

Weinsheimer, Bradley (ODAG)

From: Weinsheimer, Bradley (ODAG)
Sent: Thursday, May 4, 2023 7:18 PM
To: Weiss, David (USADE)
Cc: BenAry, Michael (ODAG)
Subject: Next steps
Attachments: HB Charges.docx

David: Following our meeting with counsel, I put together the attached brief outline to aid in our discussion moving forward. Perhaps we can find some time next week to talk about the meeting and next steps.

Thanks, Brad.

Discussion Outline

For ease of reference and discussion, I have set forth below the firearms and tax charges I understand you are considering and some related issues that arose from the meeting with counsel. As the Attorney General has said, whether and what charges to bring is your decision to make. While you have sought input from other USAOs and the Tax Division, you are not bound by whatever recommendation they may have offered. The decision is yours, and you will be designated as a Special Attorney pursuant to 28 USC 515 if you decide to bring charges in any jurisdiction outside of Delaware. The Attorney General would act only if, following consultation with you and giving great weight to your views, he concluded that the charges or actions you propose are so inappropriate or unwarranted under established Departmental practices that the charges or actions should not be pursued.

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