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**JAFFE**  
LLP

August 29, 2024

**BY ECF**

The Honorable Lewis A. Kaplan  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Ryan Salame*  
No. 1:22-cr-00673-LAK (S.D.N.Y.)

Dear Judge Kaplan:

On behalf of Ryan Salame, we write to inform the Court and the Government that Mr. Salame hereby withdraws without prejudice his *Petition for a Writ of Error Coram Nobis, or Alternatively for a Writ of Audita Querela* (ECF No. 470) (“the Petition”). Now that the indictment of Mr. Salame’s longtime partner, Michelle Bond, has been docketed, Mr. Salame is withdrawing the Petition so that Ms. Bond may raise the matter in her proceeding.

To be clear, Mr. Salame stands by the facts set forth in the Petition and his accompanying declaration.<sup>1</sup> Mr. Salame is withdrawing the Petition, however, to allow the facts to be developed by Ms. Bond, and a ruling to be made, in her case, *United States v. Bond*, No. 1:24-cr-000494 (GBD). Since the primary relief sought in the Petition is dismissal of the indictment against Ms. Bond, *see* Pet. 26, it makes sense to adjudicate the issues raised in the Petition in the docket in which the indictment is pending.

For the record, Mr. Salame denies the Government’s nonsensical contention that he filed the Petition because this Court “imposed a sentence far above the sentence sought by Salame.” ECF No. 474 at 2. The clear impetus for the Petition was the imminent

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<sup>1</sup> We cannot help but note that the Government’s position that, on April 28, 2024, it gave no assurances to Mr. Salame’s counsel that a guilty plea by Mr. Salame would also conclude the investigation into Ms. Bond is contradicted moments later by the Government’s claim that a subsequent conference was held to “clarify” what it had said on April 28. ECF No. 474 at 1–2. If there was no “assurance,” why would there be any need for a clarification?

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indictment of Ms. Bond, which occurred on August 22, 2024, one day after Mr. Salame filed the Petition—not his sentencing three months ago on May 28, 2024.

Accordingly, Mr. Salame's Petition is hereby withdrawn without prejudice.

Respectfully submitted,

*/s/ H. Christopher Bartolomucci*  
H. Christopher Bartolomucci

cc: All counsel of record (by ECF)