

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

YANPING WANG,

Defendant.

Case No. 23-CR-118 (AT)

**DECLARATION OF ALEX  
LIPMAN, ESQ., IN SUPPORT OF  
DEFENDANT’S MOTION FOR  
AN ORDER REVOKING THE  
MAGISTRATE JUDGE’S ORDER OF  
DETENTION AND AUTHORIZING  
PRETRIAL RELEASE**

I, **ALEX LIPMAN, ESQ.**, duly admitted to practice law in the United States District Court for the Southern District of New York, pursuant to 18 U.S.C. § 1746, make the instant Declaration in Support of Defendant’s Motion for an Order Revoking the Magistrate Judge’s Detention Order and Authorizing Pretrial Release and hereby declare as follows:

1. I, along with ChaudhryLaw PLLC, represent Defendant Yanping Wang (“Ms. Wang”) in the above-captioned matter.
2. Attached hereto as **Exhibit A** is a true and accurate copy of a May 7, 2020, Order, granting Ms. Wang an order of protection.
3. Attached hereto as **Exhibit B** is a true and accurate copy of an August 8, 2019, Summons and Verified Complaint Ms. Wang filed against Xianmin Xiong et al. for threats, harassment, and defamation.
4. Attached hereto as **Exhibit C** is a true and accurate copy of Ms. Wang’s Verified Amended Complaint against Xianmin Xiong et al., dated August 26, 2019, for the same case referenced in Exhibit B.

5. Attached hereto as **Exhibit D** is a true and accurate copy of an April 30, 2020, Affidavit of Ms. Wang in support of an emergency restraining order against Xianmin Xiong et al., for threatening her with death.

6. Attached hereto as **Exhibit E** is a true and accurate copy of an HCN allocation schedule the government called, "HCN Allocation at USD0.1," and seized from Ms. Wang's apartment on March 15, 2023.

7. Attached hereto as **Exhibit F** is a true and accurate copy of a Himalaya Coin Distribution Table the government seized from Ms. Wang's apartment on March 15, 2023.

8. Attached hereto as **Exhibit G** is a true and accurate copy of Ms. Wang's TD Bank Statements, showing a wire to "Himalaya Internati" in the amount of \$42,300.00, dated September 27, 2021, which was returned to her account at the same bank on October 7, 2021.

9. Attached hereto as **Exhibit H** is a true and accurate copy of a notice from the Himalayan Exchange.

10. Attached hereto as **Exhibit I** is a true and accurate copy of an email thread, dated April 10 and 11, 2023, from AUSA Juliana Murray to herself of notes from her conversation with a Pretrial Services Officer.

11. Attached hereto as **Exhibit J** is a true and accurate copy of a letter to defense counsel, dated May 22, 2023, from Kenneth Rowan, Deputy Chief United States Pretrial Services Officer.

12. Attached hereto as **Exhibit K** is a true and accurate copy of PTS' completed PS2 form, dated March 15, 2023.

13. Attached hereto as **Exhibit L** is a true and accurate copy of an email from AUSA Murray and defense counsel, dated April 25, 2023.

14. Attached hereto as **Exhibit M** is a true and accurate copy of my handwritten notes from Ms. Wang's March 15, 2023, PTS interview.

15. Attached hereto as **Exhibit N** is a true and accurate copy of Priya Chaudhry, Esq.'s handwritten notes from Ms. Wang's March 15, 2023, PTS interview.

16. Attached hereto as **Exhibit O** is a true and accurate copy of the government's floorplan of Ms. Wang's apartment.

17. Attached hereto as **Exhibit P** is a true and accurate copy of the government's photographs of all closets in Ms. Wang's apartment taken on March 15, 2023.

18. I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 5<sup>th</sup> day of June 2023.

/s/ Alex Lipman  
Alex Lipman, Esq.

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