

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

HO WAN KWOK,

Defendant.

FILED PARTIALLY UNDER SEAL

Case No. 1:23-CR-118-1 (AT)

**NOTICE OF MOTION
TO COMPEL DISCOVERY**

ORAL ARGUMENT REQUESTED

Defendant Ho Wan Kwok, through counsel, respectfully moves the Court, pursuant to Federal Rule of Criminal Procedure 16, for an order compelling the government to produce all exculpatory evidence concerning (i) the Chinese Communist Party’s targeting of Mr. Kwok, his family, the political movement of which he is part, and his fellow movement members through a campaign of harassment and intimidation commonly known as “Operation Fox Hunt”; (ii) the credibility of Mr. Kwok’s movement, the New Federal State of China; (iii) [REDACTED]
[REDACTED]
[REDACTED]; and (iv) the identity of any U.S. government agency, other than the FBI, possessing any of the aforementioned information.

Defendant moves upon the Declaration of Matthew S. Barkan, the exhibits annexed thereto, the accompanying Memorandum of Law, and all prior papers and proceedings had herein.

Defendant respectfully requests oral argument on this motion.

Dated: November 17, 2023
New York, New York

Respectfully submitted,



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