



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*

January 4, 2023

BY ECF

The Honorable Sidney H. Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Jennifer Shah*, S4 19 Cr. 833 (SHS)

Dear Judge Stein:

The Government respectfully provides this supplemental submission in advance of the sentencing of defendant Jennifer Shah, currently scheduled for January 6, 2023, at 10:00 a.m.

The defendant has relied upon certain “descriptions of her character by her family and friends” to attempt to justify her request for an extraordinary downward variance. (Def. Mem. 23; *see* Def. Mem. Ex. A.) In response to the defendant’s portrayal of her “character” in her public filing, a particular individual (“Individual-1”), with whom the Government had no previous communications, sent a brief, unsolicited letter to the Government about Individual-1’s experience with the defendant (attached hereto as Exhibit 7).¹

After the Government received the letter, law enforcement agents interviewed Individual-1 (notes of which are attached as Exhibit 8) and obtained corroborating materials regarding Individual-1’s interactions with the defendant, including a temporary restraining order provided by the Justice Court of Henderson Township, Nevada (attached hereto as Exhibit 9), and a police report provided by the Henderson (Nevada) Police Department (attached hereto as Exhibit 10).

¹ Consistent with 18 U.S.C. §§ 3771(a)(8) & 3664(d)(4) and Federal Rule of Criminal Procedure 49.1, and to protect the privacy interests of Individual-1, the Government would propose filing redacted versions of the exhibits referenced herein on the public docket that would redact only personally identifiable information concerning Individual-1, Individual-1’s spouse, and the defendant (as indicated with red boxes on the exhibits). However, because the Government understands that the defendant intends to seek broader redactions than those proposed by the Government, at this time the Government will submit the exhibits only to the Court and the defendant by email. The Government respectfully requests that the Court address the proper scope of redactions at the sentencing hearing.

