



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

May 11, 2023

VIA ECF

Hon. Analisa Torres
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Yanping Wang, a/k/a "Yvette," S1 23 Cr. 118 (AT)*

Dear Judge Torres:

The Government respectfully writes in response to the Court's order dated May 4, 2023. (Dkt. 64.) On April 27, 2023, the defendant Yanping Wang, a/k/a "Yvette" (the "defendant") filed a letter requesting that the Court order the Pretrial Services Office for the Southern District of New York to provide certain information relating to the defendant's March 15, 2023 Pretrial Services interview. (Dkt. 59.)

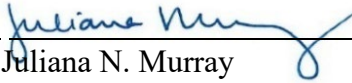
The Government takes no position on the defendant's request. The Government contacted Pretrial Services to understand why it has opposed the defendant's motion. Specifically, on May 8, 2023, the Government spoke with a Deputy Chief United States Pretrial Services Officer regarding the defendant's requests (the "USPO Deputy Chief"). The USPO Deputy Chief advised the Government of the following, in sum and in substance:

- The defendant's attorneys were present during the defendant's Pretrial Services interview on March 15, 2023;
- Many Pretrial Services officers use and/or take notes on a standard interview form referred to as a "PS2" form during Pretrial Services interviews;
- To the USPO Deputy Chief's knowledge, Pretrial Services has never made internal forms (such as the PS2 form) or any other internal notes available for review by the Government or defense counsel;
- The USPO Deputy Chief spoke with the Pretrial Services Officer ("Officer") who interviewed the defendant. The Officer took notes on a PS2 form during the defendant's interview. The Officer reviewed that PS2 form and the defendant's Pretrial Services Report and confirmed that there are no discrepancies between the PS2 form and the Pretrial Services Report, and further confirmed that there was no information reflected in the PS2 form that was not also included in the Pretrial Services Report;

- The Pretrial Services Office objects to the request to provide the name and contact information for the Pretrial Services intern who sat in on the defendant's interview;
- The Pretrial Services intern who sat in on the defendant's interview took notes, which the intern discussed with the Pretrial Services intern coordinator following the interview. Those notes were disposed of after the conclusion of the defendant's interview, per Pretrial Services' standard practice; and
- To the extent the Court does order the Pretrial Services Office to provide any of the requested information, Pretrial Services respectfully requests that all portions of the PS2 form be redacted, aside from the section regarding the defendant's claimed assets.

Respectfully submitted,

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Cc: All Counsel of Record (by ECF)