## **EXHIBIT A**



Via Facsimile: (877) 891-6035

September 11, 2020

William White Internal Revenue Service FOIA Request Stop 211 P.O. Box 621506 Atlanta, Georgia 30362-3006

Re: Freedom of Information Act Request regarding Joseph P. Warren

SSN:

Dear Internal Revenue Service:

Under the provisions of the Freedom of Information Act, 5 U.S.C. § 552, we are requesting, on behalf of Joseph P. Warren (hereinafter referred to as "Client"), copies of certain information listed below pertaining to an IRS examination, proposed assessment, or actual assessment of any FBAR penalties and Form 8938 penalties for tax years 2011 and 2012 (collectively, the "examination communications").

## We request the following:

- all correspondence concerning tax years 2011 and 2012, to or from the Client or their representative(s) and other documents pertaining to the examination communications including, but not limited to, requests for interviews, interview memoranda, Forms 4180, summonses, notices of proposed assessments, administrative appeals, collection notices, collection appeals, and notices of determination;
- 2. Individual Master File, Business Master File and Non-Master file account transcripts, MFTRA-X record of account printouts showing all transactions posted to the Client's accounts that resulted from any examination communications from tax years 2011 and 2012;
- all documents from tax years 2011 and 2012, related to the Internal Revenue Service's efforts to collect the taxes or penalties from the Client resulting from any examination communications including, but not limited to, ICS history transcripts, Collection Information Statements (Forms 433-A, 433-B and/or 433-F) and supporting documents, financial statements, credit reports, lien and judgment searches, Offers-in-Compromise, proposed or accepted installment agreements, notices, correspondence, computations, and TDA or TDI assignment records;
- 4. all bank statements for foreign bank accounts (including, but not limited to, obtained by any IRS officer or agent, pursuant to one or more summons or any other formal or informal document requests, used by any IRS officer or agent in computing any FBAR penalties and Form 8938 penalties that have been proposed or assessed for tax years

2011 and 2012 and;

- any other documents contained in the administrative file including, but not limited to, account statements, signature cards, cancelled checks, tax returns, and other documents pertaining to the examination communications for tax years 2011 and 2012; and
- 6. identification of the official having control of the records being requested.

Our Client is entitled to two hours of free search time and one hundred pages of duplication without charge. We want copies made of the information requested above, and we agree to pay any search and duplication fees should any be incurred. If you believe the research and duplication fees will exceed \$250.00, please contact us prior to duplicating the information to discuss payment. We do not wish to inspect the documents prior to duplication and mailing.

Our Client is an "other requester" as defined in Treas. Reg. § 601.702(f)(3)(ii)(E). For your reference, we have enclosed a sworn statement signed by our Client granting the IRS permission to release the above-described information to J. L. Williamson Law Group, LLC, and an executed copy of our Client's Forms 2848 ("Power of Attorney and Declaration of Representative").

We have determined that the information requested above is not a classified document, is not a protected internal communication, and is not protected by privacy or as a protected investigative record within the meaning of the Freedom of Information Act. If any of the requested information is deemed to be exempt, we request that you provide the following:

- i. a full statement of the reasons for the refusal or access,
- ii. identification of each document, or deleted portions of any document, withheld,
- iii. a statement regarding the statutory exemption claimed and citations to the particular authority asserted for the denial, and
- iv. an explanation as to how disclosure would damage the interest protected by the claimed exemption.

Any notifications, records, or information regarding this request may be sent to the following address: J. L. Williamson Law Group, LLC, P.O. Box 60549, Savannah, Georgia 31420.

Finally, a copy of this letter is enclosed along with a self-addressed, stamped envelope. We ask that you acknowledge receipt of all documents referenced above by stamping the copy of this letter and returning it to us in the envelope provided.

Sincerely,

J. L. Williamson Law Group, LLC

Jeffrey L. Williamson, Esq.

Ell Call

JLW/vrw Enclosures

cc: Mr. Joseph P. Warren (with enclosures)