



U.S. Department of Justice

*United States Attorney's Office
District of Delaware*

*The Hercules Building
1313 N. Market Street, Suite 400
P. O. Box 2046
Wilmington, Delaware 19899-2046* (302) 573-6277
FAX (302) 573-6220

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

Benjamin L. Wallace
Assistant United States Attorney

Enclosures
CC: Christopher J. Clark

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JUN 20 2023

U.S. DISTRICT COURT DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal Action No. 23-
)	274M
ROBERT HUNTER BIDEN,)	
)	
Defendant.)	

INFORMATION

The United States Attorney for the District of Delaware charges that:

COUNT ONE

During the calendar year 2017, the defendant Robert Hunter Biden, who was a resident of the District of Columbia, had and received taxable income in excess of \$1,500,000.00 on which taxable income there was owing to the United States of America an income tax in excess of \$100,000.00. He was required by law to pay, on or before April 17, 2018, that income tax to the Internal Revenue Service Center, at Hartford, Connecticut, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue. Well knowing and believing all of the foregoing, Robert Hunter Biden did willfully fail, on or about April 17, 2018, in the District of Columbia and elsewhere, to pay the income tax due.

In violation of Title 26, United States Code, Section 7203.

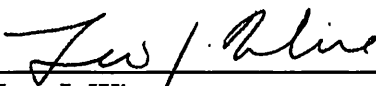
COUNT TWO

During the calendar year 2018, the defendant Robert Hunter Biden, who was a resident of the District of Columbia, had and received taxable income in excess of \$1,500,000.00 on which taxable income there was owing to the United States of

America an income tax in excess of \$100,000.00. He was required by law to pay, on or before April 15, 2019, that income tax to the Internal Revenue Service Center, at Hartford, Connecticut, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue. Well knowing and believing all of the foregoing, Robert Hunter Biden did willfully fail, on or about April 15, 2019, in the District of Columbia and elsewhere, to pay the income tax due.

In violation of Title 26, United States Code, Section 7203.

DAVID C. WEISS
UNITED STATES ATTORNEY

By: 

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

Benjamin L. Wallace
Assistant United States Attorney

Dated: June 20, 2023

DEFENDANT INFORMATION SHEET

23-274M

TO: Clerk, U.S. District Court Felony Class A Misdemeanor

DEFENDANT: Robert Hunter Biden Indictment Information

DOB (Year Only): 1970 **COUNTY OF OFFENSE:** New Castle

OFFENSE(S) & CITATION(S):

MAXIMUM PENALTY:

Count 1: Willful Failure to Pay Tax, 26 U.S.C. § 7203	12 months of imprisonment; a fine of \$100,000 or twice the gross gain or loss from the offense, whichever is greater; 1 year of supervised release; restitution; a \$25 special assessment; costs of prosecution
Count 2: Willful Failure to Pay Tax, 26 U.S.C. § 7203	12 months of imprisonment; a fine of \$100,000 or twice the gross gain or loss from the offense, whichever is greater; 1 year of supervised release; restitution; a \$25 special assessment; costs of prosecution

INSTRUCTIONS

Order to Produce for Arraignment on: _____ at 1:00 p.m.

Issue Arrest Warrant upon signing of Order _____

Issue Summons for Initial Appearance on: _____ at _____

Interpreter Needed _____ Language _____

DEFENDANT INFORMATION

Defendant's Address: _____

City: Malibu **County:** Los Angeles **State:** California **Zip:** 90265

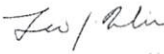
Date of Arrest: _____ **Date of 1st Appearance in this District:** _____

Bail Set: _____ **Date Made:** _____ **Remains in Federal Custody:**

FILED

JUN 20 2023

U.S. DISTRICT COURT, DISTRICT OF DELAWARE

By:  Digitally signed by LEO WISE
 Date: 2023.06.19 18:28:09 -04'00'

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

Benjamin L. Wallace
 Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)
)
 v.) Criminal Action No. 23- 61-UNA
)
 ROBERT HUNTER BIDEN,)
)
 Defendant.)

INFORMATION

The United States Attorney for the District of Delaware charges that:

COUNT ONE

On or about October 12, 2018, through on or about October 23, 2018, in the District of Delaware, the defendant Robert Hunter Biden, knowing that he was an unlawful user of and addicted to a controlled substance as defined in Title 21, United States Code, Section 802, did knowingly possess a firearm, that is, a Colt Cobra 38SPL revolver with serial number RA 551363, said firearm having been shipped and transported in interstate commerce.

In violation of Title 18, United States Code, Sections 922(g)(3) and 924(a)(2) (2018).

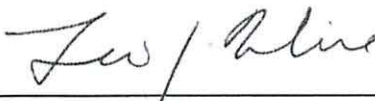
FILED

JUN 20 2023

U.S. DISTRICT COURT DISTRICT OF DELAWARE

DAVID C. WEISS
UNITED STATES ATTORNEY

By:



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

Benjamin L. Wallace
Assistant United States Attorney

Dated: June 20, 2023

DEFENDANT INFORMATION SHEET

CR 23-61-JNA

TO: Clerk, U.S. District Court Felony Class A Misdemeanor

DEFENDANT: Robert Hunter Biden Indictment Information

DOB (Year Only): 1970 COUNTY OF OFFENSE: New Castle

OFFENSE(S) & CITATION(S):

MAXIMUM PENALTY:

Possession of a firearm by a person who is an unlawful user of or addicted to a controlled substance, 18 U.S.C. §§ 922(g)(3) and 924(a)(2) (2018)	10 years of imprisonment; a fine of \$250,000; 3 years of supervised release; a special assessment of \$100

INSTRUCTIONS

Order to Produce for Arraignment on: _____ at 1:00 p.m.

Issue Arrest Warrant upon signing of Order _____

Issue Summons for Initial Appearance on: _____ at _____

Interpreter Needed _____ Language _____

DEFENDANT INFORMATION

Defendant's Address: _____

City: Malibu County: Los Angeles State: California Zip: 90265

Date of Arrest: _____ Date of 1st Appearance in this District: _____

Bail Set: _____ Date Made: _____ Remains in Federal Custody

FILED

JUN 20 2023

U.S. DISTRICT COURT DISTRICT OF NEW CASTLE

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

Benjamin L. Wallace
 Assistant United States Attorney

Digitally signed by LEO WISE
 Date: 2023.06.19 18:28:19 -04'00'