

AGNIFILO INTRATER

November 22, 2024

BY EMAIL

Hon. Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs, 24-cr-542 (AS)*

Dear Judge Subramanian:

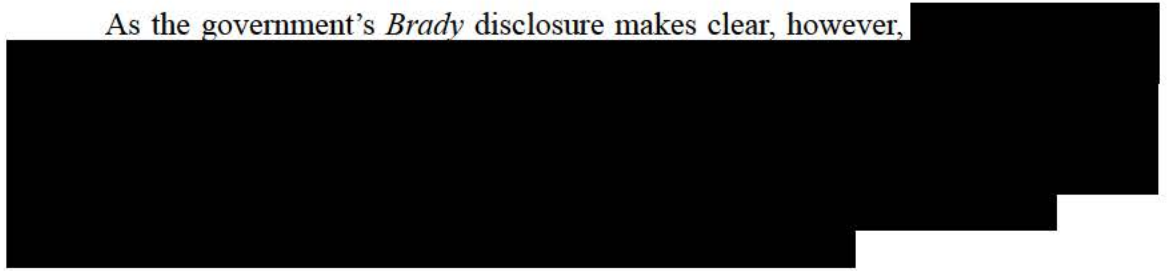
We submit this letter in further support of Mr. Combs' Renewed Motion for Bond (Dkt. 60), with the accompanying exhibit, which is a letter the government sent to us at 11:32 pm yesterday evening. This letter was sent to us in response to targeted *Brady* requests. The proffers cited in the government's letter further support Mr. Combs' position as to "the weight of the evidence" and "the nature and seriousness of the offense." 18 U.S.C. § 3142(g)(2) & (4).

As just one example, in attempting to rebut the defense's proffer during the initial bail hearing, the government argued the following:

Yesterday, the defense said they interviewed about half a dozen escorts who would dispute the government's account of what happened during the freak offs. Our investigation is ongoing, and so I can't say too much about this, but I will note that half a dozen escorts is just the tip of the iceberg of the number of escorts who have participated in freak offs.

Sept. 18, 2024 Tr.13.

As the government's *Brady* disclosure makes clear, however,



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Additionally, this letter provides even more new information that warrants reopening the bail proceedings. Defense counsel will address these points at the bail hearing today.

Although we do not believe there is any basis to seal the government's letter, we have not had an opportunity to confer with the government on this issue and are filing it under seal in the first instance in an abundance of caution.

Respectfully submitted,



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