

Time:

Internal Revenue Service Criminal Investigation

Memorandum of Interview

Investigation #:		Location:	IRS-CI Office Building
Investigation Name:	Robert DOE		1200 1st Street NE
Date:	May 7, 2021		Washington, DC

2:26PM

Approx. 10:07AM -

Participant(s): Kathleen Buhle, Witness

Danny Onorato, Buhle's Attorney Paola Pinto, Buhle's Attorney Sara Wilson, Buhle's Paralegal Katarina Parent, Paralegal

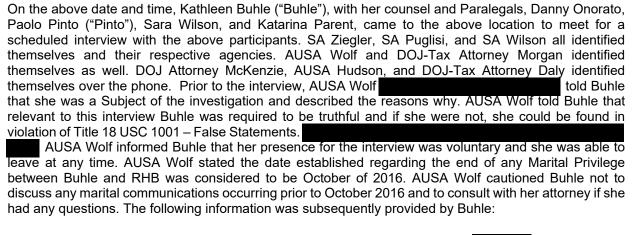
Joseph A. Ziegler, Special Agent (IRS-CI) Christine Puglisi, Special Agent (IRS-CI) Joshua Wilson, Special Agent (FBI)

Lesley Wolf, Assistant United States Attorney (DEL)

Jack Morgan, Litigation Attorney (DOJ-Tax)

Mark Daly, Senior Litigation Attorney (DOJ-Tax) – Via Telephone Matthew McKenzie, Trial Attorney (DOJ-NSD) - Via Telephone

Carly Hudson, Assistant United States Attorney (DEL) – Via Telephone



- 1. Buhle's full name is Kathleen Ann Buhle. Buhle's date of birth is currently lives at since August of 2017.

 Buhle's date of birth is currently is a substant with the currently lives at since August of 2017.
- 2. Buhle is currently not married. Buhle was married to RHB from July of 1993 to April of 2017. Buhle had a trial separation from RHB in the Summer of 2015. Buhle considered this a permanent separation in October of 2015. Buhle stated that she never really thought of it as separating and that RHB officially moved out of their home in October of 2015. Buhle stated that the marital issues related to the addiction issues rather than the

actual marriage.

- 3. Buhle and RHB have three children together: Naomi age 27, Finnegan age 22, and Roberta (also known as Maisy) age 20.
- 4. Buhle stated that she went to college at St. Mary's University of Minnesota. Buhle received her Bachelor of Science degree in 1991. Buhle is currently employed. Buhle is developing a woman's program / professional woman's social group located in Dupont Circle. Buhle is currently compensated by her business partner as a consultant. Buhle was hired two years ago to be one of the founders of the entity, "House of 1229". Buhle stated that she is currently paid for this work through Stop 16 LLC. Buhle stated that before 2019, she worked for DC Volunteer Lawyers Project. Buhle stated she is not an attorney and that she started initially as a volunteer, and then at some point (possibly 2016) began working as a consultant for the Project. Buhle stated she began working full time for the Project shortly after the divorce.
- 5. Buhle stated that during her marriage with RHB, she did not get paid for any work outside of the home (until approximately 2016 with the DC Volunteer Lawyers Project). Buhle stated that she was very involved with raising their children and that it was a mutual decision between her and RHB that she did not work. Buhle stated that leading up until 2014, RHB was the financial support for the family and that he primarily handled the finances of the family. Buhle had access to a credit card but stated that she had a debit card linked to a joint bank account and that RHB would transfer funds to that account for her to use. Buhle stated that her and RHB never had a formal budget and that she didn't recall RHB giving Buhle too much money or RHB spending too much money. Buhle stated that she was embarrassed to admit that she did not access the bank accounts she had with RHB and again, that RHB was in charge of the finances.
- 6. Buhle stated RHB attended law school right before they were married and that they were living together while he was in law school. After RHB graduated from law school, RHB worked on his father's campaign in 1996 and that they moved to Wilmington, DE during this time. RHB and Buhle lived in Wilmington until 1999. After the campaign, RHB worked at MBNA bank and that she had no idea what he did. Buhle thought that RHB was an executive at MBNA and that he worked in multiple departments. Buhle stated RHB subsequently worked for the Department of Commerce. Buhle was not sure what he did at the Department of Commerce but thought that he was Director of E-Commerce.
- 7. Buhle stated that RHB's next employment involved him founding the law firm Oldaker Biden and Belair. Buhle was not sure if they did lobbying work at this law firm at the time. Buhle did not recall any of the clients RHB had at the law firm. Buhle stated that she wasn't sure when one business ended, and the next business started but thought the law firm was from 2000 through 2008. Buhle was not sure why RHB closed his lobbying firm. Buhle stated that Eric Schwerin ("Schwerin") worked at Oldaker Biden and Belair.
- 8. Buhle thinks that the next business RHB started was the Rosemont Seneca entities. Buhle stated that Schwerin worked with RHB for the Rosemont Seneca entities but wasn't sure if Schwerin was a partner.
- 9. Buhle stated there was a point in time where RHB moved away from lobbying work to business investments. Buhle's first memory of this shift was in 2006. Buhle stated that RHB also started working at Paradigm at some point. Buhle thought that Paradigm and the Rosemont Seneca entities overlapped.
- 10. Buhle recalled RHB being of counsel / associated with Boies Schiller but does not remember when he started at Boies. Buhle stated during the 2010 through 2014 timeframe, RHB was going to work in an office daily and was traveling everywhere for work. Buhle stated that once RHB stopped his lobbying work, that she really didn't

- understand what he did for his businesses. Buhle stated that she was embarrassed to admit this and that she really never asked RHB.
- 11. Buhle stated that at some point in 2014, she became aware of RHB joining the board of directors at Burisma. Buhle didn't recall the date but stated that she became aware because RHB had told her. Buhle did not recall a shift of RHB's work in 2014 / 2015 and/ or after their separation.
- 12. AUSA Wolf told Buhle they now wanted to discuss vehicles that were used, owned, and operated by the family. Buhle stated she was not very knowledgeable regarding cars and that RHB had many. Buhle currently drives a 2017 Mini Cooper that she has owned since August of 2017. Before the Mini Cooper, Buhle had a Mercedes Station Wagon that she had for many years. Buhle thinks that both her name and RHB's name were on the ownership documents for the Mercedes Wagon. Buhle didn't think she had any cars in just her name while she was with RHB.
- 13. As far as RHB, Buhle stated that around 2015 (when they separated), RHB had a Porsche, BMW and a Tesla, but then stated that she doesn't have a firm memory of what RHB was driving. Buhle then stated that maybe RHB didn't have a Tesla, but that she knows that he had luxury cars. Buhle stated that she thought RHB had owned two Porsches, but not at the same time. Buhle stated that one of the Porsches was small and the other Porsche was larger.
- 14. Buhle stated that the family had an Audi Q5 which Finnegan primarily drove; however,all members of the family, including RHB, used the Q5 at different times. Buhle stated that they used the Q5 to drive to family events, but that it was mostly Finnegan's car. Buhle was not included in the purchase of the Q5.
- 15. an email from January 11, 2015. Buhle stated that no one ever referred to RHB as "Rob". People would always refer to RHB as "Hunter". Buhle recalled RHB getting a Porsche 911 Turbo S, but didn't recall the timeline, and that Buhle recalled the Audi Q5 because the girls drove it.
- 16. In January of 2015, Finnegan was using Buhle's car to get to and from school and the decision was made to get "the girls" a car. Buhle didn't remember the exact conversation she had with RHB regarding this though. Buhle doesn't recall the details of how the Porsche 911 or Audi Q5 were paid for.
- 17. Buhle stated that she had never seen this document before. Buhle remembered the BMW, and that it was RHB's car. Buhle never drove the BMW and she couldn't recall how long RHB had the vehicle for. Buhle thought she recalled the Porsche Panamera. SA Ziegler displayed a Google image of the Porsche Panamera for Buhle. Buhle stated cars were not her thing and that cars were more of an interest of RHBs. Buhle couldn't recall when the family went from one car to two cars, but that they had got a family car at some point which was an SUV. Buhle doesn't recall the actual conversation about the Porsche Panamera and that she never really had an opinion about RHB's purchase of luxury cars. Buhle stated that the Porsche Panamera just showed up one day, and that she didn't know how or why RHB had gotten it. Buhle didn't think the Porsche Panamera was given to RHB as a gift. Buhle has not heard of Kenges Rakishev. Again, Buhle stated that the Porsche Panamera was RHB's car and that she didn't know how the vehicle was titled.

At this point, Buhle asked for a slight break and stepped outside of the room with her counsel.

18. AUSA Wolf asked Buhle outside of the context of the Porsche, does the name Kenges Rakishev mean anything to Buhle or any individuals from Kazakhstan. Buhle stated there was a birthday party for RHB in which (what she thought were) some Kazakhstani

individuals were at the dinner. Buhle had never met the Kazakhstani individuals before and she couldn't recall their names. Buhle couldn't recall the timing but stated that it was after 2012 and before 2016. Buhle stated that there was more than one Kazakhstani individual at the party, possibly two. Buhle stated family members attended this birthday dinner. Buhle stated that Devon Archer ("Archer") and his wife, Krista Archer, were at the dinner. Archer was RHB's business partner. Buhle thought that Eric Schwerin ("Schwerin") might have also been at the birthday dinner. Buhle stated that someone else (she wasn't sure who), organized the birthday dinner for RHB. Buhle stated the dinner was at Café Milano in Washington, DC.

- 19. Buhle stated it was strange for these Kazakhstani individuals to show up to this dinner and that she thought it was unusual. Buhle stated it was unusual for RHB to have his clients show up to a family / birthday dinner. Buhle thought she was surprised at the time but that she might have been told beforehand. Buhle stated the Kazakhstani individuals gave RHB a framed photo of a car that she understood they were going to give to RHB. It was Buhle's understanding that this was going to be gifted to RHB. Buhle didn't recall the car in the picture, but thinks it was a Tesla. Again, Buhle stated that her understanding was that this was a gift to RHB but doesn't know how she got that information or impression. Buhle didn't recall what happened to the photo of the car and stated that it was for sure a picture of a luxury car. Buhle recalled saying, "wow that's a nice car". Again, Buhle stated that this photo of the car was given during the time she was together with RHB. Buhle cannot recall if Archer also received a photo of a car. Buhle later said that she doubted that Joan Mayer ("Mayer") was at the birthday dinner for RHB, but that she thought Schwerin was at the dinner.
- 20. Buhle stated this was a difficult time for her family and that her memory is messed up. Buhle stated that in the divorce RHB received the Audi Q5 and the Mercedes Station Wagon went to her. Buhle stated that RHB bought Maisy a small pickup truck at one point. Buhle stated that RHB also drove a Silverado which was a bigger pickup truck.
- 21. Buhle still has the 2003 Chevrolet Suburban; it is paid off and it was always left at the Lakehouse. Buhle stated that the girls were driving the Suburban before receiving a Secret Service detail.
- 22. Buhle doesn't recall why the Porsche wasn't in the Marital Settlement Agreement and that maybe RHB didn't have it at the time of the divorce.
- 23. Buhle stated that the 2018 Ford Raptor was also RHB's car and that she doesn't know if the Raptor replaced another vehicle. Buhle stated RHB was driving the Ford Raptor after their divorce and that she was no longer tracking his cars. Buhle was not sure of any other cars RHB obtained after their divorce.
- 24. Buhle stated that RHB received the Audi Q5 in the divorce and that she doesn't know it's current status. The last that Buhle had heard of the Q5 was that it was parked at the house that Joe and Jill were renting in McClean, Virginia. Buhle recalled the girls having the Q5 towed to a repair shop. The girls said that the Q5 appeared abandoned and that it had mold in it. Buhle stated that this would have been in the last year or two. The Q5 was mostly Finnegan's and that Maisy probably drove the Q5 when she got her license.
- 25. Buhle never reviewed RHB's corporate tax returns until recently. Buhle had no sense of RHB's businesses and their corporate structure. Buhle did not review any reports in QuickBooks to assist in classifying personal / business expenditures with Mayer or Schwerin. Buhle is not familiar with QuickBooks. Buhle didn't have access to a corporate credit card and she only would use her debit card. Buhle stated that Mayer might have asked about a dental bill or family expenditure, but that Buhle was not involved with anything outside of the household/ girls.

- 26. Buhle and RHB had a joint bank account at USAA and Wells Fargo. Buhle couldn't recall which account was the primary account she used and couldn't recall which account had the debit card she would use.
- 27. AUSA Wolf told Buhle that they were transitioning to questions regarding taxes. Buhle stated that prior to her divorce, RHB would take care of the taxes. Buhle thought they had an accountant but doesn't recall their name. AUSA Wolf asked Buhle if she knew of the name Morgan Wingate/ Bill Morgan in which Buhle said "Yes". Buhle didn't recall meeting with Bill Morgan or anyone at Morgan Wingate.
- 28. AUSA Wolf asked Buhle if Schwerin played a role in their tax preparation. Buhle stated that she assumed Schwerin played a role because he seemed to be very involved in the entirety their finances. Buhle stated that Schwerin and RHB first worked together at the Commerce Department. Buhle recalled Schwerin and RHB first being friendly with each other and their relationship developed to a business relationship.
- 29. Buhle probably spoke to Schwerin and Mayer more about finances than RHB. Buhle's understanding was that Schwerin and Mayer took care of all of their family bills. It was Buhle's understanding that Mayer worked for Schwerin and that Schwerin made the decisions, but that Buhle didn't recall dealing with Mayer more than Schwerin.
- 30. Buhle described Schwerin as more in the weeds of the family finances and that he wanted Buhle to understand some of it. Buhle recalled Schwerin being patient with her. Buhle stated that there was not any other relationship with Schwerin outside of his work with RHB. Buhle was not aware that RHB and Schwerin had a business breakup. Buhle stated that RHB was going through a difficult time and that he had a lot of breakups.
- 31. Buhle stated that after the divorce from RHB, she didn't ask Schwerin or Mayer any questions and that they sort of had a breakup as well.
- 32. During the divorce, Buhle stated that she thought the finances were peculiar, and that she would reach out to Schwerin and Mayer. Buhle struggled with the finances and she didn't feel like Schwerin or Mayer were helping her. Buhle was asked why she thought this. Buhle stated that she didn't know and that during this time she was very emotional and that finances were very stressful. Buhle stated that during the divorce proceedings, Schwerin and Mayer put together the budget and what they owed. Buhle stated that Schwerin and Mayer were responsive and helpful but that she thought they were holding things back and that they were helping RHB hide money from her.
- 33. Buhle reached out to Schwerin and Mayer occasionally after the divorce because she struggled with access to different bank accounts. Buhle was cordial with Schwerin and Mayer, but was aware of their loyalties to RHB. Buhle stated that she doesn't receive child support from RHB and that RHB is responsible for all of the girl's expenses.
- 34. Buhle stated Katie Dodge ("Dodge") had previously worked for RHB for a period and returned to work for RHB following their divorce.
- 35. Buhle stated that she would talk with Mayer and that it was her assumption that Schwerin knew everything. Buhle again stated that it was Schwerin making the decisions and that this was her assumption because Schwerin was Mayer's boss.
- 36. Prior to the divorce, Buhle would go to the office occasionally to see RHB. Buhle stated that she recalled all of their bills went to the office with the exception of medical bills.
- 37. Buhle knows of the business entity Owasco but was not sure of the difference between PC and LLC. Buhle does not know of Skaneateles. Buhle knew of the Rosemont Seneca entities and thought that there were multiple RSP entities. Buhle recalls Rosemont

Seneca Thornton vaguely and recalled a partnership with the Thornton Group out of Boston. Buhle was familiar with Eudora. Buhle stated that RHB was in business with Chris Heinz and Archer but can't recall the name of the entity. Buhle knows of Bohai Harvest and that this was the investment with the Chinese. Buhle stated that this came up during the divorce and that RHB said it was going to be lucrative one day. Buhle recalled being worried about Bohai Harvest having value. Buhle recalled RHB mentioning that Bohai Harvest was exciting because he was traveling to China. Buhle did not know who else was involved in Bohai Harvest but assumes Archer was. Buhle was never provided with any information regarding the investments of Bohai Harvest.

- 38. Buhle stated that Archer was a business partner of RHB and that she wasn't sure the year they met. Buhle thought that RHB and Archer met through a mutual friend, Chris Heinz. Archer eventually became a close friend of RHB. Buhle recalled traveling together with Archer and his wife. Buhle recalled going to a wedding in Buenos Aires with Archer and his wife. Buhle recalled this wedding being for a business associate and not a friend. Buhle stated that the name Gabriel Popoviciu did not sound familiar. Buhle couldn't recall any other trips with RHB, Archer, and Archer's wife.
- 39. Buhle was sure that she traveled with RHB on business trips. Buhle recalled one trip to Tahoe. Buhle stated that she and RHB traveled quite a bit and that some of the trips were business related. Buhle stated that after 2012, she recalled a trip to Lake Como with RHB and that it was a business-related trip. Buhle could not recall if Archer went on the trip to Lake Como. Buhle stated that the 2012 year sticks out to her because this was tied to the second term of the Obama Administration. Buhle did travel to Asia but did not go with RHB. Buhle and RHB went to the UAE two times but she can't recall if those trips were post 2012. Buhle stated that they went to the UAE as a guest of the Ambassador to the U.S. Buhle recalled it being a mixed group of people in the UAE and that RHB was a friend of the U.S. Ambassador at that time.
- 40. Buhle stated that Jeff Cooper ("Cooper") was a friend and business associate of RHB. Buhle met Cooper in Nantucket many years ago. Buhle thought that they were in Nantucket for the family as a part of the father's Senate campaign. Buhle thought that they met Cooper at a Democratic Campaign event. Buhle stated that she knew Cooper's wife from high school.
- 41. Buhle knew of Rob Walker ("Walker"). RHB had met Walker while working at the Department of Commerce. RHB and Walker had a personal and business relationship, but she was unsure of the details of the business relationship.
- 42. Buhle recalled traveling with RHB and Walker to Africa and that the trip was organized by Walker. Buhle stated that a trip to Romania sounds familiar with Walker.
- 43. AUSA Wolf asked about RHB's relationship with James Biden ("James"). Buhle stated that "Uncle Jim" and RHB did some business deals together but that she didn't know any of the specific details. Buhle stated that RHB and James bought Paradigm together in 2006. Buhle stated that RHB and James were close personally and professionally.
- the joint 2014 Form 1040 of RHB and Buhle. Buhle was asked to turn to page 2 and confirmed her signature on the page. Buhle did not recall signing the form and didn't recall if the tax return was brought home for her to sign. Buhle stated that the other signature of RHB looked like his. Buhle did not review the information on the tax return before signing it. Buhle did not discuss the tax return with the accountants and was just told to sign it. Buhle again stated that she didn't look at the income reported on the tax return. Buhle couldn't recall the sources of wages in 2014. Buhle knew RHB was teaching at Georgetown but she didn't recall the year. Buhle knows RHB was of counsel at Boies. Buhle recalled RHB joining the board of Burisma but couldn't recall the year that it happened. Buhle knew RHB was getting paid for his board

of director's work for Burisma. Buhle knew RHB was being paid a substantial amount of money from Burisma and it was approximately \$50,000 a month; she knew this through RHB. AUSA Wolf pointed out the other income amount of \$2,400 to Buhle on and asked if Buhle was ever aware that the Burisma income from 2014 was omitted from the return. Buhle stated that she was not aware of this and that she never had any discussions with Schwerin or Morgan Wingate about omitted income on the tax return. Buhle was not aware of any discussions regarding amending their 2014 Form 1040.

- the Marital Settlement Agreement. Buhle recognized the document. AUSA Wolf told Buhle to turn to page 19 (Buhle confirmed her initials at the bottom of the page), paragraph 21B regarding taxes. Buhle couldn't recall what she knew regarding the reference to a 2014 tax liability with her and RHB. AUSA Wolf referenced Buhle back to in which it showed they were due a refund that year. Buhle again stated that she had no understanding of this tax liability for 2014. Buhle stated that she was not aware of any other income received by Buhle or RHB during 2014. Buhle didn't recall RHB receiving any watches or cars from Burisma in connection with work RHB performed for Burisma. Buhle didn't recall any gifts from Burisma but said she recalled RHB receiving a coat with Burisma on it at one point.

At this point in the interview, a break was taken from 11:52AM – 12:00PM.

- 46. - the joint 2015 Form 1040 of RHB and Buhle. Buhle was asked to turn to page 2 and confirmed her signature on the page. Buhle did not recall signing the form and didn't recall if the tax return was brought home for her to sign. Buhle stated that the other signature of RHB looked like his. Buhle stated that she did not review the information on the tax return before signing it. Buhle stated that she did not discuss the tax return with the accountants and that she was just told to sign it. Buhle was asked to turn to Page 44 of the return - Other Income. Buhle stated that Eplata sounds familiar but didn't know about it. Buhle stated that she didn't know why Rob Walker was paying RHB in 2015. Buhle didn't know what the referral fees from Burisma were for. Buhle couldn't recall how RHB came to be on the board of directors for Burisma. Buhle was shown on page 2 of the return the amount of additional taxes owed of \$176,550. At the time, Buhle didn't know if the taxes were going to be paid at that time or if the taxes were going to be paid at all. Buhle later learned that the taxes weren't paid. Buhle's memory of taxes post-divorce was never really clear and she wasn't completely sure what was still owed and for what tax year. Buhle stated that during the divorce, it was decided that the tax liability was 100% RHB's responsibility and that was the reason she really wasn't focused on it.
- 47. Buhle stated that at some point, she learned of the tax lien against her and RHB. Buhle stated that she became concerned and reached out to RHB. Buhle recalled the first time RHB saying "too bad". Buhle was attempting to sell the Loughboro residence when she discovered the tax lien. Buhle's realtor had told her about the lien and that the tax needed to be paid off before closing on the sale. Buhle stated that at the time, she wasn't sure whether it was a federal or state tax lien. Buhle called RHB and begged him to pay the tax lien and figured that he must have paid it because she was able to sell the house.
- 48. Buhle stated that she subsequently learned about another tax bill with RHB. Buhle received some forms in the mail regarding their taxes, which she sent to her accountant and her attorney.
- 49. Buhle recalled this email, but she couldn't recall if this was the first time she encountered a tax issue; she was supposed to receive a tax refund and never received it. Buhle thought that she also reached out to Bill Morgan regarding her refund being withheld because he was the one who filed the taxes.
- 50. Buhle had received a call from Trent Kutler. Buhle's

accountant at the time, Kathy Nelson, told her not to call him back and that Trent was an "Ambulance Chaser" in the IRS world. Buhle did not recall reaching out to Katie Dodge regarding this tax issue.

- Buhle recalled the email and that it sounded familiar that Bill Morgan needed permission from RHB to discuss the taxes with Buhle. Buhle went to Dodge because she was working for RHB at the time. Buhle would have also gone to RHB at the time regarding the tax issue.
- 52. . Buhle reviewed the messages and she couldn't recall if she had been asking RHB about his taxes at the time or if this was a new conversation regarding his taxes. Buhle stated that it would be fair to say that she was asking around about RHB's taxes. Buhle stated that at the time, nobody else could help her regarding the tax issues except for RHB so it wouldn't surprise Buhle that she was frantically emailing, calling, and texting RHB. Buhle recalled that at that time, RHB was very hard to reach. After RHB had left the marriage, it was very inconsistent with regards to RHB's responsiveness. Buhle recalls being scared at times and that their children sometimes couldn't reach RHB. At that time, Buhle recalled having no idea that RHB was having financial difficulties. Buhle stated that there was a time in which RHB's payments to her would be late, but that they were mostly consistent. Buhle thought that this was because the payments were coming from their financial person at Wells Fargo, Ed Prewitt. Buhle recalled some late payments from RHB and being scared because she had almost no insight into RHB's life and how he was earning a living post-divorce. Buhle and the girls had very little contact with RHB after the divorce.
- 53. Buhle stated that RHB was living the same lifestyle. RHB had rented a big house in Annapolis which Maisy had told her about. Buhle couldn't recall when RHB had rented the Annapolis house and thought it was probably a year or so after their divorce. Buhle thought that RHB and Hallie Biden ("Hallie") rented the Annapolis house for the school year and that RHB lived with Hallie and her children. RHB was traveling a lot and staying at luxury hotels. Buhle stated that RHB stayed at the Chateau Marmont, which was a very expensive hotel in California. Buhle couldn't recall how she learned about some of RHB's lifestyle.
- 54. Buhle stated that RHB moved out in 2015 and moved in with Hallie after RHB's brother had died. Buhle stated that RHB did rent an apartment at a complex named Holm. Buhle stated that after the Annapolis house, RHB might have been in California or was maybe living with Hallie in Delaware. Buhle stated that when RHB moved out in 2015, they put his stuff in the apartment above the house RHB's parents were renting in McClean, VA. The kids did not see RHB very often and he would come to Washington, DC infrequently. Again, Buhle stated that she was not completely sure where RHB was living post-divorce and that he really didn't have a permanent residence until after he was married again.
- 55. Buhle stated that Ed Prewitt ("Prewitt") was a mutual friend of RHB and Buhle's from Arkansas. Prewitt works for Wells Fargo and handles Buhle's IRA. Buhle stated that Prewitt was in the Clinton Administration. Buhle assumed they met Prewitt while RHB was at the Department of Commerce and that Prewitt was also friends with Schwerin and Walker. Prewitt went back to Arkansas with his family after the Clinton Administration. Buhle never really discussed finances with Prewitt while she was married to RHB, but after the divorce Buhle would call Prewitt.
- 56. Buhle was not sure why Prewitt administered the alimony payments and that this was not something she setup. Buhle would also ask Prewitt about RHB's life insurance policy and sought to ensure the payments were made in a timely fashion as detailed in the divorce agreement. Buhle stated that Prewitt wouldn't share anything about RHB's finances with her and would simply tell her when the alimony was going to be paid each month. Buhle stated that the alimony payments were consistently paid to her Wells Fargo checking

account.

- 57. Buhle recalled the tax issue also having an impact on the sale of the lake house. Buhle thinks that she tried to refinance the lake house when she learned of the tax lien. Buhle stated that she didn't decide to sell the lake house until the summer of 2019. Buhle recalled at the time of the sale, she was very concerned that the tax lien was going to come up and that the sale would fall through. A title search was performed and there was no tax lien on the lake house, so the sale was able to close.
- 58. Buhle recalled having an issue trying to change her name back to her maiden name, Buhle, on her passport. Buhle recalled receiving a letter from the Department of State stating that they were withholding her passport until the tax debt she had with RHB was paid.
- Buhle stated when she sold the Lake House, she thought RHB had resolved the tax debt. However, in 2019, when the issue with her passport came up again, Buhle learned the tax debt was still an issue. Buhle recalled wanting to see the tax returns, partly because of the tax lien, but also because as a part of the divorce agreement, if RHB earned income over \$850,000, Buhle would receive additional alimony. Buhle stated that money was a consistent battle with RHB and that RHB never shared his tax returns with her.
- 60. Buhle was worried RHB was making more money and hiding that additional income. Buhle had thought this because of RHB's lifestyle at the time.
- 61. Buhle stated that she recalled her passport being withheld in November of 2019 and that might be the wrong date. Buhle stated that the message would have been the first time Buhle had learned that RHB had not filed his tax returns. With regards to Buhle did not get a further understanding of what RHB meant in the message. Buhle did not get her passport back for a long time. Buhle is not sure when she got her passport back and that she hasn't used it or gone anywhere recently.
- 62. Buhle learned that the tax debt / lien was paid through RHB's attorney, either George Miseres (Miseres) or Sarah Mancinelli. Buhle doesn't know who paid the tax lien.
- 63. Buhle vaguely knows the name Kevin Morris ("Morris") and has a guess who he is, but that she doesn't know him. Buhle did not know that Morris paid off the tax debt.
- 64. AUSA Wolf told Buhle that they were going to discuss RHB's addiction and substance abuse. Buhle stated that in 2014, RHB was struggling with addiction. Buhle knew about RHB's addiction with alcohol and could also imagine that he was doing drugs as well, but she wasn't sure. Buhle stated RHB was functioning to a certain degree during his addiction. Buhle stated that RHB was getting worse into early 2015 but was still going into the office each day and working. Buhle stated that RHB's struggle with addiction was getting worse towards the end of 2015. During this time, RHB was going into the office, traveling, and making business deals. Buhle discovered RHB was doing drugs at some point. Buhle stated that when RHB first left the house because of addiction in August of 2015, he went into rehab. RHB was in rehab for not quite 28 days and left early, but RHB didn't return to their home. Buhle stated that RHB did return to work.
- 65. Buhle stated that there was a period of time that she did stress about money and did recall some of their bills not getting paid. Buhle couldn't recall a date when she was worried, but there was a time when the housekeeper was not being paid. Buhle doesn't recall how she became aware of bills not being paid but thought the bills might have been coming to the house. Buhle stated that the financial arrangement with RHB didn't change after the separation and that she continued using the debit card from the joint bank

account.

- 66. Buhle stated that there came a point prior to filing for divorce that she poured through the bank account activity. Buhle recalled seeing money coming into the bank accounts but wasn't sure what the deposits of money were for. Buhle recalled being concerned with how fast they were spending the money that was coming in and also stated that she was concerned with the volume of spending and the spending on luxury items to include hot-tubs, jewelry, Cartier and other big purchases. Buhle could recall having some conversations with Schwerin about the family bills. Buhle did not have access to the corporate bank accounts. Buhle doesn't recall specifically, but she would imagine that she would have brought the bills and the lavish spending to RHB's attention.
- 67. Buhle stated that Schwerin continued to be a resource and provided information during the divorce and provided less information to her after the divorce.
- Buhle recalled the motion in February of 2017. Buhle stated that this statement in the filing was regarding RHB's spending habits, which she just described. Buhle knows this from looking at the bank statements. Buhle presented these bank statements to her attorney. Buhle doesn't know why the payments to her from RHB were reduced (as mentioned in the filing) and she doesn't recall a discussion about it. Buhle wasn't able to compare the spending at the time of their divorce to previously in their marriage because she never looked at the spending and would have nothing to compare it to. Buhle couldn't recall specifically what she meant by "already large outstanding tax liability".
- 69. Again, Buhle confirmed her joint account with RHB at USAA. AUSA Wolf asked Buhle about a bank account opened for Finnegan at USAA in 2013. Buhle stated that she knew they currently had accounts for their daughters at Wells Fargo and may have had accounts for them previously at USAA and that these bank accounts would have been tied to Buhle. Buhle couldn't specifically recall the account opened for Finnegan in 2013 at USAA.
- 70. Buhle confirmed that 1010 Wisconsin was RHB's office address at the time. Buhle was asked about a \$60,000 deposit from Rob Walker. Buhle stated that she was not aware of this deposit and that she doesn't know why Walker would send money to Finnegan. Buhle stated that Finnegan would not have been aware of this USAA bank account as this is the first time Buhle is learning about it. Buhle was not aware of the specific transfer until now but did recall uncovering a \$122,000 deposit from Walker to a TD Bank account. At the time, Buhle was not aware of RHB having a TD Bank account until mail came to the house for this account and Buhle subsequently uncovered these wires from Walker.
- , and stated that her memory is that the \$122,000 deposit was from Walker. When Buhle learned about the transfers from Walker, she didn't recall if she asked RHB, Schwerin, or Mayer about it, but recalled asking Walker about it. Buhle doesn't recall how Walker responded, but that she did ask Walker not to give money directly to RHB, but instead to Schwerin and Mayer for RHB. Walker seemed like he respected her request, but then Buhle found out Walker sent another transfer straight to RHB and that's when Buhle realized that Walker was not on her team.
- 72. Buhle stated that at some point in 2017, she became aware that RHB was in possession of a diamond. Buhle stated the diamond had certificates with it. Buhle thought that one of the divorce lawyers produced the diamond certificates. Buhle recalled taking note of the diamond and sending what she had to her attorney. Buhle looked up the value of the diamond and stated that she doesn't know where the diamond is now. Buhle doesn't recall how RHB received the diamond.

- 73. Buhle stated that she worked with attorneys and accountants in coming up with the tax debt between RHB and Buhle. Buhle didn't recall specifically talking about tax debt at the time of the divorce but more specifically about debt and finances in general. Buhle stated that she was communicating with RHB during the divorce, but nothing was ever productive.
- 74. Buhle stated that she wasn't involved with Schwerin, Mayer, or the accountants in separating business from personal expenses. Buhle is sure she used a credit card in the past but that the majority of the spending came from the debit card. Again, Buhle stated that she wasn't aware of RHB's spending after the divorce and that she didn't know if Schwerin and/or Mayer were involved in RHB's finances. Buhle recalls reaching out to Dodge after the divorce, but she couldn't provide any additional information that Mayer and Schwerin couldn't provide.
- 75. Buhle recalled the email and said that the reference to RHB hiding money was the TD Bank account. Buhle still believes that RHB is hiding money and income from her now. Buhle stated that when RHB finally provided his unfiled tax returns, they did in fact show that he made more money than what he had stated. RHB kept saying that all of his money was going to Buhle and that he had no money because he is paying Buhle so much. Buhle thinks RHB spent that excess money and doesn't know specifically where it went.
- 76. AUSA Wolf asked Buhle how the divorce was resolved so quickly and Buhle stated that her mother called RHB. RHB usually listens to Buhle's mother.
- 77. Again, Buhle stated RHB consistently made his spousal support payments, although sometimes they were late and she doesn't recall a reason why. Buhle stated that up until May of 2019, the spousal support payments were consistent, and it was in May of 2019, that the payments stopped. Buhle is not sure why the payments from RHB stopped and that RHB was still obligated to pay. Buhle couldn't recall how the wires looked for the spousal support payments she received from RHB. Buhle stated that since 2019, she received some payments from RHB's new wife Melissa Cohen and not from RHB, and also stated the payments she received were sporadic, not consistent, and were court ordered.
- 78. Buhle didn't recall receiving any payments from Miseres or Morris. Buhle has discussed the spousal support payments with Miseres. Miseres was a good friend of Buhle's and RHB's, but now he is no longer a friend of hers and is only a friend of RHBs. Buhle stated that Miseres began acting as RHB's attorney during this time. Miseres never acted as an attorney on behalf of Buhle.
- 79. Buhle recalled the first time Miseres acted as an attorney for RHB was around the time RHB stopped making the alimony payments. Buhle has had direct conversations with Miseres, and she would reach out to him on his cell phone. Miseres works in Chicago. Buhle stated that she would reach out to Miseres because she knew he was helping RHB get the situation with RHB and Buhle resolved. Buhle recalled Miseres not being helpful in the beginning and that the first time Buhle and RHB went back to court in late 2019, early 2020, Miseres came to the hearing but wasn't able to represent RHB. Buhle recalled Miseres saying that RHB had no money and told her in the hallway of the court, "you're out of luck". Buhle recalled being upset. Buhle stated the relationship with Miseres became contentious and that she eventually stopped communicating with him.
- 80. Buhle thought that RHB did present some documents to Buhle's attorney to show his finances and that RHB was working with her attorney to resolve the issue. It was Buhle's understanding that RHB wasn't currently paying any of the expenses for the girls. Maisy is still in college and Finnegan is graduating from school next week.

- 81. Buhle stated that RHB's father was paying the tuition and rent of Buhle's daughters. Buhle pays for their food and living expenses. RHB may occasionally give the girls money but she doesn't think it's much.
- 82. Buhle stated that she is currently entitled to additional money from RHB based on his increase in income. The court has ordered RHB to pay three payments to Buhle. One of those payments has been made to Buhle from RHB. RHB currently owes Buhle approximately \$3 million. Buhle received \$2,400 from RHB this week. Buhle stated that they are still in court trying to resolve the matter.
- 83. Buhle stated that RHB was ordered to pay Buhle money from his book sales. Buhle stated the agreement with RHB is that Buhle receives 30% of his salary. RHB currently is employed as general counsel for Jeff Cooper's company. RHB is making \$150,000 from this employment. Atomic 47 didn't sound familiar to Buhle.
- 84. Buhle was not aware of RHB actually selling any artwork. Buhle was not aware of RHB receiving money from Morris. Buhle stated that she asks her daughters how RHB is able to afford his current lifestyle. Buhle stated that she found out an entertainment lawyer was lending him money but that they didn't know the details or his name. Buhle didn't know why this entertainment lawyer was helping RHB.
- 85. Buhle stated that there were no conditions on how Buhle was to receive money from RHB only that it was being handled by the attorneys and court orders.
- 86. Buhle stated that RHB had to provide tax returns in the Arkansas case and that was how they received copies of RHB's tax returns. Buhle doesn't recall if the tax returns provided to Buhle's attorney were signed by RHB.
- 87. Buhle didn't have any contact with Ed White and Company, RHB's accountants in California. Buhle stated that Bill Morgan had died and that RHB needed to get a new accountant.
- 88. Buhle couldn't recall the first time she learned about RHB's unfiled tax returns but based on the text messages she saw during the interview that it would have been at some point in 2019. Buhle stated Morgan never told Buhle RHB's tax returns were unfiled. Buhle stated that the 2016 tax year was the last year that she and RHB were supposed to file together. Buhle stated the divorce agreement stated that the last joint return was 2016. Buhle recalled learning that the 2016 joint tax return with RHB was unfiled but initially could not recall when.

 Buhle's 2016 Form 1040 as married filing separately. Buhle verified her signature on page 2 of the return. Buhle then stated she learned about the unfiled 2016 tax return when she called into the IRS regarding her revoked passport. That was when the agent told her the 2016 joint return was unfiled.
- 89. Buhle stated at some point, RHB had her sign the 2016 tax return with RHB. Buhle stated that RHB came over on Christmas Eve or around the Holidays and asked Buhle to sign the 2016 tax returns. Buhle stated that she did not initially sign the returns and told RHB that she wanted her accountants to review it. RHB was upset that she wanted to have her accountant review the return, but he said ok and wanted Buhle to mail the tax return back to RHB. Buhle stated that she did send the returns back to RHB but cannot recall where she sent them. Buhle later said that she probably gave the returns to RHB directly, either through the girls or through RHB's father, and didn't mail them.
- 90. Buhle didn't recall the situation specifically. Buhle stated that in 2018, the girls were using RHB's car and they found the 2016 tax returns in the trunk. Buhle thought it was in the trunk of the Porsche and stated that the trunk was dirty and sitting on top with a check to the IRS. Buhle stated that the check to

the IRS was drawn on a bad bank account. Buhle knew this because RHB had owed Buhle's parents some money as well and had written some checks from that same bank account, which bounced. Buhle took the check written to the IRS off and discarded it because she didn't want it to bounce.

- 91. Buhle was then shown a text message between RHB and Buhle from March 9, 2018. Buhle was asked to elaborate on "begged to sign". Buhle then again explained that when RHB brought the taxes to her to sign, Buhle told RHB that she wanted to have her accountant to review them. RHB got upset with Buhle and told her they were fine and to just sign them. Buhle stated that she cried. Buhle stated that she just needed a minute because her mom was just diagnosed with Parkinson's Disease. RHB told Buhle that the 2016 tax return had to be sent in immediately. Buhle told RHB she would get it back to him in a matter of days. Buhle stated that her accountant looked at them and they were fine. Buhle signed the return, sent it to RHB and assumed they were filed. It wasn't until 2020 that she learned the 2016 tax return was never filed. Buhle couldn't recall if she reached out to RHB directly, but that she started the process with her attorney of claiming innocent spouse with the IRS.
- 92. Buhle was then asked by AUSA Wolf about RHB forging her signature on a Line of Credit. Buhle stated that this was her belief during the divorce with RHB. Buhle never took care of finances in the past and it was overwhelming to her. Buhle didn't realize until during her divorce that the mortgage, plus the home equity line of credit ("HELOC"), plus the money they owed her parents was more than the value of the house. Buhle contacted the bank with the HELOC and asked to see the loan agreement. Buhle received the agreement and it did not appear to be her signature. Furthermore, she had no memory of signing this agreement. Buhle stated that she and RHB bought the lake house in 2010. Buhle and RHB borrowed some money from Buhle's parents in order to purchase the lake house. Buhle stated that when RHB bought the lake house, she wasn't there and RHB looked at the house with Buhle's parents. Buhle and RHB didn't have money at the time for the down payment so Buhle's parents lent them the money for the down payment. At the time of the purchase, Buhle didn't know that she and RHB borrowed money from her parents. Buhle was shown a copy of the filed HELOC with Washington First Bank. Buhle confirmed the property as her home address at the time. Again, Buhle stated she has no memory of signing the document and the signature doesn't look like her signature. Buhle confronted RHB about the HELOC but doesn't recall what RHB said in response. Buhle stated RHB didn't deny taking out the loan but didn't say that he forged her signature. Buhle stated that the HELOC came up in the divorce but Buhle didn't say it was fraudulent. Buhle stated she did disclose the forged signature to her attorney during the divorce, but the attorney said it was too late and that Buhle didn't feel like she had any other options regarding the HELOC. Buhle stated the HELOC has been paid off with the proceeds from the sale of the property.
- 93. Buhle reviewed the document and said that she had printed on the document "my forged signature". Buhle didn't recall sending the document to Miseres.
- 94. Owasco PC General Ledger, Office Expense Account.

 Buhle was asked about expenses on 8/28/18 for P&P Matters. Buhle had never heard of that before, but it could have been for tutoring paid to Prep Matters for Maisy, but that she wasn't sure. the checks paid to Prep Matters memo line states Maisy. Buhle confirmed that these related to Maisy's tutoring.
- 95. Owasco PC General Ledger, Professional & Outside Services. Buhle was asked about a \$30,000 payment made to Columbia. Buhle stated that Naomi was in law school at Columbia during 2018 and that the expense could be for that. Buhle stated that at this point, RHB was paying for the fees and costs of the girls up until May of 2019.

- 96. Buhle stated she could now see when money was transferred to their joint bank accounts and that she thinks RHB sometimes used his credit card.
- 97. Buhle stated she doesn't know which airlines her daughters would use to fly to places.
- 98. Buhle stated at times the girls would use RHB's bank card to pay for items with RHB's permission. Buhle stated RHB sometimes used a credit card and that she has some memory of the girls using RHB's credit card.
- 99. Buhle stated their children were never employed by RHB.
- 100. SA Ziegler asked Buhle if RHB and Buhle had any tax problems in the past. Buhle stated they did in 2003. RHB had just come out of rehab and told her that they owed money in back taxes. Buhle stated that they set up a payment plan and the debt was paid off within 2-3 years. Buhle was not aware of any other tax issues.
- 101. Buhle didn't recall RHB or Buhle receiving any other high-end gifts.
- 102. Buhle was asked if she knew of any of the following names:
 - a. Vadym Pozharsky No
 - b. Nikolay Zolochevsky No
 - c. Sally Painter No
 - d. Karen Tramantano No
 - e. Evan Ryan Yes, she is married to the current Secretary of State and previously worked in the Obama administration. Ryan and was a friend of hers and RHBs, though not a close friend. Buhle further described her as friendly and a devoted Biden political supporter.
- 103. At this point, AUSA Wolf told Buhle they had no more questions for her and that if they needed to follow up, Buhle would be contacted through her counsel. AUSA Wolf told Buhle that if Buhle thought of anything else, to advise this through her counsel. The interview ended at approximately 2:26 PM.

I prepared this memorandum on May 27, 2021, after refreshing my notes immediately after the interview with Kathleen Buhle.

Joseph A. Aigh y Joseph A. Ziegler Special Agent

Christine Puglisi Special Agent