

Healy Gallagher, Erin (TAX)

From: Moran, Christopher R. (TAX)
Sent: Thursday, May 26, 2016 1:45 PM
To: Justin Heideman; Donald Reay
Cc: Hines, Erin R. (TAX)
Subject: USA v. RaPower3, et al. USA Notice of Intend to Subpoena documents
Attachments: 2016 05 26 Notice of Intent to Subpoena documents.PDF

Dear Counsel:

Please see the attached notice. I will send the subpoenas in a separate email. If you do not receive it, please let me know and we will send them on a disk. The email will be encrypted with the same password we've used in the past. Don- I assume you have it; if not, let me know. Justin: I will call you momentarily with the password.

Thanks.

Chris

Christopher R. Moran
Trial Attorney, Civil Trial Section-Central Region
Tax Division
U.S. Department of Justice
Telephone: 202-307-0834
FAX: 202-514-6770

**Plaintiff
Exhibit**

A

Healy Gallagher, Erin (TAX)

From: Moran, Christopher R. (TAX)
Sent: Thursday, May 26, 2016 1:51 PM
To: Justin Heideman; Donald Reay
Cc: Hines, Erin R. (TAX)
Subject: USA v. RaPower3, et al. - Subpoenas
Attachments: WinZip Compressed Attachments.zip

Dear Counsel:

Subpoenas are attached.

Thank you.

Chris

Christopher R. Moran
Trial Attorney, Civil Trial Section-Central Region
Tax Division
U.S. Department of Justice
Telephone: 202-307-0834
FAX: 202-514-6770