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BY ECF

The Honorable Robert M. Levy
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

RE: United States v. Webb et al., 15 Cr. 252
(Alfredo Hawit Bail)

Dear Judge Levy:

I write on behalf of the defendant Alfredo Hawit regarding our proposal for the conditions of his release. Taking to heart your Honor's comments at yesterday's argument, and in the hopes of expediting the client's release, we request to augment the conditions we have previously proposed by adding \$50,000 cash security for the bond. We are going to take the funds for this augmented proposal from our retainer. As argued in Court, we submit that the package of conditions proposed, augmented with this \$50,000 cash security, satisfies the standards for release. In the event your Honor agrees that this augmented package is sufficient, we would request that it be ordered and that the defendant be released as soon as possible, rather than waiting for our scheduled January 21 appearance.

I also would like to correct a statement I made during yesterday's argument. In addition to the RICO conspiracy (Count 1), Count 65 (a wire fraud conspiracy) and Count 92 (conspiracy to obstruct) are alleged to have occurred in the Eastern District of New York and elsewhere. All other counts in which Mr. Hawit is charged (Counts 31-37, 66-67) are alleged to have occurred outside this District.

Respectfully submitted,

BROWN RUDNICK LLP

Justin S. Weddle

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