

## Exhibit H

---

**From:** Woods, Rae [mailto:Rae.Woods@usdoj.gov]

**Sent:** Friday, October 29, 2010 10:08 AM

**To:** Shannon Holliday; Joe Espy; Bobby Segall; fgray@glsmgn.com; David Martin; Sam Heldman; Walter McGowan; Ben Espy; Bill Espy; Jones, G. Douglas; ajoseph@maynardcooper.com; brettbloomston@hotmail.com; wnc@rmclaw.com; ronwwise@aol.com; Gillis, H. Lewis; parkman@parkmanlawfirm.com; rbeardsley@sirote.com; tgoggans@tgoggans.com; Dsimlaw@aol.com; lameadows@tmgsllaw.com; lajackson@tmgsllaw.com; sgjamesandassoc@aol.com; sheldman@gmail.com

**Cc:** Ainsworth, Peter; Morris, Brenda; Franklin, Louis V. (USAALM); Feaga, Steve P. (USAALM); Cohen, Barak; Olshan, Eric; Shaw, Debbie L. (USAALM)

**Subject:** RE: Items mentioned in 302s which have not been provided

Shannon:

We will get you an answer to your question.

Going forward, please copy all the government attorneys on e-mail correspondence. That list should include the attorneys, Peter Ainsworth, Brenda Morris, Louis Franklin, Steve Feaga, Barak Cohen, Eric Olshan, and me, as well as our support staff Debbie Shaw and Jean Spells.

Thank you.

Rae Woods  
Trial Attorney  
Public Integrity Section  
United States Department of Justice

---

**From:** Shannon Holliday [mailto:Holliday@copelandfranco.com]

**Sent:** Thursday, October 28, 2010 6:46 PM

**To:** Woods, Rae; Joe Espy; Bobby Segall; fgray@glsmgn.com; David Martin; Sam Heldman; Walter McGowan; Ben Espy; Bill Espy; Jones, G. Douglas; ajoseph@maynardcooper.com; brettbloomston@hotmail.com; wnc@rmclaw.com; ronwwise@aol.com; Gillis, H. Lewis; parkman@parkmanlawfirm.com; rbeardsley@sirote.com; tgoggans@tgoggans.com; Dsimlaw@aol.com; lameadows@tmgsllaw.com; lajackson@tmgsllaw.com; sgjamesandassoc@aol.com; sheldman@gmail.com

**Cc:** Shaw, Debbie L. (USAALM)

**Subject:** RE: Items mentioned in 302s which have not been provided

Rae,

We spoke after the hearing about Section 1A of the FBI investigation file. You asked me to provide you an example of a 302 which mentioned that. I am attaching an example here which references video and audio recordings, which clearly have not been provided.

In addition, both of the 302s attached reference an "attachment" to the 302. Those attachments were not provided in discovery. At least they were not attached to the 302s nor have we located them elsewhere. (Obviously we have not had time to go through each file page by page but the government's designation of the documents produced does not include any reference to 302 attachments or Section 1A.)

Apparently, there are many more of these references to documents or videos etc. in section 1A and to attachments which were not produced. Please let me know what the government will do to provide these documents, videos, audio recordings and the like.

Shannon Holliday

---

**From:** Woods, Rae [mailto:Rae.Woods@usdoj.gov]

**Sent:** Wednesday, October 27, 2010 6:27 PM

**To:** Joe Espy; Bobby Segall; Shannon Holliday; fgray@glsmgn.com; David Martin; Sam Heldman; Walter McGowan; Ben Espy; Bill Espy; Jones, G. Douglas; ajoseph@maynardcooper.com; brettbloomston@hotmail.com; wnc@rmclaw.com; ronwwise@aol.com; Gillis, H. Lewis; parkman@parkmanlawfirm.com; rbeardsley@sirate.com; tgoggans@tgoggans.com; Dsimlaw@aol.com; lameadows@tmngslaw.com; lajackson@tmngslaw.com; sgjamesandassoc@aol.com

**Cc:** Shaw, Debbie L. (USAALM)

**Subject:** RE: additional disclosures

Dear Counsel:

Some of you did not receive the below email because it contained too many attachments. In this email, I am including the attachments referenced in paragraphs 3-4. The attachments referenced in paragraphs 1-2 were sent in a previous email.

Please let me know if you have not received the referenced material.

Sincerely,

Rae Woods

Trial Attorney

Public Integrity Section

Criminal Division

United States Department of Justice

---

**From:** Woods, Rae

**Sent:** Wednesday, October 27, 2010 7:19 PM

**To:** 'Joe Espy'; 'Bobby Segall'; 'Shannon Holliday'; 'fgray@glsmgn.com'; 'David Martin'; 'Sam Heldman'; 'Walter McGowan'; 'Ben Espy'; 'Bill Espy'; 'Jones, G. Douglas'; 'ajoseph@maynardcooper.com'; 'brettbloomston@hotmail.com'; 'wnc@rmclaw.com'; 'ronwwise@aol.com'; 'Gillis, H. Lewis'; 'parkman@parkmanlawfirm.com'; 'rbeardsley@sirate.com'; 'tgoggans@tgoggans.com'; 'Dsimlaw@aol.com'; 'lameadows@tmngslaw.com'; 'lajackson@tmngslaw.com'; 'sgjamesandassoc@aol.com'

**Cc:** Ainsworth, Peter; Morris, Brenda; Franklin, Louis V. (USAALM); Feaga, Steve P. (USAALM); Cohen, Barak; Olshan, Eric; Shaw, Debbie L. (USAALM); Spells, Jean; May, Joe

**Subject:** additional disclosures

Dear Counsel:

1. Please find attached a 2-page Discovery Index of Financial Documents produced on October 15, 2010, and October 22, 2010 for the Bates range US-FIN-1 to US-FIN-80681.
2. Please find attached a 84-page grand jury transcript of Cheryl Farrow's September 24, 2010 testimony.

3. Please find attached grand jury exhibits 1-24. Please note that grand jury exhibit 19 is a separate PDF file.
4. Please find attached a proffer agreement between the United States and Gerald W. Taylor.
5. In response to Ron's question regarding the blank lines that appear at the bottom of page 3 and the top of page 4 of the Index for the October 22, 2010 Non-Financial Disclosures, we have confirmed that the lines were left blank intentionally. No data is missing from the chart.
6. As requested, we are providing the names of the ABI agents who have worked or are working on this case. Those agents' names are Anthony Green, Joseph Herman, Charles Huggins, and Brooke Walker.
7. We will disclose the pen register on a disk tomorrow.
8. As we agreed this morning, if you experience technical difficulty in accessing the discovery, please work with Shannon Holliday to bring those concerns to the attention of Joe May, an information technology specialist located in Washington, DC, who can be reached at [joe.may@crm.usdoj.gov](mailto:joe.may@crm.usdoj.gov) or (202) 616-7996, and Trial Attorney Barak Cohen, who can be reached at [barak.cohen@usdoj.gov](mailto:barak.cohen@usdoj.gov). We want you to have good working copies of all discovery as soon as possible and appreciate your willingness to work with us to this end.
9. As we discussed, we will continue to review our disclosures to ensure that all discoverable material has been produced. The United States is aware of and will continue to comply with its ongoing discovery obligations.

Please feel free to contact any attorney of record for the government if you have questions.

Sincerely,

Rae Woods  
Trial Attorney  
Public Integrity Section  
Criminal Division  
United States Department of Justice