



147 WEST 25TH STREET, 12TH FLOOR
NEW YORK, NEW YORK 10001
CHAUDHRYLAW.COM

April 27, 2023

Via ECF

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

Re: *United States v. Yanping Wang*, S1 1:23-cr-00118-AT
Request for Court Order for Pretrial Services Information

Dear Hon. Judge Torres:

Along with Lipman Law PLLC, we represent Defendant Yanping Wang in the above-referenced matter. We write to request Your Honor order the Pretrial Services Office for the Southern District of New York to provide certain information in connection with the instant matter (listed below). The government takes no position on our request, and Pretrial Services opposes.

On April 21, 2023, Magistrate Judge Robert W. Lehrburger ordered Ms. Wang detained pending trial because he found that there were no conditions that could reasonably assure Ms. Wang's attendance at future proceedings. (ECF No. 56 at 23–24). His decision recited certain factual assertions the government made regarding Ms. Wang's interview with Pretrial Services upon her arrest. (*Id.* at 21).

On April 24, 2023, *via* email, defense counsel requested information from the government relating to, *inter alia*, the factual assertions it made in connection with Ms. Wang's Pretrial Services interview. The government explained that Pretrial Services was best positioned to provide this information and suggested we contact its office directly.

On April 26, 2023, we called Pretrial Services and were informed by Kenneth Rowan, Deputy Chief United States Pretrial Services Officer, that Pretrial Services would oppose our request (which is its standard position) and that a court order would be required to obtain the information.

Accordingly, we write to request Your Honor order the Pretrial Services Office for the Southern District of New York to provide the following information:

1. The name and contact information for the Pretrial Services trainee who participated in Ms. Wang's pretrial interview;
2. Any written list of questions or script, whether formal or informal, that Pretrial Officer Jessica Aguilar-Adan used during Ms. Wang's pretrial interview, or, if there is no such list or script, a statement saying that one does not exist;
3. Any written list of questions or script, whether formal or informal, that Officer Aguilar-Adan shared with the trainee in advance of Ms. Wang's pretrial interview, or, if there is no such list or script, a statement saying that one does not exist;
4. The form Officer Aguilar-Adan filled out in her handwriting and any other notes she may have taken during Ms. Wang's pretrial interview; and
5. Any form filled out or notes taken by the pretrial trainee who participated in the pretrial interview.

Respectfully submitted,

/s/

Priya Chaudhry

SO ORDERED.

HON. ANALISA TORRES, U.S.D.J.

Cc: AUSA Juliana N. Murray (*via email*)
AUSA Micah Ferguson (*via email*)
AUSA Ryan Finkel (*via email*)
Kenneth Rowan (*via email*)