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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

NATALIE MAYFLOWER SOURS EDWARDS,  
a/k/a "NATALIE SOURS,"  
a/k/a "NATALIE MAY EDWARDS,"  
a/k/a "MAY EDWARDS,"

Defendant.

INFORMATION

19 Cr. - (GHW)

19 CRIM 064

JUDGE WOODS

COUNT ONE

(Conspiracy to Make Unauthorized Disclosures  
of Suspicious Activity Reports)

The United States Attorney charges:

1. From at least in or about October 2017, up to and including in or about October 2018, in the Southern District of New York and elsewhere, NATALIE MAYFLOWER SOURS EDWARDS, a/k/a "Natalie Sours," a/k/a "Natalie May Edwards," a/k/a "May Edwards," the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with another to commit an offense against the United States, to wit, to make unauthorized disclosures of Suspicious Activity Reports ("SARs") and the existence of SARs, in violation of Title 31, United States Code, Section 5322 and Title 31, Code of Federal Regulations, Section 1020.320(e)(2).

2. It was a part and object of the conspiracy that NATALIE MAYFLOWER SOURS EDWARDS, a/k/a "Natalie Sours," a/k/a "Natalie May Edwards," a/k/a "May Edwards," the defendant, and others known and unknown, would and did knowingly disclose and describe SARs, and information that would reveal the existence of a SAR, which EDWARDS obtained by virtue of her position as a Senior Advisor at the United States Department of Treasury, Financial Crimes Enforcement Network ("FinCEN"), and which disclosure was not necessary to fulfill EDWARDS's official duties.

OVERT ACTS

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed and caused to be committed in the Southern District of New York and elsewhere:

a. On various occasions between at least in or about October 2017 and in or about October 2018, NATALIE MAYFLOWER SOURS EDWARDS, a/k/a "Natalie Sours," a/k/a "Natalie May Edwards," a/k/a "May Edwards," the defendant, transmitted files containing or describing SARs to a member of the news media ("Reporter-1") via a certain encrypted application (the "Encrypted Application").

b. On or about January 12, 2018, EDWARDS sent a message to Reporter-1, via the Encrypted Application, in which EDWARDS stated that another individual at FinCEN, whom EDWARDS referred to as "Enigma" and had previously identified to Reporter-1 as someone with a "wealth of information . . . willing to verify any information you have and provide additional details as warranted," could "pull the data quick or i can check in the morning."

c. On or about August 2, 2018, EDWARDS exchanged approximately 541 messages with Reporter-1 via the Encrypted Application.

d. On or about October 16, 2018, in an interview with federal law enforcement agents, EDWARDS initially concealed her relationship with Reporter-1 and denied having any contacts with the news media.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Unauthorized Disclosures of Suspicious Activity Reports)

The United States Attorney further charges:

4. From at least in or about October 2017, up to and including in or about October 2018, in the Southern District of New York and elsewhere, NATALIE MAYFLOWER SOURS EDWARDS, a/k/a

"Natalie Sours," a/k/a "Natalie May Edwards," a/k/a "May Edwards," the defendant, an employee of a federal government authority, willfully violated subchapter II of Title 31 and a regulation and order prescribed thereunder, namely Section 1023.320(e)(2) of Title 31 of the Code of Federal Regulations, by disclosing SARs, and information that would reveal the existence of a SAR, which disclosure was not necessary to fulfill EDWARDS's official duties, to wit, EDWARDS knowingly disclosed and described SARs, which she obtained by virtue of her position as a Senior Advisor at FinCEN, including by electronically sending images of such SARs to Reporter-1 via the Encrypted Application.

(Title 31, United States Code, Section 5322(a); Title 18, United States Code, Section 2.)

  
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GEOFFREY S. BERMAN  
UNITED STATES ATTORNEY

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INFORMATION

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(18 U.S.C. §§ 2, 371; 31 U.S.C. §  
5322(a).)

GEOFFREY S. BERMAN  
United States Attorney.

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