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January 13, 2023

BY ECF

The Honorable Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Lawrence Ray*, 20 Cr. 110 (LJL)

Dear Judge Liman:

Lawrence Ray's crimes were heinous. Over a period of years, he intentionally inflicted brutal and lifelong harm on innocent victims that he groomed and abused into submission. Once he had established control over his victims, he exploited them for his own profit through extortion, sex trafficking, and forced labor. While the defendant's victims descended into self-hatred, self-harm, and suicidal attempts under his coercive control, the evidence showed that the defendant took sadistic pleasure in their pain and enjoyed the fruits of their suffering. He extracted millions of dollars in extortion and sex trafficking proceeds from Claudia Drury, but the money was never enough, and at times it was besides the point: the defendant displayed an insatiable desire to make his victims pay, in both body and spirit. He sought to convince his victims that they were worthless, undeserving of love, and irredeemable, and until his arrest in this case, he was succeeding. In order to maintain his control and the lifestyle it ensured, he obstructed justice and threatened his victims with retaliation. He has shown no remorse, accepted no responsibility, and impeded the prosecution of this case, including by disrupting the trial and prolonging the trauma to his victims. Through his conduct, he has shown that he is a danger to others, is incapable of contrition, and must be incapacitated.

The Probation Office correctly calculated the applicable United States Sentencing Guidelines ("U.S.S.G." or the "Guidelines") range as life imprisonment, with a mandatory minimum of 180 months' imprisonment. The defense does not raise any legal objections to this calculation but advocates for the mandatory minimum sentence. For the reasons set forth below, and due to the uniquely egregious nature of the defendant's crimes, the Government submits that a Guidelines sentence of life imprisonment is necessary to achieve the purposes of sentencing.

I. A Guidelines Sentence of Life Imprisonment is Justified by the Section 3553(a) Factors

The Court is familiar with the offense conduct in this case, having presided over the defendant's four-week jury trial in March of 2022. The Government relies on the lengthy factual summary of the offense conduct set forth in the Final Presentence Report dated October 5, 2022 ("PSR"), and in the Court's opinion on the defendant's Rule 29 motion. *See* Dkt. 596 ("Rule 29 Op.").

As discussed below, a Guidelines sentence of life imprisonment is justified by the Section 3553(a) sentencing factors, including to achieve just punishment for the defendant's serious crimes, to ensure adequate deterrence, and to incapacitate the defendant.

1. Applicable Law

In addition to the Guidelines, which are not mandatory but must be consulted prior to sentencing, a sentencing judge must consider seven factors outlined in Title 18, United States Code, Section 3553(a): (1) "the nature and circumstances of the offense and the history and characteristics of the defendant"; (2) the four legitimate purposes of sentencing, as set forth below; (3) "the kinds of sentences available"; (4) the Guidelines range itself; (5) any relevant policy statement by the Sentencing Commission; (6) "the need to avoid unwarranted sentence disparities among defendants"; and (7) "the need to provide restitution to any victims," 18 U.S.C. § 3553(a)(1)-(7). *See Gall v. United States*, 552 U.S. 32, 50 & n.6 (2007).

In determining the appropriate sentence, the statute directs judges to "impose a sentence sufficient, but not greater than necessary, to comply with the purposes" of sentencing, which are:

- (A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;
- (B) to afford adequate deterrence to criminal conduct;
- (C) to protect the public from further crimes of the defendant; and
- (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.

18 U.S.C. § 3553(a)(2).

2. The Seriousness of the Offense and the Need for Just Punishment Support a Guidelines Sentence

a. The Nature of the Offense

As the evidence proved at trial, Lawrence Ray's crimes were calculated. The defendant arrived at his daughter's college campus and inserted himself into the lives of her college roommates. He cast himself as a father figure and mentor, and built relationships of trust. After the defendant had earned his victims' trust and after he had learned about their particular vulnerabilities, he turned to exploitation. He used his position to degrade his victims, to erode

their autonomy and self-esteem, to isolate them from their families, and to destroy their sense of reality.

The defendant's grooming and exploitation of his victims was deliberate and painstaking. After cultivating his victims' dependence on him, the defendant made a pretense of extending his love and approval only to withdraw it. He alienated his victims from their parents precisely because it left them alone, exposed, and poised for manipulation. When his victims were at their most afraid and unsure, he fed on that fear and self-doubt to enslave them and eliminate any lifeline available to them.

The defendant "unleashed a campaign of terror on his victims." Dkt. 596, Rule 29 Op., at 3. The evidence at trial showed that the defendant studied and collected articles about mind control. (GX 1403 (listing articles found in the defendant's possession, like "Mind Control: The Ultimate Terror," "The Mind has no Firewall," "Cult Membership: What factors contribute to joining or leaving?")). That is what he tried to exercise over his victims. He deployed tactics and mechanisms designed to establish coercive control over his victims, including physical violence, sexual abuse, isolation, indoctrination, gaslighting, emotional abuse, deprivation, economic abuse, surveillance behaviors, and collateral. (*See generally* Tr. 480 *et seq.* (testimony of Dr. Dawn Hughes)). By the time he was finished with them, he had gained total control. As the Court summarized:

He initially befriended [his victims] and then, once they were caught in his snare, he steadily groomed them, turned them into his slaves, forced them to engage in labor for his own benefit and the benefit of his relatives, extorted them, and tortured them. He also sex-trafficked one of his victims[.]

Dkt. 593, Rule 29 Op., at 3. And, for years, the defendant sustained these tactics of abuse and degradation.

b. The Impact on the Victims

It is notable that after learning of his victims' vulnerabilities, the defendant crafted a method of torture uniquely tailored to inflict maximum control and physical and psychological suffering on each.

With Daniel Levin, the defendant exploited what he understood to be Levin's sexual insecurities. The defendant described to others that Levin was "experiencing uncertainty over his sexuality." (Tr. 872:4). The very insecurity that the defendant identified became the focus of his humiliation and abuse. The defendant sought to emasculate Levin. He belittled Levin and mocked his sexuality in front of his peers, forcing him to wear a dress and shove an oversized dildo into his mouth. The defendant photographed Levin in this degrading scenario, memorializing a moment of abject humiliation to display for others. (Tr. 827-828). That was only one incident of horrendous abuse. In yet another, the defendant fashioned a garrote out of tin foil and attached it to Levin's testicles. The defendant then interrogated Levin under the implicit threat of castration,

physically tightening the foil noose whenever Levin answered questions “incorrectly.” (Tr. 829:17-24).

In addition to targeting Levin’s sense of masculinity, the defendant physically abused Levin in group settings with tactics that exhibited the defendant’s total domination of Levin. The defendant attacked Levin by hammering his stomach and pulling his tongue with pliers. While Levin ultimately extricated himself from the defendant’s grasp, the defendant deployed similar tactics of sexual humiliation and domination against others to achieve his unlawful ends. (*See, e.g.*, Tr. 316 (Santos testifying that the defendant held a knife to his genitals); Tr. 896 (Drury testifying that the defendant had her tied up and whipped, and instructed Isabella Pollok to penetrate her with an oversized dildo)).

Santos and Yalitza Rosario were two siblings with a history of mental health struggles. The defendant elicited details about their histories of mental health struggles, only to use that information against them. (Tr. 2078). The defendant turned their depression into a weapon, taunting Santos to jump out the window and blaming Yalitza for her sister’s problems until he pushed her over the brink and Yalitza intentionally overdosed on medication in a Walmart parking lot. The defendant tormented Santos and Yalitza in part by convincing them that they had inflicted harm on people they cared about, like Talia Ray, Felicia Rosario, and the defendant himself.

The defendant turned the Rosarios’ love for their siblings into a tool of abuse. Yalitza described, for example, how Felicia’s condition deteriorated extensively at Pinehurst – where the defendant had his victims engaged in grueling physical labor and she watched the defendant repeatedly physically abuse Felicia. According to Yalitza, Felicia’s demeanor was “childlike, her tone of voice was different from when -- how I knew her as growing up, and her hygiene was not good, and she looked very confused most of the time.” (Tr. 2075:4-7). The defendant blamed Yalitza for Felicia’s condition, which pushed Yalitza into her own emotional decline. She described the effect that this accusation had: “It made me feel very confused, upset, and at one point in Pinehurst I had to emotionally shut down.” (Tr. 2075:22-23). When asked about the effect her time with the defendant had on her, Yalitza answered simply: “It tore my world apart.” (Tr. 2202).

The defendant told Santos, again and again, that he had harmed Talia, his family members, and the defendant. In person and over the phone, the defendant repeatedly insisted that Santos had harmed Talia, required him to write down confessions about it, and berated him when the confessions did not satisfy the defendant. It was a campaign of accusation through which the defendant intentionally wore Santos down, telling him repeatedly that denials and protestations were a kind of dishonesty. Santos described how if he denied harming Talia, the defendant: “[c]alled me a liar; [said] that he didn’t believe me; that he didn’t believe I was being complete, forthcoming.” (Tr. 251:10-11). Those accusations drove Santos to despair: “[i]t made me feel as if I had been untruthful and that I did something wrong.” (Tr. 256).

The defendant’s methods were effective at warping Santos’s sense of reality:

In the beginning I was convinced that if Larry said it wasn’t true, it couldn’t be true because he’s such an honest man, and he’s been my

friend, so I must be confused, and I must be misremembering or I must not want to remember what I did; and then over time that shifted to where if I didn't agree, the conversation would escalate to verbal and physical abuse. (Tr. 274).

The defendant was not satisfied simply to control Santos and his mind. The defendant then pivoted to accusations about property damage. The defendant's unceasing pressure on Santos for his supposed damaging of household items sent Santos to a place of desperation. Not content to bilk Santos for everything he had, the defendant steered Santos to deplete his parents' limited assets too. Fearful that Santos would kill himself if she did not comply, Maritza Rosario gave the defendant, through Santos, more than one hundred thousand dollars. The defendant also persuaded Santos to drop out of college, which cut short Santos's otherwise promising academic and professional trajectory.

Felicia Rosario was a young woman with a promising medical career ahead of her. The defendant transformed her into a shell of herself. In Pinehurst, the Harvard graduate was babbling and incoherent as the defendant berated her and slammed her to the floor. She arrived in New York with romantic aspirations, and soon found herself locked out of the apartment and commanded to have sex with strangers on film. The defendant's mercilessness served no apparent financial end, but he was relentless in destroying Felicia's self-worth, her womanhood, and her bright future.

The defendant's threats to Felicia aimed at Felicia's desire to return to medicine, conveying that he could, and would, prevent her from doing that. As Felicia testified: "He often talked about all of his relationships, that he even knew Dean Goldman at Columbia, he knew the presidents of all the hospitals in New York City, so he was going to call them and use whatever influence he had to make sure that I never worked as a doctor." (Tr. 1550:5-9). He used her achievements against Felicia – requiring her to wear her medical school graduation cap as he humiliated her. In one video, Felicia is recorded wearing her graduation cap while the defendant's voice is audible in the background. (GX 2122). Felicia explained that she was wearing the graduation cap, something the defendant did on multiple occasions (Tr. 1482:16), while he insulted her.

The defendant's insults were particularly calibrated to wound the victim, to erode whatever remaining pride or sense of self they retained. Felicia recalled some of his insults: "Like, 'some doctor,' 'this is what a Columbia grad does?' 'This is what a Harvard graduate does?' Like, 'you're not a doctor at all.'" (Tr. 1482:11-13). Other people participated in Felicia's abuse, at the defendant's invitation. "[H]e would tell anyone else who was in the apartment with us to go ahead and make fun of me with him and to participate in the humiliation." (Tr. 1482:18-20). The group dynamic amplified the defendant's abuse, destroying their relationships with each other and further isolating the victims. The defendant's insults were effective at destroying Felicia's confidence and sense of self, as he undoubtedly knew and designed them to be. "I felt completely humiliated, degraded, debased, like I was -- like I was nothing, like I was really just -- like I was something, not even someone; like worthless."

With Claudia Drury, the defendant's grooming was a years-long project, taking advantage of her impressionable and self-exacting nature. The defendant met Drury when she was a 19-year-

old college sophomore with an interest in math and a plan to take the LSAT. Had the defendant suggested to her then that she become a prostitute, she would have been horrified. But he bided his time. For years, the defendant methodically eroded Drury's self-esteem, self-respect, sexual autonomy, familial support system, and sense of reality, and gradually moved the line of deviancy inch by inch until Drury found herself submitting to horrendously painful acts of BDSM. (Tr. 489 (Dr. Hughes testimony describing the line of deviance, and how perpetrators "slowly desensitize the victim to more extreme forms of sexual behavior")). At the time Drury and the defendant met, Drury was "uncomfortable" in her body and sexually insecure. (Tr. 723). The defendant was quick to begin sexually grooming his daughter's friend. Drury described the defendant touching her body, encouraging her to have sex with Daniel Levin in his presence, directing her to masturbate, and telling her to have sex with a married tools salesman in his truck. (Tr. 722-23, 750-51). The defendant belittled Drury for being sexually inhibited (Tr. 871-72), subjected her to BDSM (Tr. 896), repeatedly suggested that she try sex clubs to become more sexually liberated (Tr. 884), and positively reinforced her behavior as she became more sexually experimental (including by collecting photos of her bruised body, Tr. 897), at a time when he otherwise exhibited only disapproval of her (Tr. 885-87).

In parallel with grooming Drury sexually, the defendant physically threatened and psychologically tormented her. Among other things, the defendant forced Drury to labor in Pinehurst; Drury lost 40 pounds during that period, she worked outside during thunderstorms and with limited food and sleep, and she labored while the defendant physically abused her and others, and accused her of constant sabotage. (Tr. 860-63). Reflecting on her time there, Drury recalled being "starving and hungry, and completely, completely overwhelmed by the chaos of the situation," which included Felicia "deteriorating psychologically before my eyes everyday," the "whole thing was insane, and I did not feel at all that I had any ability to leave whatsoever." (Tr. 866). The accusations of sabotage in Pinehurst progressively gave way to the defendant blaming Drury for an elaborate poisoning scheme against the defendant and his family, to which Drury was made to confess again and again. (*See, e.g.*, Tr. 873-78). Using graphic imagery, the defendant convinced Drury that she would suffer a terrible fate in prison for her crimes and left her feeling so hopelessly "trapped" that she attempted suicide. (Tr. 881-82). The sexual grooming and the psychological abuse went hand in hand: Drury submitted herself to BDSM that involved physical harm that was "quite severe" (Tr. 887-94) because the defendant encouraged it and she had "buil[t] up a lot of self-hate that [she] had no outlet for" (Tr. 895). By 2014, when the defendant "suggested" Drury work as a prostitute to repay her debts and to avoid prison, he had therefore already—through his well-honed playbook of coercive control—eliminated the barriers of resistance and convinced Drury that her body and mind were worthless because she was a lying, murderous poisoner.

The trial evidence left no doubt that Drury worked as a prostitute because the defendant coerced her to do it, and that this period of her life was nightmarish. In addition to the daily degradations of having sex for money during most of her waking hours, Drury described being choked, robbed, forced to administer oral sex for hours on end, and being offered money to have sex in a hotel room in the presence of a one-year-old child. She testified about physically painful sexual experiences and a client who smoked crack during their appointments. (Tr. 1239-40). She explained that she endured these traumatic experiences because the defendant relentlessly

pressured her to earn money and made a variety of threats to ensure her continued obedience and prostitution. Drury summarized some of the threats:

He would threaten to blackmail my clients. He would threaten me physically. He would threaten to put me in prison because I wasn't even trying to make repairs for this horrible crime. A lot of the time he—on several occasions he would tell me—he literally said, We are dying, Claudia. Referring to the people I had poisoned.

(Tr. 1007).

The defendant not only convinced Drury that she should go to prison, but also that her soul would be beyond repair if she did not satisfy his endless thirst for more money. (Tr. 903; Tr. 936 (the defendant told Drury that “if he stopped accepting [her] repairs . . . [her] soul would deteriorate for everything that [she] had done” and she would not be “able to make amends for it”)). He flogged her with BDSM props (Tr. 910-11), destroyed her belongings (Tr. 925), instructed her to have sex with Isabella Pollok (Tr. 928), interrogated her for hours (Tr. 934-38), blackmailed her with a website in her name (Tr. 938-40), and incited her to develop, and then mocked, her “horrific binge bulimia eating disorder” (Tr. 943). Among other names, he called her “fat,” “deformed,” a “criminal,” a “murderer,” a “liar,” and a “poisoner.” (Tr. 1011). And he interspersed his threats with merciless violence. (*See, e.g.*, Tr. 1014-16). That violence culminated at the Gregory Hotel when the defendant targeted Drury for a night of torture and humiliation. As Drury told the jury, over the course of 7 to 8 hours, the defendant tied her naked to a chair, suffocated her multiple times with a plastic bag, smothered her with a pillow, threatened to waterboard her, and choked her to the point of passing out with a leash and collar. (Tr. 1033-34). This incident epitomized the depraved and brutal nature of the defendant’s treatment of his victims. As Drury gasped for air, he accused her of being overdramatic and a faker, even as he threatened to kill her. (Tr. 1037). Drury internalized the violent directive to make more money and returned to work within hours. Within a day of their vicious assault, the defendant and Pollok spent hundreds of dollars in cash on a shopping spree. (GX 1624 at 133-134 (cash receipts from October 17, 2018 for approximately \$415 from UGG store, and approximately \$497 from Paige)). Over the course of the defendant’s sex trafficking, she provided the defendant approximately \$2.5 million.

These examples of abuse are staggering but provide a glimpse of an existence that was truly beyond comprehension. Even a four-week trial provided only a snapshot of conduct that his victims experienced daily and over years. For every incident captured, the victims recalled many more similar experiences, more abuse, more humiliation. What did become clear through the trial evidence is that the defendant’s capacity for cruelty towards his victims was limitless. His victims are still struggling with the scars of what they endured. (*See Ex. C, Victim Impact Statements*).

c. The Defendant’s Motives

Part of the defendant’s motive was profit. He collected tens of thousands, and then hundreds of thousands of dollars from the Rosarios. When he finally succeeded in trafficking Claudia Drury as a high-end escort on a nearly 24/7 basis, he lost interest in Santos Rosario, and focused his efforts on extorting Drury for millions of dollars. When Drury ran away, he set his sights back on Santos, once again using him as a source of income.

But greed alone does not explain the defendant's unspeakable conduct. He also enjoyed being cruel. It is obvious, for example, that his victims, without any experience with physical labor or construction equipment, had no real chance of making productive financial improvements to the property in North Carolina—and yet the defendant forced them to toil senselessly under punishing conditions for weeks on end simply to revel in their Sisyphean struggle. When his victims expressed anguish or guilt, he feigned sympathy and twisted the knife in deeper. He baited his victims to attempt suicide and then stymied their recoveries, while pretending to be the only one concerned with their wellbeing.

For this reason, any supposed explanation from the defense that the defendant believed he was being poisoned rings deeply hollow. The evidence demonstrated that the defendant manufactured accusations against his victims to control them—and he escalated those accusations in step with the advancement of his scheme. Regardless, no purported belief—however strong—in a poisoning plot could ever justify the defendant's sustained, coldhearted destruction of his victims' lives. The defendant's silence on this score is damning, indefensible, and entirely unexplained by his mother's supposed experiment in baking with ex-lax.¹

The defendant collected trophies from his reign of terror. As corroborated by the numerous photographs, videos, and audio recordings introduced at trial, the defendant documented his sexual, physical, and psychological abuse of his victims. The documentary evidence proved what otherwise sounded too nightmarish to be real, or that which was too painful for the victims to recall and to relive: among other things, the defendant twisting Daniel Levin's tongue with pliers, the defendant crushing Felicia Rosario with his body while she writhed on the floor or sending her to engage in degrading sexual escapades with strangers, Claudia Drury with a welt on her forehead after the defendant whipped her with a crop, and the defendant directing Santos Rosario to slap himself over and over again in the face. The defendant preserved these episodes to further extort and threaten his victims, and to cement his control over them. But the sheer volume of material he amassed suggests that he derived sadistic pleasure from the misery and degradation of his victims.

The defendant requests a sentence of 15 years, the mandatory minimum for the sex trafficking count, and a significant departure below the Guideline sentence. Such a sentence would not reflect the particularly cruel and sustained nature of his sex trafficking conduct, which involved a sociopathic plot to turn a promising college student into his highly profitable slave. The sex trafficking alone demands a sentence far above the mandatory minimum. And such a sentence would not address or account for the racketeering conspiracy, the extortion, the forced labor, the money laundering, and the financial crimes, or the pain and trauma that the defendant caused to his other victims. A 15-year-sentence would be wholly inadequate to reflect the seriousness of the offense and provide just punishment.

Drury described at trial the lasting damage inflicted by the defendant:

¹ The Government has interviewed both Martha Ray, who indicated that she did not know whether Ingrid Ray had, in fact, put anything in the cupcakes, and Carl Ray, who has no recollection of the incident. *See* Ex. A, B.

[The defendant] has severely damaged my life and my ability to think, my ability to interact with people, my ability to believe in the good in the world. I am in debt that I have no way to pay back. My credit score is very low. I can't really hold down a job, normal job. I have to live with and try and reconcile with, you know, having been a prostitute for many years and all of the experiences I had, not to mention all the publicity.

(Tr. 1237-38). As Drury's words illustrate, the defendant's campaign of terror—uniquely tailored to each victim's vulnerabilities—was utterly, devastatingly effective. This is made most clear in the spate of suicide attempts by his victims while enduring his abuse. He brought his victims to such despair that they tried to end their lives, including Felicia hospitalized in Washington DC in the fall of 2012 (GX 545), Yalitza hospitalized in Pinehurst in 2013 (GX 542), Santos hospitalized in New York in February 2014 (GX 1401), Drury hospitalized in New York in April 2014 (GX 540), and Yalitza hospitalized in New York also in April 2014 (GX 539). The defendant treated the victims' suicide attempts as another kind of collateral—something to be catalogued and used against them at an opportune moment. Even from jail, the defendant was instructing his associates on the outside to gather what he saw as helpful material, including tallying his victims' suicide attempts. (*See* GX 702-T (“Then I want to also know- we need to build like a chronology. When was Dan at the apartment? When was Claudia at the apartment? Santos, Yali, so on, okay? [...] And then also we wanna- how many suicides were there between the three of them- attempts?”)).

With the defendant's arrest and conviction, his victims are left to sort through the wreckage and reckon with the lasting damage from the defendant's crimes. But one victim has no prospect of rebuilding a life. Iban Goicoechea, one of the students over whom the defendant asserted control, committed suicide in May 2020. While the precipitating cause is unknown, around the time of his suicide, Goicoechea was still in touch with the defendant and convinced—as other victims were at the time of their suicide attempts—that the defendant was a positive influence on his life. It is plain that the defendant harmed Goicoechea and exploited his mental health vulnerabilities, just as he did with his victims who were able to put their experiences into words on the stand. Santos and Drury testified about an incident when the defendant threatened Goicoechea with a sharp object to his throat as a supposed therapeutic intervention that involved requiring Goicoechea to disavow his parents. (GX 3001). The defendant treated the incident as if he had done Goicoechea a service and “freed iban from the web of hate and anger that his mother created.” (*Id.*) The incident illustrates the very same tactics described by testifying victims: isolation that involved villainizing family members, physical violence, threats, and deprivation.

d. Comparable Cases

There are few comparable cases where a defendant's conduct is as calculated, as brutal, as sustained, and as effective.

One similar case is NXIVM leader Keith Raniere in the Eastern District of New York. Raniere was convicted after trial of offenses including racketeering conspiracy and sex trafficking, and continued to show no remorse through the time of sentence. Raniere, too, groomed victims, gained control over their lives, and, with the help of a loyal inner circle, then exploited that control for his own ends. He received a sentence of 120 years, effectively, a life sentence. *See United States v. Raniere*, 18 Cr. 204 (NGG).

3. A Guidelines Sentence is Necessary to Afford Adequate Deterrence

The defendant's conduct in this case, both for what he did and for how long he did it, shows an acute need for specific deterrence, particularly because he has not accepted responsibility for his crimes. The need for deterrence is also made clear by the defendant's prior conduct, which demonstrates that his crimes of conviction are an outgrowth of a pattern of abusive behavior.

The defendant has a history of using violence, abuse, and deceit to victimize others. He has followed the same playbook, going back for years. For example, as proffered in pre-trial briefing, long before the charged conduct, the defendant used sexual abuse, physical violence, and financial exploitation to dominate women with whom he had relationships, including Teresa Ray, his ex-wife, and Valerie Lederman, an ex-girlfriend. With Teresa, the defendant used physical violence and degradation, including banging Teresa's head into a cabinet requiring stitches, choking her during a fight, and throwing food at her during a fight, which he then required her to clean up naked. As noted in the PSR, Teresa has an active restraining order against the defendant. (PSR ¶ 123). With Lederman, the defendant used physical violence, sexual abuse, isolation, and collateral. The defendant isolated her from other sources of support, brought strangers home and instructed her to have sexual encounters with them, and then used these encounters as leverage against her. Against this backdrop, the defendant asked Lederman for money, borrowed money from her father, and then later threatened to never repay her father and to destroy her. In one encounter, the defendant held her in a choke-hold position. As noted in the PSR, Lederman has an active restraining order against the defendant. (PSR ¶ 122).

The defendant's criminal history also includes a pattern of fraud, deceit, and disregard for the judicial system that echoes in the present offense conduct. The defendant was convicted of conspiracy to commit securities fraud in 2001. (PSR ¶ 116). Between December 2005 and January 2006, the defendant had a variety of violations while he was on supervised release, including failing to provide requested documentation to the probation office, possessing ammunition and the barrel of a rifle, and leaving the district without permission, which led to the imposition of a six-month sentence. (*Id.*) In February 2007, the defendant was accused of still other violations while on supervised release, with the supervising officer reporting that the defendant has "proven himself to be uncooperative with the simplest of conditions." A warrant issued and the defendant was apprehended by the U.S. Marshals after resisting arrest and using his daughter as a human shield. (*Id.*)

The defendant has violated other court directives, which resulted in a contempt charge for violation of a restraining order in 2005 (PSR ¶ 117), interference with custody and a contempt charge in 2010 for failing to abide by a court order regarding custody of his two daughters (PSR ¶ 118), and a bail jumping charge in 2008 in the same incident described above in which he wielded his daughter as a human shield (PSR ¶ 119). He evidently believes himself to be above the law, brazenly indifferent even to those court orders directed specifically to him.

Finally, it is worth noting that the defendant had a series of medical episodes during trial that caused substantial interruptions and threatened a mistrial. Drury, in particular, remained on the stand from March 18, 2022 through March 25, 2022. At least one doctor observed that aspects

of the defendant's presenting symptoms were inconsistent with "legitimate medical causation," and, in other words, fake. Dkt. No. 561. These mid-trial interruptions came after the defendant sought to delay the trial by, as this Court found, causing a rupture of his relationship with counsel shortly before trial began. (Tr. 964:16-23.) This conduct was consistent with his actions in prior judicial proceedings. The defendant used claims of illness to obtain delays in his sentencing in his criminal case in EDNY, to delay his testimony as a witness in a Bronx criminal trial, and when he delayed a deposition in a civil proceeding in New York Supreme Court in which he was the plaintiff. Dkt. 557. The defendant's use of claims of physical illness to manipulate the pace of judicial proceedings is well-documented and further illustrates his disregard for the courts.

4. A Guidelines Sentence is Necessary to Protect the Public

The defendant has shown a total lack of remorse for his conduct. The defendant's submission nowhere mentions the defendant's victims, the abuse that he inflicted upon them, or the trauma that they are still trying to overcome. Its silence on this score is telling. To the extent it reflects the defendant's inability to reckon with what he has done, it serves as a warning that the public would not be safe were the defendant to be released.

The defense submission focuses on the defendant's beliefs that he was poisoned, his difficult childhood, and an allegation that the defendant was the victim of sexual abuse by his maternal grandfather. (PSR ¶133).

The defendant's supposed belief that his victims poisoned him does not withstand scrutiny and flies in the face of his actual behavior. The defendant kept his supposed poisoners close, shared space, and shared meals. He never—in any of the audio or video recordings that he captured—showed even a flash of fear. He deployed accusations when convenient, when profitable, and regardless of their plausibility. And finally, he monetized these accusations as a way to profit off of his abuse. The legitimacy of his beliefs is debunked by the greed and opportunism with which he promulgated them. His accusations became a basis for claimed damages, and the claimed damages only grew. He received millions of dollars from Drury and kept meticulous ledgers about her payments towards an unlimited, unshrinking debt. He spent the money on fancy hotels, construction equipment, and other luxury goods—but the ledgers and receipts showed no significant spending on medicine or medical treatment. He wielded accusations when and where they were most profitable—for example, renewing claims against Santos after several years of absence and only after Claudia had escaped his control and he had lost his source of proceeds. (See Tr. 1709:1-5 (Felicia describing the defendant returning to Santos as a source of funds only after Claudia escaped)).

With respect to the defendant's claims of childhood abuse, there is no way to corroborate this account. The defendant does not recall whether he disclosed the sexual abuse to anyone. (PSR ¶133). That, of course, is not dispositive, but given the defendant's flexible approach to the truth and his habit of lodging accusations of terrible sexual or physical abuse against others, his statements about his own childhood experiences cannot simply be taken at face value. Where it suits his ends, the defendant has demonstrated no compunction about accusing other individuals of terrible sexual or physical violence. He used allegations of sexual abuse to try to obtain custody of his children, falsely accusing his ex-wife, his ex-wife's father, and his nephew of sexually

abusing their daughter. (*See Ex. A*). He convinced Felicia that she was sexually abused as a child, and similarly convinced his other victims that they had been abused, neglected, or mistreated by their parents. The defendant has a long history of wielding accusations where it suits him without regard to the truth.

No person is deserving of sexual abuse. By the same token, whatever the defendant's childhood experience, the trial evidence shows that he inflicted abuse that far surpasses that which he now claims to have experienced, and against innocent teenagers and young adults who he forced into his path. The defendant shows absolutely no sympathy and expresses no contrition for the experience of his victims, despite asserting that he was personally damaged by sexual abuse. The Final Presentence Report notes that the defendant "brutally traumatized these victims over a period of years," but still blames his victims, as if they bear responsibility for the harm that he inflicted upon them. "The defendant took this case to trial and does not appear to have shown any remorse. In fact, he appears to continue to blame the victims for poisoning him." (PSR at p. 46). The harm that the defendant inflicted upon others and his inability to accept responsibility or express contrition show that incapacitation is an overwhelming consideration. Nothing less than life imprisonment would assure the safety of the community.

The defendant's prior experience on supervised release, and his repeated violations of court orders also show that community supervision would be ineffectual. His prior probation officer, following his fraud conviction in EDNY, observed that the defendant has "proven himself to be uncooperative with the simplest of conditions." (PSR ¶ 116). There is no reason to think the defendant will abide by the restrictions of his supervision given his track record. There is no reason to think he has changed, and every reason to think that his brazen disregard for the law and the community continues through the present.

An adult man perpetrated unspeakable harm over a period of years. Unfortunately, the defendant's treatment of his victims had a prelude in his mistreatment of his ex-wife and his ex-girlfriend. It was also echoed in his treatment of the many others that had the misfortune of crossing his path during the charged conspiracies. During his extended course of criminal conduct, the defendant took advantage of and used many others, like Cleo Beletsis whom he tried to con out of her Riverside Drive apartment and Lee Chen, whom he did force out of the Upper East Side apartment where Ray and his victims resided. But no one, not even the defendant's own children, have been spared from the defendant's abusive and self-serving conduct. The defendant convinced Talia Ray, his daughter and co-conspirator, that her own mother had abused her. He used her as a human shield to avoid arrest when she was just a teenager. The defendant then enlisted her in the abuse, extortion, and forced labor of her own college roommates.

The defendant was also convicted of a racketeering conspiracy and of leading a criminal enterprise. There is particular danger posed by a defendant who is able to indoctrinate others, recruit them into his belief system, and deploy them as his tools in victimizing others. This was chillingly exhibited in the evidence at trial, which included recordings in which Pollok and Talia laugh and joke at their former roommates are humiliated and threatened. (*See GX 4175* (Talia laughing as she tells Santos that he could go to jail for life as a violent criminal; Pollok being instructed to make a recording)). The defendant's recruitment of his co-conspirators and his

unique power to create an enterprise that carried out his criminal directives, further demonstrates the real and constant danger that the defendant poses.

Furthermore, given the manner in which the defendant inflicted his harm and his demonstrated ability to wield psychological tools to establish coercive control, the defendant's age does not provide any reassurance that the defendant's crimes would stop. The defendant is 63 years old, and defendant embarked upon this campaign of terror when he was already in his 50's. His relatively advanced age offered no protection to his victims here; indeed, he used his age to insinuate himself into his victims' lives as a mentor and figure of authority. A sentence at the mandatory minimum would return the defendant to the community in his early 70's, and there is every reason to believe that the defendant would return to the violence and exploitation and fraud in which he has so consistently engaged. Even a longer sentence would not adequately assure the safety of the community. The Probation Office's recommendation of a 300-month sentence purports to "recognize the defendant's age, health, and difficult upbringing." For the reasons described above, the Government disagrees that the defendant's self-serving account of his health conditions and difficult upbringing should be accepted without scrutiny. But more troublingly, the defendant committed this conduct while in his 50's, suggesting that advanced age did not and will not stop continued criminal conduct. There is every reason to conclude that he will not age out of his potential and capacity for violence and victimization. Indeed, the defendant deployed his own father, while in his 80's, to deliver threats against Felicia Rosario after his arrest and to demand her continued loyalty. (GX 1685). Even while incapacitated, even when relying on elderly people, the defendant has found a way to abuse and exploit others. Only lifetime incarceration will protect the public and send the appropriate message to the defendant and others who would commit similar offenses about the consequences of such conduct.

II. Forfeiture and Restitution

The Government has attached a proposed Order of Forfeiture and a proposed Order of Restitution to the victims of his crimes. In addition to the proposed Order of Restitution, the Government requests that the defendant be ordered to pay \$761,276.26 to the Internal Revenue Service ("IRS") as a condition of any term of supervised release specifying that, consistent with 18 U.S.C. §3664(i), restitution to all nonfederal victims will take precedence over restitution to the United States.

A. Forfeiture

With respect to forfeiture, the Government is seeking a money judgment in the amount of \$2,444,349, and to forfeit the following specific property: (i) the proceeds from the sale of the defendant's GoDaddy portfolio and (ii) the residence at 4 Scarborough Place, Pinehurst, North Carolina, 28374 (the "Pinehurst Property").

As the Court is well aware, "[c]riminal forfeiture statutes empower the Government to confiscate property derived from or used to facilitate criminal activity. Such statutes serve important governmental interests such as separating a criminal from his ill-gotten gains, returning property, in full, to those wrongfully deprived or defrauded of it, and lessen[ing] the economic

power of criminal enterprises.” *Honeycutt v. United States*, 137 S. Ct. 1626, 1631 (2017) (citation and internal quotation marks omitted).

The forfeiture statutes at issue here authorize a money judgment representing the proceeds of the subject offense. *See, e.g.*, 18 U.S.C. § 981(a)(1)(C) (describing “property . . . which constitutes or is derived from proceeds traceable to” the crimes charged”); 18 U.S.C. § 982(a)(2) (“The court, in imposing sentence on a person convicted of a violation of, or a conspiracy to violate— (A) section . . . 1344 of this title, affecting a financial institution, . . . shall order that the person forfeit to the United States any property constituting, or derived from, proceeds the person obtained directly or indirectly, as the result of such violation.”); 18 U.S.C. § 1963(a) (a defendant convicted of racketeering conspiracy must forfeit “any property constituting, or derived from, any proceeds which the person obtained, directly or indirectly, from racketeering activity”); *see also United States v. Peters*, 732 F.3d 93, 101-102 (2d Cir. 2013) (holding that proceeds forfeitable under Section 982(a)(2) are the gross receipts of the offense, not merely the profits); *United States v. Gotti*, 459 F.3d 296, 347 (2d Cir. 2006) (defendant liable for forfeiture of all proceeds he received from racketeering enterprise under § 1963(a)(3), even from predicates to which he did not agree).

Where forfeiture is sought in the form of a personal money judgment, the district court “must determine the amount of money that the defendant will be ordered to pay.” Fed. R. Crim. P. 32.2(b)(1)(A). The court’s determination “may be based on evidence already in the record,” Fed. R. Crim. P. 32.2(b)(1)(B), “including testimony at the earlier trial” *United States v. Mathieu*, No. --Fed. Appx.--, 2021 WL 1783122, at *3 (2d Cir. May 5, 2021) (internal quotation marks omitted). The “calculation of forfeiture amounts is not an exact science. “[T]he court need not establish the loss with precision but rather need only make a reasonable estimate of the loss, given the available information.” *United States v. Treacy*, 639 F.3d 32, 48 (2d Cir. 2011) (quoting *United States v. Uddin*, 551 F.3d 176, 180 (2d Cir. 2009)). A court “may make reasonable extrapolations from the evidence established by a preponderance of the evidence at the sentencing proceeding.” *Treacy*, 639 F.3d at 48. As “an aspect of sentencing,” *Libretti v. United States*, 516 U.S. 29, 49 (1995), forfeiture amounts are determined by a preponderance of the evidence, *United States v. Capoccia*, 503 F.3d 103, 116 (2d Cir. 2007).

As reflected in the PSR, a conservative loss amount based on the trial evidence is \$2,444,349. (*See* PSR ¶¶ 35, 74). The proposed forfeiture order is amply supported by the trial evidence, which established that:

- Between 2016 and 2019, the defendant obtained at least **\$2,029,821** from Claudia Drury in cash. (*See* GX 1422). That amount is drawn from ledgers maintained by the defendant and Isabella of the cash pick-ups, and does not include money that Claudia transferred to them by other means, such as wire transfers and payments to GoDaddy.
- With respect to 2016, the ledger of cash deposits only included approximately two months (or a total of \$84,140). (GX 1422). A total of \$242,236 was deposited into Pollok and Felicia Rosario’s bank accounts that same year. (DX C29). Accordingly, the defendant received at least an additional **\$158,096** into Pollok and Felicia’s accounts, which, as

established at trial, were under his control.

- Claudia paid **\$13,432** into Ray's GoDaddy in the fall of 2017.
- Ray received at least **\$53,000** in wire transfers from clients into Pollok's bank accounts. (GX 1404 at 9 (\$40,000 from Kenneth Mumma), and at 10 (\$14,650 in Transfers from Clients)).
- Claudia also made some direct wire transfers to Pollok, such as **\$2,000** into Pollok's account in June 2018. (See GX 1404 at 8).
- Maritza Rosario testified that she gave her children, Santos, Yalitza, and Felicia, approximately **\$150,000** for the defendant through approximately 2014, when she lost contact with her children.
- Santos Rosario paid the defendant approximately **\$40,000** between May 2019 and June 2020. (Gx 1404 at page 13.)

As the evidence at trial established, the sex trafficking of Drury constituted a predicate crime of the racketeering conspiracy, and the sex trafficking proceeds also constituted proceeds of the defendant's extortion scheme, which further encompassed the extortion of the Rosario family. Thus, \$2,444,349 is a conservative forfeiture estimate for Count One, *see* 18 U.S.C. § 1963, and Counts Two and Three, *see* 18 U.S.C. §§ 981(a)(1)(C) and 2461(c). (*See* PSR ¶ 35). \$2,254,349 is a conservative forfeiture estimate for Counts Four and Five, *see* 18 U.S.C. § 1594, and Count Eleven, *see* 18 U.S.C. 982(a)(1). (*See* PSR ¶ 35). The defense does not appear to dispute the loss amount. (*See* PSR ¶¶ 35, 74).

In addition, the Pinehurst Property is subject to forfeiture as a result of the defendant's convictions on Counts One (racketeering conspiracy) and Six through Eight (forced labor crimes). The racketeering statute and the Trafficking Victims Protection Act of 2000 (the "TVPA") provide for the forfeiture of real property used to facilitate racketeering and forced labor, respectively. *See* 18 U.S.C. § 1963(a)(2)(D) (providing for forfeiture of "any . . . property . . . affording a source of influence over any enterprise"); 18 U.S.C. § 1594 (e)(1)(A) (providing for forfeiture of "[a]ny property, real or personal, involved in, used, or intended to be used to commit or to facilitate the commission of any violation of this chapter, and any property traceable to such property"); *see also United States v. Rudaj*, No. 04 CR. 1110 (DLC), 2006 WL 1876664, at *3, *5 (S.D.N.Y. July 5, 2006) (forfeiting restaurant based on proof that it gave defendant influence over racketeering enterprise); *United States v. Sabhnani*, 599 F.3d 215, 262-63 (2d Cir. 2010) (affirming forfeiture of real property used to facilitate trafficking); *see also United States v. Davis*, S3 07 Cr. 11 (JCH) (D. Conn) (ordering forfeiture, pursuant to 18 U.S.C. § 1594(b), of a two-story residence used by defendant to house girls whom he physically and sexually abused and forced into prostitution). Given the overwhelming trial evidence proving that the Pinehurst property was used in the defendant's forced labor crimes, both to house the victims and as the location and object of their unpaid labor, the Government is seeking its forfeiture.

B. Restitution

With respect to restitution, the Government is seeking restitution in the total amount of \$5,398,125.32. We are seeking the following: (i) entry of a proposed Order of Restitution, with

\$4,636,849.06 to be paid to the victims identified in its Schedule of Victims²; and (ii) inclusion of \$761,276.26 of restitution to the Internal Revenue Service (“IRS”) as a condition of any term of supervised release. (*See* Ex. D (calculations of IRS Revenue Agent Valerie Catanzaro)).

With respect to the proposed Order of Restitution, five victims have submitted detailed restitution statements outlining the losses they have suffered. Relevant to their claims are two restitution statutes. First, the TVPA provides for mandatory restitution for “the full amount of the victim’s losses” for crimes including sex trafficking and forced labor offenses. 18 U.S.C. § 1593(b)(1). Under the TVPA, victims are entitled to full compensation for “any costs incurred, or that are reasonably projected to be incurred in the future, by the victim, as a proximate result of the offenses involving the victim,” including “medical services relating to physical, psychiatric, or psychological care,” “lost income,” and “reasonable attorneys’ fees.” *Id.* §§ 1593(b)(3), 2259(c)(2).

Second, the Mandatory Victim Restitution Act of 1996 (“MVRA”) requires that defendants convicted of certain crimes, including crimes of violence or offenses against property that cause a “physical injury or pecuniary loss” to “an identifiable victim,” “make restitution to the victim of the offense.” 18 U.S.C. § 3663A(a)(1), (c). Under the MVRA, victims of offenses “resulting in bodily injury” are entitled to recover the costs of medical care and “related professional services” relating to mental health care, the costs of “necessary physical and occupational therapy and rehabilitation,” and lost income that resulted from the offense. *Id.* § 3663A(b)(2). The MVRA applies to racketeering conspiracy and extortion and extortion conspiracy.

With respect to determining the amount of restitution, the Court need only make a reasonable estimate, based on available evidence, of the amounts to be forfeited and repaid to victims. *United States v. Gushlak*, 728 F.3d 184, 195-96 (2d Cir. 2013) (“reasonable approximation” for restitution “will suffice, especially in cases in which an exact dollar amount is inherently incalculable” (internal citations omitted)). In evaluating restitution claims, the court recognizes that “the Government bears the burden of proving a victim’s actual loss by a preponderance of the evidence.” *United States v. Finazzo*, 850 F.3d 94, 117 (2d Cir. 2017). Both statutes make restitution mandatory.

Here, the restitution statements catalogue the types of losses suffered by the victims, for which they are entitled to mandatory restitution. In the event that the defendant wishes to litigate the restitution claims of the victims, the Government requests that the Court proceed with sentencing on January 20, 2023 and set a schedule for briefing on restitution within the 90 days allowed by statute. *See* 18 U.S.C. § 3664(d)(5) (permitting Court to defer restitution order for up to ninety days following a defendant’s sentencing proceeding).

III. Conclusion

For the reasons set forth above, the Government respectfully requests that the Court impose

² Consistent with 18 U.S.C. §§3771(a)(8) & 3664(d)(4) and Federal Rule of Criminal Procedure 49.1, to protect the privacy interests of the victims, the Government is requesting that Schedule A to the Proposed Order of Restitution be filed under seal.

a Guidelines sentence of life imprisonment, as such a sentence would be sufficient but not greater than necessary to serve the legitimate purposes of sentencing.

Respectfully submitted,

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FEDERAL BUREAU OF INVESTIGATION

Date of entry 01/09/2023

MARTHA RAY (MARTHA), [REDACTED]
[REDACTED]. After being advised of the identity of the interviewing Agent and the nature of the interview, MARTHA provided the following information:

MARTHA advised that recently an attorney for LAWRENCE RAY (LARRY) contacted her and asked a few questions about LARRY. The attorney discussed drafting a letter of support for LARRY addressed to the court with regards to his upcoming sentencing. MARTHA advised that she did not draft the letter. The attorney's would draft the letter based on her responses to their questions because MARTHA was busy as of lately and did not have the time to write it herself. The attorneys indicated to her that they would submit the letter to the court. MARTHA did relayed that defense counsel was supposed to also provide her a copy of the letter via email for her to check it for accuracy but she had not seen the letter to date.

MARTHA dated LARRY's brother CARL RAY (CARL) for approximately three (3) months before they decided to get married. They were married in 1984 but MARTHA could not recall the exact date. Prior to their wedding, MARTHA described CARL and LARRY's mother INGRID RAY (INGRID) as a "distinguished lady" but MARTHA relayed that she was not accustomed to some of things that INGRID did. When asked for clarification, MARTHA recalled a time when LARRY had purchased a Mercedes car. To MARTHA, it seemed like LARRY wanted INGRID's approval on the new vehicle. When LARRY brought the vehicle over to the home, MARTHA would not go outside and look at it. There was another instance during the summertime when LARRY was "juicing" and had lost some weight. When LARRY arrived at the residence, everyone was standing outside. MARTHA described that INGRID went towards LARRY's car and acted as if LARRY was not standing there. She started saying things like I'm waiting for my son to arrive. Suddenly she acknowledged LARRY and said "Oh my God, if thats what juicing does, I don't want any part of it." MARTHA felt that in both instances, INGRID should have just acknowledged LARRY's purchase or the fact that he had lost some weight and looked well.

MARTHA relayed the day before her wedding, INGRID made cupcakes for her former husband, LAWRENCE GRECCO (GRECCO). At the time, MARTHA and CARL were

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living with INGRID. MARTHA articulated that INGRID indicated she wanted MARTHA and CARL to deliver cupcakes to GRECCO. INGRID snickered and said that she put Ex-Lax in the cupcakes. MARTHA did not witness INGRID put Ex-Lax in the cupcakes. MARTHA was asked why INGRID would go to such lengths to cause harm to GRECCO and she responded " I guess she just didn't like him," MARTHA speculated that INGRID wanted GRECCO to miss the wedding but could not give a reason why. When MARTHA was asked what CARL's reaction was to INGRID's admission about the cupcakes, MARTHA said " I think he didn't do anything because she gave him money and bought him corvettes." MARTHA was also asked why she delivered the cupcakes if she believed INGRID was purposely causing GRECCO to get sick. MARTHA relayed that she was not sure why she went along with it. She stated, "You wonder if that's even true, she could have been joking." MARTHA emphasized that she did not know for a fact that INGRID put Ex-Lax in the cupcakes.

MARTHA also recalled that INGRID talked about "JESSE" who was a carpenter that did odd jobs around INGRID's home. INGRID had been friendly with JESSE's wife who was named "LAVERNE" or "ROBERTA." MARTHA described that INGRID said "He thinks he's always looking good." INGRID mentioned that JESSE had hair plugs. INGRID thought that JESSE may have been having an extramarital affair. MARTHA relayed that INGRID chuckled and said that JESSE was getting fat and noted that she was putting something in the food she fed JESSE. When asked, MARTHA noted that INGRID did not specifically name anything that she was putting in the food. MARTHA was not sure it was something that could be considered poisoning. MARTHA believed it was possible INGRID put a vitamin in the food that nourished JESSE's appetite.

After she and CARL were married and were living at INGRID's home, INGRID had MARTHA performing household chores. She said she "had me washing clothes, cleaning." MARTHA gave the example that she remembered a time when she was ironing and INGRID came over and said "Oh, can you iron Gordon's pants." MARTHA was asked if she was living under INGRID's roof, did she think it was out of line for INGRID to ask for assistance with household chores. MARTHA relayed that she "grew up old school... she don't have to be told to pitch in." MARTHA went on to say that in the basement there were panel walls that INGRID wanted polished and MARTHA thought it was "absurd" and thought no one should polish panel walls. MARTHA also said that INGRID owned chairs that she wanted MARTHA to use a Q-tip to clean hard to reach areas. MARTHA was asked if INGRID was overtly harsh or rude when she asked MARTHA to assist with household chores, to which MARTHA indicated that INGRID was not.

According to MARTHA, it was evident that INGRID favored CARL over LARRY. She said "It looked like she never really cared for him (LARRY)." MARTHA

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believed that INGRID was jealous of LARRY's successes and always tried to "one up him" whenever LARRY talked about someone he met or accomplished something. MARTHA described that INGRID never outright degraded LARRY but seemed disinterested.

MARTHA relayed that her marriage with CARL ultimately ended because his demeanor changed. He seemed more controlling. She recalled a time when he called a friend of hers a "whore." LARRY told MARTHA before her divorce was finalized that CARL had been intimately involved with LARRY's ex-wife TERESA. MARTHA was unsure if that was true or not. MARTHA also relayed that CARL spoke badly about her after the divorce and called her a drug addict. She and CARL have no relationship today; they last spoke in 2015. MARTHA advised that she never heard of physical abuse between LARRY and TERESA that she witnessed.

With regards to the federal trial against LARRY, MARTHA commented, "That's not the Larry I know." She relayed that she did not attend the trial or see any evidence presented. MARTHA relayed that she heard LARRY had been at college with his daughter TALIA and "got money through girls from prostitution and married one of them." She initially heard about the allegations about LARRY when she was at a trade show. MARTHA saw a story about LARRY on the news. MARTHA stated "I don't know all the details of what took place or the situation; all I know is he's been a good person, but not sure why he did this. Maybe it was something that happened to him." MARTHA then said, "Maybe it was something his mom did, maybe it was his brother getting with his ex-wife." MARTHA had always known LARRY to be a good person and generous. He had been there financially at times for MARTHA and CARL.

MARTHA articulated that she did not understand fully the charges against LARRY. She had asked LARRY's defense counsel what the difference was between LARRY and other pimps because, "pimps hurt girls all the time and are let out of jail." MARTHA was asked if she had a negative viewpoint of pimps, why would she consent to a letter of support for LARRY if he had been charged with sex trafficking. MARTHA responded that she understood in this case, "the girls weren't underage, so they had a choice, not saying it's right."

FEDERAL BUREAU OF INVESTIGATION

Date of entry 01/10/2023

CARL RAY (CARL), [REDACTED]
[REDACTED]. After being advised of the identity of the interviewing Agent and the nature of the interview, CARL provided the following information:

CARL was married to his ex-wife MARTHA RAY (MARTHA) on November 24, 1984. They dated for approximately two (2) years prior to their wedding. CARL was asked if he recalled an incident around the time of his wedding where it was alleged by MARTHA, that CARL's mother INGRID put Ex-Lax in cupcakes to be given to his father, LAWRENCE GRECCO (GRECCO). CARL indicated that he does not recall the cupcake incident and had no knowledge of his mother putting anything into anyone's food. He advised the only thing that his mother put into food was love; she was a great cook.

CARL went on to say, "Martha is just as evil as Larry; they are both narcissists and psychopaths." CARL felt that MARTHA was very bitter and similar to his brother LAWRENCE RAY (LARRY). For years, she had tried to turn their two sons against him. He relayed that there was a time in the 1990's when MARTHA got arrested for shoplifting with their children present in Bridgewater Township in New Jersey. CARL advised that it was not MARTHA who told him about the arrest, but rather it was LARRY who told him. MARTHA had contacted LARRY after her arrest. CARL also saw the arrest in the local newspaper.

In regards to LARRY's federal charges, CARL commented, "What Larry did was disgusting." He specifically commented on what he learned about CLAUDIA DRURY (DRURY) through trial coverage, and said "that's someone's daughter." He also commented in reference to the victims in the case, "I am so glad they are putting their lives back together."

CARL confirmed that he had heard stories from LARRY over the years about alleged physical/sexual abuse that LARRY had suffered when they lived at his maternal grandparents house for a time. CARL specifically commented that LARRY had claimed he had been whipped with a "cat of nine tails." CARL advised he never saw the described whip in the residence. Furthermore, he stated that he never observed any manifestation of injuries on LARRY at any

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time when they were living there. CARL articulated that LARRY was closest to his father and if LARRY had informed his father of any such abuse, "My dad would have killed someone." LARRY had also made a claim that he had been sexually abused while living at the residence. CARL was extremely skeptical. He said LARRY always accused people of sexual abuse. During LARRY's divorce and child custody battle, LARRY accused his ex-wife, TERESA; TERESA's father, and CARL's son CARL JR, of sexually abusing LARRY's daughter TALIA. CARL emphasized that LARRY's accusations against his seventeen year old son was what ultimately lead to the deterioration of his relationship with LARRY and GRECCO. CARL emphasized that there was no outside proof of LARRY's claims other than his word.

CARL relayed that during the time that he and LARRY lived with their mother at their maternal grandparent's home, there was no strain in LARRY's relationship with INGRID. INGRID always bought CARL and LARRY gifts. CARL specifically remembered that INGRID bought LARRY a mini bike that he wanted. She also took them on trips to Disney World and Montauk. LARRY was never made to sleep on the floor. During that time period, LARRY always got into mischief and trouble. He would push back when he was confronted about his behavior. CARL did not feel that his maternal grandmother responded to LARRY inappropriately or in an overboard way. LARRY never wanted to live with INGRID despite the fact that the court had awarded her custody of LARRY and CARL. LARRY always wanted to live with his father, GRECCO. CARL did recall a time that LARRY was sick while they were living at the maternal grandparents home, however he said it was false information that LARRY was kicked out of the home and he made his way to his father's residence. According to CARL, he recalled that their Aunt Phyllis came to pick LARRY up and took him to GRECCO's home. INGRID was adamant that she did not want LARRY and CARL separated so CARL went too. LARRY's persistence in wanting to live with GRECCO lead to LARRY and CARL living with him for a period of time.

As CARL and LARRY grew older, CARL started to see LARRY change and said that was when he saw a difference in LARRY and INGRID's relationship. He specifically mentioned that when LARRY started working on Wall street and made money, LARRY acted like he could part the ocean. CARL also described a time when LARRY fought with their stepfather, GORDON in the kitchen of their home in Wautchung, New Jersey. LARRY had GORDON pushed up against a wall. CARL remembered the incident because the family dog which was a collie, bit LARRY through his suit.

CARL commented that at times LARRY was generous and sometimes did help out financially. CARL said it was a "brotherly thing" and he vice versa helped out LARRY when needed. However, he described favors with LARRY as "kinda like the mafia, when he wants to recall that favor, he recalls it--

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there's always something behind it."

CARL was unsure why his ex-wife, MARTHA was supportive of LARRY at this time because she had not been associated with LARRY in years. He believed that MARTHA was unhappy that CARL ended up in a relationship with TERESA. CARL stated that he and TERESA did not get together until much later after his divorce from MARTHA. CARL went on to say that his relationship with TERESA started out as a friendship. He saw the abuse she suffered from LARRY, specifically bruises on her arms. She needed support to get away from LARRY. CARL detailed that he bought MARTHA out of their marital home after their divorce. It was also he who put their sons through college. CARL also described that MARTHA was an avid marijuana user. He recalled a time when his son CHRISTOPHER was young, he had opened a drawer in the kitchen of MARTHA's home and it was filled with marijuana. MARTHA's boyfriend at the time yelled at CHRISTOPHER which prompted him to report the matter to CARL.

CARL speculated throughout the years that MARTHA and LARRY had an intimate relationship or affair. CARL and TERESA had discussed the matter several times. CARL described that he found a pair of underwear that belonged to LARRY with women's lipstick on it. It appeared to match a cup that had MARTHA's lipstick on it. CARL for a long time considered sending the two items off for DNA testing to confirm an affair. CARL also described a telephone call that he recorded of LARRY and MARTHA once. In the call, CARL indicated that LARRY said " It's one thing when you fuck for fun, but it's another when you fuck for food; you did what you had to do, I'm proud of you." CARL was unsure of the context but felt that the conversation alluded to possible prostitution. CARL was unsure if he still had the conversation but could look for it if needed.

CARL relayed that LARRY's defense counsel came to his residence not too long ago. CARL was not at home and spoke to the attorney's through the ring camera on his porch. CARL advised them that he had "nothing to offer for Larry" and did not wish to speak further. CARL commented that he heard that his father GRECCO passed away as well as GORDON. CARL had not heard from GRECCO since 2005. Their relationship ceased when GRECCO sided with LARRY and his accusations towards CARL's son CARL Jr. for sexually abusing TALIA. CARL went on to say "Larry was always powerful in my father's life because he was the successful one; Mr. Money Bags." CARL also relayed that INGRID now owned the home in Pinehurst, North Carolina that she once shared with GORDON. CARL indicated that LARRY had successfully stalled GORDON and INGRID's divorce and settlement for approximately ten (10) years but the matter was finally closed. CARL recently had been taking trips to North Carolina to clean the residence up. Prior to the writer's call, CARL had dropped off INGRID for cancer treatment.

50E-NY-3111837

Continuation of FD-302 of (U) Interview of Carl Ray on 01/09/2023 , On 01/09/2023 , Page 4 of 4

CARL advised that the family had not heard from TALIA for many years, even after LARRY's trial conviction. He advised that LARRY's other daughter AVA had graduated with a business degree and had bought her first home. He advised that AVA was good at compartmentalizing and was not going to let LARRY affect her life. TERESA hoped that one day she would be reunited with TALIA.

VICTIM IMPACT STATEMENT

Victim: Daniel Levin

USAO Number: 2019R00583

Court Docket Number: 20-CR-00110

Insert the impact of the crime here (or, if a separate victim impact form is attached, please use that form to describe the impact of the crime):

My name is Daniel. I'm a writer and a teacher. When I was 19 years old, I met my friend Talia's dad, the man who was introduced to me as Lawrence Ray.

What that man went on to do to me and my friends, there isn't language for. And because there was no language for what happened to me, the years that followed were characterized by a deep well of silence. I've never had a way to explain what he did to me and because of that, I've had no way to explain what it made me into. I'm going to try now.

Inside of this courtroom, all sorts of people from law enforcement agents to lawyers and judges to the folks sitting on the jury were all subjected to watching some of the most heinous acts ever committed to video. None of those people will ever again get to live a life in which they haven't seen those images. None of them will ever get to live again in a world where such horrible things seem impossible.

Imagine not just seeing those videos but living those experiences.

Imagine living in a world where what you think doesn't matter. What you believe doesn't matter. You can't go outside. You can't go to the bathroom. You can't stand up from where you're sitting. You've learned that the second you move without asking, you might do something that warrants punishment. And maybe the way you ask will be wrong anyway, so you'll be punished for that. Eventually, you learn that you don't have to move or speak at all—you can just think the wrong thing. You'll be caught out and tortured for it.

I will for the rest of my life be on the ground, the kitchen tile digging into my knees, sobbing while Lawrence Ray brandishes a knife over me, asking Isabella to go line the bathtub with plastic to catch my blood and the pieces of my body he's about to cut off.

I will never truly be able to stand up from the living room carpet while Lawrence Ray forces me to choke down Isabella's dildo, asking me if I still think I'm gay.

I am, right now, standing in front of my friends while Lawrence Ray holds a garrote around my testicles, twisting it tighter and tighter, trying to get me to confess to something I never did.

There will not be a single day I don't live inside the impact of Larry Ray's sledgehammer hitting my ribs as he pulls my tongue with pliers.

Lawrence Ray made me disbelieve myself. So, when I thought that something hurt, when something felt wrong, when I felt scared, he said none of that was true, that I didn't understand myself as well as he understood me. Which is to say, he knew better than I did whether he should be allowed to continue putting his hands on me.

For the rest of my life, I will struggle with doubting what I believe, what I think, what I feel. All my joy will be tinged with pain. All my ambition will be tinged with shame. All my hope will be tinged with fear.

Outside of this room, people will grasp at words and phrases to describe what happened to me and my friends. They'll call it a sex cult. But if I learned one thing from my experience with Larry Ray, it's that language can be used to obfuscate. Language can be used to dumb down, to confuse, to flatten out, and to replace the hard reality of what is actually happening right in front of you.

Some will call me or my friends stupid or weak or naïve because of what Larry did to us. I challenge you to look directly at the reality instead. Look at all of us: intelligent, capable young people full of promise and hope and possibility. People just like you at 18, 19, 20 years old.

What happened here was not because of a set of circumstances or the vulnerability of a group of young people. What happened was because of one man. A man who would beat and rape and torture and berate me and my friends and call it "helping," call it "healing," and would call our fear and our pain, "resistance to progress," would call it "weakness leaving the body."

Lawrence Ray is a man who is not so special, really. He is, unfortunately, not unlike many, many others. This is a petty man who seeks power. We know men like this. To control people with less authority than them, to feel strong and big, confirms his existence. A petty man. A small man. A man who, because he could not stand what was broken inside of him, convinced me and my friends that our brokenness, our sadness, our fears, our vulnerabilities, our angst, that all of these were freakish, dire problems. Problems only he could solve. In front of you is a man who claims to value logic, but whose version of the facts is an incoherent house of cards. A man who claims to value truth and honor, but who feigns illness and weakness in order to garner your sympathy. A hypocrite. A liar. An abuser, like any other.

Larry would often say, "Truth wins." Okay. So, what is the plain truth? Lawrence Ray tortured me and my friends verbally, physically, emotionally, and sexually. That is a fact, as is the fact that there is simply no situation, absolutely no circumstance, in which treating or touching another person in the way Lawrence Ray routinely did is ever acceptable.

I would like to hear Lawrence Ray say that he's sorry for what he's done and mean it, but I know he never will. In front of you is a man who shows no remorse for his actions, who, unless he thought there were some utility in tricking you into believing otherwise, would tell you himself that he does not think he did a single thing wrong. A remorseless man. A shameless man.

From my experience, I am confident that he will spend every day in prison plotting how to hurt the people he believes wrongfully hurt him—the very victims who are speaking against him today. This is precisely what he did the last time he was incarcerated, and he will do it again. He has given us no reason to believe otherwise. I am confident he will attempt to find ways to hurt me from confinement. I believe with little doubt that because of what I am saying now, because I am refusing

to continue to live in silence as I did for years, the moment Lawrence Ray is released from prison is the moment my death warrant will have been signed.

I will live the rest of my life with what he did to me. It's true. The throbbing pain may lessen and grow, but I can never live a life where this didn't happen at all. I can never live in a world that didn't allow this to happen. Lawrence Ray did steal my youth from me. He irrevocably harmed me and my friends. And given the opportunity, he would do it again, and if he could, he would find a way to do it worse.

That being said, this morning, I opened my front door and I stepped outside. Because I can. I went for a walk. I talked to a friend about whatever I wanted. Because I can. I get this inconceivable, beautiful privilege: I get to live. Really live. I've experienced love and wonder, devastating sadness, and overwhelming joy at the kindness of other people. Because of my trauma, I'm more able to understand and empathize with the countless other people in this world who've been subjected to harm by men who are similar to Lawrence Ray: small, petty men.

Tonight, I can go back home, I can walk through the door and, if I like, I can lock it behind me, because I have the key. That's a right Lawrence Ray took away from me and my friends, and one he does not deserve, not today, and not until the day he dies.

December 13, 2022

Judge Lewis Liman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Lawrence Ray 20-cr-110*

Dear Judge Liman,

You heard from me and members of my family at the trial of Lawrence Ray earlier this year. I am writing you now to share the lasting impact Larry has unfortunately made on my life.

1. *The Loss of My Medical Career*

As a young girl, I dreamed of making the world a better place and helping people. I went on to earn an undergraduate degree from Harvard College, a medical degree from Columbia University, and began my residency in Los Angeles. Today, I do not work in medicine, and it's very possible that I may never be a doctor. Seeing doctors, nurses, hospitals, doctor's offices, and ambulances, serve as a painful reminder that because of Larry, I do not wake up in the morning to work at a hospital, or go into an office to see patients.

In September 2012, I was two weeks from completing my last exam. *Two weeks*. At this critical moment, I had fallen victim to Larry. For months, Larry had been manipulating me to the point that he controlled my life. I reached a breaking point when Larry made me paranoid, unable to sleep, and fearful for my life. Convinced that only Larry could keep me safe, I left my residency in Los Angeles and went to be with him in New York. Soon after, I was fired from my residency program. As you saw throughout the trial, in the ensuing years, I lived under Larry's complete control in circumstances that made it impossible to get reinstated to my residency program. Larry was acutely aware of how important it was to me to become a practicing physician. He used this to ridicule, threaten, and shame me. I consoled myself by wearing scrubs from medical school around the house to remember what it felt like to pursue my dreams.

Since Larry's arrest, I have tried to get my medical career back on track, but I'm continually met with road blocks: it's been too long, my loans are in default, my credit is shot, the abuse I suffered has become public, and potential employers consider me a liability. The onset of the pandemic in 2020 was particularly difficult. The strain on our health care system felt personally painful. I knew that I *could* help... but I couldn't, because of what Larry has done to me. My ability to fully contribute to society and to find meaning as a doctor was taken away because of Larry's actions. That pain will never leave me. However, I was still determined to do something, so I volunteered in the morgue where I worked in refrigerated trailers helping COVID victims' remains reach their final resting place.

2. *Abuse that Haunts Me*

Larry physically, emotionally, and sexually abused me. Larry hurt my self-esteem, my confidence, my connection to myself, my sexuality, and my femininity. He made me feel

inadequate and unlovable. I attempted suicide after Larry entered my life, and if it weren't for his arrest, I don't know what other horrible things would have happened to me, or where I would be right now. At the trial, you heard a tiny sliver of the abuse that I suffered. I live with memories of this abuse every day, when doing even the most unremarkable daily activities:

- Every time I look at myself in the mirror, wash my face, brush my teeth, put make up on, I see the scar Larry left on my upper lip. He had kicked my laptop into my face because he said I was talking too much. Afterwards, he forced me to slather the scar with Neosporin to make it disappear, and when it didn't go away, he said I would always be ugly to him because of this scar. He got worse afterwards, beating my face so hard I would have to lay down for a week with ice on my face for the bruises to go down.
- Using a public restroom can hurl me back into the nightmare I used to live in. When driving with Larry, at rest stops, he would kick me out of the car and lock me out until I found a trucker to have sex with me. It was horrifying then, and horrifying now. I still feel disgusted with this part of my past, wishing it had never happened.
- Every time I look at a trash can I hear Larry's voice yelling at me. He constantly accused me of throwing things out. It got to the point where he would have me dump out all the garbage on the driveway, often in the summer heat, and sift through it to find the things I had allegedly thrown away, the stench of rotting food and refuse nauseating. Today I ask for help throwing out the garbage where I live because it's so traumatic for me.

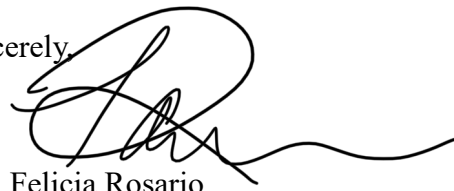
These memories, and many more, are so difficult that they can be debilitating. Extensive therapy has helped me process what I've been through and re-learn how to be a human being.

3. Relationships with Loved Ones

My relationships with friends and family mean the world to me. Before I met Larry, I strove to be a good daughter, a good sister, a good niece, a good cousin, a good friend, and a good member of the various communities that I considered myself a part of. Coming together and having good relationships was a large part of my identity. He methodically and maniacally isolated me from anyone who loved me and I loved. He robbed me of a decade of relationships. I missed my grandparents' funerals. I missed my mom's surgery. I missed my best friend's wedding where she asked me to be the Maid of Honor. I missed birthdays, weddings, and dinners catching up with friends. In fact, I had no friends at all. But what I missed, most of all, were my siblings, who themselves were suffering.

Because of Larry, I have lost time, opportunities and relationships. There was so much I could have done that I will never be able to accomplish. I try not to ruminate on the loss, and instead, I take pride in having survived and managed to live to see this day. I still dream of making the world a better place and helping people. Thank you for considering my story.

Sincerely,

A handwritten signature in black ink, appearing to read 'Felicia Rosario', with a long horizontal flourish extending to the right.

Felicia Rosario

VICTIM IMPACT STATEMENT

By: Santos Junior Rosario

Re: USA v. Ray 1:20-cr-00110-LJL; Lawrence Ray Sentencing

In 2010 I was 19 years old and a sophomore in college. I was doing well in my classes. I had friends. My oldest sister was in medical school and my other sister was in college as well. I was happy. It was an exciting time and it felt like me and my family's future was bright and hopeful. Then I met Larry Ray and all of that went up in smoke. Instead, the next decade was one of absolute misery.

My family was ripped apart - Larry made us believe there was something deeply wrong with us. I saw my brilliant sister Felicia reduced to a shell of her former self, my sister Yalitza committed to a state institution, and my mother and father weep for years in confusion and helplessness. He used me as a tool to drain the little money my family had.

I lost all of my friendships - I burned every relationship I ever had at his behest. Acquaintances, friends, cousins - he systematically cut me off from everyone I ever cared about.

He drove me to attempt suicide more than once and by certain point I was contemplating it daily.

I lost my education from one of the top colleges in the country. He engineered my exit from college and actively worked to prevent my return.

He physically abused, degraded, humiliated, and blackmailed me to cement his control.

He took away everything that made me me - my family, my friends, my education, my dignity, my pride, my hopes and my dreams.

By the middle of 2012 I had lost my sense of self. I got to the point where I could not distinguish fact from fiction - I lost trust in my own thoughts, my own memories, and my own desires and intentions.

He put me in a pit of self hatred and self loathing - he had me falsely believing that I hurt my friends and family, that I was the lowest of the low. I became convinced that I was unsafe to be around. I was homeless for months, unable to conceive of a future for myself, waiting to eventually kill myself because that's all I believed I deserved.

He took 10 years of my life away from me , permanently changing my life for the worse. I have perpetual anxiety these days and I'm constantly expecting the worst. I have trouble remembering things in general. I find it difficult to connect with others as its hard to relate and even harder to trust. Getting therapy is difficult as I find it similar to my time under Larry's control.

Writing these few lines for this statement took me weeks. Revisiting all of the ways my family and I suffered was stressful and traumatic. And despite my efforts, I don't think I can fully convey how this man's crimes derailed my life. All I know is that I wish I had never met him.

Thank you for your time.

Kramer Levin



December 16, 2022

By Email

Special Agent Kelly Maguire
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, New York 10007

Re: *United States v. Lawrence Ray, et al.*, 1:20-CR-110 (LJL)
Yalitza Rosario Victim Impact Statement

When I think of my time under Larry, the moments that stand out to me are the following: how he broke those sacred bonds between me and my family; how he made me believe I was a damaged person undeserving of love and community; and how, because of him, I believed myself to be a criminal that will never know peace. Larry destroyed life as I knew it and made it into a living Hell. He haunted me even after I ceased contact. The absence of abuse was like an axe dangling over my head.

Over the years, the trauma has weighed heavily on both my mind and my body, with his cruelty festering inside of me. I struggled to reestablish mental and emotional stability. I was unable to remain gainfully employed. And my physical health suffered; I developed an eating disorder and became morbidly obese. I used food to cope; first, with the extreme stress of having Larry in my life and, then, with the minefield he made of my mind.

He alienated me from my loved ones, from myself, from God, and from life itself. Increasingly, I did not want to exist in a world defined by Larry, in a world occupied by him. He made living so painful. Every moment felt heavy with torment. It felt as if I owed him the very air I breathed. My life had value as long as he associated with me. I felt I needed his attention, no matter how minimal or toxic; for without it, I would end up alone and a reject, forever.

Yet, retaining his attention meant destroying myself. He chipped away at my identity and dismantled the entirety of my selfhood. Ultimately, I rationalized this abuse as a way of testing my dedication to self-improvement. Larry had presented himself as the key to truth, love, and happiness. And I wanted all of those things. I needed all of those things. Larry claimed to be my mentor, my guide to navigating these choppy waters. But, in truth, he was a predator masquerading as a hero.

When everything I sacrificed proved insufficient, I tried to end my own life. This was a cycle I went through multiple times in Larry's orbit. I gave up parts of myself. I wanted to die.

Kramer Levin



He hooked me back with guilt, shame, and threats. I tried to prove myself worthy of love by lying. He had me give so-called confessions of my criminality and deceit. “Maybe this will make him love me again.... Maybe it would be enough this time.... Maybe I still have a chance to be happy.” Yet, with every meeting, call, glance, stare, and cold silence, he destroyed any hope I had for a future. What’s worse, I had already “confessed”; retracting those would only make my words - make me - truly worthless. And so, I wanted to die. Rinse and repeat.

Eventually, I could not take it anymore. Every single second I spent around him, listening to his voice, being in his presence, depleted me. And so, I got away. But even then, he lived in my mind, reigning with fear. His voice overpowered my own. Through him, my own mind mocked me, snuffing out all glimmers of self-esteem and undermining any efforts to build up confidence. I was unable to say his name out loud for years. I was terrified of speaking my truth, thinking no one would listen or believe me. I felt I could get arrested at any given moment and that I was doomed to rot behind bars. I lived in the shadows, trying to make myself invisible. I avoided talking about myself and was thus unable to form authentic connections. I internalized the label he shackled me with: “sociopath.” How could anyone ever love me, the liar?

Only after years of therapy have I been able to speak his name, share my truth, and build self-mastery. I am eternally grateful for the spotlight placed on this nightmare. Thank you to the FBI and the Department of Justice, for believing the victims. Thank you for your fierce dedication to truth. For that is why I am living. Despite you, Larry, I am.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Yalitza Rosario', is written over a horizontal line.

Yalitza Rosario

Lawrence Ray
Detailed Tax Loss Calculations 2016-2019

	2016	2017	2018	2019	Total
Substitute for Return					
Unreported Income	\$84,140	\$708,870	\$1,082,521	\$154,290	\$2,029,821
Standard Deduction	(\$6,300)	(\$6,350)	(\$12,000)	(\$12,200)	
Exemptions	(\$4,050)				
Corrected Taxable Income	\$73,790	\$702,520	\$1,070,521	\$142,090	\$1,988,921
Corrected Tax Liability	\$14,215	\$234,017	\$361,782	\$28,276	\$638,290
Tax Loss/Deficiency	\$14,215.00	\$234,017.00	\$361,782.00	\$28,276.00	\$638,290.00
Interest through 1/20/2023	\$4,034.63	\$54,522.66	\$61,317.64	\$3,111.33	\$122,986.26
Total Restitution to the IRS	\$18,249.63	\$288,539.66	\$423,099.64	\$31,387.33	\$761,276.26

Name Of Taxpayer: Lawrence Ray

01/12/2023

Identification Number: [REDACTED]

Total

23.20.00

2016 TAX YEAR INTEREST COMPUTATION

Interest computed to	01/20/2023
Total Tax Deficiency	\$14,215.00
Plus Penalties*	
Failure to File - IRC 6651	\$.00
Accuracy Related Penalty - IRC 6662	\$.00
Accuracy Related Penalty - IRC 6662A	\$.00
Civil Fraud - IRC 6663	\$.00
Manually Computed Penalty	\$.00
Total Penalties Subject to Interest	\$.00
Tax Deficiency and Penalties Subject to Interest	\$14,215.00

Type	Effective Dates	Days	Rate	Interest
Compound	04/15/2017--12/31/2017	260	4%	\$410.83
Compound	01/01/2018--03/31/2018	90	4%	\$144.96
Compound	04/01/2018--12/31/2018	275	5%	\$567.01
Compound	01/01/2019--06/30/2019	181	6%	\$463.17
Compound	07/01/2019--12/31/2019	184	5%	\$403.30
Compound	01/01/2020--06/30/2020	182	5%	\$407.92
Compound	07/01/2020--12/31/2020	184	3%	\$252.43
Compound	01/01/2021--12/31/2021	365	3%	\$513.58
Compound	01/01/2022--03/31/2022	90	3%	\$129.02
Compound	04/01/2022--06/30/2022	91	4%	\$175.46
Compound	07/01/2022--09/30/2022	92	5%	\$224.24
Compound	10/01/2022--12/31/2022	92	6%	\$272.85
Compound	01/01/2023--01/20/2023	20	7%	\$69.86

Total Interest	\$4,034.63
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Interest on penalties is computed from the due date of the return (including extensions) until the date of payment. The interest shown on this report is estimated. Interest is computed from the due date of the return (including extensions) and will continue to accrue until the date paid in full. Interest on the failure to pay penalty is computed from the date of assessment and is therefore not considered in this report.

Name Of Taxpayer: Lawrence Ray

01/12/2023

Identification Number: [REDACTED]

Total

23.20.00

2017 TAX YEAR INTEREST COMPUTATION

Interest computed to	01/20/2023
Total Tax Deficiency	\$234,017.00
Plus Penalties*	
Failure to File - IRC 6651	\$.00
Accuracy Related Penalty - IRC 6662	\$.00
Accuracy Related Penalty - IRC 6662A	\$.00
Civil Fraud - IRC 6663	\$.00
Manually Computed Penalty	\$.00
Total Penalties Subject to Interest	\$.00
Tax Deficiency and Penalties Subject to Interest	\$234,017.00

Type	Effective Dates	Days	Rate	Interest
Compound	04/15/2018--06/30/2018	76	5%	\$2,448.90
Compound	07/01/2018--09/30/2018	92	5%	\$2,998.77
Compound	10/01/2018--12/31/2018	92	5%	\$3,036.80
Compound	01/01/2019--03/31/2019	90	6%	\$3,614.06
Compound	04/01/2019--06/30/2019	91	6%	\$3,708.99
Compound	07/01/2019--09/30/2019	92	5%	\$3,168.18
Compound	10/01/2019--12/31/2019	92	5%	\$3,208.36
Compound	01/01/2020--03/31/2020	91	5%	\$3,204.67
Compound	04/01/2020--06/30/2020	91	5%	\$3,244.76
Compound	07/01/2020--09/30/2020	92	3%	\$1,988.05
Compound	10/01/2020--12/31/2020	92	3%	\$2,003.10
Compound	01/01/2021--03/31/2021	90	3%	\$1,979.65
Compound	04/01/2021--06/30/2021	91	3%	\$2,016.59
Compound	07/01/2021--09/30/2021	92	3%	\$2,054.14
Compound	10/01/2021--12/31/2021	92	3%	\$2,069.73
Compound	01/01/2022--03/31/2022	90	3%	\$2,039.94
Compound	04/01/2022--06/30/2022	91	4%	\$2,774.09
Compound	07/01/2022--09/30/2022	92	5%	\$3,545.47
Compound	10/01/2022--12/31/2022	92	6%	\$4,313.91
Compound	01/01/2023--01/20/2023	20	7%	\$1,104.50
		Total Interest		\$54,522.66

Interest on penalties is computed from the due date of the return (including extensions) until the date of payment. The interest shown on this report is estimated. Interest is computed from the due date of the return (including extensions) and will continue to accrue until the date paid in full. Interest on the failure to pay penalty is computed from the date of assessment and is therefore not considered in this report.

Name Of Taxpayer: Lawrence Ray

01/12/2023

Identification Number: [REDACTED]

Total

23.20.00

2018 TAX YEAR INTEREST COMPUTATION

Interest computed to	01/20/2023
Total Tax Deficiency	\$361,782.00
Plus Penalties*	
Failure to File - IRC 6651	\$.00
Accuracy Related Penalty - IRC 6662	\$.00
Accuracy Related Penalty - IRC 6662A	\$.00
Civil Fraud - IRC 6663	\$.00
Manually Computed Penalty	\$.00
Total Penalties Subject to Interest	\$.00
Tax Deficiency and Penalties Subject to Interest	\$361,782.00

Type	Effective Dates	Days	Rate	Interest
Compound	04/15/2019--06/30/2019	76	6%	\$4,547.77
Compound	07/01/2019--09/30/2019	92	5%	\$4,645.65
Compound	10/01/2019--12/31/2019	92	5%	\$4,704.57
Compound	01/01/2020--03/31/2020	91	5%	\$4,699.17
Compound	04/01/2020--06/30/2020	91	5%	\$4,757.95
Compound	07/01/2020--09/30/2020	92	3%	\$2,915.17
Compound	10/01/2020--12/31/2020	92	3%	\$2,937.24
Compound	01/01/2021--03/31/2021	90	3%	\$2,902.86
Compound	04/01/2021--06/30/2021	91	3%	\$2,957.02
Compound	07/01/2021--09/30/2021	92	3%	\$3,012.08
Compound	10/01/2021--12/31/2021	92	3%	\$3,034.95
Compound	01/01/2022--03/31/2022	90	3%	\$2,991.26
Compound	04/01/2022--06/30/2022	91	4%	\$4,067.78
Compound	07/01/2022--09/30/2022	92	5%	\$5,198.90
Compound	10/01/2022--12/31/2022	92	6%	\$6,325.69
Compound	01/01/2023--01/20/2023	20	7%	\$1,619.58
Total Interest				\$61,317.64

Interest on penalties is computed from the due date of the return (including extensions) until the date of payment. The interest shown on this report is estimated. Interest is computed from the due date of the return (including extensions) and will continue to accrue until the date paid in full. Interest on the failure to pay penalty is computed from the date of assessment and is therefore not considered in this report.

Name Of Taxpayer: Lawrence Ray

01/12/2023

Identification Number: [REDACTED]

Total

23.20.00

2019 TAX YEAR INTEREST COMPUTATION

Interest computed to	01/20/2023
Total Tax Deficiency	\$28,276.00
Plus Penalties*	
Failure to File - IRC 6651	\$.00
Accuracy Related Penalty - IRC 6662	\$.00
Accuracy Related Penalty - IRC 6662A	\$.00
Civil Fraud - IRC 6663	\$.00
Manually Computed Penalty	\$.00
Total Penalties Subject to Interest	\$.00
Tax Deficiency and Penalties Subject to Interest	\$28,276.00

Type	Effective Dates	Days	Rate	Interest
Compound	04/15/2020--06/30/2020	76	5%	\$295.09
Compound	07/01/2020--09/30/2020	92	3%	\$216.26
Compound	10/01/2020--12/31/2020	92	3%	\$217.90
Compound	01/01/2021--03/31/2021	90	3%	\$215.35
Compound	04/01/2021--06/30/2021	91	3%	\$219.36
Compound	07/01/2021--09/30/2021	92	3%	\$223.45
Compound	10/01/2021--12/31/2021	92	3%	\$225.15
Compound	01/01/2022--03/31/2022	90	3%	\$221.90
Compound	04/01/2022--06/30/2022	91	4%	\$301.77
Compound	07/01/2022--09/30/2022	92	5%	\$385.68
Compound	10/01/2022--12/31/2022	92	6%	\$469.27
Compound	01/01/2023--01/20/2023	20	7%	\$120.15

Total Interest	\$3,111.33
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Interest on penalties is computed from the due date of the return (including extensions) until the date of payment. The interest shown on this report is estimated. Interest is computed from the due date of the return (including extensions) and will continue to accrue until the date paid in full. Interest on the failure to pay penalty is computed from the date of assessment and is therefore not considered in this report.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	x	
	:	
UNITED STATES OF AMERICA	:	
	:	PRELIMINARY ORDER OF
- v. -	:	FORFEITURE AS TO SPECIFIC
	:	PROPERTY/
LAWRENCE RAY,	:	<u>MONEY JUDGMENT</u>
a/k/a “Lawrence Grecco,”	:	
	:	S2 20 Cr. 110 (LJL)
Defendant.	:	
-----	x	

WHEREAS, on or about January 13, 2022, LAWRENCE RAY, a/k/a “Lawrence Grecco” (the “Defendant”) was charged in a seventeen-count superseding Indictment, S2 20 Cr. 110 (LJL) (the “Indictment”), with, *inter alia*, racketeering conspiracy, in violation of Title 18, United States Code, Section 1962(d) (Count One); extortion conspiracy, in violation of Title 18, United States Code, Section 1951 (Count Two); extortion, in violation of Title 18, United States Code, Sections 1951 and 2 (Count Three); sex trafficking, in violation of Title 18, United States Code, Sections 1591 and 2 (Count Four); conspiracy to commit sex trafficking, in violation of Title 18, United States Code, Section 1594 (Count Five); forced labor, in violation of Title 18, United States Code, Sections 1589 and 2 (Count Six); forced labor trafficking, in violation of Title 18, United States Code, Sections 1590 and 2 (Count Seven); forced labor conspiracy, in violation of Title 18, United States Code, Section 1594 (Count Eight); and money laundering, in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i), (ii), and 2 (Count Eleven);

WHEREAS, the Indictment included a forfeiture allegation as to Count One of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 1963, of any and all interests the Defendant acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named

and described in the Indictment which the Defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all property, constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, the offense charged in Count One of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment;

WHEREAS, the Indictment included a second forfeiture allegation as to Counts Two and Three of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts Two and Three of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offenses charged in Counts Two and Three of the Indictment that the Defendant personally obtained;

WHEREAS, the Indictment included a third forfeiture allegation as to Counts Four through Eight of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 1594, of: (1) any property, real and personal, that was involved in, used or intended to be used to commit, or to facilitate the commission of the offenses charged in Counts Four through Eight of the Indictment, and any property traceable to such property; and (2) any property, real and personal, constituting or derived from, any proceeds obtained, directly or

indirectly, as a result of the offenses charged in Counts Four through Eight of the Indictment, or any property traceable to such property;

WHEREAS, the Indictment included a fourth forfeiture allegation as to Count Eleven of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), of any and all property, real and personal, involved in the offense charged in Count Eleven of the Indictment, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in the offense charged in Count Eleven of the Indictment;

WHEREAS, on or about March 19, 2020, a Post-Indictment Restraining Order was entered by the Hon. Colleen McMahon, restraining the following property: any and all domain names registered on GoDaddy Inc. by Shopper ID 42845221 (the “Domain Names”);

WHEREAS, on or about September 2, 2020, the Court entered an Order for the Interlocutory Sale of the Domain Names (“Interlocutory Sale Order”) authorizing the Government to sell the Domain Names;

WHEREAS, on or about February 24, 2021, pursuant to the Interlocutory Sale Order the Government sold the Domain Names and deposited the net proceeds in the amount of \$23,138 into the Seized Asset Deposit Fund (the “Domain Proceeds”);

WHEREAS, on or about April 6, 2022, following a jury trial, the Defendant was found guilty of Counts One through Nine, Eleven, and Thirteen through Seventeen of the Indictment;

WHEREAS, the Government asserts that \$2,444,349 in United States currency represents the amount of proceeds traceable to the offenses charged in Counts One through Nine

of the Indictment that the Defendant personally obtained, and the property involved in the offense charged in Count Eleven of the Indictment;

WHEREAS, the Government seeks the entry of a money judgment in the amount of \$2,444,349 in United States currency representing the amount of proceeds traceable to the offenses charged in Counts One through Nine of the Indictment that the Defendant personally obtained and the property involved in the offense charged in Count Eleven of the Indictment;

WHEREAS, the Government further seeks the forfeiture of all right, title and interest of the Defendant in the following specific property:

- i. The Domain Proceeds; and
- ii. The real property commonly described as 4 Scarborough Place, Pinehurst, North Carolina, 28374, more particularly described as Lot 300, Unit 17, Add 4, Phase 2, of the property of Pinehurst Incorporated, as shown on the Plat thereof, recorded in the office of the Register of Deeds of Moore County North Carolina, in Plat Cabinet 3, Slide 404;

(i and ii, collectively, the “Specific Property”) which constitute proceeds traceable to the offenses charged in Counts One through Nine of the Indictment that the Defendant personally obtained; property involved in, used, or intended to be used to commit, or to facilitate the commission of the offenses charged in Count One and Counts Four through Eight; and/or property involved in Count Eleven of the Indictment;

WHEREAS, the Court finds that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to offenses charged in Counts One through Nine of the Indictment that the Defendant personally obtained, and the property involved in Count Eleven of the Indictment cannot be located upon the exercise of due diligence with the exception of the Specific Property; and

WHEREAS, pursuant to Title 21, United States Code, Section 853(g), and Rules 32.2(b)(3), and 32.2(b)(6) of the Federal Rules of Criminal Procedure, the Government is now entitled, pending any assertion of third-party claims, to reduce the Specific Property to its possession and to notify any and all persons who reasonably appear to be a potential claimant of their interest herein;

NOW, THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that:

1. As a result of the offenses charged in Counts One through Nine and Eleven of the Indictment, to which the Defendant was found guilty, a money judgment in the amount of \$2,444,349 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offenses charged in Counts One through Nine of the Indictment that the Defendant personally obtained, and the property involved in Count Eleven of the Indictment, shall be entered against the Defendant.

2. As a result of the offenses charged in Counts One through Nine and Eleven of the Indictment, to which the Defendant was found guilty, all of the Defendant's right, title and interest in the Specific Property is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Preliminary Order of Forfeiture as to Specific Property/Money Judgment is final as to the Defendant LAWRENCE RAY, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

4. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals

Service, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number.

5. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

6. Upon entry of this Preliminary Order of Forfeiture as to Specific Property/Money Judgment, the United States (or its designee) is hereby authorized to take possession of the Specific Property and to hold such property in its secure custody and control.

7. Pursuant to Title 21, United States Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Certain Admiralty and Maritime Claims and Asset Forfeiture Actions, the United States is permitted to publish forfeiture notices on the government internet site, www.forfeiture.gov. This site incorporates the forfeiture notices that have been traditionally published in newspapers. The United States forthwith shall publish the internet ad for at least thirty (30) consecutive days. Any person, other than the Defendant, claiming interest in the Specific Property must file a Petition within sixty (60) days from the first day of publication of the Notice on this official government internet web site, or no later than thirty-five (35) days from the mailing of actual notice, whichever is earlier.

8. The published notice of forfeiture shall state that the petition (i) shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the Specific Property, (ii) shall be signed by the petitioner under penalty of perjury, and (iii) shall set forth the nature and

extent of the petitioner's right, title or interest in the Specific Property, the time and circumstances of the petitioner's acquisition of the right, title and interest in the Specific Property, any additional facts supporting the petitioner's claim, and the relief sought, pursuant to Title 21, United States Code, Section 853(n).

9. Pursuant to 32.2 (b)(6)(A) of the Federal Rules of Criminal Procedure, the Government shall send notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.

10. Upon adjudication of all third-party interests, this Court will enter a Final Order of Forfeiture with respect to the Specific Property pursuant to Title 21, United States Code, Section 853(n), in which all interests will be addressed. All Specific Property forfeited to the United States under a Final Order of Forfeiture shall be applied towards the satisfaction of the Money Judgment.

11. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

12. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

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13. The Court shall retain jurisdiction to enforce this Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

SO ORDERED:

HONORABLE LEWIS J. LIMAN
UNITED STATES DISTRICT JUDGE

DATE

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

**Proposed
Order of Restitution**

v.

LAWRENCE RAY,

Docket No. 20 Cr. 110 (LJL)

Upon the application of the United States of America, by its attorney, Damian Williams, United States Attorney for the Southern District of New York, Mollie Bracewell, Lindsey Keenan, and Danielle Sassoon, Assistant United States Attorneys, of counsel; the presentence report; the Defendant's convictions on Counts One through Nine, Eleven, Thirteen through Seventeen of the S2 Superseding Indictment; and all other proceedings in this case, it is hereby ORDERED that:

1. Amount of Restitution

Lawrence Ray, the Defendant, shall pay restitution in the total amount of \$4,636,849.06, pursuant to 18 U.S.C. § 3663; 18 U.S.C. § 3663A; and 18 U.S.C. § 2259, to the victims of the offenses charged in Counts through Eight. The names and specific amounts owed to each victim are set forth in the Schedule of Victims, attached hereto as Schedule A. Upon advice by the United States Attorney's Office of a change of address of a victim, the Clerk of the Court is authorized to send payments to the new address without further order of this Court.

Pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid. Restitution shall be paid to the victim(s) identified in the Schedule of Victims, attached hereto as Schedule A, on a pro rata basis, whereby each payment shall be distributed proportionally to each victim based upon the amount of loss for each victim, as set forth more fully in Schedule A.

2. Schedule of Payments

Pursuant to 18 U.S.C. § 3664(f)(2), in consideration of the financial resources and other assets of the Defendant, including whether any of these assets are jointly controlled; projected earnings and other income of the Defendant; and any financial obligations of the Defendant; including obligations to dependents, the Defendant shall pay restitution in the manner and according to the schedule that follows:

In the interest of justice, restitution shall be payable in installments pursuant to 18 U.S.C. § 3572(d)(1) and (2). The Defendant shall commence monthly installment payments of not less than \$100 *OR* in an amount equal to ten percent of the Defendant's gross income, whichever is greater, payable on the first of each month, immediately upon entry of this judgment.

If the Defendant defaults on the payment schedule set forth above, the Government may pursue other remedies to enforce the judgment.

3. Payment Instructions

The Defendant shall make restitution payments by certified check, bank check, money order, wire transfer, credit card or cash. Checks and money orders shall be made payable to the "SDNY Clerk of the Court" and mailed or hand-delivered to: United States Courthouse, 500 Pearl Street, New York, New York 10007 - Attention: Cashier, as required by 18 U.S.C. § 3611. The Defendant shall write his name and the docket number of this case on each check or money order. Credit card payments must be made in person at the Clerk's Office. Any cash payments shall be hand delivered to the Clerk's Office using exact change, and shall not be mailed. For payments by wire, the Defendant shall contact the Clerk's Office for wiring instructions.

4. Additional Provisions

The Defendant shall notify, within 30 days, the Clerk of Court, the United States Probation Office (during any period of probation or supervised release), and the United States Attorney's

Office, 86 Chambers Street, 3rd Floor, New York, New York 10007 (Attn: Financial Litigation Unit) of (1) any change of the Defendant's name, residence, or mailing address or (2) any material change in the Defendant's financial resources that affects the Defendant's ability to pay restitution in accordance with 18 U.S.C. § 3664(k). If the Defendant discloses, or the Government otherwise learns of, additional assets not known to the Government at the time of the execution of this order, the Government may seek a Court order modifying the payment schedule consistent with the discovery of new or additional assets.

5. Restitution Liability

The Defendant's liability to pay restitution shall terminate on the date that is the later of 20 years from the entry of judgment or 20 years after the Defendant's release from imprisonment, as provided in 18 U.S.C. § 3613(b). Subject to the time limitations in the preceding sentence, in the event of the death of the Defendant, the Defendant's estate will be held responsible for any unpaid balance of the restitution amount, and any lien filed pursuant to 18 U.S.C. § 3613(c) shall continue until the estate receives a written release of that liability.

6. Sealing

Consistent with 18 U.S.C. §§3771(a)(8) & 3664(d)(4) and Federal Rule of Criminal Procedure 49.1, to protect the privacy interests of victims, the Schedule of Victims, attached hereto as Schedule A, shall be filed under seal, except that copies may be retained and used or disclosed by the Government, the Clerk's Office, and the Probation Department, as need be to effect and enforce this Order, without further order of this Court.

SO ORDERED:

HONORABLE LEWIS J. LIMAN
UNITED STATES DISTRICT JUDGE

DATE