

WILMERHALE

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Anjan Sahni

**BY ECF**

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The Honorable Lewis A. Kaplan  
U.S. District Court for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Caroline Ellison*, No. 1:22-cr-673-LAK (S.D.N.Y)

Dear Judge Kaplan:

On behalf of Caroline Ellison, I write to inform the Court that we have finalized the financial settlements with the government and the FTX Debtors that were anticipated in our sentencing submission. *See* Dkt. 497 at 5 n.2. Specifically, counsel for the government has conveyed to Your Honor's Chambers earlier today a proposed Consent Preliminary Order of Forfeiture as to Specific Property / Money Judgment. And this afternoon, we finalized a settlement agreement with counsel for the FTX Debtors that resolves all of the Debtors' claims against Ms. Ellison and establishes a framework for Ms. Ellison's ongoing cooperation with the FTX Debtors' investigation, asset recovery, and litigation efforts.

Respectfully submitted,

/s/ Anjan Sahni  
Anjan Sahni

Cc: Danielle Sassoon, U.S. Attorney's Office (by ECF)  
Christopher Dunne, Sullivan & Cromwell (by email)