

December 12, 2018

Hunter Biden

via email only

*rhbdc@icloud.com*

Dear Mr. Biden,

As you are aware I represent Kathleen Biden. I write with respect to post-divorce domestic disputes between the two of you. If you are represented by counsel, please forward this correspondence to them, and ask them to reach out to me promptly.

Ms. Biden recently received notice that a tax lien was filed against the two of you on November 21, 2018, in the amount of $112,805 related to 2015 tax liability. Ms. Biden also had her own tax refund withheld in the amount of $5,345. The MSA provides that the 2015 tax liability is yours alone, including indemnifying and holding harmless Ms. Biden therefrom. Ms. Biden is in the process of refinancing the lake house and is appropriately concerned about the effect of the tax lien on the process. Please promptly let us know your plan for resolving the 2015 tax liability and lien. Please also reimburse Ms. Biden for her garnished tax refund.

Moreover, pursuant to the terms of the MSA, you are to cooperate with Ms. Biden in her efforts to refinance the mortgage note and home equity line of credit on the lake house, including executing a Quit Claim deed contemporaneous with her removing your name from the liability. To date, you have not cooperated in this process. Please promptly execute the forms provided, including without limitation, the quit claim deed transferring your interest to Ms. Biden.

Paragraph 16e requires you to provide filed tax returns to Ms. Biden within three days of your filing them. Please immediately authorize your accountants to make your returns available to Ms. Biden.

Note also that the MSA provides for Ms. Biden to recover her reasonable attorney fees and expenses incurred enforcing the provisions of the MSA. While we hope to resolve these disputes amicably and expeditiously, we do intend to seek reimbursements of Ms. Biden’s fees and costs for doing so.

Sincerely,

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Rebekah Sullivan