

# EXHIBIT

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**U.S. Department of Justice**

**Tax Division**

Please reply to: *Civil Trial Section, Eastern Region*  
*P.O. Box 227*  
*Washington, D.C. 20044*  
*Fax No. 202-514-6866*

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DJ 5-16-4842  
CMN 2015101461

March 25, 2016

**By FEDEX and E-mail**  
Ryan Mulvey  
Lee Steven  
Cause of Action Institute  
1875 Eye Street, NW  
Suite 800  
Washington, DC 20006

Re: *Cause of Action Institute v. Internal Revenue Serv., Dep't of Justice*  
No. 1:15-cv-00770 (D.D.C.)

Dear Messrs. Mulvey and Steven:

This letter provides an update regarding the processing of Cause of Action Institute's ("CA Institute") April 2015 Freedom of Information Act ("FOIA") request submitted to the Department of Justice, Tax Division that is at issue in this case. In addition, this letter provides an update regarding approximately 400 pages of documents that the Department of Justice, Justice Management Division referred to the Department of Justice's Office of Information Policy ("OIP") for OIP's processing.

Enclosed with this letter are records that the Department of Justice Tax Division has instructed me to release to you in the Freedom of Information Act ("FOIA") case named above. The disc contains records bearing control numbers TAX-APR-0000443 – 0000777. The documents are responsive to the FOIA request submitted to the Tax Division on April 15, 2015, and since clarified by the parties. The Tax Division is withholding some pages in that range in part, and the basis for those redactions is indicated on the documents. Please note that non-responsive information has been redacted and identified with the designation "NR."

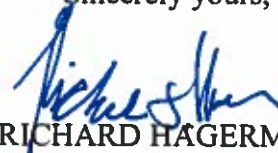
The Tax Division has not yet completed its response to the April 2015 FOIA request, and it is continuing to review records that it identified as potentially responsive to that request. The Tax Division will make an additional release of responsive records and provide an update to CA Institute no later than April 26, 2016. The Tax Division presently estimates that it will complete its release on or before May 23, 2016.

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OIP recently informed me that (a) it is continuing to process the referral from the Justice Management Division; and (b) OIP estimates that it will complete its processing of the referral by May 6, 2016. Accordingly, I will provide an update on or before that date.

Should you have any questions or difficulties opening the files, please contact me at 202-616-9832 or [Richard.j.hagerman@usdoj.gov](mailto:Richard.j.hagerman@usdoj.gov).

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Richard Hagerman", is written over the typed name.

RICHARD HAGERMAN

Trial Attorney

Civil Trial Section, Eastern Region