



**U.S. Department of Justice**

*United States Attorney's Office*

*District of Delaware*

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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

23-274M

**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