

EXHIBIT A

EXHIBIT A**DOJ – BIDEN NEGOTIATION CHRONOLOGY**

<i>Date</i>	<i>Event Description</i>	<i>Source</i>
06/20/2023	Counsel for Biden and U.S. Attorney’s Office in Delaware agree to a resolution of two tax misdemeanors and one diverted gun charge, and two Informations are filed on the docket in Delaware.	<i>United States v. Biden</i> , No. 23-cr-00061-MN (D. Del.); <i>United States v. Biden</i> , No. 23-mj-00274-MN (D. Del.)
07/26/2023	Plea hearing in Delaware before U.S. District Judge Maryellen Noreika. Shortly before the plea, Leo Wise (on behalf of U.S. Attorney Weiss), Biden’s counsel, and Hunter Biden signed and executed the Diversion Agreement (DA) and Memorandum of Plea Agreement (PA). At the hearing, Judge Noreika deferred a decision on the PA until further briefing was submitted.	<i>United States v. Biden</i> , No. 23-cr-00061-MN (D. Del.), Min. Order on 7/26/2023
07/31/2023	Phone call at 4:00 pm EST on July 31 between DOJ (Wise, Hines, Wallace) and Biden’s counsel (Clark, McCarten, Salerno). On that call, DOJ proposed the following revisions and modifications with respect to a resolution: <ol style="list-style-type: none"> 1. Amending ¶14 of the DA to eliminate the Court’s role as arbiter of any claimed breach of the DA (and substituting some other dispute resolution mechanism instead); 2. Deleting the immunity provision in ¶15 from the DA; and 3. Deleting the stipulation in ¶5(b) from the PA and the stipulation in ¶17 from the DA to emphasize that the PA and DA are separate and independent agreements. Importantly, DOJ—not Biden’s counsel—proposed removing the immunity provision from the next draft of the DA.	Clark 8/7/23 Letter to DOJ
08/07/2023	Counsel for Biden writes to DOJ in response to the modifications proposed on July 31, and explains they are not comfortable with DOJ’s insistence on removing the Court as the arbiter of any claimed breach; declines to amend the Parties’ existing agreement on immunity contained in the executed, bilateral DA; and agrees to remove the stipulations in the PA and DA under a modification of the DA.	Clark 8/7/23 Letter to DOJ
08/09/2023	DOJ responds to Biden’s counsel’s August 7 letter, and argues that neither the PA nor DA are in effect, and neither side is bound. In that letter, DOJ withdraws the PA and the DA it offered Biden on July 31, 2023, and withdraws the PA and the DA presented to the Court on July 26, 2023.	Wise 8/9/23 Letter to Clark

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	DOJ notifies Biden's counsel that it intends to move to dismiss the tax information without prejudice and pursue charges in another district where venue lies, and requests Biden's counsel's position by no later than August 11, 2023.	
08/10/2023 3:05 PM EST	Biden's counsel emails AUSA Wise to inform him they are discussing DOJ's August 9 letter and the options with Mr. Biden. Biden's counsel asks if they may respond to DOJ's requested position by Monday (August 14) instead of by Friday (August 11). Alternatively, Biden's counsel proposes having a conference with the Court.	Clark 8/10/23 Email to DOJ
08/11/2023 12:00 PM EST	At Noon (12:00 pm), AUSA Wise replies to Mr. Clark's email that the United States <i>declines</i> to extend the time in which it asked for Biden's position on the motions identified in its August 9 letter, and further declines to have a conference with the Court.	DOJ 8/11/23 Email to Clark
08/11/2023 12:05 PM EST	Approximately five minutes later, at 12:05 pm EST, <i>before</i> Biden's counsel could even respond to DOJ or discuss it with Mr. Biden, DOJ moves to dismiss the criminal tax Information without prejudice against Biden, so that tax charges can be brought in another district.	<i>United States v. Biden</i> , No. 23-mj-00274-MN, DE 31 (D. Del.)
08/11/2023 12:15 PM EST	Approximately ten minutes later, at 12:15 pm EST, Attorney General Garland delivers remarks and appoints U.S. Attorney Weiss as Special Counsel. DOJ Order No. 5730-2023 appointing Weiss as Special Counsel indicates the document was created on 8/11/2023 at 10:00 AM before AUSA Wise responded to Mr. Clark.	DOJ, Press Release on 8/11/2023
08/13/2023	In response to the DOJ's motion to dismiss the tax Information, Biden's counsel informs the Court in its filing that Biden intends to abide by the terms of the DA that was executed on July 26 and that the executed DA is a valid and binding bilateral agreement.	<i>United States v. Biden</i> , No. 23-mj-00274-MN, DE 33 (D. Del.)
08/17/2023	Judge Noreika grants DOJ's motion to dismiss the criminal tax information without prejudice.	<i>United States v. Biden</i> , No. 23-mj-00274-MN, DE 43 (D. Del.)
08/29/2023	Biden's counsel (A. Lowell, C. Man) meet with DOJ (L. Wise, D. Hines) at the U.S. Attorney's Office in Delaware to discuss the status of the case and recent filings. During this meeting, AUSA Wise informs Biden's counsel that at this time, DOJ is no longer adhering to the misdemeanor plea agreement it made, not willing to be bound by the immunity provision in the Diversion Agreement, and not willing to commit to a "no jail"	Declaration of Abbe David Lowell, filed contemporaneously.

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	recommendation. AUSA Wise stated he was in a “listening mode” but the statements described immediately above made it clear that DOJ was planning felony charges, the only type of charge Biden’s counsel questioned. AUSA Wise also said DOJ was not prepared to make Mr. Biden a plea offer at this time.	
09/14/2023	DOJ indicts Biden on three felony gun charges in Delaware.	<i>United States v. Biden</i> , No. 23-cr-00061-MN, DE 39