**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*

July 9, 2020

**BY ECF**

The Honorable Gregory H. Woods
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

**Re: *United States v. Natalie Mayflower Sours Edwards*, 19 Cr. 64 (GHW)**

Dear Judge Woods:

The Government respectfully writes in the above-captioned matter to advise the Court of a recent filing made by the defendant in an administrative proceeding in which, among other things, she materially misrepresents events in this matter and this Court's recent actions.

As described in part in the Presentence Investigation Report (at ¶ 26), despite being suspended following her arrest, and then resigning following her guilty plea, the defendant is claiming in an administrative proceeding, in which she is *pro se*, that she was suspended and then terminated or forced to resign by FinCEN in retaliation for purported whistleblowing. Following this morning's conference, the Government learned that, earlier this week, on Monday, July 6, the defendant filed the enclosed document, dated July 7, in that proceeding. (Exhibit A.) Among other things, the defendant asserts, under penalty of perjury:

> The Federal Judge in the criminal trial held a conference on June 29, 2020 and assigned an independent counsel to the defendant/appellant and requested the independent counsel review the case. The Federal Judge found merit and significant concerns in the "letter and substantial documentation" the whistleblower defendant/appellant provided to the court concerning violation of fifth amendment, conflict of interests pertaining to the prosecution/counsel, coercion of the plea deal, criminal referral submitted against agency IG, the letter defendant sent to Attorney General Sessions and Special Counsel Mueller, etc., all elements withheld from the Federal court by both the prosecution and defense counsel.

(Ex. A at 3-4 (PDF pages 6-7).)

As the Court is aware, these statements are false. The Court did not find "merit" in the defendant's recent submissions to this Court, much less determine that she had a basis in fact for allegations "concerning violation of [the] [F]ifth [A]mendment" or "coercion" or any other purported violation or purported misconduct in this case, even assuming *arguendo* that the defendant's submissions may be read to contain such allegations. Nor did the Court "assign[] an independent counsel" to "review the case."

Rather, the Court appointed Criminal Justice Act counsel (which did not occur on June 29, as the defendant states, but was discussed then and occurred earlier today) because the defendant had sent directly to the Court three documents, certain of which contained communications that appeared otherwise to be protected by the attorney-client privilege or corresponding work product protection, and her current retained counsel, without objection from the Government, accordingly asked the Court to appoint counsel for the defendant, independent from current retained counsel, "for the limited purpose of conferring with [her] about her submission and any issues she has regarding her relationship with current counsel." (Dkt. No. 51.) The Court did not opine on these communications, or the defendant's submission more generally, or any allegations concerning her criminal conduct or this case. In short, contrary to the defendant's statements in the administrative proceeding, the Court did not "f[in]d merit" in any allegations, and the Court appointed counsel to confer with the defendant for a limited purpose in light of her transmission of potentially privileged material to the Court.

The defendant's misrepresentations reflect a troubling pattern of conduct, which the Government expects to address more fully in connection with sentencing.

Respectfully submitted,

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Enclosure

cc: (by ECF)

Counsel of Record