

# **EXHIBIT A**



**U.S. Department of Justice**

Criminal Division

---

Washington, D.C. 20530

October 1, 2008

BY ELECTRONIC MAIL

Robert M. Cary, Esq.  
Williams & Connolly LLP  
725 Twelfth Street, N.W.  
Washington, D.C. 20005

Re: United States Senator Theodore F. Stevens

Dear Mr. Cary:

As we are all aware, the government is under a continuing duty to provide the defendant with information in the government's possession, custody, or control that is "favorable" to the defense. This obligation includes, among other things, the production of information that could reasonably be used to impeach a government witness.

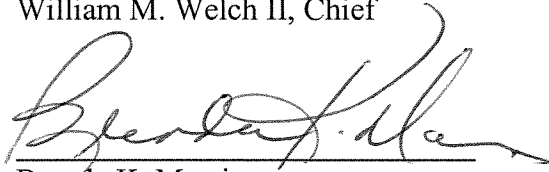
In connection with the ongoing trial testimony of Bill J. Allen, this evening we undertook a re-review of, among other information, all memoranda of interviews between federal law enforcement agents and Mr. Allen. During the course of that re-review, we have located two memoranda that, out of an abundance of caution, we are providing to you in redacted form. The unredacted portions of these memoranda could arguably constitute cumulative Brady material that was provided in summary fashion in our August 25 and September 9 letters but was not provided to you in redacted format and could arguably constitute Giglio material concerning certain parts of Mr. Allen's trial testimony.

The redacted memoranda have been attached hereto. In an additional abundance of caution, we are sending the Court, by separate cover, both the redacted and unredacted memoranda for in camera review.

We have also reviewed, again, all of the interviews of Mr. Allen to insure that no other reports pertain to this issue.

Very truly yours,

William M. Welch II, Chief

A handwritten signature in black ink, appearing to read "Brenda K. Morris". The signature is fluid and cursive, written over a horizontal line.

Brenda K. Morris  
Principal Deputy Chief

Nicholas A. Marsh  
Edward P. Sullivan  
Trial Attorneys

Joseph W. Bottini  
James A. Goeke  
Assistant United States Attorneys

cc: The Honorable Emmet G. Sullivan

- 1 -

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 03/01/2007

A source who is in a position to testify provided the following information regarding the addition and remodeling of the residence of Unites States Senator TED STEVENS:



Investigation on 2/28/2007 at Anchorage, AK  
File # [REDACTED] Date dictated Typed 3/1/07  
by SA Mary Beth Kepner *MBK*  
SA Michelle R. Pluta *MP*

FD-302a (Rev. 10-6-95)

[REDACTED]

Continuation of FD-302 of Source, On 2/28/2007, Page 2

[REDACTED] The source did not invoice STEVENS for the work that HESS performed; however, the source believes that STEVENS would have paid an invoice if he had received one.

[REDACTED]

[REDACTED]

[REDACTED] CHAN recommended AUGIE PAONE from Christensen Builders for the job and STEVENS agreed.

[REDACTED]

[REDACTED]

FD-302a (Rev. 10-6-95)



Continuation of FD-302 of Source, On 2/28/2007, Page 3



In relation to the work on the Girdwood residence, STEVENS told the source that he needed to pay some of the source's invoices. This conversation occurred within a month or two of the completion of the Girdwood renovation project. STEVENS said he wanted to pay the source and requested the source provide him with an invoice. The source never complied with STEVENS' request and STEVENS never again asked for an invoice for the renovations.

5)

[REDACTED]

Continuation of FD-302 of Source, On 2/28/2007, Page 4

[REDACTED]

[REDACTED] The source received an email from STEVENS that said that STEVENS' thought he should pay for the plumbers not the source. STEVENS and the source later discussed this matter in person while vacationing in Wickenburg, Arizona. STEVENS said "ethics" was on his ass and the source needed to get him an invoice. STEVENS said that he didn't want the source to go through what JON RUBINI went through with their investment. The source did not provide STEVENS with the requested invoice.

Internal Revenue Service  
Criminal Investigation



Memorandum of Interview

In Re: BILL ALLEN

Location: [REDACTED]

Investigation #: [REDACTED]

Date: December 11-12, 2006

Time: Dec. 11<sup>th</sup> 9:05am to 11:50am and  
1:05pm to 3:55 pm  
Dec. 12<sup>th</sup> 10:45am to 12:00 pm and  
1:35 pm to 3:25 pm

Participant(s): BILL ALLEN, Witness  
Robert Bundy, Defense Attorney  
Dennis Roberts, Special Agent-IRS  
Larry Bateman, Special Agent-IRS  
Mary Beth Kepner, Special Agent-FBI

IRS Special Agents Dennis Roberts and Larry Bateman and FBI Special Agent Mary Beth Kepner met with BILL ALLEN and Robert Bundy on the dates and times noted above.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



[REDACTED]

[REDACTED]

[REDACTED] BILL ALLEN thought ROGER CHAN recommended Augie Paone as a carpenter. Augie Paone owned Christianson Builders. Eventually Christianson Builders was hired and paid by Ted and Catherine Stevens to perform finish work on their Girdwood cabin.

[REDACTED]

[REDACTED] If Rocky Williams or Dave Anderson had invoiced Ted and Catherine Stevens for VECO'S work, BILL ALLEN believes they would have paid the bill. BILL ALLEN did not request any VECO employee invoice Ted or Catherine Stevens for work performed on the cabin. If there were invoices, they would have gone to Bob Persons then to Catherine Stevens for payment.

[REDACTED]

[REDACTED]

*Dennis Roberts* <sup>E</sup>  
Dennis Roberts  
Special Agent

*Larry Bateman* <sup>E</sup>  
Larry Bateman  
Special Agent

I prepared this memorandum on December 13, 2006, after refreshing my memory from notes made during and immediately after the interview with BILL ALLEN.

*Dennis Roberts* <sup>E</sup>  
Dennis Roberts  
Special Agent