



**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*

March 15, 2023

**BY ECF**

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Reginald Fowler, S3 19 Cr. 254 (ALC)***

Dear Judge Carter:

The Government respectfully requests that the Court modify the defendant's bond, to restrict him from gambling activities, in light of information the Government has recently obtained. The Government asked defense counsel its position on this request but has not received a response.

As the Court knows, on April 25, 2022, the defendant pleaded guilty to charges of conspiracy to commit bank fraud, substantive bank fraud, conspiracy to operate an unlicensed money transmitting business, substantive operation of an unlicensed money transmitting business, and wire fraud. A *Pimentel* letter described the Government's position that the applicable Sentencing Guidelines are 188 to 235 months' imprisonment. At the defendant's guilty plea hearing, the Government noted that it would be seeking forfeiture, and that such forfeiture "would be as high as \$750 million." April 25, 2022 Fowler Plea Tr. at 36. The Court also noted that it could order restitution. The defendant has been on bail pending sentencing since his plea; sentencing has been adjourned periodically but is now scheduled for April 20, 2023 at 3:30 p.m.

The Government has obtained records from a casino company in Arizona that indicate that during the pendency of the defendant's criminal case, he has gambled hundreds of thousands of dollars. This gambling continued after his plea, and records the Government has obtained from the company indicate that the defendant has continued to gamble until at least February 7, 2023, spending at least \$200,000 in the period from October 3, 2022 until that date.

Honorable Andrew L. Carter, Jr.  
United States District Judge  
March 15, 2022  
Page 2

Every dollar the defendant has risked at these casinos is a dollar less likely to be paid to victims in restitution, and to the Government in forfeiture. The Government therefore respectfully requests that the Court add a bail condition that bars the defendant from gambling.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By: *Samuel Raymond*  
Jessica Greenwood  
Samuel L. Raymond  
Samuel P. Rothschild  
Sheb Swett  
Assistant United States Attorneys  
(212) 637-1090/2504/6522

cc: Edward Sapone, Esq. (by ECF)