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September 28, 2011

Thomas F. McLaughlin
Assistant Inspector General
U.S. Department of Justice
1425 New York Ave., Suite 7100
Washington, DC 20530-2001

Dear Mr. McLaughlin:

The MPM Group, Inc. (MPM) is a litigation support firm previously adjudicated as experts in most types of criminal investigations including, but not limited to, violations of Title 18 of the United States Code (U.S.C.) as well as federal contracting law. In that capacity, former senior management at **Jireh Consulting, Inc.** (“Jireh”) retained this firm to review their corporate files along with more than 800-pages of U.S. government documents dating back to 1997. Subsequent to our review of those documents, Jireh requested that we render our opinion concerning the conduct of various government employees as it pertained to allegations of federal contract fraud and possible government malfeasance.

Cognizant that the Department of Justice (DoJ) Inspector General’s (IG) office is undergoing a *changing of the guard*, we are directing this letter to your office, as well as your counterpart at the U.S. Department of the Treasury (“Treasury”), on behalf of Jireh. We do so because the well-documented facts of the instant matter draws an objective reviewer to the unavoidable conclusion that Jireh’s several previous allegations of misconduct quite possibly fell upon “deaf ears” at Treasury, the Treasury Inspector General for Tax Administration (TIGTA), as well as other federal investigative entities, and did so either because of conscious complicity in the matter, tacit approval or simple, yet egregious incompetence. Your office has jurisdiction in this renewed matter pursuant to Title 5 of the United States Code (U.S.C.), as well as other inter-office authorizations mandated by the Office of the U.S. Attorney General.

Official government records will confirm the genesis of the instant allegations dates back to November 1997, wherein **Jireh**, a St. Louis, Missouri-based minority-owned 8(a) company, doing business as (dba) **The Writing Company** (TWC), was awarded a high-profile, multimillion-dollar time-and-materials (T/M) services contract with Internal Revenue Service (IRS), a component of the U.S. Treasury. Notwithstanding

that IRS had already properly awarded this services contract to TWC pursuant to prevailing federal contracting guidelines, significant corroborating evidence will confirm that various senior government management officials including, but not limited to, the IRS, the Treasury, and the National Partnership for Reinventing Government (formerly the National Performance Review, or NPR) agreed and/or conspired to rescind this original minority T/M contract for personal reasons. Indeed, available material will suggest that these government entities did so in a concerted effort to improperly award this contract to a non-8(a), non-minority firm owned by individual(s) with whom members of the U.S. government (IRS, the Treasury, and NPR) had a personal and improper relationship. Although such conduct is, in and of itself, a violation of federal contracting regulations, the tactics employed by these senior government employees in voiding this properly awarded contract, as well as their subsequent cover-up of the same, is quite possibly criminal in nature.¹

Aware that the statute of limitations has passed concerning some of the overt criminal offenses cited herein, our legal experts have opined that the underlying “conspiracy,” should one exist, is still ongoing and, therefore, still prosecutable under federal law.² Since the original allegations, as well as related government responses, are dated and quite voluminous, we summarize the basis of the principle allegations as follows:³

In late 1997, IRS representatives contacted TWC’s president to advise that the agency was searching for an 8(a) contractor that could rewrite and redesign complex IRS notices and do so within an aggressive time-frame. As your office is no doubt aware, federal procurement statutes permit federal agencies to award contracts to 8(a) firms without competition—a procedure known as *sole source* awards. TWC met with IRS senior executive **John Dalrymple**⁴ and several other IRS executives to discuss the contract on two separate occasions. Subsequent to those meetings, TWC was advised that they had, in fact, provided convincing evidence they could successfully perform the contract.

Consequently, IRS executive Dalrymple—in full compliance with prevailing federal contracting regulations—authorized IRS Procurement personnel to award TWC this major, multimillion-dollar federal contract known as the **IRS Notice Redesign Contract** (NRC). Although approved, the contract signing, slated for December 31, 1997, was repeatedly delayed due to funding issues. Consequently, in an effort to protect

¹ To provide an overview of the sequence of events in this matter, I have attached an *Event Chronology* that is not all inclusive. Upon request, the contractor will furnish a more comprehensive investigative file.

² The crucial question in this regard is the scope of the conspiratorial agreement; the conspiracy is deemed to continue until its purpose has been achieved or abandoned. See *United States v. Northern Imp. Co.*, 814 F.2d 540 (8th Cir. 1987); *United States v. Coia*, 719 F.2d 1120 (11th Cir. 1983), *cert. denied*, 466 U.S. 973 (1984). Records will confirm, as of fiscal year (FY) **2008**, Kleimann has the same Notice Redesign Contract with IRS (TIRNO-08-Z00002) for \$3,104,931.00. That same contract is listed on the FY 2010 register as well. Both events fall well within both the federal and state Statute of Limitations.

³ Substantial corroborating documentation in this matter is available upon request.

⁴ **Dalrymple** rose to IRS Deputy Commissioner and eventually retired in 2006. At present, he is employed as a consultant with Deloitte Consulting in Washington.

the schedule and formalize the NRC agreement, IRS issued TWC a letter contract Purchase Order (“PO”), in February 1998 for a portion of the NRC scope of work. In March 1998, IRS followed that with a contract modification for remaining work. Even though the NRC was properly awarded to a minority-owned 8(a) firm, substantial evidence will now confirm that in or about April 1998, certain IRS senior managers began a calculated plan (conspiracy) to rescind the NRC from TWC and do so in clear violation of multiple federal civil and criminal statutes.

Cognizant that the IRS has repeatedly failed to offer any other plausible explanation, available facts will suggest that on/about March 23, 1998, when TWC hosted the NRC “Kick-Off” meeting, certain IRS and Treasury senior management staff only then became aware that the lucrative NRC had been awarded to an African-American owned 8(a) contractor. Subsequent to this apparent 8(a) “revelation,” it would appear that the senior staff members including, but not limited to, Treasury executives **Lisa G. Ross** (married name: McGonigle) and **Nancy Killefer** (married name: Cumby) as well as **Annetta Cheek** and **Melodee Mercer**, from then Vice President Gore’s NPR committee, and others identified herein, initiated a well-planned, albeit illegal, effort to wrest the properly awarded NRC away from an established 8(a) firm and award it instead to a newly established non-8(a) firm, **Kleimann Communications Group, LLC** (KCG).⁵ KCG was and is owned and operated by **Susan Kleimann**, a personal friend of at least two senior U.S. government NPR staff.⁶ Since that time, Kleimann has received numerous questionable NRC-related contract awards from IRS for more than a decade.⁷

Subsequent to losing the NRC, and in an effort to comply with established government contracting policies and procedures, TWC filed a formal inquiry, or complaint, with IRS asking for an explanation for the cancellation of its NRC. IRS failed to provide *any* explanation, adequate or otherwise, and instead apparently hoped that TWC would simply “...go gentle into that good night.” Consequently, TWC was forced to file numerous complaints with numerous government entities concerning the unexplained cancellation of the NRC with TWC. Ironically, these many complaints may have been erroneously perceived by other agencies as bitterness on the part of TWC over losing the NRC contract as well as unwillingness to accept the government’s explanation for that loss. However, the reality is that official records will confirm that *all* of TWC’s consequential allegations were systematically being sent back to TIGTA for *investigation*—the very government entity that had been repeatedly named in the TWC complaints and a government entity that had a vested interest in protecting high-ranking

⁵ Central Contractor Registration (CCR) reveals Kleimann Communications Group was established on November 22, 1997—10 days *after* Dalrymple directed IRS Procurement personnel to award TWC the NRC. It was later restructured into Kleimann Communications Group, **Inc.** in Washington, D.C.

⁶ Official biographies will confirm Ross and Killefer both attended MIT MBA graduate school, both were associated with **McKinsey & Co.**, and both were close associates of Cheek and Mercer. Records will also confirm that Kleimann’s business partner, Barbara Kingsley, was presented an award from Cheek’s and Mercer’s government committee for work in 1998—at the same time TWC was performing on the NRC. Kleimann and Kingsley worked together at the **American Institute for Research** from 1993 to 1997.

⁷ An earlier version of KCG’s website indicates KCG began providing NRC services to IRS in 1999—the same year IRS terminated TWC’s contract. USASpending.gov reveals Kleimann has provided NRC-related services for more than a decade.

IRS senior managers, most notably political aspirants **Lisa Ross** and **Nancy Killefer**. Thus, nothing substantive was being done on any of the many TWC's complaints and/or allegations.⁸

Notwithstanding any "explanation" TIGTA might now offer in hindsight, even a cursory review of this matter, by any objective Inspector General (IG) investigator, will confirm an obvious pattern of improper, and quite possibly illegal, government contract manipulation, senior management cover-ups, false statements, malfeasance, and abuse of office by various senior managers of the U.S. Treasury and the Internal Revenue Service. Indeed, to date, *none* of the following consequential issues have ever been properly addressed concerning specific allegations related to the conduct of numerous U.S. government employees involved in this matter.

In/about April 1998, in compliance with the NRC, TWC delivered prototype *Notices*, as well as their accompanying codes, to IRS for review. However, and in blatant violation of federal contracting policies, IRS inexplicably began interfering with TWC's ongoing contract efforts by offering unqualified vendors an opportunity to work on the same project samples TWC had already developed and submitted to IRS for review.

Suffice it to say, TWC management took note of IRS' and Treasury management team's counter-productive and improper alliances with these outside entities as they pertained to the NRC. Consequently, TWC made repeated formal complaints to IRS contracting officers **Beverly Cox** and **Pamela Kitchens** concerning this perceived contract interference and improper involvement on the part of IRS, NPR, and Treasury senior management. As requested, both Cox and Kitchens made various routine inquiries to IRS senior management (as would be their duty as NRC contracting officers) with respect to TWC's complaints and they jointly reiterated TWC's concerns about perceived *interference* with the NRC. Subsequent to voicing their concerns, both Kitchens and Cox were unceremoniously replaced by new, and certainly questionable, contracting officers **Sharon Warren** and **Ethel Carter** in late November 1998. About that same time, it appears that IRS and Treasury executives commissioned a *concealed* contract review to determine if there was any basis upon which to terminate TWC's NRC. They sought to ascertain from IRS legal counsel what actions TWC might take if IRS proceeded with contract termination.⁹ Less than a month later, IRS planned an unnecessary seven-person inspection visit to TWC's St. Louis site. According to IRS' own official records, this very questionable visit, at taxpayer's expense, netted no negative findings.¹⁰

⁸ Notably, IRS terminated the NRC with TWC for "**convenience of the government**," not because of any of the scurrilous "allegations" previously proffered by IRS senior managers.

⁹ Documented results from the contract review reveal there was no evidence TWC breached the contract. Yet evidence existed to confirm that IRS not only breached the contract repeatedly but also sought to discover the ramifications of terminating TWC's contract and awarding it to a new contractor. It appears further that two subsequent contract reviews commissioned by Treasury and IRS netted similar findings.

¹⁰ During the visit, IRS employees retrieved copies of all completed and in-process notices, all notice codes, demanded copies of all electronic files that contained notice data, retrieved TWC's financial records and held contentious discussions with TWC's management and its legal counsel.

On November 12, 1998, TWC submitted a formal complaint to resident Contract Officer (CO) Sharon Warren. Shortly thereafter, with numerous issues remaining unresolved, TWC submitted a formal *Dispute* to Warren on January 28, 1999. Interestingly, less than 14-days after the submission of that formal *Dispute*, **John Gunner**, then Acting Chief of Customer Service, made several unsubstantiated and slanderous allegations to the TIGTA against TWC and IRS employee **Beverly Cox**. In addition to alleged “collusion” in the awarding of the original NRC, Gunner further alleged financial fraud on the part of TWC.

Pursuant to Gunner’s scurrilous and highly suspect allegations, it would appear that on/about February 6, 1999, TIGTA opened an internal investigation targeting IRS employee **Beverly Cox**’s alleged criminal misconduct (contract fraud, abuse of trust, misuse of office, etc.) as well as contract and financial fraud directed at TWC. After closer review, however, it would appear that TIGTA did not immediately assign this obviously significant criminal investigation an Investigative File Number, as would be standard operating procedure (SOP).¹¹ Nonetheless, and notwithstanding the fact there was no formal investigative file designator, TIGTA began “investigating” TWC and **Cox** as early as February 17, 1999, as confirmed when TIGTA special agents Randolph Gregory and Manuel DeCastro “interviewed IRS’s John Gunner, V’Neil DeCosta and Janet Delvison simultaneously regarding Gunner’s allegations.” Based on the timing and ultimate results of this “investigation,” TIGTA’s actions appear to have been nothing more than a well-orchestrated *smokescreen* carefully designed to conceal IRS and Treasury managements’ behind-the-scenes attempts to void TWC’s NRC.¹²

As previously stated, and in light of the glaring facts that appear to have been repeatedly ignored by the many previous government “investigations,” the timing, context and entire government handling of the Gunner allegations is questionable at best—even to a layperson. For example, although Gunner made these consequential allegations in February 1999 (coincidentally, at the precise time IRS management was seeking an excuse to terminate TWC’s NRC), there was apparently no official investigation even documented until April 1999.

Nonetheless, when Gunner made his initial, albeit unsupportable, allegations purporting collusion between TWC and IRS employee Beverly Cox, it would appear the allegations were based, at least in part, on the fact that TWC and Cox were “both from

¹¹ Even though felonious allegations were forwarded to TIGTA and initial “interviews” were being conducted in mid-February 1999, irreparably damaging TWC’s reputation with regard to the NRC, TIGTA and IRS did not open a formal investigation (No. 8-9904-0004-1) on these specific allegations until April 1999—two months after IRS terminated TWC’s NRC for *convenience of the government*.

¹² As an aside, former U.S. Department of Justice and the Office of Professional Responsibility (OPR) criminal investigators (Series 1811) state they have never heard of *any* properly trained and objective government investigator(s) interviewing potential witnesses simultaneously—especially when the purpose of the interview involved the investigation of alleged felonious misconduct of a government employee. In any event, their own report will support that Gunner’s, Delvison’s, and DeCosta’s allegations were based on a conveniently timed, albeit unexplained, interest in the NRC and were later found to be nothing but unsubstantiated rumors, innuendo, and ridiculous conclusions. As was expected, the allegations were eventually deemed to be unfounded.

the St. Louis area.” Adding to the absurdity of these transparent allegations, Gunner’s suspected “collusion” allegation supposedly was further supported by the fact that TWC’s senior management “*displayed intimate knowledge of internal IRS information*” and that TWC was able to prepare a “*36-page letter detailing specifics known only to the IRS.*” Interestingly, IRS never denied any of TWC’s allegations, but rather preferred to question TWC’s source for the information.¹³ By doing so, TIGTA failed to provide a single shred of substantive evidence that would support its contention that the “information” cited by TWC was not, in fact, available through myriad government sources— including, but not limited to, certain IRS employees who elected not to be complicit in obvious misconduct being perpetrated by IRS senior management. Most notably, TIGTA failed to properly recognize that these memoranda and allegations from TWC were authored well after IRS terminated the NRC; therefore, the *origin* of the information could not have been a factor in IRS’s decision to terminate TWC’s contract.

Notwithstanding TWC’s several formal requests from February through April 1999, the IRS repeatedly failed to provide any plausible justification for the cancellation of the NRC. Instead, in April 2000, IRS/TIGTA opened a formal investigation of John Gunner’s allegations (contract and financial fraud), which IRS/TIGTA informally investigated in early February 1999. This case was eventually forwarded to the U.S Attorney for grand jury action, even though an earlier audit conducted by the Defense Contract Audit Agency (DCAA) confirmed TWC had, in fact, “Invoiced” at IRS approved rates and in accordance with hours worked. After TWC’s initial allegations fell on deaf ears, TWC filed a more detailed set of allegations on February 12, 2001. As previously stated, instead of investigating these very specific and supportable allegations, TIGTA elected to open yet another apparent smoke-screen internal investigation (Case No. 54-0105-0005-1) that alleged TWC was suspected of financial fraud. Although the investigative file would suggest that Special Agent (SA) Douglas S. Luzier investigated this new case from May 11, 2001, to September 21, 2001, not once did SA Luzier actually investigate TWC’s allegations. Instead, it would appear that SA Luzier tried desperately to make a criminal case against TWC. Despite TIGTA’s considerable efforts in this regard, their efforts failed again.¹⁴ While both these alleged “investigations” were tainted and without merit, their mere existence had an obviously detrimental effect on other government investigative agencies that were expected to view TWC’s allegations objectively.¹⁵

Inasmuch as all of these investigative efforts were unfounded, it could easily be suggested by the available documentation that, as a collateral benefit to the IRS, these contrived investigations succeeded in allowing IRS management to protect certain high-ranking IRS, Treasury and NPR employees while at the same time concealing their personal involvement in the NRC cancellation and the awarding of that lucrative contract

¹³ Ironically, it appears no one ever bothered to question Gunner or his associates as to their source or any ulterior motives they might have had for the original fallacious allegations against TWC in February 2009.

¹⁴ Upon receipt of the subject investigation, it is apparent that either the entire investigation consisted totally of one page of text or the entire “case” was redacted by TIGTA.

¹⁵ Note that all of these questionable investigations of TWC were *Closed as Unfounded or Without Merit*

to Susan Kleimann and her newly formed Kleimann Communications Group, LLC.¹⁶ Furthermore, it should become obvious to any objective fact-finder that as long as TWC continued to make *waves* for IRS and a few of its well-connected political figures, TIGTA's strategy was to continue opening frivolous and unfounded investigations in an effort to conceal its egregious misconduct while demeaning TWC management and its credibility with any other government agency.

Unable to resolve matters related to NRC, TWC finally turned to the courts to exercise their rights afforded federal contractors by the Contract Disputes Act (CDA). The CDA allows government contractors to bring claims and disputes before either the U.S. Court of Federal Claims¹⁷ or an appropriate administrative tribunal. TWC timely filed three *Pro Se* actions related to the NRC. It would appear that in all cases, questionable legal rulings denied TWC the right of due process mandated by CDA.¹⁸

One should find it telling that TIGTA, its attorneys and support staff have spent hundreds, if not thousands, of man-hours at taxpayers' expense attacking minutia concerning TWC, formulating possible responses to TWC's repeated and legitimate inquiries, citing and then criticizing minor legal errors committed by a *Pro Se* litigant, and discussing possible actions that would successfully circumvent judicial decisions in this matter. Not once, however, has TIGTA ever answered the two initial questions posed more than 12 years ago. Instead, TIGTA's own inter-office memoranda and formal documents demonstrate a consistent and calculated non-response attitude that includes diverting attention away from TWC's specific, well-documented, and supportable allegations with a continuing and conspicuous pattern of slander and false allegations.

Nonetheless, and contrary to IRS's best efforts to again divert attention from its malfeasance, two questions have remained unresolved for more than a decade:

- 1. Under what specific circumstances did TWC lose the multimillion-dollar NRC for *convenience of the government*?**
- 2. What were the specific circumstances surrounding the NRC being awarded to Susan Kleimann and her newly formed company?**

Official records will confirm that TIGTA has never provided a supportable explanation to anyone, including when responding to several congressional inquiries, as

¹⁶ In the course of 12 years of smoke & mirrors, the IRS has yet to explain the personal and professional association of Ross, Killefer, Cheek, and Mercer with Susan Kleimann and/or Barbara Kingsley.

¹⁷ As the court stated in *RCS Enterprises, Inc. v. U.S.*, "After a lengthy analysis of the legislative intent of CDA, the Federal Circuit held that 'any attempt to deprive [a court] of power to hear a contract dispute that otherwise falls under the CDA conflicts with the normal *de novo* review mandated by the CDA and subverts the purpose of CDA.

¹⁸ Notwithstanding *Haines v. Kerner*, 404 U.S. 520 (1971), as well as subsequent cases, wherein the courts have found that *pro se* pleadings should be held to "less stringent standards" than those of a properly trained attorney, government attorneys in this matter elected to capitalize on that inexperience while publically ridiculing TWC's legal efforts.

to why IRS decided to cancel TWC's NRC. Instead, IRS has vaguely suggested that TWC lost the contract because of allegations of misconduct (collusion and contract fraud) proffered by John Gunner. Interestingly, however; IRS has never reconciled how that could be the case when IRS senior management efforts were well underway to void the NRC almost ten months before Gunner's allegations were even brought to light. In point-of-fact, Gunner's allegations didn't even surface until TWC began questioning IRS's apparent misconduct and then, only mere days prior to the cancellation of the NRC.

A final issue that appears to have gone totally unnoticed (or deliberately covered up) was that **Kleimann Communications Group, LLC**, was originally formed by Susan Kleimann in the State of Maryland on November 22, 1997—coincidentally, mere days after IRS senior executive **John Dalrymple** directed IRS Procurement to award TWC the NRC. Kleimann, who was a novice business owner at best, came over from the **American Institute for Research** as did her partner **Barbara Kingsley**. Unlike the established firm of TWC, Kleimann and Kingsley were awarded the NRC when readily available facts (then and now) will support that KCG was nothing more than a leased “mail drop” with a phone answering service.¹⁹ In fact, in November 1997, KCG had no established client base, had never been awarded a government contract, had no employee work force and had no verifiable financial standing. In fact, KCG had no corporate history at all other than a “history” with **Annetta Check/Melodee Mercer** and their close association with **Lisa Ross** and **Nancy Killefer**. Consequently, through the last decade of contentious litigation and several purportedly “thorough investigations,” nobody from TIGTA has ever reconciled how a brand new company with no government contract performance track record, no client base, no office, and no employed staff could have emerged with such a lucrative contract following the abrupt termination “for convenience” of TWC's contract and the unexplained cancellation of the new NRC Reprocurement in February 2000 following bid opening.²⁰

Finally, as a current follow-up to the status of **Kleimann Communications Group**, it would appear that KCG still holds the original NRC (with certain modifications over the years), but continues to have no office (simply a “mail drop”), and continues to run its business from a single cellular telephone based in a Washington, D.C. suburb.²¹ Moreover, KCG's employee base would appear to remain nothing more than an assortment of various well-credentialed semi-professionals who do occasional sub-contract work for KCG and allow their names to be used on the KCG website for “credibility” purposes. Furthermore, although KCG claims to have offices in various cities, it appears that the cities named on KCG's website are locations where KCG's contractors reside. There is no evidence KCG has “real” offices there or anywhere else for that matter.

¹⁹ An earlier version of KCG's website indicates, KCG secured NRC work in 1999—the year IRS terminated TWC's NRC.

²⁰ A document from the General Accounting Office (GAO) dated February 10, 2000 (File Number: B-284622), responding to a bid protest from TWC related to the NRC re-procurement, indicates TWC and one large business responded to the NRC re-procurement RFQ. IRS abruptly cancelled the requirement after bid opening.

²¹ Even though the KCG website boasts a host of employees and multiple offices nationwide, it would appear that KCG has no formal office anywhere— other than a place to receive mail.

Based on the facts and circumstances set forth herein, one comes to the unavoidable conclusion that various senior management personnel at IRS and Treasury knowingly breached a legally awarded services contract with a well-established and recognized minority firm and then gave that extremely lucrative contract to a newly-formed, well-connected non-minority firm that had no physical office location, no employee base, no financial base, and no prior federal/state contract credibility (not a single prior federal or state contract as a reference). The obvious questions emerge: How is it that only TWC questioned these events and why has the government turned a blind-eye?²²

In conclusion, this firm's thorough and *objective* review of hundreds of pages of government material and collateral official documents supports TWC's claim of the improprieties alleged herein. But what is more telling is what these documents fail to show. Simply, there is no indication that political aspirants **Lisa Ross** and **Nancy Killefer** were ever even interviewed regarding this matter. Moreover, **Anetta Cheek's** and **Melodee Mercer's** personal association with Ross and Killefer was never explored nor was their improper association with **Susan Kleimann of Kleimann Communications Group**. Also, there is no indication there were any attempts to discover how Kleinmann's firm was awarded the new NRC.²³ These glaring failures on the part of any objective investigative team, in and of themselves, convey the appearance of impropriety and malfeasance and, in turn, justify your office's investigation into this protracted matter.

Succinctly, to any objective observer there exists, at the minimum, a *prima facie* case that there was improper IRS senior management involvement in the cancellation of the NRC, the awarding of same to Kleimann and quite possibly criminal misconduct emanating from the cover-up. Indeed, available documentation and witness statements would strongly suggest that the IRS improperly interfered with the awarding of a federal contract, knowingly made false claims against TWC, improperly used government resources to investigate those false claims, improperly divulged sensitive Grand Jury information concerning the alleged financial fraud claims against TWC and then coerced and enlisted various government employees to aid and abet this egregious misconduct.

Therefore, we would respectfully request that you now assign objective investigators from your office to look into the information and facts set forth herein. Simply, we would ask that you satisfactorily (finally) answer the original two (2) questions posed herein and identify any criminal misconduct, if any.

In an effort to avoid any delays or confusion with Privacy and/or FOIA concerns, please direct all responses and results to:

²² For years, TWC and various congressional representatives sought to determine what became of the NRC via congressional inquiries and Freedom of Information Act (FOIA) requests. In 2009, in a "twist of events," TWC finally discovered KCG had been performing NRC work for almost a decade.

²³ Mercer, Cheek, and Kleimann are still associates to this day in the Washington metropolitan area.

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Thank you for your time and we remain-

Respectfully,

COPY

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cc: **Jerroll Maneice Sanders** ✓
for *The Writing Company*

Raymond Mansolillo, Esq.
In-House Counsel

NHO/cj (TWC 11-113)