



U.S. Department of Justice

United States Attorney's Office
District of Delaware

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June 20, 2023

By Email

Mr. Keith Kincaid
U.S. District Court Clerk's Office
U.S. District Court
844 King Street
Wilmington, Delaware 19801

CR 23-61-UNA

Re: Robert Hunter Biden

Dear Mr. Kincaid:

Enclosed, please find two Informations to be docketed in criminal matters involving the above-referenced defendant. The first Information charges the defendant with tax offenses—namely, two counts of willful failure to pay federal income tax, in violation of 26 U.S.C. § 7203. The defendant has agreed to plead guilty to both counts of the tax Information. The second Information charges the defendant with a firearm offense—namely, one count of possession of a firearm by a person who is an unlawful user of or addicted to a controlled substance, in violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2) (2018). The defendant has agreed to enter a Pretrial Diversion Agreement with respect to the firearm Information.

The defendant is represented by Christopher J. Clark. The parties jointly request that the Court schedule a consolidated Initial Appearance on the firearm Information and an Initial Appearance and Change of Plea Hearing on the tax Information charges. Original, executed copies of the Memorandum of Plea Agreement related to the tax Information, and the Pretrial Diversion Agreement related to the firearm Information, will be submitted at or in advance of the Hearing.

Respectfully submitted,

DAVID C. WEISS
United States Attorney

By: Leo J. Wise
Leo J. Wise
Derek E. Hines
Special Assistant United States Attorneys

FILED

JUN 20 2023

U.S. DISTRICT COURT DISTRICT OF DELAWARE

Enclosures
CC: Christopher J. Clark

Benjamin L. Wallace
Assistant United States Attorney