

Jay Alan Sekulow, J.D., Ph.D. Chief Counsel June 17, 2014

VIA U.S. CERTIFIED MAIL & EMAIL

Grover Hartt, III U.S. Department of Justice, Tax Division

Joseph A. Sergi U.S. Department of Justice, Tax Division

Re: Linchpins of Liberty, et al. v United States, et al. - No. 13-cv-777 (D.D.C.) -Preservation of Communications with Lois Lerner

Dear Counsel,

In light of the recent revelation that the IRS has apparently "lost" information, including extra-agency email communications, that was stored on the computer of Lois Lerner, we are writing on behalf of plaintiffs in the above-referenced lawsuit to request preservation of any and all communications between any official of the FEC, FBI, DOJ, or the White House and (1) Ms. Lerner or (2) any other IRS official in the Exempt Organizations office between January 1, 2009 and the present. With regard to emails, such preservation extends to communications sent and received through official government email accounts and any other email accounts over which officials of these agencies maintain custody or control.

If you do not claim to represent the above-identified agencies for purposes of the pending litigation, please inform the undersigned immediately so that we may issue letters directly to the agencies.

We appreciate your prompt attention to this urgent matter.

Very truly yours,

Jay Alan Sekulow

Chief Counsel