

## AGNIFILO INTRATER

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November 26, 2024

**BY ECF**

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:

This short letter is in response to the Government's letter of yesterday (Dkt. 86) and updates the Court on one issue discussed at Friday's conference. Following Friday's conference, the defense located



This is an important safety measure that better ensures the safety of Mr. Combs, the security detail and others.

We have attached several photographs taken on November 25, 2024 of the building,



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A security professional is coming to the location on the morning of November 26, 2024 to assess the location, including the placing of cameras and other security measures. We have also spoken with Pre-Trial Services, which indicated that in the event Mr. Combs is granted release on conditions, it would want to inspect the location prior to Mr. Combs residing there.

In regard to the concerns raised by the Government, the stringent measures laid out in our bail proposal include, as the Court will recall, that Mr. Combs will not have access to a cell phone. Rather, the cell phone will be in the exclusive possession of the security detail, which will keep a written log of all incoming and outgoing calls, texts, messages, etc. Accordingly, all such communications will be maintained both in a written log and within the phone itself. Without getting into the merits of the Government's various allegations, these conditions address them all, while also ensuring that Mr. Combs has full

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access to his counsel to prepare for trial and to defend the over thirty lawsuits in which he is a defendant.

We thank the Court for the time and attention it has devoted to our application.

Respectfully submitted,



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