

# Exhibit 605

## Ziegler Joseph A

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**From:** Shapley Gary A Jr  
**Sent:** Friday, May 13, 2022 5:09 PM  
**To:** Ziegler Joseph A; Puglisi Christine A  
**Subject:** FW: Sportsman - 3rd DOJ Tax - Taxpayer Conference Delayed

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

FYI.



Gary A. Shapley Jr.  
Assistant Special Agent in Charge  
Chicago Field Office – Branch C  
Joint Chiefs of Global Tax Enforcement – J5

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**From:** Shapley Gary A Jr  
**Sent:** Friday, May 13, 2022 5:09 PM  
**To:** Batdorf Michael T [REDACTED] Waldon Darrell J [REDACTED]  
**Subject:** Sportsman - 3rd DOJ Tax - Taxpayer Conference Delayed

Mike/Darrell,

We learned today that the new tentative date for the 3<sup>rd</sup> taxpayer conference (that we believed was scheduled for next week) is tentatively planned for 5/31. I stress tentatively.

As a result of the new time frame, I wanted to ask if you thought it may be better to request to present to Jason Poole/David Weiss in advance of that meeting. It made sense to wait when the meeting was next week but the delay might change your mind.

This tactic...to move things down the road backing us up against a statute...appears to be purposeful at this point.

We will make ourselves available when you determine the preferable timeframe to offer to present.

Thanks and have a great weekend.



Gary A. Shapley Jr.  
Assistant Special Agent in Charge  
Chicago Field Office – Branch C  
Joint Chiefs of Global Tax Enforcement – J5



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