



**U.S. Department of Justice**

Executive Office for United States Attorneys

Freedom of Information and Privacy Staff

Suite 5.400, 3CON Building  
175N Street, NE  
Washington, DC 20530

(202) 252-6020

June 11, 2025

**VIA EMAIL:** [REDACTED]

Mike Howell  
The Heritage Foundation  
214 Massachusetts Avenue, NE  
Washington, DC 20002

Re: Request Number \_\_\_\_\_  
Date of Receipt: June 28, 2023  
Subject of Request: 1:23cv1854, Heritage Foundation et al. v. DOJ  
**SUPPLEMENTAL RELEASE III**

This letter is a supplemental release from the Executive Office for United States Attorneys, the official record-keeper for all records located in this office and the various United States Attorneys' Office.

To provide you with the greatest degree of access authorized by the Freedom of Information Act and the Privacy Act, we have considered your request in light of the provisions of both statutes. The records you seek are located in a Privacy Act system of records that, in accordance with regulations promulgated by the Attorney General, is exempt from the access provisions of the Privacy Act. 28 CFR § 16.81. We have also processed your request under the Freedom of Information Act and are making all records required to be released, or considered appropriate for release as a matter of discretion, available to you. Please be advised that we have considered the foreseeable harm standard when reviewing records and applying FOIA exemptions.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. *See* 5 U.S.C. § 552(c) (2018). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all our requesters and should not be taken as an indication that excluded records do, or do not, exist.

We have reviewed approximately 288 pages of material for this supplemental response:

1 page(s) is being released in full (RIF);  
107 page(s) are being released in part (RIP);  
116 page(s) are withheld in full (WIF);  
38 page(s) are duplicate;  
26 page(s) are not responsive.

The exemption(s) cited for withholding records or portions of records are marked below.  
An enclosure to this letter explains the exemptions in more detail.

(b)(3) Rule 6(e) of the Federal Rules of Criminal Procedure, 26 U.S. Code § 6103

(b)(5)

(b)(6)

(b)(7)(C)

(b)(7)(E)

You may contact Jason Lynch, Federal Programs Branch Attorney, at  
Jason.Lynch@usdoj.gov, for any further assistance and to discuss any aspect of your request.

Sincerely,



Kevin Krebs  
Assistant Director

Enclosure(s)

## EXPLANATION OF EXEMPTIONS

### FOIA: TITLE 5, UNITED STATES CODE, SECTION 552

- (b) (1) (A) specifically authorized under criteria established by and Executive order to be kept secret in the in the interest of national defense or foreign policy and (B) are in fact properly classified pursuant to such Executive order;
- (b)(2) related solely to the internal personnel rules and practices of an agency;
- (b)(3) specifically exempted from disclosure by statute (other than section 552b of this title), provided that such statute (A) requires that the matters be withheld from the public in such a manner as to leave no discretion on the issue, or (B) establishes particular criteria for withholding or refers to particular types of matters to be withheld;
- (b)(4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;
- (b)(5) inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency;
- (b)(6) personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy;
- (b)(7) records or information compiled for law enforcement purposes, but only the extent that the production of such law enforcement records or information (A) could reasonably be expected to interfere with enforcement proceedings, (B) would deprive a person of a right to a fair trial or an impartial adjudication, (C) could reasonably be expected to constitute an unwarranted invasion of personal privacy, (D) could reasonably be expected to disclose the identity of a confidential source, (E) would disclose techniques and procedures for law enforcement investigations or prosecutions, or would disclose guidelines for law enforcement investigations or prosecutions if such disclosure could reasonably be expected to risk circumvention of the law, or (F) could reasonably be expected to endanger the life or physical safety of any individual.
- (b)(8) contained in or related to examination, operating, or condition reports prepared by, on behalf of, or for the use of an agency responsible for the regulation or supervision of financial institutions; or
- (b)(9) geological and geophysical information and data, including maps, concerning wells.

### PRIVACY ACT: TITLE 5, UNITED STATES CODE, SECTION 552a

- (d)(5) information compiled in reasonable anticipation of a civil action proceeding;
- (j)(2) material reporting investigative efforts pertaining to the enforcement of criminal law including efforts to prevent, control, or reduce crime or apprehend criminals;
- (k)(1) information which is currently and properly classified pursuant to Executive Order 12356 in the interest of the national defense or foreign policy, for example, information involving intelligence sources or methods;
- (k)(2) investigatory material compiled for law enforcement purposes, other than criminal, which did not result in loss of a right, benefit or privilege under Federal programs, or which would identify a source who furnished information pursuant to a promise that his/her identity would be held in confidence;
- (k)(3) material maintained in connection with providing protective services to the President of the United States or any other individual pursuant to the authority of Title 18, United States Code, Section 3056;
- (k)(4) required by statute to be maintained and used solely as statistical records;
- (k)(5) investigatory material compiled solely for the purpose of determining suitability eligibility, or qualification for Federal civilian employment or for access to classified information, the disclosure of which would reveal the identity of the person who furnished information pursuant to a promise that his identity would be held in confidence;
- (k)(6) testing or examination material used to determine individual qualifications for appointment or promotion in Federal Government service the release of which would compromise the testing or examination process;
- (k)(7) material used to determine potential for promotion in the armed services, the disclosure of which would reveal the identity of the person who furnished the material pursuant to a promise that his identity would be held in confidence.

**From:** Weiss, David (USADE)  
**To:** Wolf, Lesley (USADE); (b)(6); (USADE)  
**Cc:** Weede, Shawn (USADE); (b)(6); (b)(7)(C); (USADE)  
**Subject:** FW: CDCA PR protocol  
**Date:** Tuesday, August 9, 2022 4:35:36 PM  
**Attachments:** Policy - Privilege Review Protocol.20190827.pdf

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I spoke to Steph Christensen, the Acting USA in LA. She was very accommodating. They will assist in whatever way they can. In that vein, she sent the attached privilege protocol used in the district, although I made it clear that we were well into the process.

As one might expect, they have a busy grand jury schedule but they will make sure we get time on the calendar. They are happy to have the criminal tax folks work with us. As a first step, we agreed that Shawn/Lesley would touch base in the next few days with CDCA's Criminal Chief, (b)(6); (b)(7)(C) who is intimately familiar with their grand jury/court processes. For now, I suggested that we keep this on a close hold, but that will change as we make grand jury arrangements.

Let me know if you have any questions.

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**From:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, August 9, 2022 3:48 PM  
**To:** Weiss, David (USADE) (b)(6); (b)(7)(C)  
**Subject:** CDCA PR protocol  
Per our conversation.

**From:** Weiss, David (USADE)  
**To:** Wolf, Lesley (USADE); (b)(6); (b)(7)(C) (USADE)  
**Cc:** (b)(6); (b)(7)(C) (USADE); Weede, Shawn (USADE)  
**Subject:** FW: Delaware Matter  
**Date:** Tuesday, August 9, 2022 4:36:45 PM

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FYI re LA contact.

**From:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)

**Sent:** Tuesday, August 9, 2022 3:04 PM

**To:** Weiss, David (USADE) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Subject:** Re: Delaware Matter

David-

It was great chatting with you. I've cc'd our Crim Div Chief (b)(6); (b)(7)(C) for follow-up.

Regards,

Steph

On Aug 9, 2022, at 11:21 AM, Weiss, David (USADE) (b)(6); (b)(7)(C) wrote:

Stephanie,

We have an ongoing Delaware investigation that I wanted to discuss and seek your assistance.

Please let me know when you have a minute to talk.

Thanks.

David Weiss

United States Attorney, Delaware

(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADE)  
**To:** Wolf, Lesley (USADE)  
**Subject:** FW: Grand Jury Time  
**Date:** Wednesday, March 9, 2022 8:39:09 PM

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Lesley,

I see this was indeed scheduled for Tuesday morning. I'm happy to head into the city on Monday night as well but also totally understand if this meeting is better kept small. It's equally easy for me to just come in for the Tuesday afternoon meeting. Let me know what you'd like me to do.

(b)(6);  
(b)(7)(C)

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**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:13 PM  
**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** FW: Grand Jury Time

If we want to try and schedule something for Tuesday morning, I can stay over Monday night.

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:11 PM  
**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

That is great. We will start to look at the information you uploaded to FX and then we can meet at your office at a convenient time. Thank you Jack!

---

**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:04 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

(b)(5); (b)(7)(E); (b)(3):31 U.S.C Code § 5319

I've also directed (b)(6); (b)(7)(C) who is our technical litigation support assistant, to provide you with access to Tax Division's Relativity database. This contains most, but not all, of the subpoena returns obtained in this case. (At present, we have issued (b)(3): Rule subpoenas.) Additional (b)(7)(E)

Mark, Lesley, and I are happy to jump on a call, though it may make sense for us to meet either at Tax or the DC USAO sometime in the near future as some of the evidence, particularly the tax returns and accountant work papers, are easier to discuss and explain in person.

Jack

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:21 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Thank you, (b)(6); (b)(7)(C)

Can I please propose that we set up a call in the next few days to hear a little bit about your investigation, start to collect materials to get up to speed, and figure out how we can support you?

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

Chief, Fraud, Public Corruption, and Civil Rights Section  
U.S. Attorney's Office for the District of Columbia

(b)(6); (b)(7)(C)

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:19 PM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)

(USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

All,

I will be requesting that a grand jury be empaneled as soon as possible (unfortunately that's (b)(3):Rule 6(e) I will request a (b)(3):Rule 6(e) and indicate that for approximately the first month the grand jury will sit (b)(3):Rule 6(e)

Also, (b)(6); (b)(7)(C) of my office will be working with you as we go forward. Please contact her, (b)(6); (b)(7)(C) and her supervisors (b)(6); (b)(7)(C) and (b)(6); (b)(7)(C) are copied on this email.)

Don't hesitate to contact me if you need anything,

(b)(6); (b)(7)(C)

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**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Sent:** Tuesday, March 8, 2022 12:51 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6); (b)(7)(C)

One other logistical follow-up. Among other things, the trial team is also beginning to work on the discovery plan and will have questions about local practice with respect to discovery. Do you want those directed to you right now or do you have someone else in mind on who the contact will be there who can start fielding those sorts of questions?

Thanks,

(b)(6); (b)(7)(C)

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**From:** (b)(6); (b)(7)(C) (TAX)

**Sent:** Monday, March 7, 2022 3:03 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

All,

Adding Mark Daly and Jack Morgan, who are on this for Tax. Nothing further from me, but just wanted to get everyone on one thread in case there is further discussion.

Best,

(b)(6);  
(b)(7)(C)

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**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Monday, March 7, 2022 2:41 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) Weede, Shawn (USADE) (b)(6); (b)(7)(C);

(b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

I believe we are prepared to move ahead as we discussed- with the plan for (b)(3); Rule 6(e) The (b)(3); Rule 6(e) we discussed on Friday works- but needless to say, the sooner the better- largely to keep everyone calm. But we know you are working with your court and the constraints of a jury plan – and your help is greatly appreciated.

Please let us know if you have any other questions or need additional information.

-Lesley

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Monday, March 7, 2022 12:43 PM

**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)

(b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Have you decided how you would like to proceed with respect to the grand jury? Thanks.

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**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Sent:** Friday, March 4, 2022 10:36 AM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Great. Talk then.

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Friday, March 4, 2022 10:36 AM

**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** Re: Grand Jury Time

Works for me. I'm at (b)(6); (b)(7)(C)

On Mar 4, 2022, at 10:35 AM, Weede, Shawn (USADE) (b)(6); (b)(7)(C) wrote:

How about 2:30?

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**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:34 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Other than 130-2, I am completely available.

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**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:24 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Sure thing. Lesley, what's your availability?

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:23 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

I'm very sorry that I missed you yesterday. Can we talk this afternoon?

On Mar 3, 2022, at 12:13 PM, Weede, Shawn (USADE)  
(b)(6); (b)(7)(C) wrote:

Hi (b)(6);  
(b)(7)(C)

Greetings from the District of Delaware. As you may have heard, my U.S. Attorney reached out to yours this morning regarding a sensitive investigation that will require some grand jury time in your district. Lesley Wolf is the lead AUSA and is copied here. Do you have a few minutes to discuss this afternoon?

Best,

Shawn

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

(b)(6); (b)(7)(C)

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OVERSIGHT PROJECT

**From:** Wolf, Lesley (USADE)  
**To:** Weiss, David (USADE); (b)(6) (USADE)  
**Cc:** Weede, Shawn (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** FW: LA  
**Date:** Friday, July 29, 2022 2:07:09 PM

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Tax Division reached out to Tax Chief and did not mention a specific case, but got the below intel. Usefully, their GJs seem to (b)(3); Rule 6(e)

-LW

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**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Friday, July 29, 2022 1:25 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Subject:** FW: LA

You can see below from (b)(6); (b)(7)(C) regarding opening a GJ in LA. Let me know if you have any follow-up questions.

jM

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**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Sent:** Thursday, July 28, 2022 10:12 PM  
**To:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Subject:** LA

Mark/Jack,

I spoke with LA (b)(6); (b)(7)(C) this evening.

1. They have multiple grand juries (b)(7)(E)
2. (b)(3); Rule 6(e) is no problem.
3. They can support Tax Division with AUSA(s).
4. Subpoena documents returned in another district do not need to be returned in LA. Rule 6e permits sharing of evidence between districts.

Let me know if you'd like any further information. I made no disclosures about the target.

(b)(6); (b)(7)(C)

Chief, Western Criminal Enforcement Section  
Department of Justice, Tax Division  
(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (TAX)  
**To:** Daly, Mark F. (TAX); Morgan, Jack A. (TAX); Wolf, Lesley (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** FW: (b)(7)(F) GJ - schedule/CJ Howell requesting response today  
**Date:** Friday, May 6, 2022 11:42:35 AM

Mark and Jack – as discussed (and Lesley and (b)(6); (b)(7)(C) as to be discussed)

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, May 6, 2022 11:19 AM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Subject:** (b)(7)(E) GJ - schedule/CJ Howell requesting response today

(b)(6); (b)(7)(C)

Thanks for speaking with me just now. (b)(3) 26 U.S.C. §§ 6103

(b)(3) 26 U.S.C. §§ 6103

As I mentioned, Chief Judge Howell has inquired about timing for the grand jury, which I believe is set to start sitting (b)(3) Rule 6(e). I believe that means she will be meeting with them for orientation next week. Since our call, I've clarified that the Chief has asked us for a response on the expected GJ schedule TODAY – presumably so she can set clear expectations for them during her orientation. She's asked for an answer by the end of the day on our requests/expectations:

1. What is the first day you'd like them to sit?
2. For their first (b)(3) Rule based on the understanding (pre-SOL-extension) that there was an urgent need, the GJ was advised to be available every day. [For context, in contrast to protocols earlier in COVID, this grand jury – and a couple others soon to be convened – will be meeting in more usual GJ space and thus we have much greater flexibility to bring them in.] Can we give the Court an expectation of the day(s) you plan to use them for this initial (b)(3) Rule (b)(3) Rule 6(e)?
3. After those first (b)(3) Rule are there specific day(s) each week the GJ should plan to be available?

Essentially, it will behoove the grand jurors and you (and the Court) to set clear expectations at the outset when the Chief gives them orientation next week.

Again, I know this is short notice, but the Chief is asking for an answer today.

[I also checked: as I expected, there has not been a conflict check for the grand jury. Our practice here is (b)(7)(E)

(b)(7)(E)

(b)(6); (b)(7)(C)

Chief, Fraud Unit

Fraud, Public Corruption, and Civil Rights Section

U.S. Attorney's Office for the District of Columbia

Office: (b)(6); (b)(7)(C)

Cell: (b)(6); (b)(7)(C)

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**From:** Wolf, Lesley (USADE)  
**To:** Weede, Shawn (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** Fwd: Follow Up  
**Date:** Monday, October 24, 2022 4:03:14 PM

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Sent from my iPhone

Begin forwarded message:

**From:** (b)(6); (b)(7)(C) (USACAC)" (b)(6); (b)(7)(C)  
**Date:** October 24, 2022 at 4:00:50 PM EDT  
**To:** "Wolf, Lesley (USADE)" (b)(6); (b)(7)(C)  
**Cc:** "Daly, Mark F. (TAX)" (b)(6); (b)(7)(C), (b)(6); (b)(7)(C)  
(USACAC)" (b)(6); (b)(7)(C)  
**Subject:** RE: Follow Up

Hi Lesley,

The proposed time (Wednesday at 10:30 PST/1:30 EST) works for us. Thank you for accommodating our schedule.

The Office's prosecution guidelines provide that, as a general matter, financial crimes are considered for prosecution if the evidence establishes that:

(b)(5); (b)(7)(E)

On a case-by-case basis, based on a review by the Major Frauds Section Chief, lower fraud loss thresholds may be applied when:

(b)(5); (b)(7)(E)

These guidelines are intended to distinguish the types of cases that presumptively merit prosecution by our Office the United States Attorney's from those that do not. The guidelines provide, however, that the Office may still consider matters and subjects that do not meet these guidelines when compelling interests or aggravating factors are present.

(b)(6); (b)(7)(C) and I look forward to speaking with you and your team on Wednesday.

(b)(6); (b)(7)(C)

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**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Monday, October 24, 2022 8:28 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USACAC)  
(b)(6); (b)(7)(C)  
**Subject:** RE: Follow Up

Hi (b)(6); (b)(7)(C)

How about 130pm/1030am on Wednesday?

Also checking again on prosecution guidelines.

Thanks,  
Lesley

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Friday, October 21, 2022 8:06 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USACAC)  
(b)(6); (b)(7)(C)  
**Subject:** RE: Follow Up

Hi Lesley,

Thanks for your email. (b)(6); (b)(7)(C) (my Crim Chief) and I are available next Wednesday (10/26) anytime except between 2:00 and 4:00 pm PST, Thursday (10/27) anytime after 10:30 am PST and before 3:30 PST, and Friday (10/28) anytime in the afternoon (before 3:00 pm PST would be preferable but we can make a later time work as well). In case Tuesday (10/25) frees up for your team, we are also available on that day anytime except between 3:00 and 5:00 pm PST.

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

| Assistant United States Attorney

**Chief, Major Frauds Section**

United States Attorney's Office | Central District of California

United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles,  
California 90012

Office: (b)(6); (b)(7)(C)

| Mobile: (b)(6); (b)(7)(C)

| (b)(6); (b)(7)(C)

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Friday, October 21, 2022 9:40 AM

**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C)

**Subject:** Follow Up

(b)(6);  
(b)(7)(C)

I understand that my US Attorney, David Weiss, spoke with your US Attorney earlier this week. USA Weiss has asked me to set up a call with you for a discussion where we can talk through your feedback more specifically. I would expect the call to include not only Mark and myself, but Mark's colleagues (b)(6); (b)(7)(C) and (b)(6); (b)(7)(C) from Tax Division as well as (b)(6); (b)(7)(C) and my criminal chief, Shawn Weede. Could you propose a few blocks of time that might work for you and then I can try to get a quorum together on this end? I know Tuesday won't work for my team.

In addition, your US Attorney referenced CD Cal's prosecution guidelines. Could you please share those with us (or the relevant portions thereof) in advance of a call?

Thanks,  
Lesley

*Lesley F. Wolf*

**Assistant United States Attorney**

**Section Chief, Economic Crimes**

**District of Delaware**

**1313 N. Market Street, Suite 400**

**Wilmington, DE 19801**

(b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** Weiss, David (USADE); (b)(6); (b)(7)(C) (USADE); Weede, Shawn (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** Fwd: (b)(7)(E) follow-up meeting early next week?  
**Date:** Saturday, March 19, 2022 3:16:18 PM

---

So I am not sure what the urgency may be here. I am inclined to try to attend in person.

Sent from my iPhone

Begin forwarded message:

**From:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Date:** March 19, 2022 at 12:21:08 PM EDT  
**To:** "Daly, Mark F. (TAX)" (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(TAX)" (b)(6); (b)(7)(C); "Morgan, Jack A. (TAX)"  
(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE)"  
(b)(6); (b)(7)(C); "Wolf, Lesley (USADE)" (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(USADC)" (b)(6); (b)(7)(C)  
**Subject:** (b)(7)(E) follow-up meeting early next week?

Folks,

Thank you very much for meeting with us on Tuesday, and all the information you provided. I know it's somewhat short notice to ask this (I know, it's past 5:00 on a Friday afternoon), but could we reconvene early next week? We are happy to meet in person (again at Tax), although we also understand if folks in Delaware prefer to call in. Are you available any of:

Monday March 21 – must end by 2:00pm  
Tuesday March 22 – any time, prefer afternoon  
Wednesday March 23 – any time

Thank you and look forward to seeing you again soon.

(b)(6); (b)(7)(C)  
Chief, Fraud Unit  
Fraud, Public Corruption, and Civil Rights Section  
U.S. Attorney's Office for the District of Columbia  
Office: (b)(6); (b)(7)(C)  
Cell: (b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** Weiss, David (USADE); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C) (USADE); Weede, Shawn (USADE)  
**Subject:** Fwd: (b)(7)(E) follow-up meeting early next week?  
**Date:** Sunday, March 20, 2022 4:50:25 PM

---

FYI

Sent from my iPhone

Begin forwarded message:

**From:** (b)(6); (b)(7)(C) (USADC)" (b)(6); (b)(7)(C)  
**Date:** March 20, 2022 at 7:53:27 AM EDT  
**To:** (b)(6); (b)(7)(C) (TAX)" (b)(6); (b)(7)(C) "Wolf, Lesley (USADE)" (b)(6); (b)(7)(C)  
**Cc:** "Daly, Mark F. (TAX)" (b)(6); (b)(7)(C) "Morgan, Jack A. (TAX)" (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADE)"  
(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC)"  
(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC)"  
(b)(6); (b)(7)(C)  
**Subject: RE:** (b)(7)(E) follow-up meeting early next week?

For Delaware folks, travel is not necessary at all; phone works. But let's find a time (b)(6); (b)(7)(C) can make. Is there a good time on Tue or Wed? Might I suggest Tuesday at/after 1:00pm?

We wanted to provide our reactions to the case and views on USAO-DC's involvement going forward – and confirm our understanding of the team's next steps.

Thank you.

(b)(6); (b)(7)(C)  
Cell: (b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Sent:** Saturday, March 19, 2022 8:06 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** Re: (b)(7)(E) follow-up meeting early next week?

I cannot do the Monday timeframe but could make the others work. If necessary,

please feel free to proceed without me.

(b)(6); (b)(7)(C)

Chief, NCES

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Saturday, March 19, 2022 4:41:58 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)

(b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C);

(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Subject:** Re: (b)(7)(E); follow-up meeting early next week?

(b)(6);  
(b)(7)(C)

Happy to try and make this happen. On the Delaware end, I am working to figure out travel and whether that's necessary or preferred. Can you give us some sense of agenda? Happy to set a time to talk this weekend if that's easier.

Thanks.

Lesley

Sent from my iPhone

On Mar 19, 2022, at 12:21 PM, (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C) wrote:

Folks,

Thank you very much for meeting with us on Tuesday, and all the information you provided. I know it's somewhat short notice to ask this (I know, it's past 5:00 on a Friday afternoon), but could we reconvene early next week? We are happy to meet in person (again at Tax), although we also understand if folks in Delaware prefer to call in. Are you available any of:

Monday March 21 – must end by 2:00pm

Tuesday March 22 – any time, prefer afternoon

Wednesday March 23 – any time

Thank you and look forward to seeing you again soon.

(b)(6); (b)(7)(C)

Chief, Fraud Unit

Fraud, Public Corruption, and Civil Rights Section

U.S. Attorney's Office for the District of Columbia

Office: (b)(6); (b)(7)(C)

Cell: (b)(6); (b)(7)(C)

OVERSIGHT PROJECT  
IT'S YOUR GOVERNMENT

**From:** Wolf, Lesley (USADE)  
**To:** Morgan, Jack A. (TAX); Daly, Mark F. (TAX)  
**Cc:** Weede, Shawn (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** RE: Grand Jury Time  
**Date:** Wednesday, March 9, 2022 5:06:58 PM

---

Jack and Mark,

Please keep us plugged in on all communications with the USAO in DC. Until the 515 issue is resolved, we need to make sure we are 100% in the loop so we can keep our boss in the loop as well.

-LW

---

**From:** Morgan, Jack A. (TAX); (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:04 PM  
**To:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C) (USADC)  
**Cc:** Daly, Mark F. (TAX); (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C); Weede, Shawn (USADE); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

(b)(5); (b)(7)(E); (b)(3):31 U.S.C Code § 5319

I've also directed (b)(6); (b)(7)(C), who is our technical litigation support assistant, to provide you with access to Tax Division's Relativity database. This contains most, but not all, of the subpoena returns obtained in this case. (At present, we have issued (b)(3):R subpoenas.) Additional, (b)(7)(E)

(b)(7)(E)

Mark, Lesley, and I are happy to jump on a call, though it may make sense for us to meet either at Tax or the DC USAO sometime in the near future as some of the evidence, particularly the tax returns and accountant work papers, are easier to discuss and explain in person.

(b)(6);  
(b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:21 PM  
**To:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C); Wolf, Lesley (USADE); (b)(6); (b)(7)(C); Weede, Shawn

(USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Thank you (b)(6); (b)(7)(C)

Can I please propose that we set up a call in the next few days to hear a little bit about your investigation, start to collect materials to get up to speed, and figure out how we can support you?

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

Chief, Fraud, Public Corruption, and Civil Rights Section

U.S. Attorney's Office for the District of Columbia

C: (b)(6); (b)(7)(C) O: (b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Wednesday, March 9, 2022 3:19 PM

**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE)

(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)

(USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

All,

I will be requesting that a grand jury be empaneled as soon as possible (unfortunately that's (b)(3):Rule 6(e)). I will request a (b)(3):Rule 6(e) and indicate that for approximately the first month the grand jury will sit (b)(3):Rule 6(e)

Also, (b)(6); (b)(7)(C) of my office will be working with you as we go forward. Please contact her. (b)(6); (b)(7)(C) and her supervisors (b)(6); (b)(7)(C) and (b)(6); (b)(7)(C) are copied on this email.)

Don't hesitate to contact me if you need anything,

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Sent:** Tuesday, March 8, 2022 12:51 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C);

Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

One other logistical follow-up. Among other things, the trial team is also beginning to work on the discovery plan and will have questions about local practice with respect to discovery. Do you want those directed to you right now or do you have someone else in mind on who the contact will be there who can start fielding those sorts of questions?

Thanks,

(b)(6);  
(b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX)

**Sent:** Monday, March 7, 2022 3:03 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C);

Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

All,

Adding Mark Daly and Jack Morgan, who are on this for Tax. Nothing further from me, but just wanted to get everyone on one thread in case there is further discussion.

Best,

(b)(6);  
(b)(7)(C)

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Monday, March 7, 2022 2:41 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) Weede, Shawn (USADE) (b)(6); (b)(7)(C);

(b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

I believe we are prepared to move ahead as we discussed- with the plan for (b)(3):Rule 6(e). The (b)(3):R (b)(3):R we discussed on Friday works- but needless to say, the sooner the better- largely to keep everyone calm. But we know you are working with your court and the constraints of a jury plan – and your help is greatly appreciated.

Please let us know if you have any other questions or need additional information.

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Monday, March 7, 2022 12:43 PM

**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (TAX)

(b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Have you decided how you would like to proceed with respect to the grand jury? Thanks.

---

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Sent:** Friday, March 4, 2022 10:36 AM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Great. Talk then.

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Friday, March 4, 2022 10:36 AM

**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** Re: Grand Jury Time

Works for me. I'm at (b)(6); (b)(7)(C)

On Mar 4, 2022, at 10:35 AM, Weede, Shawn (USADE) (b)(6); (b)(7)(C) wrote:

How about 2:30?

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Friday, March 4, 2022 10:34 AM

**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Other than 130-2, I am completely available.

---

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Sent:** Friday, March 4, 2022 10:24 AM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Sure thing. Lesley, what's your availability?

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:23 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

I'm very sorry that I missed you yesterday. Can we talk this afternoon?

On Mar 3, 2022, at 12:13 PM, Weede, Shawn (USADE)

(b)(6); (b)(7)(C) wrote:

Hi (b)(6); (b)(7)(C)

Greetings from the District of Delaware. As you may have heard, my U.S. Attorney reached out to yours this morning regarding a sensitive investigation that will require some grand jury time in your district. Lesley Wolf is the lead AUSA and is copied here. Do you have a few minutes to discuss this afternoon?

Best,

Shawn

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801  
(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADE)  
**To:** Wolf, Lesley (USADE); Daly, Mark F. (TAX)  
**Subject:** RE: Tax Prosecution Memo  
**Date:** Wednesday, August 31, 2022 2:51:42 PM

---

Of course. (b)(6); (b)(7)(C) conference ID: (b)(6); (b)(7)(C)

(b)(6);  
(b)(7)(C)

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, August 31, 2022 12:10 PM  
**To:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** FW: Tax Prosecution Memo

Can we use one of your dial-ins, please.

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, August 31, 2022 12:09 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Tax Prosecution Memo

Perfect.

Sent from my iPhone

On Aug 31, 2022, at 8:45 AM, Wolf, Lesley (USADE) (b)(6); (b)(7)(C) wrote:

How about 3pm our time, noon yours on Thursday?  
We can circulate a dial-in.

-LW

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, August 31, 2022 11:01 AM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE)  
(b)(6); (b)(7)(C)  
**Subject:** Re: Tax Prosecution Memo

Sure. Anytime on Thursday before 4:00 PST would work.

Sent from my iPhone

On Aug 31, 2022, at 7:41 AM, Wolf, Lesley (USADE) (b)(6); (b)(7)(C) wrote:

Hi (b)(6);

I'm now back in the office and was hoping you had some time to connect with me and Mark Daly from Tax Division. Do you have some time for a call over the next few days? To get the ball rolling I am proposing anytime after 230pm (EST) on Thursday.

Thanks so much and looking forward to speaking soon.

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, August 16, 2022 11:36 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Tax Prosecution Memo

Received. I will ensure the confidentiality of this document.

(b)(6); (b)(7)(C) | **Assistant United States Attorney**  
**Chief, Major Frauds Section**  
United States Attorney's Office | Central District of California  
United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles, California 90012  
Office: (b)(6); (b)(7)(C) | Mobile: (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C)

---

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, August 16, 2022 8:16 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** Tax Prosecution Memo

(b)(6);  
(b)(7)(C)

Attached is the prosecution memo regarding the tax aspects of this investigation. As discussed, please keep this on close hold and limit circulation to you and your chain of command.

Best,

Shawn

<< File: RHB Prosecution Memo (2022.8.15) (JM)(21257845.1).docx >>

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

(b)(6); (b)(7)(C)

**From:** Weiss, David (USADE)  
**To:** Wolf, Lesley (USADE)  
**Cc:** (b)(6); (b)(7)(C) (USADE); Weede, Shawn (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** Re: Update  
**Date:** Sunday, September 18, 2022 5:05:37 PM

---

Do they plan on sharing (b)(6); (b)(7)(C) memo with (b)(6); (b)(7)(C)?

Sent from my iPhone

On Sep 18, 2022, at 2:45 PM, Wolf, Lesley (USADE) (b)(6); (b)(7)(C) wrote:

FYI

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Saturday, September 17, 2022 9:31:20 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); Daly, Mark F. (TAX)  
(b)(6); (b)(7)(C)  
**Subject:** Update

Hello.

Our new USA was confirmed on Tuesday and will be sworn in on this coming Monday. I want to get him up to speed on the tax matter and am preparing a short cover memo for your pros memo, which I hope will help him navigate through your detailed presentation. I had a couple of quick questions – is there a good time for a brief call in the next day or two?

Thanks.

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C) Assistant United States Attorney  
Chief, Major Frauds Section

United States Attorney's Office | Central District of California  
United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles, California 90012

Office: (b)(6); (b)(7)(C) | Mobile: (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (TAX)  
**To:** (b)(6); (b)(7)(C) (USADC)  
**Cc:** (b)(6); (b)(7)(C) (USADC); Daly, Mark F. (TAX); Morgan, Jack A. (TAX); Wolf, Lesley (USADE); (b)(6); (b)(7)(C) (USADE); Weede, Shawn (USADE)  
**Subject:** (b)(7)(E) GJ - schedule/CJ Howell requesting response today - DC/DE/Tax

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Direct dial from cell: (b)(6); (b)(7)(C)

Call in number: (b)(6); (b)(7)(C)

Participant code - (b)(6); (b)(7)(C)

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**From:** (b)(6); (b)(7)(C) (TAX)  
**Sent:** Friday, May 6, 2022 11:49 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)>  
**Cc:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)>;  
Daly, Mark F. (TAX) (b)(6); (b)(7)(C) <(b)(6); (b)(7)(C)>;  
Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: (b)(7)(E) GJ - schedule/CJ Howell requesting response today

Thanks (b)(6); Copying the trial team.

That would work for me. We'll aim for that and I'll send a dial-in around.

If we need to adjust we'll let you know ASAP.

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, May 6, 2022 11:46 AM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** RE: (b)(7)(E) GJ - schedule/CJ Howell requesting response today

My afternoon is pretty good, though I do have something at 4:00/4:30. How's 3:00pm?

(b)(6);  
(b)(7)(C) in case he wants to join

(b)(6); (b)(7)(C)

Cell: (b)(6); (b)(7)(C)

From: (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
<mailto:(b)(6); (b)(7)(C)>  
Sent: Friday, May 6, 2022 11:44 AM  
To: (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
Subject: RE: (b)(7)(E) GJ - schedule/CJ Howell requesting response today

Thanks (b)(6); I've talked to the Tax team again and my DAAG; will hopefully be having a call soon with USAO as well.

I think it would be good to have us (the team you've meet before and myself) all have a call this afternoon to go over this all.

How's your availability this afternoon?

From: (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
Sent: Friday, May 6, 2022 11:19 AM  
To: (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
Subject: (b)(7)(E) GJ - schedule/CJ Howell requesting response today

(b)(6);  
(b)(7)(C)

Thanks for speaking with me just now.

(b)(3); 26 U.S.C. §§ 6103

(b)(3); 26 U.S.C. §§ 6103

As I mentioned, Chief Judge Howell has inquired about timing for the grand jury, which I believe is set to start sitting (b)(3):Rule 6(e) I believe that means she will be meeting with them for orientation next week. Since our call, I've clarified that the Chief has asked us for a response on the expected GJ schedule TODAY – presumably so she can set clear expectations for them during her orientation. She's asked for an answer by the end of the day on our requests/expectations:

1. What is the first day you'd like them to sit?
2. For their first six weeks, based on the understanding (pre-SOL-extension) that there was an urgent need, the GJ was advised to be available every day. [For context, in contrast to protocols earlier in COVID, this grand jury – and a couple others soon to be convened – will be meeting in more usual GJ space and thus we have much greater flexibility to bring them in.] Can we give the Court an expectation of the day(s) you plan to use them for this initial six-week period?
3. After those first six weeks, are there specific day(s) each week the GJ should plan to be available?

Essentially, it will behoove the grand jurors and you (and the Court) to set clear expectations at the outset when the Chief gives them orientation next week.

Again, I know this is short notice, but the Chief is asking for an answer today.

[I also checked: as I expected, there has not been a conflict check for the grand jury. Our practice here is (b)(7)(E)  
(b)(7)(E)

(b)(6), (b)(7)(C)

Chief, Fraud Unit

Fraud, Public Corruption, and Civil Rights Section

U.S. Attorney's Office for the District of Columbia

Office: (b)(6), (b)(7)(C)

Cell: (b)(6), (b)(7)(C)

(b)(6); (b)(7)(C) (USAE0)

---

**From:** Wolf, Lesley (USADE)  
**Sent:** Friday, August 12, 2022 9:14 AM  
**To:** (b)(6); (b)(7)(C) (USACAC)  
**Subject:** Accepted: Discuss Delaware Matter Potentially Filing in LA

OVERSIGHT PROJECT  
IT'S YOUR GOVERNMENT

**From:** (b)(6); (b)(7)(C) (USACAC)  
**To:** Weede, Shawn (USADE); Wolf, Lesley (USADE)  
**Subject:** Discuss Delaware Matter Potentially Filing in LA

---

Discussion of matter being filed in LA by Delaware AUSAs being appointed as SAUSAs in LA, including nature of the matter, staffing from CDCA, logistical issues, and contacts for SAUSA appointment and grand jury.

-- Do not delete or change any of the following text. --

When it's time, join your Webex meeting here.

(b)(6); (b)(7)(C)

More ways to join:

Join from the meeting link

(b)(6); (b)(7)(C)

Join by meeting number

Meeting number (access code) (b)(6); (b)(7)(C)

Meeting password (b)(6); (b)(7)(C)

Tap to join from a mobile device (attendees only)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

US Toll

Join by phone

(b)(6); (b)(7)(C)

Global call-in numbers (b)(6); (b)(7)(C)

MTID= (b)(6); (b)(7)(C)

Join from a video system or application

(b)(6); (b)(7)(C)

Join using Microsoft Lync or Microsoft Skype for Business

(b)(6); (b)(7)(C)

If you are a host, click here (b)(6); (b)(7)(C)

MTID= (b)(6); (b)(7)(C)

Need help? Go to <https://help.webex.com> <<https://help.webex.com>>

**From:** Weede, Shawn (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC); Wolf, Lesley (USADE)  
**Cc:** (b)(6); (b)(7)(C) (USACAC); (b)(6); (b)(7)(C) (USACAC)  
**Subject:** RE: Delaware Case and SAUSA Appointments  
**Date:** Friday, August 12, 2022 5:53:10 PM

---

Thanks, (b)(6); Hello (b)(6); And welcome, (b)(6);

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801  
(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Friday, August 12, 2022 5:26 PM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C) Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C) (USACAC)  
(b)(6); (b)(7)(C)  
**Subject:** Delaware Case and SAUSA Appointments

Shawn and Lesley-

Thank you very much for the helpful discussion earlier, and I just wanted to reiterate that we are happy to support this matter however we can. I have copied our SAUSA Coordinator (b)(6); (b)(7)(C) who may be reached at (b)(6); (b)(7)(C) and I left her a message myself. (b)(6); should be able to answer any questions about getting your two AUSAs appointed as SAUSAs in this district, and she can guide you through the process. Please let me know if you need anything from me on that front.

On the staffing front, our Chief of Major Frauds, (b)(6); (b)(7)(C) is copied here. I spoke to her about the case (close-hold), and our current thinking is that (b)(6); would handle this case herself on our side. DOJ Tax had already reached out to her to inquire generally (without naming the target), and (b)(6); wealth of experience and collegial approach make her the ideal choice from our side. You mentioned that there was a prosecution memo that was nearing completion, and that sounds like a great first step to get (b)(6); and me) up to speed. (b)(6); will likely reach out to you separately to get started. Again, please let us know if you need anything.

Thank you,

(b)(6);

(b)(6); (b)(7)(C)  
Chief, Criminal Division  
United States Attorney's Office  
Central District of California  
312 North Spring Street  
Los Angeles, CA 90012

T (b)(6); (b)(7)(C)

OVERSIGHT PROJECT  
IT'S YOUR GOVERNMENT

**From:** Weede, Shawn (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC)  
**Cc:** Wolf, Lesley (USADE)  
**Subject:** RE: Delaware Matter  
**Date:** Wednesday, August 10, 2022 2:26:54 PM

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Thanks, (b)(6); (b)(7)(C) 1 p.m. your time (4 p.m. ours) is good. Talk then.

This aspect of the investigation involves potential tax violations, for which there is venue in C.D. Cal. but not Delaware. The prosecution memo is still being drafted, and we'll forward it on when complete, but on Friday we'd like to pick your brain on some logistical matters, including the availability of about (b)(3):Rule 6(e)  
(b)(3):Rule 6(e)

Best,

Shawn

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**From:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>  
**Sent:** Wednesday, August 10, 2022 1:49 PM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Delaware Matter

Hi Shawn-

I am happy to talk on Friday, but I am busy in the morning with our weekly division meeting. Can we talk at 1:00 (Pacific)? I am happy to read anything in the interim, if that would help.

Thank you,

(b)(6);

(b)(6); (b)(7)(C)

Chief, Criminal Division  
United States Attorney's Office  
Central District of California  
312 North Spring Street  
Los Angeles, CA 90012

T: (b)(6); (b)(7)(C)

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**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, August 10, 2022 9:38 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Delaware Matter

Hi (b)(6); (b)(7)(C)

Lesley Wolf, copied here, is our Economic Crimes Chief and the lead on the case. Let us know if you have any free time on Friday. We're both pretty open.

Best,

Shawn

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, August 9, 2022 4:39 PM  
**To:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C) Weede, Shawn (USADE)  
(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Delaware Matter

Steph,

Thanks for making time today. I really appreciate it.

Shawn/Lesley will touch base with (b)(6); (b)(7)(C) before the end of the week.

David

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**From:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, August 9, 2022 3:04 PM  
**To:** Weiss, David (USADE) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Subject:** Re: Delaware Matter

David-

It was great chatting with you. I've cc'd our Crim Div Chief, (b)(6); (b)(7)(C) for follow-up.

Regards,  
Steph

On Aug 9, 2022, at 11:21 AM, Weiss, David (USADE) (b)(6); (b)(7)(C) wrote:

Stephanie,

We have an ongoing Delaware investigation that I wanted to discuss and seek your assistance. Please let me know when you have a minute to talk.

Thanks.

David Weiss

United States Attorney, Delaware

(b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC); Daly, Mark F. (TAX)  
**Subject:** RE: Discovery Question  
**Date:** Wednesday, November 16, 2022 4:30:00 PM

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Thank you.

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**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Monday, November 14, 2022 5:29 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Subject:** Discovery Question

Hello.

My apologies for the delay in responding to your request for guidance re discovery in this district/circuit. Attached is our Office's discovery guidance. I believe your specific question pertained to the contours of prosecution teams. The discussion beginning at page 66 of the attached may be helpful.

Let me know if you need anything else.

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C) | **Assistant United States Attorney**  
**Chief, Major Frauds Section**  
United States Attorney's Office | Central District of California  
United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles, California 90012  
Office: (b)(6); (b)(7)(C) | Mobile: (b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC)  
**To:** Morgan, Jack A. (TAX); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C) (USADC)  
**Cc:** Daly, Mark F. (TAX); Wolf, Lesley (USADE)  
**Subject:** Re: GJ Referral Package and  
**Date:** Friday, March 11, 2022 12:43:55 PM

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Thank you!

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**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 11, 2022 12:41 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** GJ Referral Package and

(b)(6); requested that I upload the original GJ referral package and a status update that I provided to the Tax management last month. Both have been posted to USA Fx.

Best,

Jack

**From:** (b)(6); (b)(7)(C) (USADC)  
**To:** (b)(6); (b)(7)(C) (USADC); Wolf, Lesley (USADE); (b)(6); (b)(7)(C) (USADC)  
**Cc:** Morgan, Jack A. (TAX); Daly, Mark F. (TAX); (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C) (USADE)  
**Subject:** RE: Grand Jury Time  
**Date:** Thursday, March 10, 2022 8:56:25 AM

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Let's confirm Tuesday, 9am at Tax. Please just let us know where to meet you.

(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Sent:** Thursday, March 10, 2022 8:50 AM  
**To:** Wolf, Lesley (USADE); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C); Morgan, Jack A. (TAX); (b)(6); (b)(7)(C); Daly, Mark F. (TAX); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

That works for me and I can start as early as everyone wants.

(b)(6);

**From:** Wolf, Lesley (USADE); (b)(6); (b)(7)(C)  
**Sent:** Thursday, March 10, 2022 8:41 AM  
**To:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C); Morgan, Jack A. (TAX); (b)(6); (b)(7)(C); Daly, Mark F. (TAX); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

If others can make it work, Team Delaware prefers Tuesday and can start as early as people want- it lets us combine as a single trip. But Friday can work also.

Thanks.

**From:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Sent:** Thursday, March 10, 2022 8:25 AM  
**To:** (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C); Morgan, Jack A. (TAX); (b)(6); (b)(7)(C); Daly, Mark F. (TAX); (b)(3); Rule 6(e); (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

Ok, so let's do either Tue at 9:00 or Fri morning? \*\*IF\*\* that works for others. (b)(6); (b)(7)(C) can we meet

you out front of Tax and you show us where to go?

(b)(6); (b)(7)(C)

Sent from my iPhone

On Mar 10, 2022, at 8:00 AM, (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) wrote:

I could be back to Tax from grand jury on Tuesday 3/15 by 4 PM. I can also be available all day on Friday 3/18.

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Thursday, March 10, 2022 7:33 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

What time do we think we could start?

If Tuesday won't work, what about the morning on Friday 3/18?

Sent from my iPhone

On Mar 10, 2022, at 6:31 AM, (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) wrote:

Is afternoon on Tue an option after (b)(6); (b)(7)(C) GJ is done? (b)(6); (b)(7)(C) and I have standing meeting with VIPs at 10:00-12:00.

(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:52 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C) Weede, Shawn (USADE)  
(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C);  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Hi everyone – I could be at the Tax Division between 9-11 AM on Tuesday if that works for everyone. I have grand jury at 1 PM and need to be to the courthouse with my witness by 12 PM.

Best,

(b)(6);

(b)(6); (b)(7)(C)

Assistant United States Attorney  
Tax Fraud Coordinator  
Fraud, Public Corruption, and Civil Rights Section  
U.S. Attorney's Office for the District of Columbia  
555 4th Street NW, Room 5840  
Washington, DC 20530

(b)(6); (b)(7)(C)

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**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:49 PM  
**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C) Weede, Shawn (USADE)  
(b)(6); (b)(7)(C) Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Let's plan on it, subject to (b)(6); (b)(7)(C) availability. Just let us know a good time.

---

**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:17 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C) Weede, Shawn (USADE)  
(b)(6); (b)(7)(C) Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Most of the attorneys for the investigative team are going to be in D.C. this upcoming Tuesday. I know that's a fast turn, but if it's convenient, we are happy to have an initial meeting then. Let us know.

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:11 PM  
**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) >  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C); Weede, Shawn (USADE)  
(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

That is great. We will start to look at the information you uploaded to FX and then we can meet at your office at a convenient time. Thank you Jack!

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**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:04 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C); Weede, Shawn (USADE)  
(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C);  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

(b)(5); (b)(7)(E); (b)(3):31 U.S.C Code § 5319

I've also directed (b)(6); (b)(7)(C) who is our technical litigation support assistant, to provide you with access to Tax Division's Relativity database. This contains most, but not all, of the subpoena returns obtained in this

case. (At present, we have issued (b)(3):Rule subpoenas.) Additional, (b)(7)(E)  
(b)(7)(E)

Mark, Lesley, and I are happy to jump on a call, though it may make sense for us to meet either at Tax or the DC USAO sometime in the near future as some of the evidence, particularly the tax returns and accountant work papers, are easier to discuss and explain in person.

Jack

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:21 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C); Wolf, Lesley (USADE)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A.  
(TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) USADC  
(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Thank you, (b)(6);

Can I please propose that we set up a call in the next few days to hear a little bit about your investigation, start to collect materials to get up to speed, and figure out how we can support you?

(b)(6); (b)(7)(C)

Chief, Fraud, Public Corruption, and Civil Rights Section  
U.S. Attorney's Office for the District of Columbia

(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:19 PM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C) Wolf, Lesley  
(USADE) (b)(6); (b)(7)(C); Weede, Shawn (USADE)  
(b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A.  
(TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) USADC  
(b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

All,

I will be requesting that a grand jury be empaneled as soon as possible (unfortunately that's (b)(3):Rule 6(e)). I will request a (b)(3):Rule 6(e) and indicate that for approximately the first month the grand jury will sit (b)(3):Rule 6(e)

Also, (b)(6); (b)(7)(C) of my office will be working with you as we go forward. Please contact her. (b)(6); (b)(7)(C) and her supervisors (b)(6); (b)(7)(C) and (b)(6); (b)(7)(C) are copied on this email.)

Don't hesitate to contact me if you need anything,

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, March 8, 2022 12:51 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

(b)(6); (b)(7)(C)

One other logistical follow-up. Among other things, the trial team is also beginning to work on the discovery plan and will have questions about local practice with respect to discovery. Do you want those directed to you right now or do you have someone else in mind on who the contact will be there who can start fielding those sorts of questions?

Thanks,

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX)  
**Sent:** Monday, March 7, 2022 3:03 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

All,

Adding Mark Daly and Jack Morgan, who are on this for Tax. Nothing

further from me, but just wanted to get everyone on one thread in case there is further discussion.

Best,

(b)(6);  
(b)(7)(C)

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Monday, March 7, 2022 2:41 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

I believe we are prepared to move ahead as we discussed- with the plan for a new panel. The (b)(3) Rule 6(e) we discussed on Friday works- but needless to say, the sooner the better- largely to keep everyone calm. But we know you are working with your court and the constraints of a jury plan – and your help is greatly appreciated.

Please let us know if you have any other questions or need additional information.

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Monday, March 7, 2022 12:43 PM

**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)

(b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Have you decided how you would like to proceed with respect to the grand jury? Thanks.

---

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Sent:** Friday, March 4, 2022 10:36 AM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Great. Talk then.

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:36 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

Works for me. I'm at (b)(6); (b)(7)(C)

On Mar 4, 2022, at 10:35 AM, Weede, Shawn (USADE) (b)(6); (b)(7)(C) wrote:

How about 2:30?

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:34 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Other than 130-2, I am completely available.

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:24 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Sure thing. Lesley, what's your availability?

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:23 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

I'm very sorry that I missed you yesterday. Can we talk this afternoon?

On Mar 3, 2022, at 12:13 PM, Weede, Shawn (USADE) (b)(6); (b)(7)(C) wrote:

Hi (b)(6); (b)(7)(C)

Greetings from the District of Delaware. As you may have heard, my U.S. Attorney reached out to yours this morning regarding a sensitive investigation that will require some grand jury time in your district. Lesley Wolf is the lead AUSA and is copied here. Do you have a few minutes to discuss this afternoon?

Best,

Shawn

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

(b)(6); (b)(7)(C)

**From:** Morgan, Jack A. (TAX)  
**To:** Wolf, Lesley (USADE); Daly, Mark F. (TAX)  
**Cc:** (b)(6); (b)(7)(C) (USADE)  
**Subject:** RE: Grand Jury Time  
**Date:** Wednesday, March 9, 2022 5:14:31 PM

---

Works for me. If Mark has no objection, I can pitch it to (b)(6); (b)(7)(C).

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:13 PM  
**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** FW: Grand Jury Time

If we want to try and schedule something for Tuesday morning, I can stay over Monday night.

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:11 PM  
**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C) Wolf, Lesley  
(USADE) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

That is great. We will start to look at the information you uploaded to FX and then we can meet at your office at a convenient time. Thank you Jack!

---

**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:04 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C) Wolf, Lesley  
(USADE) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

(b)(6);

(b)(5); (b)(7)(E); (b)(3):31 U.S.C Code § 5319

I've also directed (b)(6); (b)(7)(C) who is our technical litigation support assistant, to provide you with access to Tax Division's Relativity database. This contains most, but not all, of the subpoena returns obtained in this case. (At present, we have issued (b)(3) Rule subpoenas.) Additional, (b)(7)(E) (b)(7)(E)

Mark, Lesley, and I are happy to jump on a call, though it may make sense for us to meet either at Tax or the DC USAO sometime in the near future as some of the evidence, particularly the tax returns and accountant work papers, are easier to discuss and explain in person.

(b)(6);  
(b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:21 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) TAX)  
(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) USADC (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Thank you (b)(6);

Can I please propose that we set up a call in the next few days to hear a little bit about your investigation, start to collect materials to get up to speed, and figure out how we can support you?

(b)(6); (b)(7)(C)

Chief, Fraud, Public Corruption, and Civil Rights Section  
U.S. Attorney's Office for the District of Columbia

(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:19 PM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C) Wolf, Lesley (USADE)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

All,

I will be requesting that a grand jury be empaneled as soon as possible (unfortunately that's (b)(3) Rule I will

request a (b)(3):Rule 6(e) and indicate that for approximately the first month the grand jury will sit

(b)(3):Rule 6(e)

Also, (b)(6); (b)(7)(C) of my office will be working with you as we go forward. Please contact her. (b)(6); and her supervisors (b)(6); and (b)(6); are copied on this email.)

Don't hesitate to contact me if you need anything,

(b)(6);

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Sent:** Tuesday, March 8, 2022 12:51 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

One other logistical follow-up. Among other things, the trial team is also beginning to work on the discovery plan and will have questions about local practice with respect to discovery. Do you want those directed to you right now or do you have someone else in mind on who the contact will be there who can start fielding those sorts of questions?

Thanks,

(b)(6);  
(b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX)

**Sent:** Monday, March 7, 2022 3:03 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

All,

Adding Mark Daly and Jack Morgan, who are on this for Tax. Nothing further from me, but just wanted to get everyone on one thread in case there is further discussion.

Best,

(b)(6);  
(b)(7)(C)

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Monday, March 7, 2022 2:41 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C);  
(b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

I believe we are prepared to move ahead as we discussed- with the plan for (b)(3):Rule 6(e) The (b)(3):Rul  
(b)(3):Ru we discussed on Friday works- but needless to say, the sooner the better- largely to keep  
everyone calm. But we know you are working with your court and the constraints of a jury plan –  
and your help is greatly appreciated.

Please let us know if you have any other questions or need additional information.

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Monday, March 7, 2022 12:43 PM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Have you decided how you would like to proceed with respect to the grand jury? Thanks.

---

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:36 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Great. Talk then.

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:36 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

Works for me. I'm at (b)(6); (b)(7)(C)

On Mar 4, 2022, at 10:35 AM, Weede, Shawn (USADE) (b)(6); (b)(7)(C) wrote:

How about 2:30?

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:34 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Other than 130-2, I am completely available.

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:24 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Sure thing. Lesley, what's your availability?

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:23 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time

I'm very sorry that I missed you yesterday. Can we talk this afternoon?

On Mar 3, 2022, at 12:13 PM, Weede, Shawn (USADE)  
(b)(6); (b)(7)(C) wrote:

Hi (b)(6);  
(b)(7)(C)

Greetings from the District of Delaware. As you may have heard, my U.S. Attorney reached out to yours this morning regarding a sensitive investigation that will require some grand jury time in your district. Lesley Wolf is the lead AUSA and is copied here. Do you have a few minutes to discuss this afternoon?

Best,

Shawn

Shawn A. Weede  
Chief, Criminal Division

United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

(b)(6); (b)(7)(C)

IT'S YOUR GOVERNMENT  
OVERSIGHT PROJECT

**From:** (b)(6); (b)(7)(C) (USADC)  
**To:** Wolf, Lesley (USADE)  
**Subject:** RE: Grand Jury Time  
**Date:** Thursday, March 10, 2022 9:14:18 AM

---

It's really the smallest world, ever. It's nice to see your name too – I look forward to seeing you on Tuesday!

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Thursday, March 10, 2022 9:09 AM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Fun to see you looped in on this. Looking forward to working with you.

-LW

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Thursday, March 10, 2022 8:50 AM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C); Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)

(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

That works for me and I can start as early as everyone wants.

(b)(6);

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Thursday, March 10, 2022 8:41 AM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)

(b)(6); (b)(7)(C); Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)

(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

If others can make it work, Team Delaware prefers Tuesday and can start as early as people want- it lets us combine as a single trip. But Friday can work also.

Thanks.

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Thursday, March 10, 2022 8:25 AM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) Daly, Mark F. (TAX) (b)(6); (b)(7)(C)

(b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** Re: Grand Jury Time

Ok, so let's do either Tue at 9:00 or Fri morning? \*\*IF\*\* that works for others. (b)(6); can we meet you out front of Tax and you show us where to go?

(b)(6); (b)(7)(C)

Sent from my iPhone

On Mar 10, 2022, at 8:00 AM, (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) wrote:

I could be back to Tax from grand jury on Tuesday 3/15 by 4 PM. I can also be available all day on Friday 3/18.

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Thursday, March 10, 2022 7:33 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) >; Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C) >  
**Subject:** Re: Grand Jury Time

What time do we think we could start?  
If Tuesday won't work, what about the morning on Friday 3/18?

Sent from my iPhone

On Mar 10, 2022, at 6:31 AM, (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) wrote:

Is afternoon on Tue an option after (b)(6); GJ is done? (b)(6); and I have standing meeting with VIPs at 10:00-12:00.

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Wednesday, March 9, 2022 5:52 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) Morgan, Jack A.  
(TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C) Weede, Shawn (USADE)

(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C);  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Hi everyone – I could be at the Tax Division between 9-11 AM on Tuesday if that works for everyone. I have grand jury at 1 PM and need to be to the courthouse with my witness by 12 PM.

Best,

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C)

Assistant United States Attorney  
Tax Fraud Coordinator  
Fraud, Public Corruption, and Civil Rights Section  
U.S. Attorney's Office for the District of Columbia  
555 4th Street NW, Room 5840  
Washington, DC 20530

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Wednesday, March 9, 2022 5:49 PM

**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C); Weede, Shawn (USADE)

(b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Let's plan on it, subject to (b)(6); (b)(7)(C) availability. Just let us know a good time.

---

**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)

**Sent:** Wednesday, March 9, 2022 5:17 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C) Weede, Shawn (USADE)  
(b)(6); (b)(7)(C) Wolf, Lesley (USADE) (b)(6); (b)(7)(C);  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

Most of the attorneys for the investigative team are going to be in D.C. this upcoming Tuesday. I know that's a fast turn, but if it's convenient, we are happy to have an initial meeting then. Let us know.

**From:** (b)(6); (b)(7)(C) USADC <(b)(6); (b)(7)(C)>  
**Sent:** Wednesday, March 9, 2022 5:11 PM  
**To:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) USADC  
(b)(6); (b)(7)(C) >  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C) Weede, Shawn (USADE)  
(b)(6); (b)(7)(C) Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>;  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

That is great. We will start to look at the information you uploaded to FX and then we can meet at your office at a convenient time. Thank you Jack!

**From:** Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 5:04 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C)  
(TAX) (b)(6); (b)(7)(C) Weede, Shawn (USADE)  
(b)(6); (b)(7)(C) Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

(b)(5); (b)(7)(E); (b)(3); 31 U.S.C Code § 5319

I've also directed (b)(6); (b)(7)(C), who is our technical litigation support assistant, to provide you with access to Tax Division's Relativity database. This contains most, but not all, of the subpoena returns obtained in this case. (At present, we have issued (b)(3) Rule subpoenas.) Additional, (b)(7)(C) (b)(7)(E)

Mark, Lesley, and I are happy to jump on a call, though it may make sense for us to meet either at Tax or the DC USAO sometime in the near future as some of the evidence, particularly the tax returns and accountant work papers, are easier to discuss and explain in person.

(b)(6);  
(b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:21 PM  
**To:** (b)(6); (b)(7)(C) USADC (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C) Wolf, Lesley (USADE) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) Morgan, Jack A. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Thank you, (b)(6);

Can I please propose that we set up a call in the next few days to hear a little bit about your investigation, start to collect materials to get up to speed, and figure out how we can support you?

(b)(6);  
(b)(7)(C)

Chief, Fraud, Public Corruption, and Civil Rights Section  
U.S. Attorney's Office for the District of Columbia

(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, March 9, 2022 3:19 PM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) Morgan, Jack A.

(TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) USADC  
(b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)

**Subject:** RE: Grand Jury Time

All,

I will be requesting that a grand jury be empaneled as soon as possible (unfortunately that's (b)(3):Rule 6(e)). I will request a (b)(3):Rule 6(e) and indicate that for approximately the first month the grand jury will sit (b)(3):Rule 6(e).

Also, (b)(6); (b)(7)(C) of my office will be working with you as we go forward. Please contact her. (b)(6); and her supervisors (b)(6); and (b)(6); (b)(7)(C) are copied on this email.)

Don't hesitate to contact me if you need anything,

(b)(6);

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, March 8, 2022 12:51 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A.  
(TAX) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

One other logistical follow-up. Among other things, the trial team is also beginning to work on the discovery plan and will have questions about local practice with respect to discovery. Do you want those directed to you right now or do you have someone else in mind on who the contact will be there who can start fielding those sorts of questions?

Thanks,

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX)  
**Sent:** Monday, March 7, 2022 3:03 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) USADC  
(b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A.  
(TAX) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

All,

Adding Mark Daly and Jack Morgan, who are on this for Tax. Nothing further from me, but just wanted to get everyone on one thread in case there is further discussion.

Best,

(b)(6);  
(b)(7)(C)

---

**From:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Sent:** Monday, March 7, 2022 2:41 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

(b)(6);  
(b)(7)(C)

I believe we are prepared to move ahead as we discussed- with the plan for (b)(3):Rule 6(e). The (b)(3):Rule 6(e) we discussed on Friday works- but needless to say, the sooner the better- largely to keep everyone calm. But we know you are working with your court and the constraints of a jury plan – and your help is greatly appreciated.

Please let us know if you have any other questions or need additional information.

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Monday, March 7, 2022 12:43 PM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Subject:** RE: Grand Jury Time

Have you decided how you would like to proceed with respect to the grand jury? Thanks.

---

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:36 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>

**Subject:** RE: Grand Jury Time

Great. Talk then.

---

**From:** (b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)>  
**Sent:** Friday, March 4, 2022 10:36 AM  
**To:** Weede, Shawn (USADE) <(b)(6); (b)(7)(C)>  
**Cc:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Subject:** Re: Grand Jury Time

Works for me. I'm at (b)(6); (b)(7)(C)

On Mar 4, 2022, at 10:35 AM, Weede, Shawn (USADE) <(b)(6); (b)(7)(C)> wrote:

How about 2:30?

---

**From:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Sent:** Friday, March 4, 2022 10:34 AM  
**To:** Weede, Shawn (USADE) <(b)(6); (b)(7)(C)> (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)>  
**Subject:** RE: Grand Jury Time

Other than 130-2, I am completely available.

---

**From:** Weede, Shawn (USADE) <(b)(6); (b)(7)(C)>  
**Sent:** Friday, March 4, 2022 10:24 AM  
**To:** (b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)>  
**Cc:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Subject:** RE: Grand Jury Time

Sure thing. Lesley, what's your availability?

---

**From:** (b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)>  
**Sent:** Friday, March 4, 2022 10:23 AM  
**To:** Weede, Shawn (USADE) <(b)(6); (b)(7)(C)>  
**Cc:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Subject:** Re: Grand Jury Time

I'm very sorry that I missed you yesterday. Can we talk this afternoon?

On Mar 3, 2022, at 12:13 PM, Weede, Shawn  
(USADE) (b)(6); (b)(7)(C) wrote:

Hi (b)(6);  
(b)(7)(C)

Greetings from the District of Delaware. As you may have heard, my U.S. Attorney reached out to yours this morning regarding a sensitive investigation that will require some grand jury time in your district. Lesley Wolf is the lead AUSA and is copied here. Do you have a few minutes to discuss this afternoon?

Best,

Shawn

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801

(b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC); Daly, Mark F. (TAX)  
**Subject:** RE: Investigation  
**Date:** Monday, October 3, 2022 11:48:00 AM

---

That works for me.

-LW

-----Original Message-----

From: (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>  
Sent: Monday, October 3, 2022 11:44 AM  
To: Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
Cc: Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
Subject: Re: Investigation

I have a proffer set to go to 10 my time (1:00 EST). How about 1:30 your time for our call? We should be done in time for your 2:00 call and, if not, can always set a follow-up call.

> On Oct 3, 2022, at 8:39 AM, Daly, Mark F. (TAX) (b)(6); (b)(7)(C) wrote:

>

> (b)(6);

>

> Can we do it at 1 pm East coast time tomorrow?

>

> I have a call from 2-3 east coast and Lesley needs to leave by 3:30 for (b)(6);

>

> Mark

>

> Mark Daly

> Senior Litigation Counsel

> Criminal Enforcement Section

> Tax Division

> U.S. Department of Justice

> T: (b)(6); (b)(7)(C)

> M: (b)(6); (b)(7)(C)

> F: (202) 616-1786

> E: (b)(6); (b)(7)(C)

>

> -----Original Message-----

> From: (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>

> Sent: Monday, October 3, 2022 11:09 AM

> To: Daly, Mark F. (TAX) (b)(6); (b)(7)(C)

> Cc: Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>

> Subject: Re: Investigation

>

> Got it. Do you have some time tomorrow afternoon for a call?

>

>> On Oct 3, 2022, at 8:05 AM, Daly, Mark F. (TAX) (b)(6); (b)(7)(C) wrote:

>>

>> (b)(6);

>>

>> We interviewed the Uncle of the target last Thursday. The Uncle is the self-described best friend of the target and a former business partner.

>>

>> Happy to give you a brief rundown of what was discussed.

>>

>> Mark

>>

>> Mark Daly

>> Senior Litigation Counsel

>> Criminal Enforcement Section

>> Tax Division

>> U.S. Department of Justice

>> T: (b)(6); (b)(7)(C)

>> M: (b)(6); (b)(7)(C)

>> F: (202) 616-1786

>> E: (b)(6); (b)(7)(C)

>>

>> -----Original Message-----

>> From: (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>

>> Sent: Monday, October 3, 2022 11:04 AM

>> To: Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

>> Subject: Investigation

>>

>> Am I correct that an interview with the target was scheduled for last Thursday? Did it go forward? Let me know when you might have some time for an update.

>>

>> Thanks.

**From:** Weede, Shawn (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC); Wolf, Lesley (USADE)  
**Cc:** Daly, Mark F. (TAX)  
**Subject:** RE: New Matter  
**Date:** Friday, August 12, 2022 6:23:02 PM

---

Hi (b)(6);

We're glad to have you aboard. In addition to Lesley, copied here is Mark Daly with the Tax Division. We expect that Tax will have a draft of the prosecution memo ready within a week. We will forward it on when finished. Lesley will be (b)(5) on a different case for the better part of next week. In the event that you two are unable to connect soon, I'm happy to jump on a call with Mark to provide some background.

Best,

Shawn

Shawn A. Weede  
Chief, Criminal Division  
United States Attorney's Office  
District of Delaware  
1313 N. Market Street  
Wilmington, DE 19801  
(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) USACAC (b)(6); (b)(7)(C)  
**Sent:** Friday, August 12, 2022 5:41 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Subject:** New Matter

Hello.

I'm following up on my Crim Chief (b)(6); (b)(7)(C) e-mail. Please let me know when you might be free for a call.

(b)(6);

(b)(6); (b)(7)(C) | **Assistant United States Attorney**  
**Chief, Major Frauds Section**

United States Attorney's Office | Central District of California  
United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles, California 90012  
Office: (b)(6); (b)(7)(C) | Mobile: (b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC)  
**Subject:** RE: Quick call  
**Date:** Wednesday, September 14, 2022 12:58:00 PM

---

That would be great. I am working from home today, (b)(6); (b)(7)(C)

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, September 14, 2022 12:54 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Quick call

Hello.

I am about to start a meeting at 10 which should be done by 11:00 my time. Shall I call you when it finishes?

(b)(6);

On Sep 14, 2022, at 9:15 AM, Wolf, Lesley (USADE) (b)(6); (b)(7)(C) wrote:

Hi (b)(6);

Wondering if you had a few minutes to connect today. Just looking to touch base briefly- so should be pretty quick. I am open until about 430 my time.

-Lesley

*Lesley F. Wolf*  
**Assistant United States Attorney**  
**Section Chief, Economic Crimes**  
**District of Delaware**  
**1313 N. Market Street, Suite 400**  
**Wilmington, DE 19801**  
(b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (USACAC)  
**To:** Daly, Mark F. (TAX); (b)(6); (b)(7)(C) (TAX)  
**Cc:** Wolf, Lesley (USADE)  
**Subject:** RE: Responses to questions  
**Date:** Thursday, September 1, 2022 5:26:54 PM

---

Thanks very much.

(b)(6); (b)(7)(C) **Assistant United States Attorney**  
**Chief, Major Frauds Section**  
United States Attorney's Office | Central District of California  
United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles, California 90012  
Office: (b)(6); (b)(7)(C) Mobile: (b)(6); (b)(7)(C)

---

**From:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Thursday, September 1, 2022 2:22 PM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USACAC)  
(b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) >  
**Subject:** Responses to questions

(b)(6); (b)(7)(C) and (b)(6); (b)(7)(C)

(b)(5); (b)(6); (b)(7)(C); (b)(3):Rule 6(e)

(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) is Chief of Major Frauds of the CD Cal USAO. Lesley and I spoke with (b)(6); (b)(7)(C) today regarding the case. We are providing her with the answers to the questions as she has been giving the pros memo a very close read.

(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (Chief of the Northern Section) is reaching out to the DC USAO to alert them that you may be calling them.

Thanks

Mark

Mark Daly

Senior Litigation Counsel  
Criminal Enforcement Section  
Tax Division  
U.S. Department of Justice

T: (b)(6); (b)(7)(C)

M: (b)(6); (b)(7)(C)

F: (202) 616-1786

E: (b)(6); (b)(7)(C)

OVERSIGHT PROJECT  
IT'S YOUR GOVERNMENT

**From:** (b)(6); (b)(7)(C) (TAX)  
**To:** (b)(6); (b)(7)(C) (USADC); Wolf, Lesley (USADE)  
**Cc:** Daly, Mark F. (TAX); Morgan, Jack A. (TAX); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Subject:** RE: (b)(7)(E) follow-up meeting early next week?  
**Date:** Sunday, March 20, 2022 1:26:05 PM

---

That would work for me.

In general, I can make most times on Tuesday and Wednesday work. Looking more closely at my schedule, the one time Tues or Weds I can NOT make work would be 10:30 to 11:30. Otherwise I am flexible those days.

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Sunday, March 20, 2022 7:53 AM  
**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) > (b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)>  
**Subject:** RE: (b)(7)(E) follow-up meeting early next week?

For Delaware folks, travel is not necessary at all; phone works. But let's find a time (b)(6); (b)(7)(C) can make. Is there a good time on Tue or Wed? Might I suggest Tuesday at/after 1:00pm?

We wanted to provide our reactions to the case and views on USAO-DC's involvement going forward – and confirm our understanding of the team's next steps.

Thank you.

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Sent:** Saturday, March 19, 2022 8:06 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
(USADC) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** Re: (b)(7)(E) follow-up meeting early next week?

I cannot do the Monday timeframe but could make the others work. If necessary, please feel free to proceed without me.

(b)(6); (b)(7)(C)  
Chief, NCES

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Saturday, March 19, 2022 4:41:58 PM

**To:** (b)(6); (b)(7)(C) USADC (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C);

Morgan, Jack A. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE)

(b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C)

(USADC) (b)(6); (b)(7)(C)

**Subject:** Re: (b)(7)(E) follow-up meeting early next week?

(b)(6);  
(b)(7)(C)

Happy to try and make this happen. On the Delaware end, I am working to figure out travel and whether that's necessary or preferred. Can you give us some sense of agenda? Happy to set a time to talk this weekend if that's easier.

Thanks.

Lesley

Sent from my iPhone

On Mar 19, 2022, at 12:21 PM, (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) wrote:

Folks,

Thank you very much for meeting with us on Tuesday, and all the information you provided. I know it's somewhat short notice to ask this (I know, it's past 5:00 on a Friday afternoon), but could we reconvene early next week? We are happy to meet in person (again at Tax), although we also understand if folks in Delaware prefer to call in. Are you available any of:

Monday March 21 – must end by 2:00pm

Tuesday March 22 – any time, prefer afternoon

Wednesday March 23 – any time

Thank you and look forward to seeing you again soon.

(b)(6); (b)(7)(C)

Chief, Fraud Unit

Fraud, Public Corruption, and Civil Rights Section

U.S. Attorney's Office for the District of Columbia

Office: (b)(6); (b)(7)(C)

Cell: (b)(6); (b)(7)(C)

**From:** (b)(6); (b)(7)(C) (TAX)  
**To:** (b)(6); (b)(7)(C) (USADC); Wolf, Lesley (USADE)  
**Cc:** Daly, Mark F. (TAX); Morgan, Jack A. (TAX); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C)  
**Subject:** RE: (b)(7)(E) follow-up meeting early next week?  
**Date:** Monday, March 21, 2022 8:52:58 AM

---

That should work. I've booked the same conference room we used last time.

-----Original Appointment-----

**From:** (b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)>  
**Sent:** Monday, March 21, 2022 6:27 AM  
**To:** Wolf, Lesley (USADE)  
**Cc:** (b)(6); (b)(7)(C) (TAX); Daly, Mark F. (TAX); Morgan, Jack A. (TAX); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C) (USADC); (b)(6); (b)(7)(C) (USADC)  
**Subject:** (b)(7)(E) follow-up meeting early next week?  
**When:** Tuesday, March 22, 2022 1:00 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).  
**Where:** TBD

To hold the time. We're happy to come to Tax Division again to meet with folks and call Delaware together, but I don't mean to invite ourselves over! We shouldn't host at USAO-DC because we are literally mid-move to Patrick Henry Building.

---

**From:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Sent:** Sunday, March 20, 2022 4:50 PM  
**To:** (b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)>  
**Cc:** (b)(6); (b)(7)(C) (TAX); (b)(6); (b)(7)(C); Daly, Mark F. (TAX); (b)(6); (b)(7)(C); Morgan, Jack A. (TAX); (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USADE); (b)(6); (b)(7)(C) (USADC); <(b)(6); (b)(7)(C)> (USADC) <(b)(6); (b)(7)(C)>  
**Subject:** Re: (b)(7)(E) follow-up meeting early next week?

Let's say 1pm Tuesday then unless there is further objection.

Lesley

Sent from my iPhone

On Mar 20, 2022, at 7:53 AM, (b)(6); (b)(7)(C) (USADC) <(b)(6); (b)(7)(C)> wrote:

For Delaware folks, travel is not necessary at all; phone works. But let's find a time (b)(6); (b)(7)(C) can make. Is there a good time on Tue or Wed? Might I suggest Tuesday at/after 1:00pm?

We wanted to provide our reactions to the case and views on USAO-DC's involvement going forward – and confirm our understanding of the team's next steps.

Thank you.

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)  
**Sent:** Saturday, March 19, 2022 8:06 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C);  
(b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Subject:** Re: (b)(7)(E); follow-up meeting early next week?

I cannot do the Monday timeframe but could make the others work. If necessary, please feel free to proceed without me.

(b)(6); (b)(7)(C)

Chief, NCES

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Saturday, March 19, 2022 4:41:58 PM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Subject:** Re: (b)(7)(E) follow-up meeting early next week?

(b)(6);  
(b)(7)(C)

Happy to try and make this happen. On the Delaware end, I am working to figure out travel and whether that's necessary or preferred. Can you give us some sense of agenda? Happy to set a time to talk this weekend if that's easier.

Thanks.

Lesley

Sent from my iPhone

On Mar 19, 2022, at 12:21 PM, (b)(6); (b)(7)(C) (USADC)

(b)(6); (b)(7)(C) wrote:

Folks,

Thank you very much for meeting with us on Tuesday, and all the information you provided. I know it's somewhat short notice to ask this (I know, it's past 5:00 on a Friday afternoon), but could we reconvene early next week? We are happy to meet in person (again at Tax), although we also understand if folks in Delaware prefer to call in. Are you available any of:

Monday March 21 – must end by 2:00pm

Tuesday March 22 – any time, prefer afternoon

Wednesday March 23 – any time

Thank you and look forward to seeing you again soon.

(b)(6); (b)(7)(C)

Chief, Fraud Unit

Fraud, Public Corruption, and Civil Rights Section

U.S. Attorney's Office for the District of Columbia

(b)(6); (b)(7)(C)

From: [REDACTED] (USACAC)  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: RE: Tax Payments for the Target  
Date: Wednesday, September 21, 2022 1:40:57 PM  
Attachments: [REDACTED].docx

Looking forward to speaking with you later today. Re the loss for sentencing purposes from the corporate returns, see U.S. v. Yip, 592 F.3d 1035 (9th Cir. 2010) ("We hold that § 271.1 does not entitle a defendant to reduce the tax loss charged to him by the amount of potentially legitimate, but unclaimed, deductions even if those deductions are related to the offense.").

From: Daly, Mark F. (TAX) [REDACTED]  
Sent: Wednesday, September 21, 2022 7:53 AM  
To: [REDACTED] (USACAC) [REDACTED]  
Cc: Wolf, Lesley (USAD) [REDACTED]  
Subject: RE: Tax Payments for the Target

(b)(6)

Sorry for the late reply. I've been locked out of my computer since last night.

We can do other than 1:30 to 3 (DC time) today.

Mark

Mark Daly  
Senior Litigation Counsel  
Criminal Enforcement Section  
Tax Division  
U.S. Department of Justice  
T: [REDACTED]  
M: [REDACTED]  
F: (202) 616-3786  
E: [REDACTED]

From: [REDACTED] (USACAC) [REDACTED]  
Sent: Tuesday, September 20, 2022 4:08 PM  
To: Daly, Mark F. (TAX) [REDACTED]  
Cc: Wolf, Lesley (USAD) [REDACTED]  
Subject: RE: Tax Payments for the Target

Thanks very much. What's a good time for a call tomorrow?

From: Daly, Mark F. (TAX) [REDACTED]  
Sent: Tuesday, September 20, 2022 3:21 PM  
To: [REDACTED] (USACAC) [REDACTED]  
Cc: Wolf, Lesley (USAD) [REDACTED]  
Subject: RE: Tax Payments for the Target

[REDACTED]

Please see the attached word document regarding corporate tax loss.

I am free tomorrow for a call to discuss.

Mark

Mark Daly  
Senior Litigation Counsel  
Criminal Enforcement Section  
Tax Division  
U.S. Department of Justice  
T: [REDACTED]  
M: [REDACTED]  
F: (202) 616-3786  
E: [REDACTED]

From: [REDACTED] (USACAC) [REDACTED]  
Sent: Monday, September 19, 2022 7:32 PM  
To: Daly, Mark F. (TAX) [REDACTED]  
Cc: Wolf, Lesley (USAD) [REDACTED]  
Subject: RE: Tax Payments for the Target

I know you are still looking into the other items we discussed. [REDACTED]

From: Daly, Mark F. (TAX) [REDACTED]  
Sent: Monday, September 19, 2022 1:55 PM  
To: [REDACTED] (USACAC) [REDACTED]  
Cc: Wolf, Lesley (USAD) [REDACTED]  
Subject: Tax Payments for the Target

(b)(6)

I consulted with the IRS agent and FBI forensic accountant. They checked the IRS transcripts for both the target and his C Corporation, the IRS payment system and statements from [REDACTED] bank accounts.

I have set forth below a table showing the tax due on the return, the amount paid and when.

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6); (b)(7)(C)

ISSUE:

2021-11-05

PAYMENT VERIFICATION/MISAPPLIED PAYMENT/PAYMENT  
TRACER

2021-11-05

Created

p7jmb

NARRATIVE

p7jmb

(b)(6); (b)(7)(C)

Mark

Mark Daly  
Senior Litigation Counsel  
Criminal Enforcement Section  
Tax Division  
U.S. Department of Justice  
T: (b)(6)  
M: (b)(6)  
F: (202) 616-1786  
E: (b)(6)

OVERSIGHT PROJECT  
IT'S YOUR GOVERNMENT

**From:** Wolf, Lesley (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC); Daly, Mark F. (TAX)  
**Subject:** RE: Update  
**Date:** Monday, September 19, 2022 1:03:00 PM

---

Disregard- let's use Mark's Webex.

---

**From:** Wolf, Lesley (USADE)  
**Sent:** Monday, September 19, 2022 12:59 PM  
**To:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>; Daly, Mark F. (TAX) <(b)(6); (b)(7)(C)>  
**Subject:** RE: Update

I realize we didn't answer your question-

Let's call into (b)(6); (b)(7)(C)

-LW

---

**From:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>  
**Sent:** Sunday, September 18, 2022 11:50 AM  
**To:** Daly, Mark F. (TAX) <(b)(6); (b)(7)(C)>  
**Cc:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>  
**Subject:** Re: Update

Thanks for getting back to me. How about Monday at 1:30 EST (10:30 PST)? What the best number for me to call?

On Sep 18, 2022, at 6:02 AM, Daly, Mark F. (TAX) <(b)(6); (b)(7)(C)> wrote:

I am free all day Monday and Tuesday (other than 2-3 eastern)

Get [Outlook for iOS](#)

---

**From:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>  
**Sent:** Saturday, September 17, 2022 9:31:20 PM  
**To:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>; Daly, Mark F. (TAX) <(b)(6); (b)(7)(C)>  
**Subject:** Update

Hello.

Our new USA was confirmed on Tuesday and will be sworn in on this coming Monday. I want to get him up to speed on the tax matter and am preparing a short cover memo for your pros memo, which I hope will help him navigate through your detailed

presentation. I had a couple of quick questions – is there a good time for a brief call in the next day or two?

Thanks.

(b)(6);

(b)(6); (b)(7)(C) | **Assistant United States Attorney**

**Chief, Major Frauds Section**

United States Attorney's Office | Central District of California

United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles,  
California 90012

Office: (b)(6); (b)(7)(C) Mobile: (b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC); Daly, Mark F. (TAX)  
**Subject:** RE: Update  
**Date:** Sunday, September 18, 2022 2:44:36 PM

---

I should be able to make that work as well, but am managing a little bit of a family situation so tomorrow is in flux. If I can't be on the call, you two can forget ahead without me.

-LW

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Sunday, September 18, 2022 11:50 AM  
**To:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Update

Thanks for getting back to me. How about Monday at 1:30 EST (10:30 PST)? What the best number for me to call?

On Sep 18, 2022, at 6:02 AM, Daly, Mark F. (TAX) (b)(6); (b)(7)(C) wrote:

I am free all day Monday and Tuesday (other than 2-3 eastern)

Get [Outlook for iOS](#)

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Saturday, September 17, 2022 9:31:20 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) Daly, Mark F. (TAX)  
(b)(6); (b)(7)(C)  
**Subject:** Update

Hello.

Our new USA was confirmed on Tuesday and will be sworn in on this coming Monday. I want to get him up to speed on the tax matter and am preparing a short cover memo for your pros memo, which I hope will help him navigate through your detailed presentation. I had a couple of quick questions – is there a good time for a brief call in the next day or two?

Thanks,

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C) Assistant United States Attorney

**Chief, Major Frauds Section**

United States Attorney's Office | Central District of California

United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles,  
California 90012

Office: (b)(6); (b)(7)(C) Mobile: (b)(6); (b)(7)(C)

IT'S YOUR GOVERNMENT  
OVERSIGHT PROJECT

**From:** Wolf, Lesley (USADE)  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C) (USACAC) [Contractor]  
**Cc:** (b)(6); (b)(7)(C) (USACAC)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27  
**Date:** Friday, April 23, 2021 2:52:55 PM

---

As promised, below is a list of folks who will be at the office on Tuesday 4/27

Lesley Wolf- AUSA Delaware  
(b)(6); (b)(7)(C) AUSA Delaware

Mark Daly-DOJ Tax

Jack Morgan-DOJ Tax

SA Joseph Ziegler- IRS-CI

(b)(6); (b)(7)(C) IRS-CI

(b)(6); (b)(7)(C) FBI

(b)(6); (b)(7)(C) FBI

(b)(6); (b)(7)(C) is the attorney for the below witnesses who will be coming sequentially:

(b)(6); (b)(7)(C)

Thank you again.

Lesley Wolf

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Thursday, April 22, 2021 6:01 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C) (USACAC) [Contractor]  
(b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C); Daly, Mark F. (TAX)  
(b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Great. Thanks Lesley. Lesley please send FedEx to:

(b)(6); (b)(7)(C)  
1200 US Courthouse  
312 N. Spring Street  
Los Angeles, CA 90012

(b)(6); (b)(7)(C) is our receptionist and she will receive the FedEx.

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Thursday, April 22, 2021 9:53 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C) >; Daly, Mark F. (TAX)

(b)(6); (b)(7)(C); Morgan, Jack A. (TAX) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

(b)(6);  
(b)(7)(C)

I am planning to send you a list of names tomorrow.

In the meantime, we were hoping to be able to FedEx documents for Monday arrival at your offices to avoid having to carry them cross country, but were not sure of your current mail operations and what might be possible on that front.

Thanks again for your help in coordinating all of this.

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Sent:** Wednesday, April 7, 2021 3:16 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

That would be great. Let's make sure to touch base a few days before and make sure we're all set.

Thanks,

(b)(6);  
(b)(7)(C)

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Wednesday, April 7, 2021 11:47 AM

**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Many thanks for hosting us.

Do you need a list of participants in advance? Any other information from us?

Best,  
Lesley

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Sent:** Wednesday, April 7, 2021 2:45 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Great. Lesley, the Spring Street Training Room on the 13th Floor at 312 N. Spring Street has been reserved for this meeting.

I've cc'ed (b)(6); (b)(7)(C), the head of Admin Services, to make sure that we have an escort for the participants to the Spring Street Training Room on the 13th Floor, which has been reserved for this meeting. The room was recently renovated and is great, but one small catch: if anyone leaves the floor, he/she will have to check in again on the 12th Floor and have someone on (b)(6); team take you back up to the 13th Floor.

Thanks all,

(b)(6);

---

**From:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Sent:** Wednesday, April 7, 2021 11:07 AM

**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C); Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

And I am very grateful to both of you.

(b)(6); I am ccing Section Chief Lesley Wolf, who is the POC and will be at your offices on 4/27.

Thanks again.

(b)(6);

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Sent:** Wednesday, April 7, 2021 1:33 PM

**To:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Hi (b)(6); Happy to help.

---

**From:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)

**Sent:** Wednesday, April 7, 2021 10:07 AM

**To:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Thanks, [REDACTED] We can accommodate your people.

I'm adding our Exec. AUSA [REDACTED] to the thread. She will take it from here so you should put her in touch with the POC on your side who can answer questions re timing, room set-up, etc. And yes, we require masks the entire time.

Best of luck with this.

[REDACTED]

---

**From:** [REDACTED] (USADE) <[REDACTED]>  
**Sent:** Tuesday, April 6, 2021 10:35 AM  
**To:** Christensen, Stephanie (USACAC) <[REDACTED]>  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Stephanie:

Thank you so much for your quick and helpful response. I needed to go back to the Lead AUSA for information.

Here are the answers to your questions:

- The likely # of people in the room at the same time is 12.
- No video needed.
- There is the potential that someone(s) will be on the phone. If that's the case, the number of onsite participants will drop to 9.
- As far as we know, everyone should be able to mask for the entirety of the time. [REDACTED]  
[REDACTED] vaccinated. In prior interviews, the team has given witnesses the option to unmask during long interviews, if the witnesses wish to do so. But if you require masking during the entirety of the time onsite for all, the team will obviously comply and ensure similar compliance by opposing counsel and witnesses.

Please let me know if you have additional questions, and I thank you very much for your assistance.

Best,

(b)(6);  
(b)(7)(C)

---

**From:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Monday, April 5, 2021 7:44 PM  
**To:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

(b)(6); (b)(7)(C)

We are happy to help out. Just a few questions.

Will all 12-15 be onsite at the same time? If not, what is the maximum number at any given time?

Do you plan to have all attendees in one room or will some be connecting in by video? For example, will you need one big room, or two small/medium rooms with a video link between them.

Are all participants able to wear a mask for the duration of the time they need to be onsite?

Regards,  
Steph

---

**From:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Sent:** Monday, April 5, 2021 12:11 PM  
**To:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Subject:** USAO - Delaware Seeks A Conference Room on 4/27

Stephanie:

(b)(6); (b)(7)(C) the (b)(6); (b)(7)(C) in Delaware, here. We are seeking to use a large conference room in your Office for witness interviews on Tuesday, April 27th.

I writing directly to you in light of COVID and the investigation at issue. If what we are requesting isn't possible, it is better for us to know sooner rather than later.

A sensitive investigation of ours will bring case prosecutors from our District and Main Justice to LA

later this month to interview 3 accountants. The lead AUSA estimates that, with all of the agents and attorneys involved, there will be between 12 and 15 attendees at these interviews, which have been determined to be critical to the investigation and therefore require in-person meetings.

What would be a routine request in ordinary times becomes anything but in April 2021. We are sensitive to the fact that your Office, like ours, is dealing with COVID concerns and staffing/census limitations in light of Departmental guidance under which we are all operating.

We are hoping that you might be willing to share a sufficiently large space that all could gather in a socially-distanced fashion.

I am happy to work through logistics with whomever is responsible in your office, if this is a request you are able to accommodate.

I am here in the office today at (b)(6); (b)(7)(C) if you wish to discuss the request further or to send my contact information to another. My cell is (b)(6); (b)(7)(C)

Thank you for your kind consideration, Stephanie.

Best,

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6);  
(b)(7)(C)

*District of Delaware*

**From:** (b)(6); (b)(7)(C) (USACAC)  
**To:** Wolf, Lesley (USADE)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) [Contractor]; (b)(6); (b)(7)(C) (USACAC)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27  
**Date:** Wednesday, April 28, 2021 9:36:34 PM

---

Great!

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, April 28, 2021 6:30 PM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) [Contractor]; (b)(6); (b)(7)(C) (USACAC)  
<(b)(6); (b)(7)(C)>  
**Subject:** Re: USAO - Delaware Seeks A Conference Room on 4/27

(b)(6); (b)(7)(C)

Just wanted to thank you all for your help and hospitality. The room worked perfectly and we are very grateful to you for allowing us to use it.

Best,  
Lesley

Sent from my iPhone

On Apr 22, 2021, at 6:01 PM, (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C) wrote:

Great. Thanks Lesley. Lesley please send FedEx to:

(b)(6); (b)(7)(C)  
1200 US Courthouse  
312 N. Spring Street  
Los Angeles, CA 90012

(b)(6); is our receptionist and she will receive the FedEx.

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Thursday, April 22, 2021 9:53 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>; Daly, Mark F. (TAX)  
(b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

(b)(6); (b)(7)(C)

I am planning to send you a list of names tomorrow.

In the meantime, we were hoping to be able to FedEx documents for Monday arrival at your offices to avoid having to carry them cross country, but were not sure of your current mail operations and what might be possible on that front.

Thanks again for your help in coordinating all of this.

-Lesley

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, April 7, 2021 3:16 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

That would be great. Let's make sure to touch base a few days before and make sure we're all set.

Thanks,

(b)(6);  
(b)(7)(C)

---

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, April 7, 2021 11:47 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Many thanks for hosting us.

Do you need a list of participants in advance? Any other information from us?

Best,  
Lesley

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, April 7, 2021 2:45 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Great. Lesley, the Spring Street Training Room on the 13th Floor at 312 N. Spring Street has been reserved for this meeting.

I've cc'ed (b)(6); (b)(7)(C) the head of Admin Services, to make sure that we have an escort for the participants to the Spring Street Training Room on the 13th Floor, which has been reserved for this meeting. The room was recently renovated and is great, but one small catch: if anyone leaves the floor, he/she will have to check in again on the 12th Floor and have someone on (b)(6); (b)(7)(C) team take you back up to the 13th Floor.

Thanks all,

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, April 7, 2021 11:07 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C) Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

And I am very grateful to both of you.

(b)(6); I am ccing Section Chief Lesley Wolf, who is the POC and will be at your offices on 4/27.

Thanks again.

(b)(6);

---

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, April 7, 2021 1:33 PM  
**To:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Hi (b)(6); Happy to help.

---

**From:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Sent:** Wednesday, April 7, 2021 10:07 AM  
**To:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Cc:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Thanks, (b)(6); (b)(7)(C) We can accommodate your people.

I'm adding our Exec. AUSA (b)(6); (b)(7)(C) to the thread. She will take it from here so you should put her in touch with the POC on your side who can answer questions re timing, room set-up, etc. And yes, we require masks the entire time.

Best of luck with this.

Steph

---

**From:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, April 6, 2021 10:35 AM  
**To:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)  
**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

Stephanie:

Thank you so much for your quick and helpful response. I needed to go back to the Lead AUSA for information.

Here are the answers to your questions:

- The likely # of people in the room at the same time is 12.
- No video needed.
- There is the potential that someone(s) will be on the phone. If that's the case, the number of onsite participants will drop to 9.
- As far as we know, everyone should be able to mask for the entirety of the time. (b)(6) vaccinated. In prior interviews, the team has given witnesses the option to unmask during long interviews, if the witnesses wish to do so. But if you require masking during the entirety of the time onsite for all, the team will obviously comply and ensure similar compliance by opposing counsel and witnesses.

Please let me know if you have additional questions, and I thank you very much for your assistance.

Best,

(b)(6);  
(b)(7)(C)

---

**From:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)

**Sent:** Monday, April 5, 2021 7:44 PM

**To:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Subject:** RE: USAO - Delaware Seeks A Conference Room on 4/27

(b)(6); (b)(7)(C)

We are happy to help out. Just a few questions.

Will all 12-15 be onsite at the same time? If not, what is the maximum number at any given time?

Do you plan to have all attendees in one room or will some be connecting in by video? For example, will you need one big room, or two small/medium rooms with a video link between them.

Are all participants able to wear a mask for the duration of the time they need to be onsite?

Regards,  
Steph

---

**From:** (b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)

**Sent:** Monday, April 5, 2021 12:11 PM

**To:** Christensen, Stephanie (USACAC) (b)(6); (b)(7)(C)

**Subject:** USAO - Delaware Seeks A Conference Room on 4/27

Stephanie:

(b)(6); (b)(7)(C) the (b)(6); (b)(7)(C) in Delaware, here. We are seeking to use a large conference room in your Office for witness interviews on Tuesday, April 27th.

I writing directly to you in light of COVID and the investigation at issue. If what we are requesting isn't possible, it is better for us to know sooner rather than later.

A sensitive investigation of ours will bring case prosecutors from our District and Main Justice to LA later this month to interview 3 accountants. The lead AUSA estimates that, with all of the agents and attorneys involved, there will be between 12 and 15 attendees at these interviews, which have been determined to be critical to the investigation and therefore require in-person meetings.

What would be a routine request in ordinary times becomes anything but in April 2021. We are sensitive to the fact that your Office, like ours, is dealing with COVID concerns and staffing/census limitations in light of Departmental guidance under which we are all operating.

We are hoping that you might be willing to share a sufficiently large space that all could gather in a socially-distanced fashion.

I am happy to work through logistics with whomever is responsible in your office, if this is a request you are able to accommodate.

I am here in the office today at (b)(6); (b)(7)(C) if you wish to discuss the request further or to send my contact information to another. My cell is (b)(6); (b)(7)(C)

Thank you for your kind consideration, Stephanie.

Best,

(b)(6);  
(b)(7)(C)

(b)(6); (b)(7)(C)

(b)(6);  
(b)(7)(C)

*District of Delaware*

**From:** (b)(6); (b)(7)(C) (USACAC)  
**To:** Daly, Mark F. (TAX)  
**Cc:** Wolf, Lesley (USADE)  
**Subject:** Re: WSJ article today  
**Date:** Friday, October 7, 2022 11:22:51 AM

---

Please call me now on my landline. (b)(6); (b)(7)(C)

On Oct 7, 2022, at 8:21 AM, Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
wrote:

(b)(6);

If you have time today, we can hop on the phone and bribe you up to speed on this latest development.

Mark

Get Outlook for iOS

---

**From:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>  
**Sent:** Friday, October 7, 2022 11:19:37 AM  
**To:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE)  
(b)(6); (b)(7)(C)  
**Subject:** Re: WSJ article today

Headline: "prosecutors hold off on final Hunter Biden case amid talks with defense"

> On Oct 7, 2022, at 8:13 AM, (b)(6); (b)(7)(C) (USACAC)  
(b)(6); (b)(7)(C) wrote:

>

> ???

**From:** (b)(6); (b)(7)(C) (USACAC)  
**To:** Daly, Mark F. (TAX)  
**Cc:** Wolf, Lesley (USADE)  
**Subject:** Re: WSJ article today  
**Date:** Friday, October 7, 2022 11:22:51 AM

---

Please call me now on my landline. (b)(6); (b)(7)(C)

On Oct 7, 2022, at 8:21 AM, Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
wrote:

(b)(6);

If you have time today, we can hop on the phone and bribe you up to speed on this latest development.

Mark

Get [Outlook for iOS](#)

---

**From:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>  
**Sent:** Friday, October 7, 2022 11:19:37 AM  
**To:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Wolf, Lesley (USADE)  
(b)(6); (b)(7)(C)  
**Subject:** Re: WSJ article today

Headline: "prosecutors hold off on final Hunter Biden case amid talks with defense"

> On Oct 7, 2022, at 8:13 AM, (b)(6); (b)(7)(C) (USACAC)  
(b)(6); (b)(7)(C) wrote:

>

> ???

**From:** Wolf, Lesley (USADE)  
**To:** (b)(6); (b)(7)(C) (USADE)  
**Subject:** FW: Discovery Question  
**Date:** Tuesday, November 15, 2022 9:22:33 AM  
**Attachments:** Guidance - Discovery. 20191213.pdf

---

(b)(6);

Finally got this from CD Cal. I have to read more carefully today, but the section she points to is useful.

(b)(6);

**From:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>

**Sent:** Monday, November 14, 2022 5:29 PM

**To:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>; Daly, Mark F. (TAX) <(b)(6); (b)(7)(C)>

**Subject:** Discovery Question

Hello.

My apologies for the delay in responding to your request for guidance re discovery in this district/circuit. Attached is our Office's discovery guidance. I believe your specific question pertained to the contours of prosecution teams. The discussion beginning at page 66 of the attached may be helpful.

Let me know if you need anything else.

(b)(6); (b)(7)(C)

**Assistant United States Attorney**

**Chief, Major Frauds Section**

United States Attorney's Office | Central District of California

United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles, California 90012

Office: (b)(6); (b)(7)(C) Mobile: (b)(6); (b)(7)(C) | (b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** Weiss, David (USADE)  
**Cc:** (b)(6); (b)(7)(C) (USADE); Weede, Shawn (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** FW: Update  
**Date:** Sunday, September 18, 2022 2:45:17 PM

---

FYI

**From:** (b)(6); (b)(7)(C) (USACAC) <(b)(6); (b)(7)(C)>  
**Sent:** Saturday, September 17, 2022 9:31:20 PM  
**To:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C)>; Daly, Mark F. (TAX) <(b)(7)(E)>

**Subject:** Update

Hello.

Our new USA was confirmed on Tuesday and will be sworn in on this coming Monday. I want to get him up to speed on the tax matter and am preparing a short cover memo for your pros memo, which I hope will help him navigate through your detailed presentation. I had a couple of quick questions – is there a good time for a brief call in the next day or two?

Thanks.

(b)(6); (b)(7)(C)

**Assistant United States Attorney**  
**Chief, Major Frauds Section**

United States Attorney's Office | Central District of California  
United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles,  
California 90012  
Office: (b)(6); (b)(7)(C) Mobile: (b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** Weiss, David (USADE); (b)(6); (b)(7)(C) (USADE)  
**Subject:** Fwd: Follow Up  
**Date:** Monday, October 24, 2022 5:38:48 PM

---

Re: pros guidelines

Sent from my iPhone

Begin forwarded message:

**From:** (b)(6); (b)(7)(C) (USACAC)" <(b)(6); (b)(7)(C)>  
**Date:** October 24, 2022 at 4:00:50 PM EDT  
**To:** "Wolf, Lesley (USADE)" <(b)(6); (b)(7)(C)>  
**Cc:** "Daly, Mark F. (TAX)" <(b)(6); (b)(7)(C)> " (b)(6); (b)(7)(C) (USACAC)" <(b)(6); (b)(7)(C)>  
**Subject:** RE: Follow Up

Hi Lesley,

The proposed time (Wednesday at 10:30 PST/1:30 EST) works for us. Thank you for accommodating our schedule.

The Office's prosecution guidelines provide that, as a general matter, financial crimes are considered for prosecution if the evidence establishes that:

(b)(5); (b)(7)(E)

On a case-by-case basis, based on a review by the Major Frauds Section Chief, lower fraud loss thresholds may be applied when:

(b)(5); (b)(7)(E)

These guidelines are intended to distinguish the types of cases that presumptively merit prosecution by our Office the United States Attorney's from those that do not. The guidelines provide, however, that the Office may still consider matters and subjects that do not meet these guidelines when compelling interests or aggravating factors are present.

(b)(6); (b)(7)(C) and I look forward to speaking with you and your team on Wednesday.

(b)(6);  
(b)(7)(C)

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Monday, October 24, 2022 8:28 AM

**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USACAC)  
(b)(6); (b)(7)(C)

**Subject:** RE: Follow Up

Hi (b)(6);

How about 130pm/1030am on Wednesday?

Also checking again on prosecution guidelines.

Thanks,

Lesley

**From:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Sent:** Friday, October 21, 2022 8:06 PM

**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); (b)(6); (b)(7)(C) (USACAC)

(b)(6); (b)(7)(C)

**Subject:** RE: Follow Up

Hi Lesley,

Thanks for your email. (b)(6); (b)(7)(C) (my Crim Chief) and I are available next Wednesday (10/26) anytime except between 2:00 and 4:00 pm PST, Thursday (10/27) anytime after 10:30 am PST and before 3:30 PST, and Friday (10/28) anytime in the afternoon (before 3:00 pm PST would be preferable but we can make a later time work as well). In case Tuesday (10/25) frees up for your team, we are also available on that day anytime except between 3:00 and 5:00 pm PST.

(b)(6); (b)(7)(C)

| Assistant United States Attorney

**Chief, Major Frauds Section**

United States Attorney's Office | Central District of California

United States Courthouse, Suite 1100 | 312 N. Spring St. | Los Angeles,  
California 90012

Office: (b)(6); (b)(7)(C) Mobile: (b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Sent:** Friday, October 21, 2022 9:40 AM

**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)

**Cc:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C)

**Subject:** Follow Up

(b)(6); (b)(7)(C)

I understand that my US Attorney, David Weiss, spoke with your US Attorney earlier this week. USA Weiss has asked me to set up a call with you for a discussion where we can talk through your feedback more specifically. I would expect the call to include not only Mark and myself, but Mark's colleagues (b)(6); (b)(7)(C) and (b)(6); (b)(7)(C) from Tax Division as well as (b)(6); (b)(7)(C) and my criminal chief, Shawn Weede. Could you propose a few blocks of time that might work for you and then I can try to get a quorum together on this end? I know Tuesday won't work for my team.

In addition, your US Attorney referenced CD Cal's prosecution guidelines. Could you please share those with us (or the relevant portions thereof) in advance of a call?

Thanks,

Lesley

*Lesley F. Wolf*

**Assistant United States Attorney  
Section Chief, Economic Crimes  
District of Delaware  
1313 N. Market Street, Suite 400  
Wilmington, DE 19801**

(b)(6), (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** Weede, Shawn (USADE)  
**Subject:** FW: Call with (b)(6); (b)(7)(C) (USACAC)  
**Date:** Tuesday, September 20, 2022 1:46:44 PM

---

FYI- DC and LA connecting tomorrow

**From:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Tuesday, September 20, 2022 1:46 PM  
**To:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** FW: Call with (b)(6); (b)(7)(C) (USACAC)

fyi

Mark Daly

Senior Litigation Counsel

Criminal Enforcement Section

Tax Division

U.S. Department of Justice

T: (b)(6); (b)(7)(C)

M: (b)(6); (b)(7)(C)

F: (202) 616-1786

E: (b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Sent:** Tuesday, September 20, 2022 1:45 PM

**To:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C); Morgan, Jack A. (TAX)  
(b)(6); (b)(7)(C)

**Subject:** FW: Call with (b)(6); (b)(7)(C) (USACAC)

FYI

---

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Sent:** Tuesday, September 20, 2022 1:45 PM

**To:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Subject:** RE: Call with (b)(6); (b)(7)(C) (USACAC)

Earlier today, we set a call for Wed afternoon.

(b)(6); (b)(7)(C)

---

**From:** (b)(6); (b)(7)(C) (TAX) (b)(6); (b)(7)(C)

**Sent:** Tuesday, September 20, 2022 1:33 PM

**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)

**Cc:** (b)(6); (b)(7)(C) USADC <(b)(6); (b)(7)(C)>

**Subject:** Call with (b)(6); (b)(7)(C) (USACAC)

Hi (b)(6)

Just wanted to follow-up on our call last week. It's my understanding that (b)(6); (b)(7)(C) Chief of Major Frauds in LA, is still try to get in touch with you and/or (b)(6) to discuss the (b)(7)(E) matter.

Thanks,

(b)(6); (b)(7)(C)

Chief

U.S. Department of Justice, Tax Division  
Northern Criminal Enforcement Section  
150 M Street NE  
Washington, DC 20002

(b)(6); (b)(7)(C)

IT'S YOUR GOVERNMENT  
OVERSIGHT PROJECT

**From:** Wolf, Lesley (USADE)  
**To:** Weede, Shawn (USADE)  
**Subject:** FW: Grand Jury Time  
**Date:** Monday, March 7, 2022 1:08:46 PM

---

I see (b)(6); (b)(7)(C) is now copied. I am trying to get through to Mark. I am so mad right now.

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Monday, March 7, 2022 12:43 PM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C) (b)(6); (b)(7)(C) (TAX)  
(b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time

Have you decided how you would like to proceed with respect to the grand jury? Thanks.

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:36 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time  
Great. Talk then.

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:36 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** Re: Grand Jury Time  
Works for me. I'm at (b)(6); (b)(7)(C)

On Mar 4, 2022, at 10:35 AM, Weede, Shawn (USADE) (b)(6); (b)(7)(C) wrote:

How about 2:30?

**From:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:34 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C) (USADC)  
(b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time  
Other than 130-2, I am completely available.

**From:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:24 AM  
**To:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)  
**Subject:** RE: Grand Jury Time  
Sure thing. Lesley, what's your availability?

**From:** (b)(6); (b)(7)(C) (USADC) (b)(6); (b)(7)(C)  
**Sent:** Friday, March 4, 2022 10:23 AM  
**To:** Weede, Shawn (USADE) (b)(6); (b)(7)(C)

**Cc:** Wolf, Lesley (USADE) (b)(6); (b)(7)(C)

**Subject:** Re: Grand Jury Time

I'm very sorry that I missed you yesterday. Can we talk this afternoon?

On Mar 3, 2022, at 12:13 PM, Weede, Shawn (USADE)

(b)(6); (b)(7)(C) wrote:

Hi (b)(6);  
(b)(7)(C)

Greetings from the District of Delaware. As you may have heard, my U.S. Attorney reached out to yours this morning regarding a sensitive investigation that will require some grand jury time in your district. Lesley Wolf is the lead AUSA and is copied here. Do you have a few minutes to discuss this afternoon?

Best,

Shawn

Shawn A. Weede

Chief, Criminal Division

United States Attorney's Office

District of Delaware

1313 N. Market Street

Wilmington, DE 19801

(b)(6); (b)(7)(C)

**From:** Wolf, Lesley (USADE)  
**To:** Woode, Shawn (USADE)  
**Subject:** FW: (b)(7)(F) Call with Latham re pending Washington Post article  
**Date:** Friday, October 7, 2022 5:14:34 PM  
**Attachments:** EXTERNAL As Discussed.msg  
image001.png  
image002.png  
image003.png

---

**From:** Daly, Mark F. (TAX) (b)(6); (b)(7)(C)  
**Sent:** Friday, October 7, 2022 11:56 AM  
**To:** (b)(6); (b)(7)(C) (USACAC) (b)(6); (b)(7)(C)  
**Cc:** Wolf, Lesley (USADE) <(b)(6); (b)(7)(C) (USADE) (b)(6); (b)(7)(C)>  
**Subject:** FW: (b)(7)(E) Call with Latham re pending Washington Post article  
(b)(6)

Here are my notes from the phone call yesterday with Chris Clark.  
Lesley – if I have misstated or omitted anything, please reply all.

Mark  
Mark Daly  
Senior Litigation Counsel  
Criminal Enforcement Section  
Tax Division  
U.S. Department of Justice  
T: (b)(6);  
M: (b)(7)(C)  
F: (202) 616-1786  
E: (b)(6); (b)(7)(C)

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**From:** Daly, Mark F. (TAX)  
**Sent:** Thursday, October 6, 2022 1:13 PM  
**To:** Goldberg, Stuart M. (TAX) (b)(6); (b)(7)(C) (b)(6); (TAX) (b)(6); (b)(7)(C) (b)(6); (TAX) (b)(6); (b)(7)(C)  
**Subject:** (b)(7)(E) Call with Latham re pending Washington Post article

Please find below my notes from a call with counsel for RHB regarding an inquiry from a Washington Post reporter (12:00 p.m. to 12:15 pm)

|                           |                                                              |
|---------------------------|--------------------------------------------------------------|
| Latham                    | Chris Clark<br>Tim McCarten<br>Brian McManus<br>Matt Salerno |
| USAO                      | Lesley Wolf<br>(b)(6)                                        |
| Tax                       | Mark Daly                                                    |
| (b)(5); (b)(6); (b)(7)(C) |                                                              |

- 2 emails and 2 calls with reporter (Devlin Barrett of WaPo) since Tuesday (emails cut and pasted below)
  - Memos to file right after calls with reporter (one on Tuesday and one on Thursday, both after receipt of emails from the reporter)

(b)(5); (b)(6); (b)(7)(C)

First email to Clark from the reporter:

**From:** Barrett, Devlin (b)(6)  
**Date:** Tuesday, Oct 04, 2022 at 11:25 AM  
**To:** Clark, Christopher (NY) (b)(6)  
**Subject:** WaPo reaching out for comment

Hi counselor,

I am writing a story today about the status of the Hunter Biden investigation – specifically, that investigators have finished their work and concluded they have a chargeable case on tax violations and a false statement on gun purchase paperwork, and are awaiting a decision from US Attorney Weiss. Can you please give me a call? My number is (b)(6)

Thanks,  
Dev

**Second email from Reporter to Clark:**

**From:** Barrett, Devlin (b)(6)  
**Date:** Thursday, Oct 06, 2022 at 10:20 AM  
**To:** Clark, Christopher (NY) (b)(6)  
**Subject:** WaPo seeking comment

Hi counselor,

We plan to publish a story today saying that federal agents investigating have gathered what they believe is sufficient evidence to charge Hunter Biden with tax charges and lying on a gun purchase form. We plan to also report that agents have believed for months they have a chargeable case against Biden, but the decision on whether to charge rests with prosecutors, not agents, and the case is currently awaiting a decision by US Attorney Weiss in Delaware.

I am asking for any comment you have on this, or anything else you think I should know on any basis. I'd also like to know if you can say whether or not there have been any plea/settlement discussions with the government.

My number is (b)(6)

Thanks,  
Dev

**Proposed Statement:**

The following is the draft language:

*It is a federal felony for a federal agent to leak information about a Grand Jury investigation such as this one. Any agent you cite as a source in your article apparently has committed such a felony. We expect the Department of Justice will diligently investigate and prosecute such bad actors.*

*As to the substance of the leak, as is proper and legally required, we believe the prosecutors in this case are diligently and thoroughly weighing not just evidence provided by (an apparently biased) agent, but also all the other witnesses in this case, including witnesses for the defense. That is the job of the prosecutors. They should not be pressured, rushed, or criticized for doing their job.*

*It bears noting that as lead counsel for the defense, I have not heard of, spoken to, seen, or interacted with any federal agent other than a prosecutor in this case, and therefore whatever rendition of the case any "agent" has provided does not and cannot incorporate information provided by the defense. It is inherently biased, one-sided, and inaccurate. We look forward to those who have perpetrated this leak being identified and brought to justice. It is a shame that those with dishonest agendas appear to be attempting to prejudice a case against a person who is a target simply because of his family name.*

As we discussed, Mr. Biden requests that this email be maintained in confidence by the Department of Justice and be used solely for the purposes of this investigation. Accordingly, the email has been marked "FOIA Confidential Treatment Requested."

Mark Daly  
Senior Litigation Counsel  
Criminal Enforcement Section  
Tax Division  
U.S. Department of Justice  
T: (b)(6);  
M: (b)(7)(C)  
F: (202) 616-1786  
E: (b)(6); (b)(7)(C)

**From:** (b)(6)  
**To:** Wolf, Lesley (USADE); Daly, Mark F. (TAX); (b)(6); (USADE)  
**Cc:** (b)(6); (b)(6); (b)(6)  
**Subject:** [EXTERNAL] As Discussed  
**Date:** Thursday, October 6, 2022 12:58:30 PM

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**FOIA CONFIDENTIAL TREATMENT REQUESTED**

All:

The following is the draft language:

*It is a federal felony for a federal agent to leak information about a Grand Jury investigation such as this one. Any agent you cite as a source in your article apparently has committed such a felony. We expect the Department of Justice will diligently investigate and prosecute such bad actors.*

*As to the substance of the leak, as is proper and legally required, we believe the prosecutors in this case are diligently and thoroughly weighing not just evidence provided by (an apparently biased) agent, but also all the other witnesses in this case, including witnesses for the defense. That is the job of the prosecutors. They should not be pressured, rushed, or criticized for doing their job.*

*It bears noting that as lead counsel for the defense, I have not heard of, spoken to, seen, or interacted with any federal agent other than a prosecutor in this case, and therefore whatever rendition of the case any "agent" has provided does not and cannot incorporate information provided by the defense. It is inherently biased, one-sided, and inaccurate. We look forward to those who have perpetrated this leak being identified and brought to justice. It is a shame that those with dishonest agendas appear to be attempting to prejudice a case against a person who is a target simply because of his family name.*

As we discussed, Mr. Biden requests that this email be maintained in confidence by the Department of Justice and be used solely for the purposes of this investigation. Accordingly, the email has been marked "FOIA Confidential Treatment Requested."

Tim

**Timothy H. McCarten**

**LATHAM & WATKINS LLP**  
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