



U.S. Department of Justice

*United States Attorney  
Eastern District of New York*

NS:TH/KMT  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 13, 2021

By ECF

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

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

Dear Judge Garaufis:

The government respectfully submits this letter to advise the Court of a potential violation of the protective order entered in this case (the "Protective Order"). Pursuant to the Protective Order, defense counsel is prohibited from disclosing or disseminating any discovery materials provided to the defendant except to defense staff directly employed by defense counsel, subject to defense counsel's supervision, and only after such staff have reviewed the terms of the Protective Order and signed Attachment A thereto. See, e.g., ECF Docket No. 39 ¶ 5. All current and former counsel of record in this case have signed the Protective Order and agreed to abide by its terms. See ECF Docket Nos. 39, 85, 990, 1001, 1060. As the Court is aware, much of the discovery material in this case is sensitive and contains personally identifying information regarding individuals other than the defendants.

The government has received a report that Suneel Chakravorty, an associate of defendant Keith Raniere's, is in possession of electronic discovery materials, including a copy of a hard drive, that were produced to defense counsel pursuant to the Protective

Order.<sup>1</sup> The government understands that Mr. Chakravorty (who is not an attorney) purports to have drafted a motion on Raniere's behalf based on materials from the hard drive, and may also have disclosed or discussed protected discovery material to and with other individuals not subject to the Protective Order.

The undersigned has contacted current counsel of record for Raniere, Marc A. Fernich, Esq. and Jeffrey H. Lichtman, Esq., who have represented that they have not provided Mr. Chakravorty with any discovery materials in this case. The government respectfully requests that the Court direct each current and former counsel of record for Raniere to provide the Court with a list of individuals to whom they have provided electronic discovery materials produced by the government in this case and to request the return of any discovery materials disclosed to individuals other than counsel of record.<sup>2</sup>

Respectfully submitted,

JACQUELYN M. KASULIS  
Acting United States Attorney

By: /s/  
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Assistant U.S. Attorney  
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cc: Counsel of Record (by ECF and email)

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<sup>1</sup> The government has also received information that Mr. Chakravorty is also in possession of sexually explicit photographs of a victim identified as a "Jane Doe" in the indictment. These photographs were not produced as discovery in this case because they were never in the government's possession.

<sup>2</sup> Raniere's current and former attorneys include Steven Alan Metcalf, Esq., Joseph Daniel McBride, Esq., Martin Tankleff, Esq., Paul DerOhannesian, Esq., Marc A. Agnifilo, Esq., Jennifer Ann Bonjean, Esq., Jeffrey Lichtman, Esq., and Marc Fernich, Esq.