

United States Attorney Southern District of New York

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

April 17, 2023

VIA ECF Hon. Robert W. Lehrburger 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 Lehrburger:

As this Court is aware, in connection with the bail application of the defendant in the abovecaptioned case, the Government advised the Court that a cellphone and documents were found between the mattresses of the defendant's bed and/or between couch cushions. Those representations were based on information provided to the Government during March 15, 2023 calls with an FBI agent who served as squad leader for the arrest of the defendant and the search of the defendant's apartment that same day (*i.e.*, March 15, 2023). Today, the Government reinterviewed that FBI agent, who said that she does not recall a cellphone or documents having been recovered from under the defendant's mattress or between couch cushions, but does recall that a laptop was found between sweaters in a closet, that documents and cellphones were recovered from suitcases in a closet, and that documents were recovered from bags in the bedroom and living room.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

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Cc: All Counsel of Record (by ECF)