

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

**JACK STEPHEN PURSLEY,
AKA STEVE PURSLEY**

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NO. 4:18-CR-575 (HUGHES)

United States' Motion to Admit Trial Exhibits

In light of the parties' respective positions outlined at the August 22, 2019 pretrial conference, and the Court's August 28, 2019 Order (Dkt. 185), the United States moves the Court to pre-admit the following exhibits into evidence:

Summary Charts and the Exhibits They Summarize

Based upon the Court's Order (Dkt. 185), the United States moves the admission of the charts that summarize the transfers of funds and the tax returns at issue. These summary charts cite the specific exhibits from which the data is drawn. Importantly, many, but not all, of the underlying exhibits cited in the summary charts were already admitted pursuant to the parties' stipulation to admissibility.¹ Inasmuch as the jurors may want to audit the government's summaries to ensure their accuracy or to review the source document for a charged overt act, the government submits that they should have access to all the underlying exhibits. Failing to do so would invite the jury to drawn impermissible conclusions about why they have access to some of the underlying exhibits, but not others.

¹ See, e.g., Gov't Exs. 4-124, 200-5, 200-6, 201-2, 201-4, 201-5, 202-3, 203-4, 206-3, 224-2, 231-1, 231-2, and 248-4.

The United States has trimmed the list below to include only those documents, not yet admitted, that relate to the relevant tax returns for tax years 2007 to 2013, or specific transfers that were charged in the indictment as either affirmative acts of evasion or as overt acts of the conspiracy.

Gov't Ex. No.	Description
Wire Transfer Summaries and Exhibits	
36-1	Summary Ex. - Step 1: Transfers of Funds from Isle of Man to United States
36-2	Summary Ex. - Step 2: Gulf States Management Corp.
36-3	Summary Ex. - Step 3: Step 3: Four Sevens Investment Corp.
36-4	Summary Ex. - Step 4: Pursley Interest, LLC
36-6	Summary Ex. - Transfers Through Gillis IOLTA Account
36-8	Summary Ex. - 2007 Flow of Funds
36-15	Summary Ex. - Bank Account Signatories
36-16	Summary Ex. - Traced Transfers: 2007-2014
350-12	Demonstrative – Total Money Moved to the U.S. and Pursley Entities
1-72	10/25/2011 Letter of Authorization Form for Charles Schwab & Co. Inc. (x1072) - Gulf States Management Corp.
1-73	10/25/2011 Letter Authorization Form for Wire Transfers for Charles Schwab & Co. Inc. (x7149) - Four Sevens Investment Corp.
1-80	Account Application for Southwest Securities Inc. (X0040) - S. Pursley
1-84	Charles Schwab (x1072) - Gulf States Management Corporation - Statement 2011 (Oct.)
1-85	Charles Schwab & Co. (x7149) - Four Sevens Investment Corporation - Statement 2011 (Oct.)
1-88	Charles Schwab & Co. Inc. (x1072) Gulf States Management Corporation - Statement 2012 (Dec.)
1-89	Charles Schwab (x1072) - Gulf States Management Corp. - Statement 2012 (Dec.)
1-94	E-Trade Securities LLC (x4096) - S. Pursley - Statement 2011 (Oct.)
1-95	E-Trade Securities LLC (x4096) - S. Pursley - Statement 2011 (Oct.)
1-99	Prosperity Bank (x1147) - S. Pursley - Statement 2013 (Feb.)
1-126	Southwest Securities Inc. (x7448) - Four Sevens Investment Corp. - Statement 2012 (Dec.)
1-127	Southwest Securities Inc. (x0040) - S. Pursley - Statement 2012 (Dec.)
4-187	BSI SES Account - Form A
4-187A	BSI SES Account - Form A (TRANSLATION)
200-7	Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2011

Gov't Ex. No.	Description
200-9	Wells Fargo (x2328) - Recruitment Partners, LP - Account Statements - 2013
200-12	Wells Fargo (x2328) - Recruitment Partners, LP - Addendum to Certificate of Authority
200-13	Wells Fargo (x2328) - Recruitment Partners, LP - 8/29/2011 Check to Four Sevens Investment Corp. for \$230,000
200-14	Wells Fargo (x2328) - Recruitment Partners, LP - 4/15/2013 Withdrawal Slip for \$416,000
200-15	Wells Fargo (x2328) - Recruitment Partners, LP - 1/17/2011 Check for \$970,000 to Four Sevens Investment Corp.
201-7	Wells Fargo (x9822) - Charles Michael Gillis PLLC IOLTA - Account Application
202-5	Wells Fargo (x74265) - Global American Properties Inc. - Business Account Application
203-3	Wells Fargo (x4315) - American Real Estate Properties Inc. - Business Account Application & Signature Card
206-1	Wells Fargo (x38312) - Diversified Land Holdings Inc. - Account Statements - 2007
206-2	Wells Fargo (x38312) - Diversified Land Holdings Inc. - Account Statements - 2008
206-10	Wells Fargo (x38312) - Diversified Land Holdings Inc. - Business Account Application
218-1	Prosperity Bank (x10300) - Texas Equal Access to Justice Foundation - Checks & Deposit Tickets
218-3	Prosperity Bank (x10300) - Texas Equal Access to Justice Foundation - Account Statements - 2008
218-4	Prosperity Bank (x10300) - Texas Equal Access to Justice Foundation - Signature Card
218-5	12/23/2008 Check for \$60,000 from Charles Schwab
220-1	Prosperity Bank/First Bank (x01147) - Jack Pursley - Account Statements - 2012
220-2	Prosperity Bank/First Bank (x01147) - Jack Pursley - Account Statements - 2013
220-3	Prosperity Bank/First Bank (x01147) - Jack Pursley - Signature Card
221-2	Smart Financial Credit Union (x0290/0300) - Arosa Partners LLC - Account & Deposit Statements - 2011
222-3	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2011
222-4	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2012
222-5	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2013
222-6	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account & Deposit Statements - 2014

Gov't Ex. No.	Description
222-8	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - Account Application, Signature Card, and Certificate of Formation
222-10	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 1/18/2011 Check to Four Sevens Investment Corp. for \$100,000
222-11	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 12/30/2013 Check to the Pursley Foundation for \$200,000
222-12	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 2/15/2014 Check to Arosa JV LLC for \$20,000
222-13	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 12/5/2011 Deposit Slip & Check from Four Sevens Investment Corp for \$200,000
222-14	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 4/20/2013 Deposit Slip & Check from Four Sevens Investment Corp. for \$416,000
222-15	Smart Financial Credit Union (x5710/5740) - Four Sevens Investment Corp. - 2/27/2012 Check to S. Pursley for \$60,000
224-1	Smart Financial Credit Union (0370/0380) - Pursley Interests, LLC - Account Application, Signature Card, and Certificate of Filing
224-3	Smart Financial Credit Union (0370/0380) - Pursley Interests, LLC - Account & Deposit Statements - 2011
225-2	Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Closure & Transfer Letter (12/17/2012)
225-3	Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Opening Documents
225-4	Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Statements - 2011
225-5	Southwest Securities (x7448) - Four Sevens Investment Corporation - Account Statements - 2012
226-2	Southwest Securities (x0040) - Jack S. Pursley - Account Opening Application & Signature Card
226--3	Southwest Securities (x0040) - Jack S. Pursley - Account Statements (Dec. 3, 2012 to Dec. 31, 2012)
229-1	Sanford Bernstein & Co (x 3314) - Four Sevens Investment Corp. - Account Application & Signature Card
235-2	E-Trade (x4096) - Jack S. Pursley - Account Opening Doc
235-3	E-Trade (x4096) - Jack S. Pursley - Account Statements - 2011
237-1	Washington Mutual Bank (x1563-0) - Gulf States Management Corp. - Account Agreement
237-2	Washington Mutual Bank (x1563-0) - Gulf States Management Corp. - Account & Deposit Statements - 2007
237-3	Washington Mutual Bank (x1563-0) - Gulf States Management Corp. - Account & Deposit Statements - 2008
238-1	Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account Agreement

Gov't Ex. No.	Description
238-2	Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account & Deposit Statements - 2007
238-3	Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Account & Deposit Statements - 2008
238-10	Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - Transfer Order Details
238-11	Washington Mutual Bank/JP Morgan Chase Bank (x1940-1) - Gulf States Management Corp. - 11/5/2007 Transfer for \$340,000
241-1	Charles Schwab (x 1072) - Gulf States Management Corp. - Account Application
241-10	Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2007
241-11	Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2008
241-14	Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2011
241-15	Charles Schwab (x 1072) - Gulf States Management Corp. - Account Statements - 2012
241-17	Charles Schwab (x 1072) - Gulf States Management Corp. - 12/14/2012 Check Order Form
241-18	Charles Schwab (x 1072) - Gulf States Management Corp. - 10/25/2011 Transfer Order Form for \$812,076
248-1	Charles Schwab (x 7149) - Four Sevens Investment Corp. - Account Application
248-2	Charles Schwab (x 7149) - Four Sevens Investment Corp. - 2/26/2011 Letter of Authorization for Wire Transfer to RBC Capital Markets for \$500,000
248-5	Charles Schwab (x 7149) - Four Sevens Investment Corp. - Account Statements - 2011
248-8	Charles Schwab (x 7149) - Four Sevens Investment Corp. - 8/30/2011 Letter of Authorization for Wire Transfer to Wells Fargo Bank for \$416,000
248-9	Charles Schwab (x 7149) - Four Sevens Investment Corp. - 10/25/2011 Letter of Authorization for Wire Transfer to E-Trade for \$1,395,785.61
253-1	Fidelity (x3549) - The Pursley Foundation - Account Application
253-4	Fidelity (x3549) - The Pursley Foundation - Account Statements - 2014
253-9	Fidelity (x3549) - The Pursley Foundation - Checks - Received & Issued
254-1	Scottrade (x8343) - Arosa JV, LLC - Brokerage Account Application
254-3	Scottrade (x8343) - Arosa JV, LLC - Account Statements - 2014
271-3	RBC (x0755) - Four Sevens Investment Corp. - Client Agreement and Approval Form
271-4	RBC (x0755) - Four Sevens Investment Corp. - Advisor Client Agreement
271-5	RBC (x0755) - Four Sevens Investment Corp. - Account Statements - 2011
286-7	Land Title Guarantee - 8/2/2011 View An Incoming Wire, \$852,117.23

Gov't Ex. No.	Description
Tax Return Summaries and Exhibits	
36-9	Summary Ex. - S. Mooney: Unreported Income
36-10	Summary Ex. - S. Mooney: Total Unreported Income
36-11	Summary Ex. - S. Mooney: Total Tax Due and Owing
36-12	Summary Ex. - J. Pursley: Unreported Income
36-13	Summary Ex. - J. Pursley: Total Unreported Income
36-14	Summary Ex. - J. Pursley: Total Tax Due and Owing
350-5	Summary of Four Sevens' Tax Returns (2009 - 2013)
350-6	Summary of Gulf States' Tax Returns (2007 - 2013)
350-7	Summary of Pursley's Tax Returns (2007 - 2013)
350-10	Demonstrative - Mooney's Payments to IRS
10-2	2007 Gulf States Management Corp. Work papers
17-23	2011 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-24	2012 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-25	2013 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-28	2016 Form 1120 Corporation Income Tax Return - Four Sevens Investment Corp.
17-48	2007 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-49	2008 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-53	2012 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-54	2013 Form 1120 Corporation Income Tax Return - Gulf States Management Corp.
17-62	2007 Form 1040 Individual Tax Return - S. Mooney
17-63	2008 Form 1040 Individual Tax Return - Processed - S. Mooney
17-82	2007 Form 1040 - Individual Income Tax Return - S. Pursley
17-83	2008 Form 1040 - Individual Income Tax Return - S. Pursley
17-86	2011 Form 1040 - Individual Income Tax Return - S. Pursley
17-91	2013 Form 1040 - Individual Income Tax Return - S. Pursley

Parties' Exhibits Relating to Eduard Venerable's Involvement in the Scheme

As the United States has explained previously, Pursley's defense hangs on one simple question: did Pursley know that Southeastern Shipping was Shaun Mooney's company? That

single fact colors everything that Pursley is alleged to have done: every decision he made, every document he drafted, and every dollar he received.

Eduard Venerabile is the Brazilian citizen who was listed as the nominal owner of Southeastern Shipping. The defense intends to introduce at trial the exhibits listed below as evidence of Pursley’s purported belief that Eduard Venerabile (and not Mooney) was the owner of Southeastern Shipping. As the Court will note, many of these communications with Mr. Venerabile occurred after tax year 2010 closed; however, the government agrees with the defense that these exhibits are relevant and admissible as intrinsic evidence of Pursley’s knowledge and intent.

<u>Def. Ex. No.</u>	<u>Description</u>
255	Venerable letter to Coughtrey
387	Email from A. Mellor to T. Duncan re: E. Venerabile Consulting Scvs Agrmt
388	10/30/2009 Email from A. Mellor to T. Duncan, L. Jude, Cc: K. Smith re: E. Venerabile Consulting Scvs Agrmt
391	6/17/2011 Email from S. Pursley to S. Pursley re: Enc: 4 Cantos Turismo - Passagem Aerea
392	7/9/2012 Email from E. Venerabile to A. Mellor re: Hello Andrew!!!
396	Email from E. Venerabile to A. Mellor re: Reminder of Money Transfer to E. Venerabile
400	Email from E. Venerabile to A. Mellor re: Money Transfer to E. Venerabile
401	Email from G. Glover to C. Gillis and M. Coughtrey re: Dividend Distributions from Australian Partners to E. Venerabile
402	11/6/2012 Email from A. Mellor to E. Venerabile re: Dividend Payment for E. Venerabile
411	3/23/2012 Email from E. Venerabile to A. Mellor re: Money transfer to E. Venerabile
412	5/22/2012 Email from E. Venerabile to A. Mellor, re: New Wire Transfer
413	6/12/2012 Email from E. Venerabile to A. Mellor, re: New Wire Transfer June 19 th

Just as the defense exhibits listed above are relevant to Pursley’s knowledge and intent regarding the conspiracy, the United States respectfully submits that the fifteen exhibits listed below are also relevant for the same purpose.

Gov't Ex No.	Description
2-42	6/21/2011 Email from S. Pursley to A. Mellor re: E. Venerabile Transfer of Funds
2-43	6/22/2011 Email from E. Venerabile to A. Mellor re: Money Transfer to E. Venerabile
2-62	7/16/2012 Email from E. Venerabile to A. Mellor re: Let me know when you are back.
2-65	8/6/2012 22:02 Email from E. Venerabile to A. Mellor re: New Wire transfers
3-4	10/19/2011 Email from E. Venerabile to S. Pursley re: Fwd. Invoices
3-13	7/16/2012 Email from A. Mellor to E. Venerabile re: Let me know when you are back
3-16	8/20/2012 Email from A. Mellor to E. Venerabile re: Southeastern Shipping Co. Ltd. / Dividend
5-18	8/8/2011 Email from E. Venerabile to Steve@Internationalrecruitmentcorp.com re: Enc. Money Transfer to E. Venerabile
5-22	8/21/2012 Email from G. Glover to E. Venerabile re: APHC and Southeastern Dividends
5-25	2/2/2013 Email from E. Venerabile to S. Mooney re: Enc. Two documents attached
5-28	8/11/2011 Note from E. Venerabile to Steve re: request to Mellor for wire transfers
5-29	8/5/2011 Note from E. Venerabile to Steve re: Invoices for IOMA services for June and May 2011
5-32	1/24/2012 Email to S. Pursley and S. Mooney re: Following Up
5-49	2/1/2012 Email from E. Venerabile to C. Gillis, A. Mellor, re: Australian Partners Holding Corp.
7-4	2/18/2014 Application for Voluntary Deregistration of a Company: Australian Partners Holding Corp

Pursley's Trial Exhibits to Which the United States has No Objection

Finally, the United States has no objection to the following defense exhibits, which Mr. Pursley recently added to his Fourth Amended Exhibit List.

Def. Ex. No.	Description
252	Pursley email to Bratcher
384	Letter from C. Gillis to the Directors of Southeastern Shipping Company Ltd., Re: Request for Dividend Declaration and Distribution & 2/12/2010 Minutes of Meeting of Australian Partners Holding Corp. Board of Directors
385	Promissory Note between Arosa Partners, LLC and Four Sevens Investment Corp.

Def. Ex. No.	Description
386	Email from S. Pursley to G. Bratcher, Re. Follow-Up
389	11/4/2009 Email from L. Jude to A. Mellor re: Pelhambridge
390	11/9/2009 Email from L. Jude to T. Duncan; A. Mellor re: Pelhambridge, Call w. S. Pursley re Consultancy Agreement
393	11/17/2009 Pelhambridge Limited Meeting Minutes & 9/26/2009 Approved Consulting Services Agreement
394	Fax from A. Mellor to S. Mooney re: Diversified Land Holdings, Inc.
395	Fax from S.E. Shipping to A. Mellor at Pelhambridge re: A. Mellor Visit to the United States
397	Email from A. Mellor to T. Duncan re: FW: Southeastern Shipping Company Limited/Dividend
398	Minutes of Meeting of Pelhambridge Ltd. Board of Directors
399	Minutes of Meeting Pelhambridge Ltd Board of Directors
403	Email from A. Mellor to G. Glover re: APHC Australian Income Tax Information Request
404	Email from A. Mellor to G. Glover re: APHC Australian Income Tax Information Request
405	9/27/2001 Consultancy Contract between Southeastern Shipping Company Limited and S. Mooney
406	7/10/2009 Email from S. Pursley to K. Smith, re: Miscellaneous Follow-up
407	4/21/2009 Letter from S. Pursley to S. Mooney re: Waiver of Claims - Southeastern Shipping Company, Ltd.
408	10/26/2012 Letter to S. Pursley, S. Mooney re AFI Investment
409	Share Agreement Certificate for Pelhambridge Limited
410	10/1/2012 Amendments/Exhibits for Limited Partnership Agreement for Recruitment Partners
414	Share Certificate for Australian Partners Holding Corp.
415	Purchase Resolution from Australian Partners, C. Gillis
416	Email at 11:59 AM from C. Gillis to S. Pursley re: initial draft of stock purchase agreement and with 4/29/2009 draft attached
417	7/9/2009 Email from C. Gillis to "5Gloves" re: Yellow with Pink Polka Dots. Pty Limited
418	7/10/2009 Email from C. Gillis to S. Pursley, S. Mooney re: Subscription Agreement, Attch. Sample Sub.
419	8/6/2009 Email from C. Gillis to S. Pursley, S. Mooney: re: Australian partners Holding Corp. - Capitalisation Issues
420	8/9/2009 Letter from S. Pursley to C. Gillis
421	8/17/2009 Email from C. Gillis to K. Smith and others re: Australian Partners Holding Corp., Attach. 8/17/2009 Letter from C. Gillis to Directors of Southeastern Shipping Company Ltd.
422	8/24/2009 Email from C. Gillis to S. Pursley, Attach. 8/4/2009 Letter from C. Gillis to M. Coughtrey re: Australian Partners Holding Corp.
423	Minutes and Meeting Forms of Diversified Land Holdings, Inc.

Def. Ex. No.	Description
424	12/14/2011 Email from C. Gillis to S. Pursley and S. Mooney re: Internal Revenue Code Section 367 Memorandum
425	10/21/2011 Email from C. Gillis to S. Pursley and S. Mooney re: Memorandum on Taxation of Foreign Corporations
426	Australian Partners Holding Corporation Pty. Ltd. Financial Report for year ended 6/30/2011
427	3/28/2012 Letter from C. Gillis to Directors of Southeastern Shipping Company Limited c/o IOMA Group - IOMFTL re: Request for Dividend Declaration and Distribution
428	4/29/2009 Email from C. Gillis to S. Pursley re: Stock Purchase Agreement With Draft Agreement Attached.
429	7/10/2009 Email from C. Gillis to G. Glover re: Brazilian Will Invest in US entities
430	6/24/2013 Subscription Agreement for \$500,000 by JSP Interests LLC
431	11/2/2009 Email from A. Mellor to S. Pursley re Consulting Scvs Agrmt
432	9/1/2011 Promissory Note from JSP Interests, LLC to Four Sevens Corp (Unsigned)
433	7/29/2011 Four Sevens Investment, Detail General Ledger, Period 1/1/2010 to 12/31/2010
434	12/31/2010 American Real Estate Properties Financial Statement
435	12/31/2011 Four Sevens Investment Corp. Adjusted Trial Balance
436	12/31/2011 Four Sevens Investment Corp. Balance Sheet
437	12/31/2011 Four Sevens Investment Corp. General Ledger
438	12/31/2011 Pursley Interests LLC, General Ledger
439	12/31/2011 JSP Interests LLC, General Ledger
440	12/31/2011 Gulf States Management Corp, General Ledger
441	12/31/2012 Four Sevens Investment Corp., Balance Sheet
442	5/26/2011 Letter from G. Bratcher to S. Pursley, re: 12/31/2010 Gulf States Management Corp., Compiled Financial Statements
443	12/31/2010 Gulf States Management Corporation, Trial Balance
444	12/31/2012 Gulf States Management Corp., Balance Sheet
445	Arosa Partners, LLC Financial Documents (2010)
446	8/7/2010 Email from S. Pursley to G. Bratcher re: Agreement AFI Venture, attaching Email from S. Pursley to G. Bratcher re: Agreement AFI Venture (containing draft agreement for participating interest in AFI)
447	3/10/2011 Email between S. Pursley and T. Salinas (Bratcher) re: promissory note for \$910,000
448	Arosa Partners, LLC Balance Sheet (2012)
449	FSIC General Ledger (2012)
450	Pursley Interests LLC Trial Balance (2010)
451	Pursley Interests LLC Balance Sheet (2012)
452	Arosa Partners LLC Trial Balance (2010)

Def. Ex. No.	Description
453	2/4/2010 Emails between S. Pursley to G. Bratcher re: FSIC investment income
454	Email from S. Pursley to J. Ortega (Bratcher) re: Personal Tax Return Estimate, addresses rental income for Arosa property
463	Change to company details – APHC Changes ownership from Acquisition Partners to Venerable

Respectfully submitted,

RYAN K. PATRICK
UNITED STATES ATTORNEY



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CERTIFICATE OF CONFERENCE

I HEREBY CERTIFY that I reached out to counsel for Pursley on August 26, 27, and 28, 2019, with respect to the admissibility of the exhibits listed in this motion. Pursley's position on this motion, as filed today, will be forthcoming.



Sean Beaty
Trial Attorney, Tax Division

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will serve a copy of this document on all counsel of record.



Sean Beaty
Trial Attorney, Tax Division