APPENDIX

Example of Analysis for the Claim of Ineffective Assistance of Counsel for Failure to File a **Rule 29 Motion for Acquittal**

Mr. Raniere was convicted and sentenced to 120 years for seven counts, with certain sentences running concurrently. This section provides an element-by-element analysis of the trial evidence for each charge. As demonstrated below, the evidence presented at trial fails to meet the legal standards required for conviction on any of the counts.

Table 1: Breakdown of the Charges					
#	Charge	Alleged Conduct	Sentence		
1	Racketeering	See the predicate acts for Count 2.	40 years		
	Conspiracy				
2	Racketeering	See the predicate acts listed below.	40 years		
	Act 1: Conspiracy to	In December 2004, Daniela, then 19, illegally			
	Commit Identity Theft	crossed the US-Canada border using a fake ID			
	and/or Conspiracy to	under the name "Ashana Chenoa." The fake ID's			
	Unlawfully Possess	birth date corresponded to that of a deceased			
	Identification Document	individual, Lisa Chenoa. Daniela alleged that Mr.			
		Raniere was involved in planning this act.			
	Act 2: Sexual	Taking nude photographs of Camila on or around			
	Exploitation of a Child	November 2, 2005, when she would was 15.			
	Act 3: Sexual	Taking nude photographs of Camila on or around			
	Exploitation of a Child	November 24, 2005, when she was 15.			
	Act 4: Possession of	Knowingly possessing the nude photographs of			
	Child Pornography	Camila on a Western Digital hard drive.			
	Act 5: Conspiracy to	Between 2005 and 2006, Daniela unsuccessfully			
	Commit Identity Theft	attempted to hack the email accounts of Kim			
		Snyder and Joe O'Hara without success. Using a			
		technique called "keylogging," she successfully			
		accessed the email accounts of Edgar Bronfman and			
		James Loperfido. Daniela testified that these acts			
		were directed by Mr. Raniere.			
	Act 6: Conspiracy to	In 2008, Mr. Raniere, along with Mark Vicente,			
	Alter Records for Use in	Kristin Keeffe, Nancy Salzman, and others, altered			
	an Official Proceeding	videotapes to remove health claims made in			
		educational videos. These edited tapes were used in			
		a civil case against Stephanie Franco.			
	Act 7: Conspiracy to	In 2008, Daniela used keylogging to hack into the			
	Commit Identity Theft	email and Facebook accounts of Marianna, Mr.			

Act 8: Trafficking of Daniela for Foreed Labor and Document Servitude Daniela for Foreed Labor				1
Act 8: Trafficking of Daniela for Forced Labor and Dacument Servitude Servit			Raniere's partner. Daniela testified that this act was	
Daniela for Forced Labor and Document Servitude and Daniela's parents, allegedly coerced Daniela, then 22, into confinement in an unlocked room in her parents' home until she completed a book report. This coercion involved withholding her identification documents. Daniela remained in the room for 22 months until her father and Kristin Keeffe drove her to Texas to cross the border into Mexico. Act 9: State Law Extortion Act 9: State Law Extortion Some members of DOS were required to provide additional "collateral" after joining. This was deemed extortionate due to the existence and use of collateral as a condition of membership in DOS. Act 10A: Sex Trafficking Participated in a single act of oral sex, performed on her by another woman, which was directed by Mr. Raniere. This was alleged to be coercive due to the existence of collateral. Act 10B: Forced Labor Act 10B: Forced Labor Act 11: Identity Theft Wince Fraud Conspiracy Act 11: Identity Theft Same conduct as Racketeering Act 10B Conspiracy Women provided collateral to join DOS, without being told of Mr. Raniere's involvement. This lack of disclosure formed the basis for alleging the collateral was fraudulently obtained. Same conduct as Racketeering Act 10A Wince Fraud Conspiracy Act 11: Amenies and performed the basis for alleging the collateral was fraudulently obtained. Same conduct as Racketeering Act 10A Act 11: Amenies and performed the basis for alleging the collateral was fraudulently obtained. Same conduct as Racketeering Act 10A Act 11: Amenies and performed the basis for alleging the collateral was fraudulently obtained. Same conduct as Racketeering Act 10A Act 11: Amenies and performed the basis for alleging the collateral was fraudulently obtained. Same conduct as Racketeering Act 10A Act 11: Amenies and performed the basis for alleging the collateral was fraudulently obtained. Same conduct as Racketeering Act 10A Act 11: Am			ž – – – – – – – – – – – – – – – – – – –	
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which she did not complete.			which she did not complete.	