



December 13, 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 of your MSA 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,

Rebekah Sullivan

[this space for recording information]

After Recording Return to:

Mail Tax Statements to:

Kathleen Buhle Biden

3418 Prospect Street

Wash., D.C. 20007

I affirm, under the penalties of perjury,
that I have taken reasonable care to redact
each Social Security Number in this
document, unless required by law.

Sidwell No#: 46-01-15-379-003.000-023

QUITCLAIM DEED

THIS indenture dated this 20th day of February, 2019;

WITNESSETH, that ROBERT HUNTER BIDEN, a divorced man, residing at 1209 BARLEY MILL RD
WILMINGTON, DE 19807, (hereinafter referred to as “**Grantor**”) QUIT-CLAIMS to
KATHLEEN BUHLE BIDEN, an unmarried woman, residing at 3418 PROSPECT STREET
WASHINGTON DC 20007, (hereinafter referred to as “**Grantee**”) for the sum of One
Dollar (\$1.00) and other valuable consideration, the receipt of which is hereby acknowledged, the real
estate more fully described as follows:

SITUATED IN LAPORTE COUNTY, STATE OF INDIANA:

**LOT NUMBERED SEVENTY-SEVEN (77) IN LONG BEACH ADDITION TO THE TOWN OF
LONG BEACH, AS RECORDED IN PLAT BOOK 5, PAGE 34 IN THE OFFICE OF THE
RECORDER OF LAPORTE COUNTY, INDIANA.**

**THIS CONVEYANCE IS MADE SUBJECT TO ALL RESTRICTIONS, EASEMENTS, RIGHTS
OF WAY, COVENANTS AND CONDITIONS CONTAINED IN THE DEEDS FORMING THE
CHAIN OF TITLE TO THIS PROPERTY.**

SOURCE OF TITLE IS DOCUMENT NO. 2011R-12550 (RECORDED 11/04/2011)

Property Address: 1605 Lake Shore Drive, Long Beach, IN 46360
The legal description was obtained from a previously recorded instrument.

*****For informational purposes only:** [Grantee herein, Kathleen Buhle Biden is the same person as Kathleen Biden, who acquired title in prior Deed recorded as Document No. 2011R-12550.]

IN WITNESS WHEREOF, Grantor has executed this deed this 20TH day of February, 2019.


ROBERT HUNTER BIDEN

Commonwealth of Virginia)

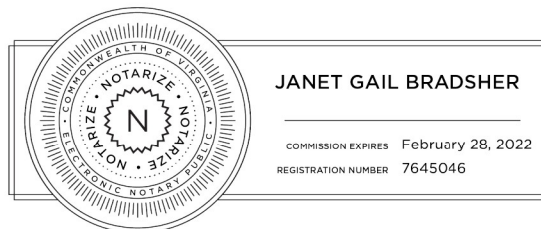
COUNTY OF HAMPTON CITY)

I, the undersigned, a Notary Public in and for said County, in said Commonwealth, hereby certify that Robert Hunter Biden whose name is signed to the foregoing instrument, and who is known to me, acknowledged before me on this day that, being informed of the contents of the instrument, they, executed the same voluntarily on the day the same bears date.

Given under my hand this 20th day of February, 2019.



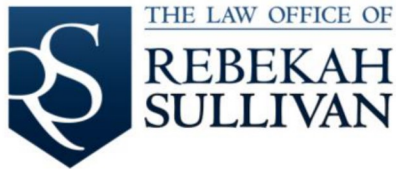
Notary Public Janet Gail Bradsher
Electronic Notary Public



Notarized online using audio-video communication

Grantee's street or rural route address is: 3418 Prospect Street, Washington D.C. 20007

The preparer of this document has been engaged solely for the purpose of preparing this instrument, has prepared the instrument only from the information given and has not been requested to provide, nor has the preparer provided, a title search, an examination of the legal description, an opinion on title or advice on the tax, legal or non-legal consequences that may arise as a result of the conveyance. Further such preparer has not verified the accuracy of the amount of consideration stated to have been paid or upon which any tax may have been calculated nor has the preparer verified the legal existence or authority of any person who may have executed the document. Preparer shall not be liable for any consequences arising from modifications to this document not made or approved by preparer. Prepared: P. DeSantis, Esq. 235 W. Brandon Blvd, #191, Brandon, FL 33511 866-755-630



January 29, 2019

VIA ELECTRONIC MAIL

George R. Mesires
george.mesires@FaegreBD.com

and

Sarah Mancinelli
SMancinelli@ainbanklaw.com

Re: Notice of Default - Marital Settlement Agreement Dated 03/27/2017

Dear Mr. Mesires and Ms. Mancinelli:

I write in follow up to my November 27, 2018, communication to Ms. Mancinelli and my December 13, 2018, communication to R. Hunter Biden ("RHB"). I write to provide formal, more detailed notice to you, and RHB, that RHB is currently in default of the terms and conditions of the Marital Settlement Agreement ("MSA") between RHB and my client, Kathleen B. Biden ("KBB").

Specifically, and based upon the presently available information concerning various aspects of the MSA, RHB is in default under the following provisions of the MSA, as more particularly set forth below:

- i) Section 16(a) Base Spousal Support: the MSA provides that, beginning 04/01/2017, and continuing thereafter RHB shall pay to KBB \$37,000 per month as Base Spousal Support with said payment to be made "on the first day of each month." RHB is in default of this provision as he did not make the Base Spousal Support payment due for the month of January 2019 in the amount of \$37,000 on or before January 1, 2019 and, as of the date of this writing, said payment remains due and owing. RHB did not contact KBB to notify her that said support payment would be late or unpaid, and has not yet notified my client, directly or through counsel, as to when he intends to make said payment;
- ii) Section 16(e) Document Exchange: the MSA provides that "within three days of filing a tax return" RHB shall provide KBB with "all documents reflecting income", including copies of all tax returns (business and personal), Schedules K-1, financial statements, and other records pertaining to RHB's income and distributions received for said period (collectively hereinafter referred to as "income records"). RHB is in default of this provision as he has failed to deliver copies of said income records for Year 2017 to KBB. The failure to provide said income records continues in spite of repeated requests made by KBB to RHB to furnish same. The willful refusal to furnish the income records also makes it impossible for KBB to determine whether RHB is in compliance with Section



- 16(c) of the MSA pertaining to Additional Spousal Support, which provides that, beginning in calendar year 2017 and continuing thereafter, RHB shall be obligated to pay to KBB Additional Spousal Support in connection with any income earned by RHB in excess of \$875,000 in a given year. Any Additional Spousal Support amount that may be due and owing to KBB pursuant to Section 16(c) is to be payable “in twelve equal installments on the first day of each month for the twelve months immediately following the filing of the tax return for that calendar year.” As such, and assuming RHB has timely filed his tax returns for year 2017, KBB should have received a copy of the subject income records no later than October 18th, 2018. Furthermore, in the event that RHB earned income in excess of \$875,000 during 2017, any Additional Spousal Support payments due under Section 16(c) were to have commenced as of November 1, 2018 and continued each month thereafter.
- iii) Section 19 Life Insurance: the MSA provides that, from that date of the MSA and continuing through the earlier of year 2035 or KBB’s remarriage, RHB shall maintain a life insurance policy on his life in an amount of \$3,000,000 with KBB named as the sole, irrevocable beneficiary thereof. RHB is obligated to furnish KBB with documentation showing that said life insurance policy is maintained and in force and that KBB is the sole beneficiary thereof at the same time that RHB furnishes KBB with the income records pursuant to Section 16(e). RHB is in default of Section 19 as he has not provided KBB with evidence of the maintenance of said insurance policy at the time that the Year 2017 income records were due. Based upon information and belief, the subject insurance policy is maintained via the payment of quarterly premiums. During the first half of 2018, as agreed with RHB’s insurance advisor at Prewitt Wealth Management, the advisor made written representations to KBB on two occasions (March 1, 2018 and May 10, 2018) confirming that the quarterly premiums due and owing on the subject policy at these times had been paid and that the policy was in force. However, since May 10, 2018, KBB has not received any further written or verbal confirmations from RHB or RHB’s insurance advisor concerning the status of the subject policy. Notably, RHB failed to furnish confirmation regarding the policy’s status at or around the time that the income records for 2017 were due, nor thereafter. The life insurance requirement set out at Section 19 of the MSA is a material component of the agreement between the parties and is designed to satisfy RHB’s spousal support obligations to KBB in the event of RHB’s death; and
- iv) Section 21(a) & (b) Taxes: the MSA provides that RHB shall have the sole and separate responsibility for payment of any taxes, additional tax, interest, or penalties due and owing in connection with any of the joint tax returns filed by RHB and KBB during their marriage, including any outstanding tax liability due and owing in connection with Year 2014 and Year 2015, and shall indemnify and hold KBB harmless therefrom. RHB is in default of Section 21(a) & (b) because he has not satisfied the tax liability due in connection with Year 2015 and, as a result, the Internal Revenue Service has filed a tax-lien in the amount of \$112,805 against the property located at 1605 Lake Shore Drive, Long Beach, IN, 46360 (“Lake House”) which is now the exclusive property of KBB.



The filing of said tax lien has caused financial harm to KBB in that it has prevented her from closing on a refinancing of the Lake House which would have provided substantial savings to KBB in the form of lower interest payments. In addition, KBB was notified by the IRS, by notice dated November 12, 2018, that a tax refund in the amount of \$5,345 due to KBB in connection with her overpayment of taxes for Year 2017 had been applied in partial satisfaction of the Year 2015 tax still owing, resulting in additional financial harm to KBB in the same amount. KBB notified RHB concerning both the tax lien and the application of her tax refund, as outlined above, requesting assistance in resolving the tax lien and reimbursement of the tax refund withheld by the IRS and, to date, has not received a response to same.

The failure to provide notice herein of other events of default which may have occurred under the MSA in no way constitutes a waiver, express or implied, on the part of KBB of her right to assert such other claims as may exist under the provisions of the MSA and we expressly reserve any and all rights with respect to same.

In addition to the above-noticed instances of default, KBB asserts that RHB has failed to reasonably cooperate with KBB in an effort to remove RHB's name from the deed of the Lake House. As a result, and as referenced above at item iv), KBB's efforts to refinance and/or sell the Lake House have been thwarted. RHB's failure to reasonably cooperate with KBB in executing documents and furnishing information necessary to verify conformance with the MSA and otherwise fulfill the spirit of the MSA, continues to harm KBB and frustrate her ability to plan for her and her children's financial security.

While I do not believe it is necessary at the present time to set forth with specificity the additional costs and expenses which KBB has incurred as a result of RHB's breach of the MSA as described above, including attorneys and accountants fees, I highlight that pursuant to Section 22(b) of the MSA, the defaulting party is responsible for all reasonable expenses incurred by the party successfully seeking enforcement of the MSA's provisions and that the previously cited provisions pertaining to outstanding tax liability issues specifically provide that RHB has sole responsibility for payment of all expenses, costs, and other liabilities arising out of the subject tax filings, including additional tax, interest, penalties, and any professional fees incurred in connection with same and expressly indemnifies and holds KBB harmless from any such expenses that she may incur.

The critical items that KBB needs addressed immediately are the following ("Immediate Issues"):

1. Immediate payment of the Spousal Support due for the month of January 2019;
2. Provision of the tax records pertaining to tax year 2017;
3. Provision of the income and remaining life insurance records for 2018;
4. Confirmation that RHB is addressing the issue of the tax-lien filed against the Lake House, including the provision of an affidavit consistent with the tax provisions of the MSA, or such other documentation as may be necessary, to establish that KBB is an "innocent spouse" with respect to the unpaid Year 2015 tax liability, that RHB has not legal right, title, or claim of interest in or to the Lake House, and that, as such, the IRS should rescind the tax lien filed against said property; and



5. Execution by RHB of a quitclaim deed (previously provided to RHB and to Mr. Mesires) conveying to KBB all right, title, and claim of interest in or to the Lake House.

My client realizes that it is possible that RHB may be experiencing changes to his financial/income position or other financial hardship which may make it difficult to satisfy certain provisions of the MSA, including timely payment of the Base Spousal Support due and owing thereunder. If this is, in fact, the case, my client would be willing to discuss potential reasonable modifications to the MSA which would allow RHB to satisfy his obligations under the MSA, as potentially modified, and provide KBB with certainty regarding the regular and timely provision of future financial support thereunder. However, prior to engaging in any such discussions, my client requires that the Immediate Issues set out above be specifically addressed. I note that under the MSA's current provisions, RHB does not have the right to reduce the amount of the Base Spousal Support due KBB based upon a reduction in RHB's annual income, until beginning in November of 2019 and only in compliance with satisfying the provision regarding furnishing income records.

If RHB is willing to undertake the necessary steps to address the Immediate Issues, and provides documentation that such items are being addressed, then KBB will be willing to enter into discussions with RHB concerning a potential modification to the provisions of the MSA.

If RHB fails to commence addressing the Immediate Issues, and does not provide verifiable documentation that he is taking such action on or before February 4, 2019, then my client will take necessary further steps to cure the events of default noticed herein including, but not limited to, commencing a legal action against RHB to enforce the provisions of the MSA.

Please contact me regarding the above at your earliest convenience as my client hopes to be able to resolve the current issues in as amicable a fashion as possible.

Sincerely,

Rebekah Sullivan

From: Kathleen Biden kathleenbiden@mac.com
Subject: Agreement
Date: March 6, 2017 at 7:37 AM
To: Hunter Biden hbiden@rosemontseneca.com

HB

Hunter,

I heard from your lawyer that you would like to submit a consent order for litigation stay. I think far more effective to complete mediation and withdraw from litigation. We can do that today. We were very close to completing last week. The MSA was left with you to agree or counter. I am ready to settle today. Let's just complete the mediation and the divorce can be finalized.

I am not talking to the press right now. I, and the girls, were incredibly hurt to see your and your parent's press release to Page 6. I don't know why you didn't warn us. It has been so painful. As for the court documents being released, your lawyer should have had them sealed the minute she saw them. She also should have shown you when she received them and maybe you would have made a different decision regarding your press release.

Once we agree on mediation, you can go to the press and say we have settled and no longer need to go to court. You can explain that the past few years have been incredibly difficult and now you are committed to living your life with the love of family and an even stronger, more focused, approach to doing meaningful work and continuing your commitment to issues important to you. I know you care about your image. You can show how you rebounded after such a difficult time in your life. Your girls will forgive you. They love you.

Hopefully we can come to an agreement today and we can move on with our lives.

From: Hunter Biden hbiden@rosemontseneca.com
Subject: Re: Agreement
Date: March 10, 2017 at 12:39 AM
To: Kathleen Biden kathleenbiden@mac.com



It ms 12AM and I've lost around 40% of my income. And any potential future relationships have all been put on hold. And you through some magical thinking have convinced yourself that it's my fault that you placed a completely dubious motion into the record and my lawyer failed to have it sealed which would have never happened with out your lawyers consent and if she wanted it sealed then she should have filed "under seal." Are you following this b/c everything you have said is completely no -sensical its gibberish.

This is my fault b/c I made a statement. Page Six had our whole file including your motion before they even asked for a statement.

This is my fault because I should have settled along time ago. I told you you can have everything from day one and instead you asked for 250%.... there is no possible way you can expect that a judge will not see through the sophomoric textbook divorce 101 strategy your simple minded lawyer has taken. You claim I didn't want to have a your lawyer do the settlement - I have the email Kathleen where I ask if she would do that and her response was "that's not a good idea."

Sent from my iPhone

On Mar 6, 2017, at 10:37 AM, Kathleen Biden <kathleenbiden@mac.com> wrote:

Hunter,

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Hopefully we can come to an agreement today and we can move on with our lives.

From: Hunter Biden hbiden@rosemontseneca.com
Subject: Fwd: Agreement
Date: March 6, 2017 at 8:12 AM
To: SMancinelli SMancinelli@ainbanklaw.com



Sent from my iPhone

Begin forwarded message:

From: Kathleen Biden <kathleenbiden@mac.com>
Date: March 6, 2017 at 10:37:17 AM EST
To: Hunter Biden <hbiden@rosemontseneca.com>
Subject: Agreement

Hunter,

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Hopefully we can come to an agreement today and we can move on with our lives.

From: Hunter Biden hbiden@rosemontseneca.com
Subject: Re: Biden Matter
Date: December 1, 2018 at 8:32 AM
To: SMancinelli SMancinelli@ainbanklaw.com



Sure call me 202-552-9396 or text a good time.

On Nov 27, 2018, at 4:15 PM, SMancinelli <SMancinelli@ainbanklaw.com> wrote:

Hey There-

I got this via email today. Want to chat?

Sarah E. Mancinelli, Esq.
Ain & Bank, P.C.
1900 M. Street, NW, Suite 600
Washington, D.C. 20036-3565
(202) 530-3355 (direct dial)
(202) 530-4411 (fax)

From: Rebekah Sullivan <RSullivan@rsullivanlaw.com>
Sent: Tuesday, November 27, 2018 3:30 PM
To: SMancinelli <SMancinelli@ainbanklaw.com>
Subject: Biden Matter

Dear Sarah,

Please see attached.

Rebekah Sullivan
The Law Office of Rebekah Sullivan, PLLC
1701 K Street NW, Suite 305
Washington, DC 20006
RSullivan@RSullivanlaw.com
(202) 450-5880

<Letter to OC 11.27.18.pdf>

From: SMancinelli SMancinelli@ainbanklaw.com
Subject: Re: Biden Today
Date: November 25, 2016 at 7:07 PM
To: Hunter Biden hbiden@rosemontseneca.com

S

I can respond to all of the questions you ask below. And I have a plan to get this done ASAP. Can you talk Sunday afternoon/evening?

On Nov 25, 2016, at 8:54 PM, Hunter Biden <hbiden@rosemontseneca.com> wrote:

I can't do Sunday> regardless, why am I moving things out now? Why am I not allowed to enter house w/o permission? Am I legally blocked from house? Also I want them to share our settlement agreement asap? This needs to end now.

On Nov 22, 2016, at 3:53 PM, SMancinelli <SMancinelli@ainbanklaw.com> wrote:

See below. I can't do lunch time.

Begin forwarded message:

From: "Rebekah J.H. Sullivan" <RSullivan@ksfmlaw.com>
Date: November 22, 2016 at 3:51:48 PM EST
To: SMancinelli <smancinelli@ainbanklaw.com>
Subject: RE: Biden Today

Monday works. What time?

From: SMancinelli [<mailto:SMancinelli@ainbanklaw.com>]
Sent: Tuesday, November 22, 2016 3:06 PM
To: Rebekah J.H. Sullivan
Subject: Re: Biden Today

We need to reschedule. Sorry for the late notice. Any times available Sunday late afternoon/evening or Monday work?

On Nov 22, 2016, at 1:22 PM, Rebekah J.H. Sullivan <RSullivan@ksfmlaw.com> wrote:

Sarah,

They will hurry to try to be out by 4:00. Please come no earlier than 4:00 exactly.

Thank you,

Rebekah

From: SMancinelli [<mailto:SMancinelli@ainbanklaw.com>]
Sent: Tuesday, November 22, 2016 12:21 PM
To: Rebekah J.H. Sullivan
Subject: Re: Biden Today

We don't want that either obviously. Is 4 possible? Or is that cutting it

too close? The timing issue is mine but I can figure that out as needed.

On Nov 22, 2016, at 12:18 PM, Rebekah J.H. Sullivan
<RSullivan@ksfmlaw.com> wrote:

Sarah,

Can you and Hunter push back until 4:30 today? It sounds like the girls will be getting packed up until then and would prefer to do so without an uncomfortable situation.

Thanks,

Rebekah J.H. Sullivan
Kuder, Smollar, Friedman & Mihalik, P.C.
1350 Connecticut Ave. NW
Suite 600
Washington, DC 20036

www.KSFMLAW.com

Tel: 202/331-7522

Fax: 202/331-0388

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Thank You.*

From: SMancinelli SMancinelli@ainbanklaw.com
Subject: Re: Biden Today
Date: November 22, 2016 at 12:02 PM
To: Hunter Biden hbiden@rosemontseneca.com



Alright. We won't do it today. Let me know later this week what day/times work for you.

Need anything from me?

On Nov 22, 2016, at 3:00 PM, Hunter Biden <hbiden@rosemontseneca.com> wrote:

I have to drive to Delaware and it's gonna be crazy traffic so let's just move it to Sunday or Monday if that's possible and just the matter is I don't really give a shit anyway so I don't know I have to move my stuff out I know I emotionally she was my stuff out but hey we give me a call see you

Sent from my iPhone

On Nov 22, 2016, at 12:20 PM, SMancinelli <SMancinelli@ainbanklaw.com> wrote:


We don't want that either obviously. Is 4 possible? Or is that cutting it too close? The timing issue is mine but I can figure that out as needed.

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From: Hunter Biden hbiden@rosemontseneca.com
Subject: Re: Biden Today
Date: November 27, 2016 at 3:43 PM
To: SMancinelli SMancinelli@ainbanklaw.com



can you talk now

Sent from my iPhone

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From: SMancinelli [<mailto:SMancinelli@ainbanklaw.com>]
Sent: Tuesday, November 22, 2016 12:21 PM
To: Rebekah J.H. Sullivan
Subject: Re: Biden Today


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Washington, DC 20036

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Tel: [202/331-7522](tel:2023317522)
Fax: [202/331-0388](tel:2023310388)

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Thank you,

Rebekah

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Sent: Tuesday, November 22, 2016 12:21 PM
To: Rebekah J.H. Sullivan
Subject: Re: Biden Today

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Rebekah J.H. Sullivan
Kuder, Smollar, Friedman & Mihalik, PCImage001.jpg>
1350 Connecticut Ave. NW
Suite 600
Washington, DC 20036

www.KSFMLAW.com

Tel: 202/331-7522

Fax: 202/331-0388

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Thank You.*

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Subject: Re: Biden Today
Date: November 22, 2016 at 12:05 PM
To: Rebekah J.H. Sullivan RSullivan@ksfmlaw.com

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From: Hunter Biden hbiden@rosemontseneca.com
Subject: Re: Biden Today
Date: November 22, 2016 at 12:00 PM
To: SMancinelli SMancinelli@ainbanklaw.com



I have to drive to Delaware and it's gonna be crazy traffic so let's just move it to Sunday or Monday if that's possible and just the matter is I don't really give a shit anyway so I don't know I have to move my stuff out I know I emotionally she was my stuff out but hey we give me a call see you

Sent from my iPhone

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Subject: RE: Biden Today
Date: November 27, 2016 at 4:16 PM
To: Hunter Biden hbiden@rosemontseneca.com

S

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Sent: Sunday, November 27, 2016 6:43 PM
To: SMancinelli
Subject: Re: Biden Today

can you talk now

Sent from my iPhone

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Subject: RE: Biden Today

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From: SMancinelli SMancinelli@ainbanklaw.com
Subject: Fwd: Biden Today
Date: November 22, 2016 at 10:23 AM
To: Hunter Biden hbiden@rosemontseneca.com



See below. Meet me at your house at 4.

Begin forwarded message:

From: "Rebekah J.H. Sullivan" <RSullivan@ksfmlaw.com>
Date: November 22, 2016 at 1:22:21 PM EST
To: SMancinelli <smancinelli@ainbanklaw.com>
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Cc: Rebekah J.H. Sullivan RSullivan@ksfmlaw.com



Sent from my iPhone

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From: SMancinelli SMancinelli@ainbanklaw.com
Subject: Re: Biden Today
Date: November 22, 2016 at 9:20 AM
To: Rebekah J.H. Sullivan RSullivan@ksfmlaw.com

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image001.jpg

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From: Hunter Biden hbiden@rosemontseneca.com
Subject: Re: Biden Today
Date: November 22, 2016 at 12:34 PM
To: SMancinelli SMancinelli@ainbanklaw.com



lets move it to Sunday

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< >

From: Hunter Biden hbiden@rosemontseneca.com
Subject: Re: Biden Today
Date: November 28, 2016 at 12:04 AM
To: SMancinelli SMancinelli@ainbanklaw.com



OK- here is the deal. She is making life miserable. She is draining the bank accounts- and telling her family and my girls that I am withholding money from her. she has now created a scenario boy which my relationship with H started long ago and that I've disgraced the family...Regardless, I only care about one thing my kids which include my niece and nephew.

=

So as long as she continues to poison the story of our lives to this point I intend to do nothing. Ill be in CA indefinitely. on plane now.By the way she has gained access to my emails and my texts and...I could care less if it wasn't such a strange violation of privacy and sharing her version of the last few years with kids ro vilify me just makes me so sad.

Thats a long way of saying no more access to money tags not hers so she can make us miss a 3rd mortgage payment. our credit score went from somewhere in the 700s to 520., so no car payments no free rule over house no credit cards no trips and gifts and whatever else.

if she wants to go to court I could care less. there is nothing more than the sum of all my sins to be printed by some news outlet. Cats out the bag already so I I truly could care less.

Every single time I do something like allow for her to pack my things and put them outside and demand I don't come into the house etc... in doing so I ONCE AGAIN SEND THE MESSAGE TO MY GIRLS THAT I TAKE THIS FROM Mom because I deserve it. Well I don't deserve it under anyones' narrative.

Kathleen stopped speaking to the day after my world shattered. I know I am not unique in experiencing loss- but I don't carer what anyone sys from my therapist to my friends to family- whomever. my brother wasn't my best friend or the kid who watched out for me or the one who so generously shared in his success.. He wasn't just a really amazing dad and son or brother or the person everyone admired most or whatever the fuck else people may think.

He was me- not half f me or a part pf me or metaphorically speaking....whatever bullshit. And thats not some cry for help or attention or woe is me. Its really just the opposite. I have e experienced what I believe to be the purest form of love- something that transcends any vocabulary I have.

Kathleen new that. Hallie knows that.My children and his children know that. When he died Kathleen list it Actually she lost al along the way since his diagnosis.bShe went from the flawed woman I loved to the terrified person that I have know understanding of. scars to death that I would torture her by not leaving, not conforming to her new reality, and worst not letting go of him.

so she freaked and she stopped talking to me other than to say awful things. she made the kids \compk3tely unavailqbkle she isolated me by demanding rehabs and that the girls not talk to me.

On Sun, Nov 27, 2016 at 7:16 PM, SMancinelli <SMancinelli@ainbanklaw.com> wrote:

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From: Hunter Biden hbiden@rosemontseneca.com
Subject: Re: Biden
Date: December 19, 2016 at 2:37 AM
To: SMancinelli SMancinelli@ainbanklaw.com



On Dec 10, 2016, at 7:44 AM, SMancinelli <SMancinelli@ainbanklaw.com> wrote:

When we talk, we need to discuss the manner in which she is inappropriately involving the children in all of this. I am going to need to send a a strongly worded letter addressing the how unfortunate Kathleen's escalation of this case is and how we need her to not alienate the girls from you, etc.

On Dec 10, 2016, at 3:10 AM, Hunter Biden <hbiden@rosemontseneca.com> wrote:

Ok- where to from here? She's telling my kids that I'm not giving her any money etc...

On Dec 9, 2016, at 8:48 PM, SMancinelli <SMancinelli@ainbanklaw.com> wrote:

See attached. They filed for divorce today. Can you talk early next week or this weekend if you prefer? Just want to touch base with you and talk about where we go from here.

Begin forwarded message:

From: "Theresa M. Mihalik" <TMihalik@ksfmlaw.com>

To: "SMancinelli" <SMancinelli@ainbanklaw.com>, "Rebekah J.H. Sullivan" <RSullivan@ksfmlaw.com>

Subject: Biden

Dear Sarah,

As further follow up to the communications you and Rebekah had earlier today, and as you have indicated your authorization to accept service, we are providing you with a copy of the Complaint that was filed today. A copy of the Initial Hearing Notice is also attached.

Next we have attached a copy of the Subpoena for Mr. Biden's TD Bank account, which was the subject of communications today.

Thank you.

Theresa

Theresa M. Mihalik
Kuder, Smollar, Friedman & Mihalik, PC
1350 Connecticut Ave. NW
Suite 600
Washington, DC 20036

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<2016-12-09 Complaint for Absolute Divorce.pdf>

<2016-12-09 Summons.pdf>

<2016-12-09 Notice of Initial Hearing for Plaintiff (1-23-17).pdf>

<2016-12-09 Notice of Initial Hearing for Defendant.pdf>

<2016-12-09 Subpoena (TD Bank).pdf>