

MARTIN G. WEINBERG, P.C.
ATTORNEY AT LAW

20 PARK PLAZA, SUITE 1000
BOSTON, MASSACHUSETTS 02116

(617) 227-3700

FAX (617) 338-9538

NIGHT EMERGENCY:
(617) 901-3472

EMAIL ADDRESSES:

owlmcb@att.net
owlmgw@att.net

December 11, 2018

BY ECF

Hon. Jesse M. Furman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Vadim Trincher, 13 CR 268 (JMF)

Dear Judge Furman:

This letter is authored for the purpose of requesting Your Honor to temporarily modify Mr. Vadim Trincher's conditions of Supervised Release and to permit him to travel internationally to India between February 11, 2019 and March 4, 2019 in order to receive inpatient Ayurveda treatment at Kalari Kovikalom. Mr. Trincher, with this Honorable Court's permission, traveled to India last year in order to receive Ayurveda treatment at this same facility. *See* Dkt. 1325 (Mr. Trincher's January 16, 2018 Request to travel to India to undergo Ayurveda treatment). The trip occurred without incident. Mr. Trincher traveled directly to and from India, maintained communication with probation during his trip to the extent required, and returned to the United States as scheduled.

Mr. Trincher's doctor recommends further Ayurveda treatment in order to address certain of Mr. Trincher's well documented medical conditions, *see* Letter of Dr. Mikhail Bernshteyn, M.D., attached hereto as Exhibit 1. If permitted to attend the treatment, Mr. Trincher will travel directly to India from New York, NY on February 11, 2019 and, after receiving treatment, Mr. Trincher will travel directly from India to New York, NY on March 4, 2019. *See* Travel Itinerary, attached hereto as Exhibit 2; *see also* Reservation at Kalari Kovikalom, attached hereto as Exhibit 3. Mr. Trincher will not enter any countries other than India during his trip and will maintain electronic communication with probation during the duration of his travels. Accordingly, Mr. Trincher respectfully requests this Honorable Court to permit the instant request.

The Probation Department, by and through Mr. Trincher's Probation Officer Michael Wasmer, does not oppose the instant request being allowed provided that Mr. Trincher's travels do not deviate from the proposed travel route to and from the medical clinic. The Government, by and through AUSA Joshua Naftalis, opposes the instant request.

Thank you for your consideration of this matter. I am available for a conference if Your Honor deems it necessary.

Respectfully Submitted,

Martin G. Weinberg

CC: Joshua Naftalis, Esq
Assistant United States Attorney (by email)

Michael Wasmer
United States Department of Probation (by email)

So Ordered:

Hon Jesse M. Furman