

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA, :
:
-against- : Dkt. No. 20-CR-110 (LJL)
:
ISABELLA POLLOK, :
:
Defendant. :
-----X

EXHIBITS TO ISABELLA POLLOK’S SENTENCING SUBMISSION

REDACTED

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Dated: January 30, 2023
White Plains, NY

**EXHIBITS TO SENTENCING SUBMISSION OF ISABELLA POLLOK
REDACTED**

Exhibit

- A Isabella Pollok letter to Assistant United States Attorneys
Danielle Sassoon, Mollie Bracewell, Lindsey Keenan
June 7, 2022 [Redacted]
- B Isabella Pollok letter to the Honorable Lewis J. Liman
January 16, 2023
- C Lisa McDermott Mitigation Report
January 25, 2023 [Redacted]
- D Chitra Raghavan, PhD, Psychological Evaluation
October 10, 2020 [Redacted]
- E Alan M. Goldstein, PhD, Psychological Evaluation
June 8, 2022 [Redacted]
- F Deferred Prosecution Request, Jun. 10, 2022 [Redacted]
- G Alan M. Goldstein, PhD, Supplemental Psychological
Evaluation, January 18, 2023 [Redacted]
- H Zohair Bhatti letter to the Court

EXHIBIT A

(Redacted)

June 7, 2022

AUSA Danielle Sassoon

AUSA Mollie Bracewell

AUSA Lindsey Keenan

Dear Ms. Sassoon, Bracewell, and Keenan:

I want to introduce myself. My name is Isabella Pollok, I currently live in Staten Island and I am in a long term relationship with someone who I love and loves me. I have been working full time since October of 2020 as an associate at an NYC Amazon Fulfillment Center. I have a network of supportive colleagues and friends who accept me, accept my past and all my imperfections. I am not the person that I was in February, 2020 and I recognize that in order to grow and move forward with my life, I need to confront the past no matter how painful that might be.

When I started at Sarah Lawrence College in 2009, I saw it as opportunity to escape all the hardships in my life, including the physical, sexual and emotional abuse I suffered growing up at the hands of people closest to me. I felt I was sinking into the quicksand of what would have mirrored my parents and my brother, addicts with no direction.

What I did not realize was that I could not escape the past. The traumas, the pain, the humiliation did not change by mere re-location. I had no support, no friends, no family and felt hopeless. The intense depression and sense of isolation I felt transformed my thoughts of suicide into a deliberate plan to take my own life. By sophomore year Talia, my one and only friend, knew that I was suffering and felt equally at a loss as to how to help me. She reached out to her father to help.

Looking back on it now, I should have asked more questions but I was not emotionally in place to do that. I was looking for a life line and Lawrence Ray seemed to be that life line. Whether he was trained, whether he was good, whether he was evil, really was of no consequence to me. Talia was good to me, I trusted her and her trust in him was enough. At that point in time, he did save my life. There is no question that I wanted to make my family suffer for the way they made me suffer and the only way I believed I could do it was to commit suicide back in Texas during Christmas break.

The fact that I am here today I accredit to Lawrence and Talia. I also recognize that my vulnerabilities and his success at helping to keep me alive allowed him to take advantage of me and manipulate me for his own benefit. Looking back on the last ten years is painful, so painful that at times I have trouble being alone. I now recognize that Lawrence not only hurt me but used me in a way that caused harm to other people. I followed him blindly. I did not intentionally look the other way but believed he was able to see things that I could not. My abuse of alcohol and my continuing depression made much of the time a fog. I was told what to do and I did it. Eventually I knew instinctively what to do: if someone confessed, I turned on the camera, if someone disagreed they were the enemy.

When I look at the victims in this case, I identify with their vulnerabilities. I recognize why they too followed blindly. Lawrence was older, seemed wiser and experienced in such a way that he became like

a father figure. He claimed to acknowledge our feelings, both good and bad, which validated us as people. However, Lawrence did not know how to manage emotions, including his own. He had no regard for the damage he was causing to other people's lives.

I am truly ashamed of my conduct and the pain I caused others. I now know Lawrence subjected all of us to conditioning in its purest form. I recognize that this is not something that any of us will recover from easily. My hope is that with therapy, real love and support that I will be able to continue to be confident in myself and my own moral compass. To the other victims, I want to say I am sorry.

Over the last year, I have had the benefit of therapeutic interventions with my defense team and with counseling through Probation. I want continued therapy in order to recover from the damage Lawrence caused me. I would have sought treatment sooner, but I was afraid of exposing my vulnerabilities to be exploited by Lawrence, the way he did with others.

I am free of substances, free of influence, and I am making decisions by myself and for myself. I know that with the right tools I can recover and am committed to doing so.

This process of the criminal justice system, the distance from the chaos, and understanding real and meaningful relationships have changed me. 10 years ago, I would have given my life for Lawrence. A measure of how much I have grown was my unwillingness to help him or to continue to support his manipulations.

I know I committed serious crimes and I fully accept responsibility for my actions. I am not the same person who met Lawrence Ray over 10 years ago. I know this request comes late. Lawrence's hold over me changed who I was and it continues to be a healing process. With the help and love of others I have freed myself from the past. I am still a work in progress but know to the extent that I can make amends for the harm I have caused I am willing. I'm now asking for a second chance.

Isabella Pollok

A handwritten signature in black ink, appearing to read "Isabella Pollok". The signature is written in a cursive, flowing style with a large initial "I".

EXHIBIT B

January 16, 2023

Dear Judge Liman,

I wanted to take this opportunity to share my feelings regarding myself and this case. I assisted Lawrence Ray in harming people who at one point were not only my classmates but my friends. I know that Claudia, Santos, Yali, Felcia and Dan will have to live with the trauma and abuse that he inflicted over the course of many years. My participation in their abuse was wrong. I deeply regret it and I accept full responsibility for everything that I did.

I was victimized by Lawrence Ray and the complete dependence I felt towards him in every regard left me susceptible to believing whatever he told me. I exposed myself to these charges because he justified the physical, mental and emotional cruelty that he subjected his victims to. I trusted in this person so much that I held his words in a higher regard than my own sense of right and wrong. He gained and exploited my trust in him for his own benefit; financial and otherwise.

It was not until well after I was charged by the SDNY that I began to see how I was used by Lawrence. The support and the countless hours of talking with my current legal team has helped me to break down the false narrative and paranoia that Lawrence perpetuated for ten years. Most of all, the love and support of my boyfriend has opened me up to forming close relationships based on respect and genuine regard.

Since this case began, I have been asked many times if I was any way vulnerable when I met Lawrence. For the longest time I believed that at nineteen years old, I was an adult and therefore in complete control of my mindset. I wish I had been able to view the world then as I do now. Attending Sarah Lawrence College was my way of trying to run away from traumas that I experienced during my childhood. My parents were drug addicts and growing up I lacked a healthy ability to integrate with my peers. The shame I felt because of what my parents did closed me off from forming any lasting, meaningful connections with anyone. After I was charged, I had to face hard realities that one cannot run away from past traumas but must work through them to have any semblance of a happy, fulfilling life. I am still working on this process of healing.

Since gaining employment at the Amazon Fulfillment Center in late 2020, I've been given the opportunity to work in various roles in my department. Furthermore, I have been asked to train new, young employees in these roles; employees the same age as I was when I met Lawrence. In training them, I have seen many qualities that I have for many years denied ever existed within myself. I have seen the uncertainty and the desire for reassurance and the pursuit of individuality; something that everyone is entitled to. It wasn't until witnessing this that I began to accept just how susceptible I was to being manipulated.

I trusted Lawrence more than I trusted myself and in doing so I betrayed my own sense of right and wrong. This trust became a sort of blind faith. Lawrence convinced me that Claudia, Santos, Yali, Felicia and Dan poisoned me and were constantly trying to hurt me, just as he convinced

them that they were doing these things. It's difficult for me to understand now how I could have believed that such conspiracies were based in reality.

I think about what happened over the course of those ten years every day; the torture, humiliation, and abuse that he inflicted. I reached a point with Lawrence where I preferred the physical violence over the emotional torment because I found it less painful. The uncertainty of what he would do to me daily became the most psychologically damaging.

Over the past three years, I have gone from someone whose sense of self was solely dependent on another person to someone who is making her way in the world. I often doubt if this is something I deserve, given what I've done. I know I've harmed the victims in this case and I am deeply sorry.

Judge Liman, I am asking you to keep me out of jail. I am ashamed of my conduct and I accept full responsibility for my actions. To the extent that I can make amends, I want to do anything possible. I hope that you will allow me the opportunity to continue making significant and constructive steps in my recovery outside of incarceration.

Sincerely,

A handwritten signature in black ink that reads "Isabella Pollok". The signature is written in a cursive style with a large, prominent initial 'I'.

Isabella Pollok

EXHIBIT C

(Redacted)



January 25, 2023

Hon. Lewis J. Liman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

RE: United States vs Isabella Pollock, 20-cr-110 (LJL)

Dear Judge Liman:

This report is being prepared for the purposes of sentencing and mitigation as it relates to Ms. Isabella Pollock. By way of background, I was retained by Jill Shellow and David Bertan as a Mitigation Specialist for the team representing Isabella Pollock. I have been working with a forensic population for over 20 years in complex criminal matters including capital cases. I am licensed as a mental health counselor in Florida and New York and began work on this case in July, 2021.

I have spent approximately 100 hours in person with Ms. Pollock; I have shared information with defense experts and provided them with avenues of information to explore and had extensive communication and coordination with Isabella's lawyers. I have reviewed mental health evaluations, discovery, videos and audio and other documents related to this case. Isabella and I have discussed in depth her beliefs, feelings and details of her early life and the last 10 years she spent with Lawrence Ray. Isabella has always been cooperative despite the extremely emotional and challenging work that went into understanding and accepting where she was in life. In addition to her work with this writer, Isabella has also been meeting with a counselor assigned by Pre-Trial Services on a weekly basis.

We are all products of our past, our experiences and environment. Who we meet, what books we read, what loves we have had, what pains we have experienced make us the unique being that we are. Early development plays a key role in who we become as an adult. It is the seed that has been planted by our early exposures that gives the foundation for everything that comes after. When the foundation is cracked, as was the case with Isabella, you lack confidence, courage, control and most importantly independence.

Unfortunately, no one comes from a past without difficulties and Isabella is no exception. [REDACTED]

[REDACTED] Her father, absent most of her life and addicted to drugs was the person she identified with and felt the closest to. Her mother was also an addict. She had few friends and lived a very sheltered life. The seed to which she was to grow from was damaged. [REDACTED]

[REDACTED]. She still faces many uphill battles to work through those memories that affect her to this day. I will not spend a great deal of time reporting on Isabella's past as that is well documented both in the PSR and [REDACTED]

What I want to focus on is the strength, growth and development of Isabella Pollock. In order to work with Isabella, we needed to understand her commitment to Lawrence Ray and what drove her. She was clearly fearful of a life without Lawrence Ray. Isabella believed that Lawrence Ray saved her and without him she would lose control of her own life. She was unable to independently identify to me her own thoughts and distinguish them from Lawrence Ray's theories. She was having difficulty making decisions, was depressed, had a great deal of anxiety. Her posture was rigid, and she was paranoid, she trusted no one fearful that this case was all part of a larger conspiracy. She wanted only to stick to the facts as told by Lawrence Ray. Her credulous loyalty to him was unshakeable. One piece of particularly disturbing video in the discovery shows the depths of disregard for her own personal safety and the extent to which she was willing to humiliate herself in order to please Lawrence Ray. [REDACTED]

[REDACTED] Her focus is on the filming and during the incident Lawrence Ray calls her. This shows the sadistic pleasure Lawrence Ray took in exploiting and degrading Isabella knowing she could be in danger.

Isabella saw herself and Lawrence Ray as the victims and while his goal was clearly self-gratification, her belief was this was a conspiracy and she and Lawrence Ray were the targets. She was angry, frustrated

and had no real insight into the consequences or impact on her actions on her future. She wanted to fight for the “truth” as she believed it. It is that same strong will that allowed her to fight to get her life back.

The process of pulling Isabella from the incredulous grasp of Lawrence Ray began with distance from the coercive techniques that Lawrence Ray employed on her already fragile being. That distance came as a product of this case. However, that alone was not enough for the process of healing to begin. The exiting of a cult or any other form of brainwashing requires participation and engagement. Isabella’s critical thinking processes and emotional processing were disabled. However, she was always willing to engage in helping her defense team to understand the evidence, actions and how she perceived them. She was willing to engage in social and professional relationships and begin new.

Isabella saw getting into Sarah Lawrence College as an escape and an opportunity for a future. She pulled herself out of a chaotic family situation with the hopes of escaping the traumas of her past.

Unfortunately, her mental state at the time allowed her to become prey to a much more sophisticated type of abuse. Lawrence Ray was a charismatic and compelling leader who demanded her loyalty and she, only wanting his love and acceptance, gladly followed despite his manipulative, exploitive and abusive tactics. He was sexually, physically and psychologically abusive to her. He was able to find her deepest vulnerabilities and exploit them to achieve maximum benefit. She never recognized or questioned the risks, and she had complete confidence that Lawrence Ray was her protector. Isabella believed that she “deserved” to suffer the multiple incidents of violence, humiliation and degradation. Her biggest fear and the worst punishment for her were that he would ignore her, not speak to her, not be there for her, like what she experienced as a child from her parents.

The emotional and cognitive dissonance between the facts as uncovered by the Government and the narrative Lawrence Ray created forced Isabella to evaluate all her beliefs and values. As an example, Isabella’s belief that she and Lawrence had been poisoned was unshakeable until the very end. The reality of his motives and actions were challenged and difficult to accept. She is still working on coming to terms with losing the last 10 years of her life. She no longer believes many of the lies that Lawrence Ray told or the conspiracies that he used to control her.

This process of unraveling the fiction imposed upon Isabella was the first step to allowing her to emotionally process her feelings about herself and the victims in this case. I spent hours with Isabella as she worked through each step and unraveled the web of lies. Her perseverance was admirable. She struggled to make sense of so many aspects of relationships. Isabella’s hard work came with

consequences including recognizing the lost opportunities and forcing her begin to address the traumatic pieces of her past. Being a part of her growth has been gratifying and I truly believe that Isabella if she continues with therapy and medication management, will be successful.

Lawrence Ray had 10 years to control and exploit Isabella comparatively to date she has had only two years to break free. She has begun to grow and seek nourishment from positive relationships and informed thinking. The work that was done by the defense team was small steps compared to the work that Isabella still has ahead of her.

It is this writer's belief that incarceration would be devastating for Isabella Pollock. She has just begun to take back control of her life. The Bureau of Prisons will take that control away from her again. It is also this writer's belief that the break in progress due to lack of meaningful psychological care will set her back. Isabella needs support, guidance and continued healing, all of which she has coordinated and is participating in now. Isabella will be unable to fully engage in her healing process until this case is over.

Sincerely,

Lisa McDermott

Lisa McDermott
Mitigation Specialist

EXHIBIT D

(Redacted)

REDACTED

EXHIBIT E

(Redacted)

REDACTED

EXHIBIT F

(Redacted)

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June 10, 2022

By Email

AUSA Danielle R. Sassoon
AUSA Mollie Bracewell
AUSA Lindsey Keenan
United States Attorney's Office
Southern District of New York
1 St. Andrews Plaza
New York, New York 10007

RE: *United States v. Isabella Pollok*, 20-Cr-110 (LJL)

Dear AUSAs Sassoon, Bracewell, and Keenan:

We submit this letter as a formal request that your Office enter into a Deferred Prosecution Agreement with Isabella Pollok. Isabella is not the same person that she was when she was under the control of Lawrence Ray. She is not the same person who met with you before her indictment. As she explains in her letter, she now recognizes the control that Mr. Ray exerted over her for 10 years and the harm that he inflicted on her.¹ She truly appreciates that while she committed shameful acts, she too was a victim in this case.² Her dramatic transformation warrants an extraordinary disposition.

SUMMARY

Growing up in San Antonio, Isabella was neglected and abused – verbally, emotionally and sexually. [REDACTED]
[REDACTED] Isabella was a loner who thought that at Sarah Lawrence she would find a community where she could make friends and find herself. In her freshman year, Isabella met Talia Ray and they quickly became best friends

¹ See Exhibit A.

² The statements in this letter are intended as “made in the course of plea discussions” for purposes of Fed. R. Evid. Rule 410 and Fed. R. Crim. P. Rule 11 (f).

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bonding over their shared childhood traumas and love of movies. But her friendship with Talia was insufficient to prevent Isabella from sliding into a deep depression as a sophomore. [REDACTED]

[REDACTED] As Isabella remembers, Talia was worried about her and asked Lawrence Ray to talk to her.

Isabella spent hours talking with Mr. Ray, and credited him with saving her life. She did not recognize that his help was the first phase of grooming her to satisfy his insatiable quest for power, control and sexual gratification. The first phase was Mr. Ray as Isabella's savior. In the second phase, Mr. Ray enabled Isabella to become financially and emotionally dependent upon him, and in the third phase he used his sexual, verbal, and physical abuse of Isabella and the others to hold his now fully formed grip on Isabella together.

After 9 years, in February 2020, with Isabella in Mr. Ray's clutches, Mr. Ray was arrested. Isabella was shocked. She firmly believed Mr. Ray was a savior, not a criminal. [REDACTED]

In January 2021, Isabella was indicted as Mr. Ray's co-conspirator. Isabella's defense team came together in the summer with the addition of Lisa McDermott, a licensed mental health counselor. Over the course of the fall of 2021, Isabella was able to start the process of separating from Mr. Ray and leaving behind her delusions. The transformation was nothing short of extraordinary. By December 2021, Isabella was able to recognize the damage Mr. Ray had caused her, and the pain that she caused others when she blindly did his bidding. She sat with the video and audio recordings that she herself remembered making and was thoroughly ashamed. She could not understand how she had allowed herself to do these things.

³ See Exhibits B and D.

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[REDACTED]

Drs. Raghavan and Goldstein agree that Isabella's separation from Mr. Ray and Talia – enabled by her defense team and the severance of the trials – allowed Isabella to recognize the highly dysfunctional, exploitative nature of her interactions with Mr. Ray. Isabella no longer is the vulnerable 20-year-old she was when she met Mr. Ray, nor is she the woman who blindly obeyed Mr. Ray's instructions for 10 years. She is a cult victim who wants therapy so that she can continue to gain clarity and learn to feel the emotions about the damage that Mr. Ray did to her. Dr. Goldstein sees little chance that Isabella will be susceptible to another Lawrence Ray.

Isabella lives in Staten Island. She is in a stable, romantic relationship with her first real lover, and she has a job at Amazon where she has already been once promoted. Isabella does not know what she wants to do next, but as a first step when her legal problems are over, she wants to move away from New York and go back to school. Isabella joins us in asking your Office to exercise its discretion and give her a second chance at finding herself.

STATEMENT OF FACTS

Ms. Pollok's Childhood

Isabella grew up in San Antonio, Texas. Isabella's father was addicted to methamphetamines and was in and out of prison for years. When Isabella was four years old, her mother left her father. Afterward, Isabella, her brother and their mother moved many times, always living in marginalized neighborhoods. Isabella attended four elementary schools before settling into an all-girls Catholic high school. Isabella's mother was generally absent and unavailable to Isabella as a parent. Isabella's father was not any better.

Isabella's mother, who lost her job after a work accident, was an alcoholic who later turned to abusing her prescription pain medications.

⁴ See Exhibits C and D.

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Isabella remembers that she and her brother had to take their mother to the hospital after she had overdosed on phenobarbital. Isabella's brother could be violent and took it out on Isabella. Isabella's mother did nothing to protect Isabella.

Isabella would often be left with her grandmother and her grandmother's boyfriend. [REDACTED]

Isabella was a quiet, withdrawn child. She had difficulty making friends. [REDACTED] She did not date in high school, instead she focused on her schoolwork hoping to attend college. In her senior year of high school Isabella received a brochure from Sarah Lawrence College inviting her to apply. Isabella was particularly attracted to Sarah Lawrence College because its brochure said "You're different – so are we."

Meeting Talia Ray and Lawrence Ray

Isabella looked forward to making friends, finding herself and becoming the adult she hoped to be at Sarah Lawrence. Almost immediately she met Talia Ray, the woman she described as her best friend. They were both taking a lecture class, "The Age of Cesar," and they bonded over their traumatic childhoods and love of movies. As they grew close, Talia shared with Isabella details of her childhood. Talia told Isabella about the trauma she experienced as a teenager as a result of her parents' contentious divorce. [REDACTED]

[REDACTED] Talia always told Isabella about how her father fought for his children and about his bravery and valor when he was up against the resources of politicians and governments.

Isabella met Mr. Ray in the fall of her sophomore year when he moved in with Talia immediately after he was released from prison. But it was not until Thanksgiving when they grew close. Around the holiday, Isabella began to withdraw mentally and emotionally from school and even Talia. Initially, Isabella had believed that Sarah Lawrence would allow her to begin making sense of her life and the things that had happened to her, but it did not. Instead of being Isabella's safe haven, the environment at Sarah Lawrence further depressed her. Isabella had made the decision to commit suicide when she

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returned to Texas for the winter break. Talia was worried about her friend. As Isabella recalls, Talia asked Mr. Ray to talk to Isabella.

On Thanksgiving, Isabella and Mr. Ray talked through the night. Although Isabella does not remember the specific details of their conversation, she recalls asking Mr. Ray if he believed that she had been abused as a child. When he responded yes, Isabella broke down crying, and her fate was sealed.

From Talia's best friend to Mr. Ray's blind follower

Quickly, Isabella's relationship with Mr. Ray became sexual. During her junior year, Isabella was unable to secure financial aid and live on campus because her mother had refused to provide her with the tax filings she needed to secure the grants and loans. Mr. Ray swooped in and helped Isabella receive an aid package and continue her third year of college. Unfortunately, Isabella had missed the housing deadline and could not reside on campus. Again, Mr. Ray came to her rescue, offering to let her live at his apartment in Manhattan and to provide her with transportation to Sarah Lawrence for class. At that point, Mr. Ray was Isabella's savior, to whom she would be forever indebted. From 2011 until 2021, Mr. Ray was the most important relationship in Isabella's life.

Lawrence Ray controlled Isabella for a decade. They were lovers. The Mr. Ray that Isabella saw was a teacher, a mental health counselor and a guiding light. To Isabella, Mr. Ray was the parent that she had always craved. Mr. Ray saw Isabella as an ideal target for satisfying his insatiable need for power, control and sexual gratification. Thus, Mr. Ray began his grooming of Isabella.

Mr. Ray always had an answer whenever Isabella questioned him about his methodologies. Isabella was conditioned not to ask "why" and not to challenge Mr. Ray's authority. Isabella obeyed Mr. Ray's commands to the point where she knew what Mr. Ray wanted her to do.

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Lawrence Ray is Arrested

Isabella was living with Mr. Ray when he was arrested in February 2020. She was cooperative during the ensuing search and sat for hours answering questions by the FBI agents and NYPD detectives. In March 2020, Isabella and her first lawyer, Peter Skinner, Esq., met with your Office and heard your invitation to voluntarily meet with them and your explanation that the Government had sufficient evidence to charge Isabella with the same crimes for which Mr. Ray had been indicted. When Isabella declined to proffer, you indicated to Mr. Skinner that your Office would have to reconsider its decision not to charge Isabella.

[REDACTED]

For chronological context, in October 2020, Mr. Skinner drafted a deferred prosecution request addressed to your Office that he never submitted. Mr. Skinner and Isabella disagreed about what the request should say. Mr. Skinner starkly set out the nature of the cult and Mr. Ray's power over his victims, including Isabella. Isabella – still in the same delusional state as she had been in your meeting in March and when Dr. Raghavan evaluated her – forbid Mr. Skinner from making the request. Mr. Skinner acquiesced.

Isabella is Indicted

In January 2021, the Government filed a superseding indictment in which Isabella was named as a co-defendant. Isabella was charged with three conspiracy counts – racketeering, extortion and sex trafficking – and money laundering. The Honorable Lewis J. Liman appointed Mr. Bertan to represent Isabella in April 2021 and Ms. Shellow in July 2021.

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Starting in July 2021, Isabella had regular meetings with her new lawyers, and in August 2021, the lawyers added Lisa McDermott, a licensed mental health counselor, to the defense team. Ms. McDermott also began working with Isabella.

From their very first meetings, the defense team recognized that Isabella was still holding onto her delusional beliefs. For example, whenever scheduling was discussed, Isabella stressed that she wanted to go to trial with Mr. Ray. She wanted to sit next to him at counsel table, and she opposed even the idea that there was merit to a severance.

Isabella Turns the Corner

As summer gave way to fall, the defense team saw Isabella struggling as she started to pull away from Mr. Ray. After working with Ms. McDermott, by October 2021, fissures were developing in Isabella's delusions. There was a noticeable shift in Isabella's thinking. First, Isabella agreed that we should seek a severance. Then she made explicit that she did not want to help Mr. Ray with his defense.

In October 2021, Judge Liman granted our motion for a severance. This ruling gave Isabella the time and structure that she needed to achieve the separation that Dr. Raghavan believed would enable her to recognize the harm that Mr. Ray had done not only to the other victims, once her friends, but also to herself.

By November 2021, Isabella tearfully admitted to Ms. McDermott that she did not know anymore whether Mr. Ray was a good person or a bad person. And by December, Isabella acknowledged to her defense team and to herself that over a period of many years Mr. Ray had manipulated and exploited her for his own gratification. Isabella watched the videos that she herself had recorded and recoiled in shame. She could not understand how she possibly could have participated in such cruelty. It was eye-opening. For the first time, Isabella genuinely understood the depth of the damage Mr. Ray had caused.

December 2021 and January 2022

In our various discussions with your Office, you were focused on whether Isabella saw herself as a victim. In her delusional period, Isabella was

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adamant that she was not a victim. “Victim” was a word she refused to acknowledge as applied to herself. By December 2021 she began to internalize her victimhood and could articulate how she, just like Claudia, Santos, Felicia and Yalitza, was a victim. We were impressed. Over five short months, Isabella had broken through the most serious of her delusions. In mid-December, with Mr. Ray’s trial barely two months away and without Isabella’s knowledge, we approached your Office about whether you were still interested in meeting with Isabella. You were interested.

We set up a series of meetings with Isabella over the Christmas holidays to talk about potential cooperation. Unfortunately, COVID interrupted those plans. First, Mr. Bertan contracted COVID and had to quarantine. Then Isabella contracted COVID, and then Ms. McDermott’s mother caught the virus. It was mid-January 2022 before we were able to talk to Isabella about meeting with your Office.

Isabella was surprised to learn about our overture, but was willing to reserve judgment until she heard us out about how cooperation would work and its potential benefits. Isabella’s initial response was that she would meet with you and answer your questions truthfully, but it would be without regard as to whether the truth would hurt or help the Government or Mr. Ray. Ms. McDermott explained to us, however, that Isabella was fearful and that her reticence harkened back to the March 2020 meeting. The delusional Isabella came away from the March meeting feeling that you would never believe her. And of course, you were never going to believe the delusional Isabella. Isabella was concerned that no matter what she said now, you still would not believe her. She had not put the pieces together. In March 2020, Isabella’s truth and her reality were the delusions of a cult victim still under the sway of her abuser. Everyone could see that except her. By January 2022, while she had significantly let go of those delusions, her perception of your Office remained sufficiently distrustful that we concluded such a meeting would not be productive.

Lawrence Ray Goes to Trial

Isabella and her boyfriend went away for the first week of Mr. Ray’s trial in part to avoid harassment by the media. By that point, reporters were routinely seeking to interview her, finding her at work and waiting for her when she came and went from her apartment building. When they returned to

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New York, the reporters were gone. Isabella fully expected the eventual verdict and agreed it was the only verdict that the jury could have reached.

Isabella Now

After the verdict, we told Isabella that we were going to ask that her July trial be delayed so that [REDACTED]
[REDACTED] She supported our decision, and she supports this request.

[REDACTED]

THE CRIMINAL CONDUCT

Mr. Ray exploited vulnerable victims. All of the young people, including Isabella, who came into his orbit between 2011 and 2020, were damaged in some respect that made them an easy mark for Mr. Ray. Using recognized “cult leader” strategies, Mr. Ray groomed them to feed his need for power: He was attentive and understanding. He made each of them feel special and unique. He helped them solve problems. In sum, first he earned their trust. Then he isolated them from their families and made them dependent on him. Then it turned ugly. He threatened and physically tortured them. He sexually abused them and made them sexually abuse one another.

In a way, Mr. Ray created a two-track cult: one track consisted of the members he exploited for his own sexual and financial gratification. This was the track that included Santos Rosario, Felicia Rosario, Claudia Drury, and Daniel Levin among others. The other track was solely Isabella – his daughter’s best friend. Isabella was conditioned not only to feed Mr. Ray’s sexual and financial gratification, but she was also groomed as Mr. Ray’s helper. Isabella

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did Mr. Ray's bidding. She video and audio recorded hours of the abuse he inflicted on the others. She kept track of every penny that was spent by anyone for everything. She collected money, deposited money and allowed Mr. Ray to use her bank accounts. She enforced his bizarre edicts and philosophies. Isabella does not deny the conduct ascribed to her at trial. Her different track also makes her a victim.

THE CHARGES, SEVERANCE AND VERDICT

In 2020, your Office indicted Mr. Ray, and he was charged with conspiracy and substantive counts of racketeering, sex trafficking, extortion, forced labor, tax evasion. Approximately one year later, Isabella was indicted in a superseding indictment with Mr. Ray, and was charged with racketeering, extortion, and sex trafficking conspiracies and money laundering. A second superseding indictment added a VICAR charge against Mr. Ray. In October 2021, in response to our motion, and with the consent of the Government, Ms. Pollok's trial was severed from Mr. Ray. In April 2022, Mr. Ray was convicted of all counts and is now awaiting sentencing. Isabella's trial is currently set for September 2022.

THE INTERESTS OF JUSTICE SUPPORT A DEFERRED PROSECUTION AGREEMENT

We understand your Office uses deferred prosecution agreements sparingly, reserving them for the cases where pretrial diversion is in the interests of justice. Given the circumstances of Isabella's involvement in Mr. Ray's crimes, including the rare confluence of factors that made her susceptible to his manipulations, along with the tremendous growth she has shown since being indicted, a deferred prosecution will allow her to receive treatment and move forward with her life.

PRINCIPLES OF FEDERAL PROSECUTION

The Justice Manual instructs a federal prosecutor "to commence or recommend federal prosecution if he/she believes that the person's conduct constitutes a federal offense, and that the admissible evidence will probably be sufficient to obtain and sustain a conviction, unless (1) the prosecution would serve no substantial federal interest; (2) the person is subject to effective

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prosecution in another jurisdiction; or (3) there exists an adequate non-criminal alternative to prosecution.”⁵

The fact that a crime has been committed and that there is sufficient evidence to secure a guilty verdict is not necessarily sufficient to prosecute an individual.

The prosecution must also serve a substantial federal interest, and the prosecutor must assess, whether in his/her judgment...there exists an adequate non-criminal alternative to prosecution. It is left to the judgment of the attorney for the government to determine whether these circumstances exist.

The Justice Manual instructs that in determining whether a continued prosecution would serve a substantial federal interest, prosecutors should consider:

1. Federal law enforcement priorities, including any federal law enforcement initiatives or operations aimed at accomplishing those priorities;
2. The nature and seriousness of the offense;
3. The deterrent effect of prosecution;
4. The person’s culpability in connection with the offense;
5. The person’s history with respect to criminal activity;
6. The person’s willingness to cooperate in the investigation or prosecution of others;
7. The person’s personal circumstances;
8. The interests of any victims; and
9. The probable sentence or other consequences if the person is convicted.

This list is not all-inclusive. As the Justice Manual states, “[N]ot all of the factors will be applicable to every case, and in any particular case one factor may deserve more weight than it might in another case.” JM § 9-27.230.

⁵ Justice Manual § 9.27.220.

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Law Enforcement Priorities
Nature and Seriousness of the Offense

We concede that prosecuting sex trafficking is a law enforcement priority and that the racketeering, sex trafficking, and extortion conspiracies and money laundering, the crimes with which Ms. Pollok is charged, are serious. Moreover, we do not argue that lengthy sentences for these crimes are often appropriate and that long sentences can and do have a specific and general deterrent effect.

Specific Deterrence

Isabella is highly unlikely to become a recidivist. [REDACTED]

There is a vast difference between the delusional Isabella and who she is now. She has made tremendous strides in her self-work, and now understands how Mr. Ray was able to brainwash her. She is a different, stronger, more self-reliant and self-confident woman, and will not allow another person to manipulate her again.

Nothing more is needed to deter Isabella from committing future crimes. Isabella would not have engaged in the charged conduct but for Mr. Ray. Between Mr. Ray's conviction and the progress that she has made, the Government has all the specific deterrence it needs with respect to Isabella.

General Deterrence

The government has little to gain from continuing to prosecute Isabella. Mr. Ray has been convicted, and will no doubt be sentenced to a lengthy prison term. The Government's law enforcement goals have been met. The Government clearly believes Isabella was victimized, and it is difficult to see how prosecuting this victim will deter future crimes by others. The Government does not need to continue with its prosecution of Isabella to deter future college students from resisting predators like Lawrence Ray.

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Isabella's Culpability for the Offenses
Isabella's Criminal History

For purposes of this request, Isabella concedes her guilt. Isabella accepts that even though she was under Mr. Ray's control, she committed the acts with which she is charged. This is the first and only time that Isabella has been charged with a crime.

Throughout a turbulent and abusive upbringing, Isabella avoided the pitfalls of alcoholism, drug addiction, and criminal behavior that swallowed up her father, mother and brother. Instead, she stayed to herself, did not even date in high school, and focused her energy and intellect on getting into college. Little did she know about what her college experience would be.

Isabella's Willingness to Cooperate

The next factor, willingness to cooperate, when looked at objectively, does not disqualify Isabella from pre-trial diversion. As both Dr. Raghavan and Dr. Goldstein make clear, at the time of Mr. Ray's arrest, Isabella was in no condition to cooperate against him. At that point, Isabella was still a "cult victim" suffering from sexual and emotional abuse by Mr. Ray. Her perceptions and realities were distorted by her delusional beliefs. Unfortunately, there was not enough time for Isabella to make the progress she needed to make if she was going to be able to provide substantial assistance to the Government. By January 2022, she had made tremendous progress, but her inability to cooperate is not her fault and should not be held against her.

As time passed, Isabella's perceptions shifted, and she gradually recognized the power Mr. Ray had held over her thoughts and actions. Seeking to sever her trial from Mr. Ray's was a dramatic first step for her: as Isabella writes, it is a measure of her growth over the last year that she was unwilling to help Mr. Ray by being tried with him and now understands and totally denounces how he manipulated her and others.

Isabella's Personal Circumstances
The Interests of the Other Victims

Mr. Ray knew precisely how to work his way into Isabella's confidences. He listened to her, consoled her, sexually exploited her, and convinced her that

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he knew what was best for her. At first, his counseling sessions helped her, but eventually, his techniques broke her so thoroughly that he was able to remake her as his subservient confederate, using her to further his extortion and sex trafficking.

[REDACTED]

[REDACTED]

[REDACTED]

Isabella is another victim of Mr. Ray. She too suffered as a result of his conditioning and control. She too suffered abuse from him – physical and verbal – as he threatened and pushed her and manipulated her into dangerous sexual conduct simply to satisfy his own desires.

As noted in its disclosure letters, the Government recognized Isabella’s status as a victim. Moreover, the perceptions of the other victims, all of whom presented similar backgrounds of vulnerability, are that Isabella was herself another of Ray’s victims. They do not want to see her punished for what they view as her unwitting participation as Mr. Ray’s assistant.

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Probable Sentence

The final factor in the Justice Manual is the probable sentence Isabella could receive if convicted. The probable sentence following a cult victim's conviction is unknowable. Each of the four counts in the Indictment charges Isabella with a crime that has a statutory maximum of 20 years. Further, a conviction for conspiracy to commit sex trafficking raises the real risk that Isabella would have to register as a sex offender minimally under state law. A conviction of any one of the other offenses would also have life-long consequences for Isabella. In an interesting turn of events, Isabella is interested in pursuing a degree in criminology. Whether she might want to go to law school is unknown, but a federal criminal conviction would make it unlikely she could pass the character and fitness requirements necessary for bar membership.

IN ISABELLA'S OWN WORDS

Isabella's transformation is most evident from the letter that she wrote in support of this request.

I now recognize that Lawrence not only hurt me but used me in a way that caused harm to other people. I followed him blindly....I was told what to do and I did it. Eventually I knew instinctively what to do: if someone confessed, I turned on the camera, if someone disagreed they were the enemy.... I am truly ashamed of my conduct and the pain I caused others....To the other victims, I want to say I am sorry.

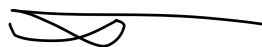
10 years ago, I would have given my life for Lawrence. A measure of how much I have grown was my unwillingness to help him or to continue to support his manipulations. I know I committed serious crimes and I fully accept responsibility for my actions.... [T]o the extent that I can make amends for the harm I have caused I am willing.

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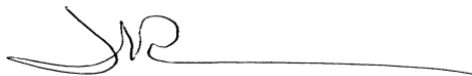
CONCLUSION

There is no substantial federal interest in the continued prosecution of Isabella. Isabella is a victim and the ends of justice are well served by a deferred prosecution.

Very truly yours,



David K. Bertan, Esq.



Jill R. Shellow, Esq.
Counsel for Isabella Pollok

EXHIBIT G

(Redacted)

REDACTED

EXHIBIT H

Dear Judge Liman,

I am writing to express my support for Isabella Pollok, who is currently facing sentencing in your court. I have been in a relationship with Isabella for the past year and a half, during which time I have come to know her as a compassionate, caring, and kind individual who consistently goes out of her way to assist others.

At Amazon, where we first met, Isabella always had a positive attitude and friendly demeanor. She always showed willingness to help her colleagues and create a supportive work environment. She would often go above and beyond to check in on individuals who appeared to be having a difficult day, while others may have overlooked them. This was what initially drew my attention to her. During a chance encounter in the break room, we engaged in conversation and I discovered that she possessed a light-hearted and humorous personality. As we got to know each other better, I learned that we shared a common background of growing up in challenging family situations. This served to further strengthen our bond and I came to appreciate her kind and understanding nature.

Isabella is a dedicated and responsible person who is always willing to lend a helping hand and goes out of her way to support and advocate for her colleagues, particularly those who may be shy or are facing mistreatment or overwork. Her actions have had a positive impact on the workplace and the lives of those around her.

In addition to her kindness and compassion towards others, Isabella has also had a profound impact on my life. She has been my rock, my biggest cheerleader, and has given me the confidence and motivation to pursue my goals and aspirations. She has been an important and positive influence on me and I cannot imagine my life without her.

I understand the gravity of the charges against Isabella, however, I believe that she is remorseful for her actions and is determined to turn her life around. I know that she is capable of making positive changes and becoming a productive member of society once again. I firmly believe that her character and the positive impact she has had on others, including myself, should be taken into consideration during her sentencing. I kindly ask you to show leniency in her sentencing and to consider her character and the impact she has had on others.

Thank you for your time and consideration.

Sincerely,
Zohair Ahmed Bhatti