate, is my point. I don't
20 want to -- I'm not going to get into the details. I don't
21 know that every statement that was made this morning to
22 Your Honor was factually correct. I don't think they all
23 were. And so we don't need to dissect each one, because the
24 important thing is this is how these people feel.

25 But my point is they don't feel this because

1 Mr. Ranieri was cruel to them at the time. They view him as
2 having been cruel now. That's what --

3 THE COURT: Well, that is not entirely accurate.
4 It may be that some of what they say is erroneous, it may be
5 insincere, it may be excessive, or it may be untrue.

6 But what about the situation where your client
7 used the financial resources of a multimillionaire to go
8 after in litigation many people who had no resources in
9 order to destroy their reputation, to have them declare
10 bankruptcy, to have them put in jail because they would not
11 go along with his approach to the way the world should work,
12 the way NXIVM should work, the way these programs should
13 work? And he and Ms. Bronfman chased them down wherever
14 they were, in the State of Washington, in Mexico, or
15 wherever they happened to be -- or Florida. According to
16 these victims they were being, not only harassed, they were
17 being further victimized because of the fact that they did
18 not continue to be interested in the program. That was
19 then. That is not now. Some of it may be continuing. But
20 what about that?

21 MR. AGNIFILO: I -- I --

22 THE COURT: He was using -- according to them, and
23 clearly she was in a position, Ms. Bronfman, was in a
24 position to provide the resources to do it, he was using
25 those tools, the use of lawyers, and the use of proceedings

1 to victimize people who felt at the time, they realized or
2 believed, that they were being victimized, you know, what
3 about that?

4 MR. AGNIFILO: Okay.

5 THE COURT: He didn't just say to these people,
6 You know, I did my best with you. I tried to help you. Go
7 with God. He did not do that. What he did was he went
8 after them.

9 MR. AGNIFILO: I have a response.

10 THE COURT: Yeah, I am waiting.

11 MR. AGNIFILO: So in May of 2017, and I don't need
12 to name names, because I named them in my sentencing
13 memorandum --

14 THE COURT: You can name names.

15 MR. AGNIFILO: Sarah Edmondson and two other
16 people broke into the NXIVM computer from Vancouver. We
17 have the data. We have the information. And, apparently,
18 Clare Bronfman went to Vancouver and tried to bring a
19 criminal investigation for computer tampering.

20 THE COURT: Well, do you mean --

21 MR. AGNIFILO: -- because there was computer
22 tampering.

23 THE COURT: -- something like what was arranged
24 for Daniela to create the malware to break into Edgar
25 Bronfman's computer? That kind of --

1 MR. AGNIFILO: No.

2 THE COURT: -- that kind of behavior? Is that the
3 same idea?

4 MR. AGNIFILO: No, it's not the same idea.

5 I think the idea was that Sarah didn't want her
6 friends or certain people she cared about to stay in NXIVM,
7 and so she went into the computer and she eliminated -- she
8 changed the computer files so that their credit cards
9 wouldn't be billed. I mean, it's very specific information,
10 you know. And at the end of the day, Vancouver did or did
11 not, you know, bring an investigation and certainly didn't
12 bring any charges. So that's what happened with that.

13 What happened with the information that was
14 NXIVM's information that people got when they took the
15 courses is it was published on a website, and that might be
16 a violation of intellectual property rights. And there was
17 a long litigation, we discussed it at the trial at length,
18 and that was something that happened because they reasonably
19 believed -- lawyers, with good lawyers -- and one thing that
20 I want to add that Kristin Keefte in her letter to
21 Your Honor mentioned someone named Steve Coffey. Steve
22 Coffey was a lawyer, an independent lawyer, highly regarded
23 lawyer at a law firm in Albany, former, I think,
24 Albany County prosecutor and he made a lot six of these
25 decisions.

1 I mean, this is not, you know, Clare on her own or
2 Keith on his own. Do I think personally that they would
3 have benefitted by adult lawyer supervision at the time?
4 Yeah, I do. I think they could have really benefitted from
5 adult lawyer supervision. And say, You know what? You guys
6 are burning a lot midnight oil over a lot of stuff that
7 doesn't matter, and you're creating a lot of problems.

8 THE COURT: And what the client does -- pardon me,
9 if I exercise my independent judgment here -- what a client
10 does if a lawyer says that and the client just wants to
11 harass and attack and has the resources to do it, that
12 lawyer -- that client goes and finds a lawyer who will do
13 it, because there's got to be a lawyer out there who is
14 willing to take the money, take the fee, and will do what
15 the client wants and not exercise independent judgment.
16 That's just the way of the world. So, you know, I think
17 it's naïve to say that adult lawyer supervision might
18 prevail. Not if you are a -- not if you're someone with a
19 lot of money and you are looking to harass somebody with
20 legal process, which may or may not be justified. Some of
21 it may be justified. I am not saying it is not or it is.
22 But it is pretty hard for some lawyers to turn down a
23 retainer from a multimillionaire, someone with deep pockets
24 who wants to go after somebody because he or she feels he
25 has been wronged or he wants to get back at them.

1 We could discuss this all day. So let's go on.

2 MR. AGNIFILO: Okay.

3 THE COURT: So the next issue.

4 MR. AGNIFILO: Yes, Judge.

5 I think part of the reason that happened is I
6 think this community felt like it was being attacked. And
7 what we -- I think we saw in some of the trial evidence is
8 we saw Keith and Kristin for a while because we had their
9 e-mails and Keith and Clare for a while because we have some
10 of their e-mails; what appears to be reasonably believing
11 that people are trying to undo them. You now, there might
12 be an aspect of paranoia to it. There might be. I mean,
13 some of that I felt was showcased in the evidence.

14 There were times when Keith thought people were
15 following him or outside his house or whatnot. So, you
16 know, yes, I think they were looking to protect themselves.
17 Do I think they brought too much litigation? Absolutely.
18 But, you know, here we are all these years later. So I
19 don't know that that, you know, is really -- one of the
20 factors I think is the most important for sentencing.

21 What I think is the most important for sentencing,
22 Judge, which is why I started with it, is a lot of people
23 have very strong feelings, and they come here and they're
24 hurt. This case has so much heartbreak, in my opinion,
25 heartbreak, because so many people -- I mean, I mentioned

1 Mark Vicente, I'll mention him again. He's hurt. On that
2 video statement, he's hurt. He doesn't know what to do. He
3 says as much. I don't know what I'm going to do with my
4 life now. That's sad, Judge, and it's sad that they feel
5 that way.

6 But I think it's important that the first step in
7 betrayal, the first step in betrayal is that there was this
8 closeness. There was this love, and I thought the person
9 who put it the most eloquently was Adriana in something she
10 said this morning. She said -- she started by talking to
11 Keith, and she said, There's a love that was all around you,
12 and you never touched. Those were her words, Judge. And
13 she got it perfectly. And what she's saying is, We loved
14 you. We loved you. We trusted you. We believed in you,
15 and you betrayed us. So why did you betray us? Why did you
16 betray us? What happened? And the problem as -- as
17 Your Honor started to point out is -- and this is something
18 that I think that Barbara Bouchey said and Toni Natalie said
19 and other people have said it, he was in love with some of
20 these women. He was in love with them. I think Toni
21 Natalie said, He doesn't know how to let go. Those are her
22 words. I'm not her. You don't know how to let go. He's
23 not trying to hurt someone -- he's not, Judge. He's not
24 trying to hurt someone.

25 And, Judge, I can see that you disagree with me.

1 I know --

2 THE COURT: All I am saying to you is that love
3 does not result in any sense of responsibility for the
4 offspring or an offspring that he has, that he has no
5 responsibility. I am not here to question feelings. I am
6 here to question, and the jury was there to decide, whether
7 he has broken the law.

8 So I think we can talk about how Vicente feels and
9 how Adriana feels and so forth, and we should put that aside
10 for the sake of sentencing. What we need for this
11 sentencing is to address what he did to other human beings
12 with the skills that he obviously had. All right?

13 You don't have to be the smartest man in the world
14 to manipulate and to harm other people. And that is really
15 what we are talking about here. What did he do? What did
16 he do to hurt people and violate the law in the process?
17 That is really what we are here for.

18 I do not want to know about his psychiatric
19 history, particularly. He has not provided us with anything
20 on it. You have not asked to -- have not provided us with a
21 workup about his problems, whatever they may be. And so I
22 am not going to consider those kinds of issues because they
23 are not in front of me.

24 What is in front of me is all these counts of --
25 where the jury found him guilty of violating the law. And

1 so, you know, let's go back to what I have to consider. All
2 right?

3 (Continued on the next page.)
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1 THE COURT: I'm supposed to consider his history
2 and characteristics, the need for the sentence to reflect the
3 seriousness of the offenses, to promote respect for the law,
4 and to provide just punishment for the offenses, and the need
5 to sentence the sentence to afford adequate deterrence, and
6 the need to protect the public, which is very important here
7 the need to protect the public, among other things. That's
8 really where I am.

9 And I can differentiate, and do differentiate,
10 between how people are hurt emotionally by the way they are
11 treated, and how they are hurt by wrongdoing. We're here
12 about wrongdoing, not so much about how they feel ten years
13 later about how they were treated. Although, it's pretty
14 clear that he took advantage of people sexually and that some
15 of it, some of what he did was illegal because the jury said
16 so that was their decision.

17 MR. AGNIFILO: I'm not going to quarrel with the
18 jury verdict, and I don't. The jury has spoken. And your
19 Honor is absolutely correct, your Honor's job, what we're all
20 here to do is give a sentence based on the jury's verdict.

21 And my point in talking about intent and the
22 circumstances of the offense certainly goes to a 3553 factor
23 because it's the nature and circumstances of the offense. And
24 so that's why I'm discussing that.

25 THE COURT: You haven't answered my question about

1 Camila. Let's cut to the chase here. You don't start having
 2 an affair with a 15-year-old girl when you're a 45-year-old
 3 man, plus total control, financial control, control over her
 4 visa, control over her father who is still writing letters in
 5 support of the defendant today, I have one in my file here.
 6 When is that appropriate? I'm just curious.

7 MR. AGNIFILO: As your Honor knows, he wasn't
 8 charged with or convicted of having sex with Camila. He was
 9 charged and convicted of the photographs.

10 And if your Honor remembers my trial defense, I
 11 didn't really dispute the photographs all that much. The way
 12 I disputed them is they were never shown to anybody and the
 13 jury shouldn't consider them as either child pornography or as
 14 a racketeering predicate because they were photographs that
 15 were taken and then for the rest of time they just stayed on a
 16 device, they never got sent anywhere, never got shown
 17 anywhere.

18 So that's how I dealt with the photographs at the
 19 trial. I didn't say anything one way or another about them.
 20 I didn't say at the trial anything one way or another about
 21 Camila at 15 years old.

22 THE COURT: You were talking about intent, I'm just
 23 wondering how that works into your theory of intent here.

24 MR. AGNIFILO: I absolutely admit that Camila is in
 25 a different category than other people in the case. There is

1 no question, there is no question. And there is no doubt, and
2 I never said anything to the contrary, and I don't say that
3 now.

4 THE COURT: Go on.

5 MR. AGNIFILO: What I think your Honor can glean
6 from all this, and I don't know if it cuts for or against them
7 but I'll say it because it's the truth, he's in a 13-year
8 relationship with her, 12-year relationship with her. I don't
9 if know that makes it better or worse, but those are the
10 facts. And my point, and it's not a point that I think a
11 psychological report, I thought that some of people who spoke
12 this morning spoke absolutely eloquently about it, he doesn't
13 how to leave people.

14 THE COURT: He doesn't know what?

15 MR. AGNIFILO: Leave, leave women. Toni Natalie
16 said, he doesn't know how to let go.

17 THE COURT: It's hard to leave, get people to leave,
18 if you're keeping all this material, this collateral. If you
19 arranged to collect, true and maybe not true, information and
20 photographs about these people so that they feel their
21 constraint to stay. He doesn't know how to leave; he knows
22 how to keep people from leaving, that's his skill. That's a
23 skill.

24 So when you start talking about he doesn't know how
25 to leave people, even if they wanted to leave they couldn't

1 leave, according to what we were told here today and during
2 the trial.

3 MR. AGNIFILO: That is certainly a big part of what
4 people have said today.

5 THE COURT: It's what they said during the trial.

6 MR. AGNIFILO: And during the trial both, no
7 question.

8 THE COURT: The jury credited that.

9 MR. AGNIFILO: Judge, I'm agreeing, I don't disagree
10 with you.

11 THE COURT: The fact that he doesn't feel -- he
12 doesn't know how to leave people. I don't understand where
13 that fits in this whole, the whole theory of his culpability.

14 MR. AGNIFILO: The theory of the culpability is he's
15 not trying to hurt them at the time. He's not. That's the
16 theory.

17 THE COURT: At this time. What about at that time?

18 MR. AGNIFILO: No, at that time. He wasn't trying
19 to hurt any of the people who spoke here this morning.

20 THE COURT: Why -- it's not trying to hurt someone
21 by controlling their ability to function and have the right to
22 come and to go and to walk out and to stay because you've got
23 this control over them with all this data about them?

24 MR. AGNIFILO: Judge --

25 THE COURT: That's not a consideration? That was

1 then.

2 MR. AGNIFILO: Judge, it's a consideration but the
3 trial evidence was very clear, when someone wanted to leave,
4 they left. We got that out of Lauren Salzman's testimony. We
5 put in text messages of her and another person. The person
6 wanted to leave. And they ended up saying, 'I love you. I'll
7 miss you too.'

8 THE COURT: All right. I'm going to let the
9 Government have something to say. Finish up.

10 MR. AGNIFILO: Two things I want to say. Kristin
11 mentioned that she spoken to me about possibly getting some
12 child support, let me give the Court some background.

13 THE COURT: How old is this child?

14 MR. AGNIFILO: Fourteen.

15 THE COURT: Never had child support I take it?

16 MR. AGNIFILO: Well, Kristin left. And for a while
17 I think Mr. Ranieri was trying to have their rent paid while
18 living until Florida.

19 THE COURT: I see. All right. Go ahead.

20 MR. AGNIFILO: So in the spring I started getting
21 text messages from someone not identifying themselves. This
22 person is on again/off again, I do want to talk to you, I'm
23 not going to speak to you. She ends up speaking to me. It
24 ends up being Kristin.

25 Kristin and I talked on the phone a number of times.

1 She basically says that she feels that she's deserves child
2 support. So I say, I think you probably deserve child support
3 too. So I talk to Raniere about it, I'm not going to get into
4 the details of that discussion.

5 But at some point I tell Kristin if we're going to
6 talk about trial support you have to get a lawyer, I'm not
7 going to talk about child support with you. If this is some
8 sort of a negotiation, the only way it can work is if the
9 Court orders some sort of money judgment. Then I don't know
10 what the laws are regarding priority, I really have no idea.
11 But if you want to try to be on record as being entitled to
12 child support, have your lawyer contact the prosecutors and
13 work it out. And basically that was the end of the
14 discussion. I did discuss it with her, that's kind of where
15 we left it.

16 I point out that Mr. Raniere has two children, one
17 with Marianna, that was referred to this morning, and one with
18 Kristin. I don't know what the future holds in terms of child
19 support or available funds.

20 One of the things I told Kristin's lawyer is, if you
21 remember from the trial, Judge, there is the Pam Cafritz'
22 estate. I have no idea what is going on with that, there are
23 lawyers handling that, who frankly I've never spoken to. I
24 said, call them, they are in Albany or nearby.

25 THE COURT: She has a lawyer in Albany, right?

1 MR. AGNIFILO: Kristin does.

2 THE COURT: Yes. I'm sure the lawyer in Albany in
3 lawyer --

4 MR. AGNIFILO: Will figure it out. So the crux of
5 what I want to sum up on --

6 THE COURT: You carefully glossed over, because he's
7 your client and you're not going to tell me about what your
8 client said to you, which is fine, but the fact is, the child
9 is 14 years old and there has been no child support,
10 apparently, and why should this even be an issue if this is
11 his child. I mean, I'm just --

12 MR. AGNIFILO: I agree with you.

13 THE COURT: -- I'm just a local guy here in
14 Brooklyn. But you've got a 14-year-old child never been
15 supported by his father who has been busy working the
16 commodities markets for tens of millions of dollars and can't
17 find it in his heart to send a few bucks to his child. Why
18 should anyone look upon that person as someone who is worthy
19 of respect?

20 MR. AGNIFILO: Because I think Kristin left, Kristin
21 was hiding, and Kristin and Gaelyn were hiding from him.
22 That's the answer. I'm not sure it makes it better or worse.

23 THE COURT: She spoke as to why she was hiding.

24 MR. AGNIFILO: That's the reason. So that's the --

25 THE COURT: No. The reason she was hiding was some

1 other reason. She wasn't hiding because she felt she would be
2 safe if he knew about where she was.

3 Let's move on to the sentencing because I'm having
4 trouble dealing with your logic. Go ahead.

5 MR. AGNIFILO: I think I'm trying to make a couple
6 of points clear. One, he didn't intend to hurt anybody. I
7 know your Honor disagrees with me. And your Honor --

8 THE COURT: The jury decided he did.

9 MR. AGNIFILO: Judge, I know.

10 THE COURT: Then you've made your point. Next.

11 MR. AGNIFILO: Obviously he's never been in trouble
12 with the law before. He's a 60-year-old man. And I'm asking
13 the Court for a 20-year sentence. Ordinarily that would seem
14 like an astronomical sentence for a 60-year-old man with a
15 first arrest.

16 And there is one other point that I want to make,
17 and I think it's an important one. At no time, nothing in the
18 evidence, and this is an exhaustively investigated case where
19 a tremendous amount of people come forward, no evidence of a
20 single instance where someone said to Keith Raniere, 'I don't
21 want to do this; I don't want you to hold my hand; I don't
22 want you kissing me;' and he did it any way. None. That's
23 the man we're going to sentence.

24 First arrest, 60-year-old man. I think a 20-year
25 sentence is more than a sufficiently long sentence for this

1 particular 60-year-old man.

2 One thing I want to end with, it's important in
3 terms of placement. The Government in its sentencing
4 memorandum took something out of context, I think it's very
5 important, that they took out of context. Because what they
6 said Mr. Ranieri said was that, 'The Judge should know he's
7 being watched.'

8 THE COURT: What is that?

9 MR. AGNIFILO: 'The Judge should know he's being
10 watched.' In their sentencing memorandum they have him on a
11 recorded phone call to someone saying, 'The Judge should know
12 he's being watched.' But what his whole statement was, 'The
13 Judge should know he's being watched by someone wise. Have
14 you been speaking with Alan Dershowitz.'

15 It's just a very important distinction because
16 without really understanding this he could be designated to
17 someplace where he shouldn't be.

18 I know that -- one thing I also want to address,
19 Judge, because it's come up I don't want to gloss over it. I
20 know that your Honor got a very long letter from a number of
21 people, I think on Friday. And the letter is discussing
22 computer tampering. And they consulted with four experts, one
23 of whom is a PhD in computers. And there has been a
24 conclusion there is computer tampering.

25 Just to be clear, so the record actually says this,

1 I have been asked many, many times to file that motion. I was
2 asked by my client, I was asked by others. I studied this
3 stuff, I think I understand it. And in my estimation, being
4 the lawyer on the case, I did not think that it rose to the
5 level of making a prosecutorial misconduct motion in the form
6 of a Rule 33.

7 What I will tell your Honor is, I don't know what
8 the future is going to hold, I'm still looking into it. I
9 don't know if it's going to turn the corner and become
10 something different than what it is. But I decided not to
11 file the motion. My client wanted me to file the motion. And
12 I made a decision not to file the motion.

13 And in making that decision I did a number of
14 things. I consulted the Rules of Professional Responsibility,
15 for one. I looked at my own sense of ethics and the fact that
16 I would be in front of your Honor soon asking for 20-year
17 sentence. And I thought that was the right thing to do, and I
18 still think it's the right thing to do.

19 One of the reasons I didn't file the motion is
20 because if more evidence of this comes to light, in the future
21 I didn't want to basically take my one Rule 33 shot now. So I
22 made the decision not to file the motion. That's why it came
23 the way it did because I wouldn't file it.

24 So your Honor, in closing, I think a 20-year
25 sentence is more than enough. It shows tremendous respect for

1 the law. It is a very severe sentence for a 60-year-old man,
2 for any person but for a 60-year-old man, that's my request
3 Judge.

4 THE COURT: Thank you. Let me hear from the
5 Government.

6 MS. HAJJAR: Thank you, your Honor.

7 Your Honor, the Government is asking the Court to
8 impose a Guideline sentence of life imprisonment.

9 The offenses here, the offenses that Mr. Ranieri has
10 been convicted of, are among the most serious under the law.
11 Sex trafficking, forced labor, child exploitation, the
12 Guidelines demand a life sentence because these crimes cause
13 immeasurable harm to victims. The court has heard from these
14 victims today, at the defendant's trial, in voluminous
15 victim-impact statements, and in court.

16 The victims have described so powerfully the impact
17 of the defendant's crimes on them and their families. And in
18 doing so they have relived the worse moments of their lives in
19 order to convey to the Court and to the public how they were
20 hurt in the most depraved ways. There is very little that I
21 could add to that, your Honor. But what is clear is that
22 these victims will be carrying this damage with them for the
23 rest of their lives.

24 It is outrageous for defense counsel to suggest that
25 the defendant committed these crimes because he didn't know

1 how to leave women or because he didn't think he was hurting
2 them. He did hurt them, and that was made absolutely clear at
3 trial and it was made absolutely clear today. It doesn't
4 matter if a child abuser doesn't think he's hurting a child;
5 when he begins a sexual relationship when she's 15 years old,
6 it doesn't matter.

7 The Government has submitted a lengthy sentencing
8 memorandum addressing the 3553(a) factors, I'm not going to
9 repeat those arguments today. I will just briefly address a
10 few of the arguments that the counsel for the defendant made
11 today.

12 Mr. Agnifilo's justification for pursuing Sarah
13 Edmondson and DOS victims by sending them threatening letters
14 and by attempting to institute criminal charges, that was the
15 justification presented at trial and the jury rejected that
16 justification. It is total nonsense and has no basis in the
17 evidence.

18 Mr. Agnifilo asked this Court not to impose a
19 sentence of 15 years because the defendant is 60 years old.
20 But the defendant was 45 years old when he first started
21 sexually abusing Camila. He was 49 years old when he ordered
22 Daniela to be confined in a room without human contact for
23 nearly two years. He was 54 years old when he attempted to
24 use first-line slaves in DOS to, quote, "find him a virgin
25 successor who would serve as a replacement for Camila." And

1 he was 55 years old when he told Allison Mack that DOS slaves
2 should be held down like a sort of sacrifice and branded with
3 his initials.

4 The defendant's age has clearly not prevented him
5 from committing crimes, far from it. If the defendant hadn't
6 been arrested, he would be committing crimes today, tomorrow,
7 and for the foreseeable future.

8 Even now after overwhelming evidence of his guilt
9 was introduced at trial and after his conviction, the
10 defendant has yet to express any understanding of or remorse
11 for his crimes. His post-conviction comment has shown him to
12 be completely unrepentant.

13 No sentence short of life in imprisonment is
14 sufficient to protect the public from this defendant. No
15 sentence short of life imprisonment is sufficient to provide
16 just punishment for the defendant's crimes.

17 Thank you, your Honor.

18 THE COURT: All right before turning to the analysis
19 of the factors, is there anything defendant would like to say
20 before sentencing?

21 THE DEFENDANT: Yes. I don't have anything written.
22 I do believe strongly that I'm innocent of the charges. But
23 it is also true that I see all this pain, and although some of
24 these people really are not factual, and in some cases I
25 believe strongly lying, that doesn't matter either because

1 they are lying for a reason and that reason stems from me.

2 The whole issue that's been brought up about my
3 remorse, it is true, I am not remorseful of the crimes I don't
4 believe I committed at all. But I'm deeply remorseful over
5 this pain. And I am deeply remorseful over this anger. And
6 what I want from all of the victims, all the people who feel
7 I've hurt them, even if I don't feel it's legitimate, I ask
8 forgiveness and that at some point in life that I be forgiven.
9 And I am deeply sorry. I did not mean to cause this pain,
10 cause this anger that is evident. And even with the people
11 that I believe really are not telling the truth, I feel
12 responsible for that too, and I do feel deep remorse. I do
13 not feel remorse for the crimes I did not commit. I'm
14 innocent of those crimes. And a lot of the things that are
15 said are simply really not true.

16 But I am, I will repeat and end with, I am so sorry,
17 I'm truly sorry.

18 And I've listened to everything that each of you
19 said, even the things that I didn't believe were true and know
20 are not true, and it's still painful. Because to get up there
21 and speak takes courage, takes upset, takes anger, takes all
22 that. That does come from me. That's something I never want
23 to cause in the world, and I have caused in the world. For
24 that I am deeply sorry.

25 There is one final point I want to make, with

1 respect to Clare, with respect to Allison, with respect to
2 Nancy especially, but all my co-defendants, not only are they
3 innocent, but please, for those of you who spoke of people
4 like Allison and Nancy and Clare, please rethink their roles.
5 Blame me if you have to, because it stems from me, it's not
6 them. They are good souls. They are good people.

7 Sometimes they may get angry, they may do things
8 that are out of anger. But the real truth is Allison should
9 spend no time in prison. Allison did testify against me, or
10 cooperated against me. Lauren shouldn't spend any time in
11 prison. Lauren was a key witness against me, but she's a good
12 person. And I may disagree with her doing that or what she
13 said, but she wasn't at fault; nor was Allison, especially not
14 Nancy, and not Clare. Please don't lump them with me. They
15 are good souls. They are innocent.

16 I believe I'm innocent. I believe I tried my best
17 and I did have good intent, but I see that I have led to this
18 place where there is so much anger and so much pain.

19 And I'm deeply sorry. And also, I see that where I
20 am is caused by me. I don't blame anyone for that. This is
21 my doing, this is all my doing that way.

22 So I'm deeply remorseful and repentant. No matter
23 where I am, I will be forever not only different but I will
24 carry this with me. I know I can't experience as much pain as
25 you guys, the people who I've hurt or who are angered, and

1 even if you're lying it doesn't matter. But I've caused that
2 and I do carry that.

3 And I am repentant and I am remorseful over that.
4 But I'm not remorseful over charges that those aren't right,
5 that those aren't right. The hurt is true; the anger is true.

6 So thank you for listening. And I am sorry.

7 THE COURT: Thank you.

8 Before coming to an analysis on the 3553(a) factors
9 it is important to say a word about what I will be considering
10 in that analysis.

11 First I've reviewed the parties' sentencing
12 submissions. I have read the 56 letters submitted in support
13 of Mr. Ranieri. Many of these letters express genuine belief
14 that NXIVM and Ranieri played a positive role in people's
15 lives. Of course, I will also review the many victims'
16 letters that have been submitted. And I've listened carefully
17 to the victims' statements made here today in court. I have
18 heard and considered counsels' arguments and I will also
19 consider the testimony introduced at Mr. Ranieri's trial.

20 After a six-week trial over which I presided, the
21 jury found Mr. Ranieri guilty of Racketeering Conspiracy,
22 Racketeering, Forced Labor Conspiracy, Wire Fraud Conspiracy,
23 Sex Trafficking Conspiracy, and two counts of Sex Trafficking.
24 Mr. Ranieri was convicted of all 11 Racketeering acts
25 submitted to the jury; to wit, Conspiracy to Commit Identity

Theft and Unlawfully Possess Identification and Jane Doe 1;
 two acts of Sexual Exploitation of Minor, Jane Doe 2;
 Possession of Child Pornography; Conspiracy to Commit Identity
 Theft; Conspiracy to Alter Records for Use in an Official
 Proceeding; Conspiracy to Commit Identity of Jane Doe 3;
 Trafficking and Document Servitude of Jane Doe 4.; State Law
 Extortion; Sex Trafficking and Forced Labor of Jane Doe 5; and
 Conspiracy to Commit Identity Theft of Jane Doe 7.

(Continued on the next page.)

1 THE COURT (Continuing): The context in which
2 Mr. Ranieri committed these egregious crimes is by now well
3 known. Mr. Ranieri is the founder of an organization called
4 NXIVM, a self-styled executive coaching and self-help
5 organization that functioned as a pyramid scheme in which
6 members paid thousands of dollars for various workshops and
7 new members were recruited via the promise of payments or
8 services for enrolling others into the scheme. Mr. Ranieri
9 made members of NXIVM call him the Vanguard and he maintained
10 a rotating group of fifteen to twenty female NXIVM members
11 with whom he had sexual relationships. These women were not
12 permitted to have sexual relationships with anyone but
13 Mr. Ranieri or to discuss with others their relationship with
14 Mr. Ranieri.

15 In 2015, Ranieri created a secret society called DOS
16 or the Vow. As the PSR explains: DOS was comprised of all
17 female masters who were NXIVM members who recruited and
18 commanded groups of all female slaves. When identifying
19 prospective slaves, masters often targeted women who were
20 experiencing difficulties in their lives, including
21 dissatisfaction with the pace of their advancement in NXIVM.
22 Each DOS slave was expected to recruit slaves of her own, who
23 in turn owed service not only to their masters but also to
24 masters above them in the DOS pyramid. Ranieri alone formed
25 the top of the pyramid as the highest master. Other than

1 Raniere, all participants in DOS were women. Raniere's status
2 as head of the pyramid was concealed from all newly recruited
3 slaves, other than those directly under Raniere. DOS masters
4 persuaded slaves to join DOS by falsely describing it as a
5 secret women's empowerment group and that the goal of DOS was
6 to eradicate weaknesses in its members. Prospective slaves
7 were required to provide collateral to prevent them from
8 leaving the group or disclosing its existence to others.
9 Collateral included sexually explicit photographs and videos
10 of themselves, rights to financial assets, and videos or
11 letters of true or not true confessions that would be damaging
12 to the prospective slave's family members and friends.

13 After joining DOS, slaves were required to provide
14 additional collateral, including sexually explicit
15 photographs, and to pay tribute to their masters, including by
16 performing tasks that would otherwise be compensable. In
17 addition, several DOS slaves were directed to have sex with
18 Raniere to maintain membership. In other words, DOS operated
19 to abuse and exploit young women for sex, labor, and financial
20 gain.

21 I now turn to the Section 3553(a) factors. The
22 nature and circumstances of Mr. Raniere's conduct, as well as
23 his history and characteristics and the need for his sentence
24 to reflect the seriousness of the offense, all warrant a
25 significant sentence. The evidence before me makes clear that

1 Mr. Ranieri's conduct was particularly egregious because he
2 targeted and exploited girls and young women. He continued
3 this abuse over the course of many years. And his abuse
4 inflicted unimaginable trauma and damage on his victims.

5 Take, for instance, his sexual exploitation of Camila.

6 Mr. Ranieri first met Camila when she was 13 years old. In
7 their first conversation alone, they spoke about how Camila
8 had just placed second in her eighth grade spelling bee
9 contest.

10 Mr. Ranieri began a sexual relationship with Camila
11 two years later, when he was 45 and she was 15. He took naked
12 pictures of 15-year-old Camila, something she describes as
13 being "seared into my memory." Years after they met,
14 Mr. Ranieri told Camila he knew she was "special" ever since
15 they first met each other when she was 13.

16 Mr. Ranieri exerted control over this child in every
17 way imaginable. As she puts it, "he used my innocence to do
18 whatever he wanted with me not just sexually but also
19 psychologically. He manipulated me into what he wanted, for
20 his own reasons and for his own pleasure." Mr. Ranieri
21 directed Camila to overstay her visa, thereby giving him
22 additional leverage over her, and he put her up in an
23 apartment where he would, "come in the house, have sex, and
24 leave." He controlled and manipulated her in every way. He
25 told her he needed a "vow of absolute obedience," and that she

1 had "to be happy whenever you are with me because my time
2 means that much."

3 In one message, Mr. Ranieri wrote her: "If you want
4 me to come tonight, I will under these conditions: There will
5 be no talking. You will meet me at the door in the outfit you
6 think I would find sexiest. You will arouse me, we will make
7 love for my satisfaction and pleasure. You will do everything
8 you can to provide that. I will finish and leave. Do you
9 agree yes or no?"

10 When Camila had a relationship with another man,
11 Mr. Ranieri "punished her" emotionally, psychologically, and
12 sexually." He branded her. As Camila tells the Court: I
13 hold scars on my body from him that can never be erased. They
14 carry immense emotional and psychological pain. They are a
15 reminder of his cruelty and manipulation. He knew exactly
16 what he was doing, even asking me at some point if having his
17 initials on my body would keep me from being with other
18 people. He drew pleasure from knowing he had marked me. I
19 was his. Even when I got a tattoo to cover his mark, it was
20 not enough to disguise the pain and shame it reminds me of.
21 Mr. Ranieri's abuse of Camila was cruel to the point of
22 inhumane. He made her ask his permission for almost
23 everything, including to contact her family and to cut her
24 hair.

25 At one point, Camila messaged Ranieri, "I feel like

1 I have a gun pointed at me and I'm just trying to say what you
2 want to hear so you won't shoot but I don't know what it is
3 you want to hear." Simply put, the harm he inflicted upon her
4 is incalculable.

5 Mr. Ranieri had many other victims. Mr. Ranieri,
6 along with others, trafficked Daniela into the United States,
7 and she began working for Ranieri. Mr. Ranieri initiated a
8 sexual relationship with Daniela when she was 18 years old; as
9 he did with many of the girls and women he had sexual
10 relationships with, Mr. Ranieri instructed Daniela to keep
11 their relationship a secret. When Daniela developed feelings
12 for another man, Mr. Ranieri told her parents that she had
13 committed an "ethical breach."

14 To punish Daniela, Mr. Ranieri ordered that she be
15 confined to a room in her parents' home without human contact.
16 At Mr. Ranieri's instruction, Lauren Salzman, one of the
17 "First Line" DOS members, threatened Daniela that if she left
18 the room, she would be sent to Mexico without any
19 identification documents.

20 Like his treatment of Camila, Mr. Ranieri's
21 treatment of Daniela was particularly cruel because of the
22 psychological harm he inflicted on her at such a young age.
23 Forced to remain in her room for months and months on end,
24 Daniela testified that one of the worst aspects of her
25 kidnapping was the feeling that, "I'm in a world where nobody

1 cares that I'm losing my life," and thinking that "it was
2 clearly never going to end."

3 It is necessary for me to mention at this juncture a
4 letter submitted in support of Mr. Raniere that I received
5 from Hector, the father of Daniela and Camila. I am frankly
6 baffled why anyone thought this letter would help Mr. Raniere.
7 In the letter, Mr. Fernandez waxes nostalgic about how
8 Mr. Raniere helped him run a marathon, before turning to
9 slandering his own daughter, Daniela, calling her a liar and a
10 thief, and implying she had no one but herself to blame for
11 what happened to her. Let me be clear: I find Mr.
12 Fernandez's letter, in support of the man who abused his own
13 daughters, a disgrace.

14 And, to Daniela, who is here today in the courtroom,
15 let me also be clear: What happened to you is not your fault,
16 and I am deeply impressed with your courage and resilience.
17 And that goes for all the victims who have spoken today,
18 either in-person or by video or audio.

19 Turning back to Mr. Raniere, his operation of DOS to
20 exploit women was ruthless and unyielding. One "slave" was
21 ordered to "seduce" Mr. Raniere by sending him naked
22 photographs of her every day. She was later taken to his
23 house where he performed unwanted oral sex on her and took
24 more photographs of her. Mr. Raniere blindfolded another
25 "slave," and tied her down to a table while a third person

1 performed unwanted oral sex on her.

2 Several former DOS "slaves" testified that they were
3 terrified to leave or speak out against DOS out of fear that
4 their collateral would be released. All the while,
5 Mr. Ranieri also benefitted financially, as DOS slaves were
6 coerced into providing labor and services for their "masters"
7 and Mr. Ranieri. Mr. Ranieri perpetrated these crimes over
8 the course of many years, and his conduct harmed a great many
9 people. More than 90 individuals have submitted victim impact
10 statements to the Court in connection with this sentencing,
11 describing the harm that his criminal conduct inflicted on
12 them.

13 What is clear to me, from all of this, is that the
14 offenses of which the jury convicted Mr. Ranieri are cruel,
15 perverse, and extremely serious. They targeted the most
16 vulnerable among his community, and they inflicted untold
17 damage. As one of Mr. Ranieri's victims wrote: I can never
18 fully explain how much damage Keith Ranieri has caused me and
19 so many others. The psychological impact of his twisted
20 teachings permeate my brain even after two-plus years of
21 consistent therapy. His sexual abuse and humiliation of me,
22 lives in my body and wreaks havoc with my soul if I am not
23 completely diligent. Nightmares fill my head almost weekly,
24 and the things he taught me to think about myself have made me
25 neglect my health and cause myself undue pain on countless

1 occasions.

2 Taking account of the nature of the offenses of
3 conviction, as well as Mr. Ranieri's history and
4 characteristics and the seriousness of his offenses, makes
5 abundantly clear that a significant sentence is not just
6 appropriate, but necessary.

7 In determining an appropriate sentence, I also
8 consider the need for the sentence that I impose to reflect
9 the seriousness of the offense, promote respect for the law,
10 and provide general and specific deterrence. I find that a
11 review of these factors also counsels in favor of a
12 significant sentence. Despite everything that has happened
13 and despite the countless victims who have given voice to
14 their great pain, Mr. Ranieri remains unmoved. Indeed, he
15 maintains his innocence.

16 To him, the brave victims who have spoken out about
17 the abuse suffered at his hands including those who spoke
18 today are liars. The women who have courageously testified to
19 his sexual exploitation of them are liars, too; in fact, they
20 all just wanted to be with him. And the six-week trial he was
21 afforded before a jury of his peers was simply
22 inconsequential.

23 Mr. Ranieri has therefore not only failed to demonstrate
24 remorse for his conduct, but he also maintains to this day
25 that he has done nothing wrong. As recently as November 2019,

1 he described DOS as "good; not just good and even noble, but
2 great and vitally important for women and humanity."

3 Having presided over his trial, and having sat here
4 today and listened to Mr. Ranieri's victims, I find it deeply
5 troubling that he thinks of DOS in those terms. To make
6 matters worse, he and his counsel, funded by an unlimited war
7 chest courtesy of co-conspirator Clare Bronfman, are engaged
8 in a public relations campaign to cast doubt on the integrity
9 of the judicial system and the jury verdict. Ultimately, Mr.
10 Ranieri's lack of remorse, coupled with his view that the
11 conduct for which he was convicted was actually "noble,"
12 strongly suggests the need for a significant sentence.
13 The need to promote respect for the law and for deterrence
14 warrants a significant sentence in yet another respect. In
15 his attempts to silence his critics and maintain control of
16 his criminal enterprise, Mr. Ranieri repeatedly obstructed
17 justice and demonstrated a disregard for the rule of law. In
18 one instance, he worked to alter videotapes that were produced
19 in discovery in a federal lawsuit.

20 When DOS victims began to speak out publicly,
21 Mr. Ranieri worked to silence them, including orchestrating a
22 threatening letter to be sent to the victims through counsel
23 in Mexico. In every aspect of his conduct, Mr. Ranieri has
24 acted as though the law does not apply to him. Unfortunately
25 for him, that is not the case.

1 I have considered the range of sentences that are
2 available, and the range suggested by the Sentencing
3 Guidelines. I have also considered the need to avoid
4 unwarranted sentence disparities between Mr. Ranieri and other
5 defendants who have been convicted of similar conduct.

6 Finally, I have considered the appropriateness of
7 imposing a fine, as I am obligated to do subject to 18 U.S.C.
8 Section 3571, unless I find that Mr. Ranieri is unable to pay.
9 Section 3571(b) permits me to impose a fine on each count of
10 up to \$250,000, for a total of \$1,750,000. In addition to the
11 factors I noted already, Section 3572(a) sets out additional
12 factors that I must consider in determining whether to impose
13 a fine and, if I do, what the amount should be. These factors
14 include Mr. Ranieri's ability to pay and the financial burden
15 that a fine will impose on him or anyone else. They also
16 include the expected cost to the Government of his sentence.
17 The Guidelines fine range for Mr. Ranieri's offenses is
18 between \$50,000 and \$250,000. I find that Mr. Ranieri has the
19 ability to pay a significant fine. As I have already
20 explained, I find the seriousness of Mr. Ranieri's conduct and
21 the extreme harm he has caused justify a serious sentence.

22 As one aspect of that sentence I am imposing the
23 statutory maximum fine of \$1,750,000 payable immediately. I
24 direct the Government to place a lien on the estate of Pamela
25 Cafritz, to which Mr. Ranieri is alleged to be the sole

1 inheritor, to secure payment of the fine.

2 Are you ready to be sentenced?

3 THE DEFENDANT: Yes, I am.

4 THE COURT: What?

5 THE DEFENDANT: Yes.

6 THE COURT: Please stand with your lawyers.

7 Applying the statutory factors to this case, I find
8 a significant sentence to be plainly justified. As I have
9 explained, each of the Section 3553(a) factors counsel in
10 favor of such a sentence. Though I have highlighted today
11 particularly egregious aspects of Mr. Ranieri's campaign of
12 manipulation, exploitation, and abuse, no words can adequately
13 communicate the lasting pain, trauma, and hardship he has
14 caused so many.

15 I, therefore, sentence Mr. Ranieri as follows: On
16 Count 1 for Racketeering Conspiracy, 40 years in the custody
17 of the Attorney General to be served concurrently with the
18 sentence on Count 2 and consecutively with all other sentences
19 imposed. On Count 2, for Racketeering, 40 years in the
20 custody of the Attorney General, to be served concurrently
21 with the sentence on Count 1 and consecutively with all other
22 sentences imposed.

23 On Count 6, Forced Labor Conspiracy, 20 years in the
24 custody of the Attorney General, to be served consecutively
25 with all other sentences imposed. On Count 7, for Wire Fraud

1 Conspiracy, 20 years in the custody of the Attorney General,
2 to be served consecutively with all other sentences imposed.
3 On Count 8, for Sex Trafficking Conspiracy, 40 years in the
4 custody of the Attorney General, to be served concurrently
5 with the sentences on Counts 9 and 10, and consecutively with
6 all other sentences imposed. On Count 9, Sex Trafficking of
7 Jane Doe 5, 40 years in the custody of the Attorney General,
8 to be served concurrently with the sentences on Counts 8 and
9 10, and consecutively with all other sentences imposed.

10 On Count 10, for Sex Trafficking of Jane Doe 8, 40
11 years in the custody of the Attorney General, to be served
12 concurrently with the sentences on Counts 8 and 9, and
13 consecutively with all other sentences imposed.

14 I am imposing 40-year concurrent sentences on Counts
15 1 and 2, a 20-year sentence on Count 6, a 20-year sentence on
16 Count 7, and 40-year concurrent sentences on Counts 8, 9, and
17 10, for a cumulative sentence of 120 years.

18 I also impose sentences of supervised release, to be
19 served concurrently with one another. On Count 1, five years;
20 Count 2, five years; Count 6, 3 years; Count 7, 3 years; Count
21 8, life; Count 9, life; Count 10, life.

22 Additionally, I impose a \$250,000 fine on each count
23 of conviction, for a total of \$1,750,000, payable immediately;
24 a \$700 Special Assessment, also due immediately; and a \$15,000
25 assessment pursuant to the Justice for Victims of Trafficking

1 Act of 2015. Any claims of restitution under 18 U.S.C.
2 Section 3664(d)(5) must be submitted within 90 days of today's
3 order.

4 You may be seated. I'm going to impose certain
5 specific terms is for your supervised release. They are as
6 follows:

7 The defendant shall comply with any applicable state
8 and/or federal sex offender registration requirements, as
9 instructed by the probation officer, the Bureau of Prisons, or
10 any state offender registration agency in the state where he
11 resides, works, or is a student. The defendant shall
12 participate in a mental health treatment program, which may
13 include participation in a treatment program for sexual
14 disorders, as approved by the U.S. Probation Department.

15 The defendant shall contribute to the cost of such
16 services rendered and/or any psychotropic medications
17 prescribed to the degree he is reasonably able, and shall
18 cooperate in securing any applicable third-party payment. The
19 defendant shall disclose all financial information and
20 documents to the Probation Department to assess his ability to
21 pay. As part of the treatment program for sexual disorders,
22 the defendant shall participate in polygraph examinations to
23 obtain information necessary for risk management and
24 correctional treatment.

25 The defendant shall not associate with or have any

1 contact with convicted sex offenders unless in a therapeutic
2 setting and with the permission of the U.S. Probation
3 Department. The defendant shall not associate with children
4 under the age of 18, unless a responsible adult is present and
5 he has prior approval from the Probation Department. Prior
6 approval does not apply to contacts which are not known in
7 advance by the defendant where children are accompanied by a
8 parent or guardian or for incidental contacts in a public
9 setting. Any such non-pre-approved contacts with children
10 must be reported to the Probation Department as soon as
11 practicable, but no later than 12 hours.

12 Upon commencing supervision, the defendant shall
13 provide to the Probation Department the identity and contact
14 information regarding any family members or friends with
15 children under the age of 18, whom the defendant expects to
16 have routine contact with, so that the parents or guardians of
17 these children may be contacted and the Probation Department
18 can approve routine family and social interactions such as
19 holidays and other family gatherings where such children are
20 present and supervised by parents or guardians without
21 individual approval of each event.

22 If the defendant cohabitates with an individual who
23 has residential custody of minor children, the defendant will
24 inform that other party of his prior criminal history
25 concerning his sex offense. Moreover, he will notify the

1 party of his prohibition of associating with any children
 2 under the age of 18, unless a responsible adult is present.
 3 The defendant shall submit his person, property, house,
 4 residence, vehicle, papers, computers as defined in 18 U.S.C.
 5 Section 1030(e)(1) other electronic communications or data
 6 storage devices or media, or office, to a search conducted by
 7 a United States probation officer. Failure to submit to a
 8 search may be grounds for revocation of release.

9 The defendant shall warn any other occupants that
 10 the premises may be subject to searches pursuant to this
 11 condition. An officer may conduct a search pursuant to this
 12 condition only when reasonable suspicion exists that the
 13 defendant has violated a condition of his supervision and that
 14 the areas to be searched contain evidence of this violation.
 15 Any search must be conducted at a reasonable time and in a
 16 reasonable manner.

17 The defendant is not to use a computer, Internet
 18 capable device, or similar electronic device to access
 19 pornography of any kind. The term "pornography" shall include
 20 images or video of adults or minors engaged in "sexually
 21 explicit conduct" as that term is defined in Title 18, U.S.C.
 22 Section 2256(2). The defendant shall also not use a computer,
 23 Internet capable device or similar electronic device to view
 24 images of naked children. The defendant shall not use his
 25 computer to view pornography or images of naked children

1 stored on related computer media, such as CDs or DVDs, and
2 shall not communicate via his computer with any individual or
3 group who promotes the sexual abuse of children.

4 The defendant shall also cooperate with the U.S.
5 Probation Department's Computer and Internet Monitoring
6 program. Cooperation shall include, but not be limited to,
7 identifying computer systems, Internet capable devices, and/or
8 similar electronic devices the defendant has access to, and
9 allowing the installation of monitoring software/hardware on
10 said devices, at the defendant's expense. The defendant shall
11 inform all parties that access a monitored computer, or
12 similar electronic device, that the device is subject to
13 search and monitoring. The defendant may be limited to
14 possessing only one personal Internet capable device, to
15 facilitate our department's ability to effectively monitor
16 his/her Internet related activities.

17 The defendant shall also permit random examinations
18 of said computer systems, Internet capable devices, similar
19 electronic devices, and related computer media, such as CDs,
20 under his control.

21 The defendant shall report to the Probation
22 Department any and all electronic communications service
23 accounts as defined in 18 U.S.C. Section 2510(15) used for
24 user communications, dissemination and/or storage of digital
25 media files i.e. audio, video, images. This includes, but is

1 not limited to, e-mail accounts, social media accounts, and
2 cloud storage accounts.

3 The defendant shall provide each account identifier
4 and password, and shall report the creation of new accounts,
5 changes in identifiers and/or passwords, transfer, suspension
6 and/or deletion of any account within 5 days of such action.
7 Failure to provide accurate account information may be grounds
8 for revocation of release. The defendant shall permit the
9 Probation Department to access and search any accounts using
10 the defendant's credentials pursuant to this condition only
11 when reasonable suspicion exists that the defendant has
12 violated a condition of his supervision and that the accounts
13 to be searched contains evidence of this violation. Failure
14 to submit to such a search may be grounds for revocation of
15 release.

16 Upon request, the defendant shall provide the U.S.
17 Probation Department with full disclosure of his financial
18 records, including co-mingled income, expenses, assets and
19 liabilities, to include yearly income tax returns. With the
20 exception of the financial accounts reported and noted within
21 the presentence report, the defendant is prohibited from
22 maintaining and/or opening any additional individual and/or
23 joint checking, savings, or other financial accounts, for
24 either personal or business purposes, without the knowledge
25 and approval of the U.S. Probation Department.

1 The defendant shall cooperate with the probation
2 officer in the investigation of his financial dealings and
3 shall provide truthful monthly statements of his income and
4 expenses. The defendant shall cooperate in the signing of any
5 necessary authorization to release information forms
6 permitting the U.S. Probation Department access to her
7 financial information and records.

8 The defendant shall not have contact with any of the
9 named victims of his offenses. This means that he shall not
10 attempt to meet in person, communicate by letter, telephone,
11 or through a third party, without the knowledge and permission
12 of the Probation Department. The defendant shall not
13 associate in person, through mail, electronic mail or
14 telephone with any individual with an affiliation to Executive
15 Success Programs, NXIVM, DOS or any other NXIVM-affiliated
16 organizations; nor shall the defendant frequent any
17 establishment, or other locale where these groups may meet
18 pursuant, but not limited to, a prohibition list provided by
19 the U.S. Probation Department.

20 You have the right to appeal your sentence and your
21 conviction in the United States Court of Appeals for the
22 Second Circuit. You should discuss with your attorneys at
23 once whether you wish to appeal.

24 Is there anything else from the Government?

25 MS. HAJJAR: Just that if Your Honor would attach

1 the general order of forfeiture that was provided in the
2 docket. It provides that the order can be amended pending a
3 review of the defendant's financial situation.

4 THE COURT: Yes. The application is granted.
5 Anything else from you?

6 MS. HAJJAR: No. Thank you, Your Honor.

7 THE COURT: Anything else from the defense?

8 MR. AGNIFILO: No, Your Honor.

9 THE COURT: All right, we're adjourned.
10 (Matter concluded.)
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22 *I (we) certify that the foregoing is a correct transcript*
23 *from the record of proceedings in the above-entitled matter.*

24 /s/ David R. Roy
25 DAVID R. ROY

October 28, 2020
Date