

EXHIBIT 204

[REDACTED]

From: Ziegler Joseph A
Sent: Wednesday, December 09, 2020 9:43 AM
To: Lesley.Wolf [REDACTED]
Cc: Carly.Hudson [REDACTED] Mark.F.Daly [REDACTED] Jack.A.Morgan [REDACTED]
Subject: RE: Storage Location Warrant

I completely understand and will work my hardest on my end to get you all whatever you need in getting this accomplished. Thank you all. Just wanted to put that in there as a goal for us.

Joe

From: "Wolf, Lesley (USADE)" [REDACTED]
Sent: Dec 9, 2020 9:34 AM
To: Ziegler Joseph A [REDACTED]
Cc: "Hudson, Carly (USADE)" [REDACTED] "Daly, Mark F. (TAX)" [REDACTED] "Morgan, Jack A. (TAX)" [REDACTED]
Subject: RE: Storage Location Warrant

Joe-

We are getting to work on this, but I want to manage expectations with regard to timing. It has to go through us, DOJ Tax, possibly OEO and definitely ED Va, who has never seen the case before. Layer in the filter requirements in the 4th Circuit and it's just not clear it's going to happen next week, even with everyone making it a priority.

-LW

From: Ziegler Joseph A [REDACTED]
Sent: Tuesday, December 8, 2020 10:26 PM
To: Wolf, Lesley (USADE) [REDACTED] Daly, Mark F. (TAX) [REDACTED] Hudson, Carly (USADE) [REDACTED] Morgan, Jack A. (TAX) [REDACTED]
Cc: Puglisi Christine A [REDACTED] Shapley Gary A Jr [REDACTED]
Subject: Storage Location Warrant

Hey Everyone -

I guess I'm happy we had a draft of this. I kept the computer language in the warrant in case there are electronic devices at the site (since he literally moved his entire office) – CD's DVDs, flash drives, etc.

We will work to get this approved ASAP on our end so please communicate your thoughts. I would like to possibly execute this sometime next week (I think that is reasonable given the upcoming holiday).

Joseph A. Ziegler
Special Agent

IRS – Criminal Investigation
International Tax & Financial Crimes
Wash. DC Field Office

