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May 31, 2016

VIA ECF & BY HAND
Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

RE: UNITED STATES V. REZA ZARRAB
S1 15 CR. 867 (RMB)

Dear Judge Berman:


On behalf of **REZA ZARRAB**, we respectfully submit the enclosed Reply Memorandum and supporting Exhibits in advance of the Detention Hearing scheduled for Thursday, June 2, 2016, at 10:00AM.

Counsel very much appreciates the courtesy extended by the Court in allowing a Reply Brief to be filed. We sincerely hope that your Honor will recognize the information we have now provided to be a very relevant and substantive response to the Government's filings opposing our bail application. We look forward to further discussion of all pertinent issues at the hearing and will of course do our best to address any questions the Court may have with respect to the details of our bail proposal.

Finally, we respectfully note that we have filed the Affidavit of Joseph Jaffe under Seal. Mr. Jaffe is the Guidepost executive who will be responsible for the supervision of the security detail that will be assigned to Mr. Zarrab if granted bail. As his Affidavit includes the specific address where Mr. Zarrab will be living if granted bail as well as other details of the security arrangements, we ask the Court not to place the affidavit in the public record.

Thank you for the courtesy your Honor has always extended to counsel in all proceedings.

Respectfully,



Benjamin Brafman

cc: *Sidhardha Kamaraju* (Sidhardha.Kamaraju@usdoj.gov)
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