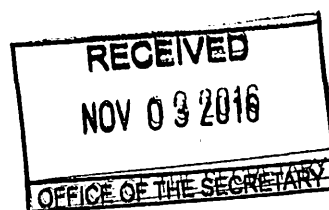


ADMINISTRATIVE PROCEEDING
FILE NO. 3-16462



UNITED STATES OF AMERICA
Before the
SECURITIES AND EXCHANGE COMMISSION

In the Matter of

**LYNN TILTON;
PATRIARCH PARTNERS, LLC;
PATRIARCH PARTNERS VIII, LLC;
PATRIARCH PARTNERS XIV, LLC;
AND
PATRIARCH PARTNERS XV, LLC,**

Respondents.

DECLARATION OF BRENT S. MITCHELL

I, Brent S. Mitchell, declare, in accordance with 28 U.S.C. 1746, as follows:

1. I am an attorney in the Complex Financial Instruments Unit in the Division of Enforcement (“Division”) at the Securities and Exchange Commission.
2. This declaration is submitted in response to the administrative law judge’s order directing the Office of Litigation and Administrative Practice (OLAP) to file a declaration and amended privilege log. *In the Matter of Tilton*, Admin. Proc. Rulings Release No. 4314 (Oct. 31, 2016).
4. The Commission instituted the above-captioned proceeding by an Order Instituting Proceedings (OIP) on March 30, 2015. The OIP alleges that Respondents violated antifraud provisions of the Investment Advisers Act of 1940 in their operation of three collateral loan obligation funds (known as the Zohar Funds) by reporting misleading values for the assets held by the funds and failing to disclose a conflict of interest arising from Lynn Tilton’s undisclosed approach to categorization of these assets.
5. Along with certain other Division staff members, I was designated by the Commission as an officer of the Commission for the purpose of conducting the investigation of Respondents’ conduct. My statements herein are based on my personal knowledge of the investigation, my review of the relevant documents in this matter, as well as information provided to me by other staff members assigned to this case.

6. On September 1, 2016, the administrative law judge issued two subpoenas requested by Respondents. *In the Matter of Tilton*, Admin. Proc. Rulings Release No. 4116 (Sept. 9, 2016). The first subpoena (the "First Request") related to the Commission's Rules of Practice and the second (the "Second Request") related to communications or meetings between Commission personnel and certain third parties. *Id.* On September 6, 2016, Respondents served the subpoenas on the Commission. On October 17, 2016, Respondents filed a Motion to Compel the Office of Litigation and Administrative Practice to Produce Documents Responsive to Respondents' Subpoenas. On October 18, 2016, the administrative law judge issued an order directing OLAP to submit for *in camera* review no later than noon on October 21, 2016, the documents listed on the privilege log and an explanation as to how the privileges asserted apply to each withheld document. *In the Matter of Tilton*, Admin. Proc. Rulings Release No. 4274 (Oct. 18, 2016). On October 21, 2016, OLAP submitted for *in camera* review the withheld documents and a verified explanation of the privileges asserted. On October 31, 2016, the administrative law judge issued an order directing OLAP to file and serve on Respondents by November 3, 2016, an amended privilege log and a declaration supporting those governmental privileges with an explanation delineating the declarant's authority to invoke them. *In the Matter of Tilton*, Admin. Proc. Rulings Release No. 4314 (Oct. 31, 2016).

7. In response to the direction from the administrative law judge, OLAP has prepared an amended privilege log listing those documents that are responsive to those Requests upon which a claim of privilege is asserted. I have reviewed each of those documents.

8. The law enforcement privilege is asserted for Documents 2 through 11 and 13 through 113 as identified on the amended privilege log attached hereto as Exhibit 1. These documents fall into three major categories. First, documents 2-11 consist of communications between Division staff and staff at the Policy and Statutory Enforcement Unit ("PSEU") of the Department of Justice ("DOJ") related to granting immunity to an individual who was being interviewed during the investigation. Second, documents 41-47, 67-74, 83-89, and 90-113 consist of communications between Division staff and various Assistant United States Attorneys regarding those AUSAs' requests for information from Commission investigative files to assist in their investigations. Third, documents 13-40, 48-66, and 75-82 consist of communications between Division staff and DOD attorneys and investigators regarding their requests for information from Commission investigative files to assist the DOD in its investigations.

9. Regarding documents 2-11, which consist of communications regarding immunity for an individual who was being interviewed during the investigation, I have reviewed the Commission's and the Respondents' witness lists, and this witness appears on neither list.

10. The law enforcement privilege is being asserted as to the documents in Paragraph 8 because the public disclosure of the documents could harm the Commission's, the DOJ's, and the DOD's on-going law enforcement interests by revealing what the Commission, DOJ, or DOD staff knows, what evidence they consider to be important, and their theories and strategies

in the ongoing investigations and any enforcement action that might arise from those investigations. Public disclosure of these documents creates a danger that they could be revealed to potential witnesses and/or persons who, it may turn out, have liability for conduct which is a subject of the ongoing investigations. Such disclosure would present an opportunity for those persons or entities to intimidate witnesses, destroy or fabricate evidence, and/or tailor their own testimony to conform to other evidence. The law enforcement privilege is also being asserted insofar as the substance and content of the documents gathered or created may show or contain law enforcement investigatory techniques, procedures and guidelines, public disclosure of which could impair the Commission's, the DOJ's, or the DOD's ongoing investigations (and potential future litigation in these matters) by revealing confidential law enforcement techniques and procedures. Such disclosure could reasonably be expected to create a risk of future circumvention of the law.

11. The deliberative process privilege is asserted for Documents 2-11, 14-21, 23, 28-29, 43-46, and 71-74 as identified on the amended privilege log attached hereto as Exhibit 1. These documents fall into three major categories. First, documents 2-11 consist of communications between the Division staff and staff at the PSEU related to granting immunity to an individual who was being interviewed during the investigation. Second, documents 43-46 and 71-74 consist of communications between Division staff and various Assistant United States Attorney regarding those AUSAs' requests for information from the Commission investigative files to assist in their investigations. Third, documents 14-21, 23, and 28-29 consist of communications between Division staff and DOD attorneys and investigators regarding their requests for information from Commission investigative files to assist the DOD in its investigations.

12. The deliberative process privilege is being asserted as to the documents in Paragraph 11 because the documents contain inter-governmental communications, including advice, evaluations, opinions and recommendations of the staff of the Commission, of the staff of the DOJ, and of the staff of the DOD, which predate determinations of the Commission and its staff, the DOJ and its staff, or the DOD and its staff regarding investigative and enforcement matters. The production of these deliberative process materials would have an inhibiting effect upon the fullness and frankness of written expression among the Commission and its staff members and between the Commission staff, on the one hand, and DOJ or DOD staff on the other hand, and, thus, would have a detrimental effect on the Commission's, the DOJ's, and the DOD's decision-making processes. Compelling production of documents related to witness immunity and any grant of access to information to other federal investigative and prosecutorial agencies during their own investigations would pose a significant threat of chilling the candor and interrupting the free exchange of ideas among staff Commission members and between Commission staff and other federal agencies. This candor and free exchange of ideas form the basis for these processes, and disclosure of these materials would seriously degrade the Division's and the Commission's ability to perform their mission. I believe that Division staff would be far less willing to participate in these types of requests and inter-agency cooperation, and would be far

less likely to be open and forthcoming during the course of their analysis and discussion, if such open and frank participation may subject them to the risk of those communications being disclosed, their being subpoenaed to offer testimony about the input they have previously offered, and their being forced to explain and justify statements they made in these confidential inter-agency communications. The result would be less thoughtful and open discussion between and among Division staff, between these staff and other offices and divisions throughout the Commission, and between Commission staff and the DOJ, DOD, and other federal agencies.

13. The work product doctrine is asserted for Documents 1 through 113 as identified on the amended privilege log attached hereto as Exhibit 1.

14. The work product doctrine is being asserted as to the documents in Paragraph 13 because the documents listed on the amended privilege log were prepared by the Division legal staff, the DOJ legal staff, and the DOD legal and investigative staff as part of then-ongoing investigations and in anticipation of bringing enforcement actions, civil proceedings, criminal proceedings, or other litigation. The documents are deliberative in nature and reflect the mental processes of the Commission legal staff, the DOJ legal staff, and the DOD legal and investigative staff relative to this administrative proceeding and other anticipated civil and criminal matters, and should be protected from discovery by Respondents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 2nd day of November 2016 at Washington, DC.

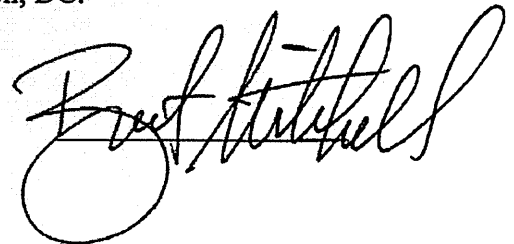
A handwritten signature in black ink, appearing to read "Brent Stetzel". The signature is written in a cursive style with a large, prominent loop at the bottom left.

Exhibit 1

**November 3, 2016 Amended Privilege Log
In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
1	02/24/2012 14:08 EST	Investigative Information	Conference call regarding Contract Award	Email without Attachment	YoungJae Chung, SEC	Willis Epps, contracting officer, U.S. Army	Brent Mitchell, SEC		Document 1 is a request by an SEC employee, under the direction of a senior counsel responsible for the investigation of Respondents, seeking information from a DOD contracting officer regarding a company being held in the Respondents' portfolio.	Work Product Doctrine
2	04/16/2012 16:35 EDT	Immunity Request	[Name Withheld] Witness Immunity Request	Email with Attachment	Stephen E. Jones, SEC	Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	N. Creola Kelly and Brent Mitchell, SEC		Documents 2-11 are Emails and attachments requesting and discussing witness immunity for an individual who was being interviewed during the Division's investigation, which were prepared during the investigation by the Division legal staff for, and approved by the Policy and Statutory Enforcement Unit ("PSEU") of, the Department of Justice ("DOJ"). The individual does not appear on Respondents' or the Commission's witness lists. Documents 2-3 are the SEC's email and attachment sent to the DOJ requesting immunity.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
3	04/16/2012 16:35 EDT	Immunity Request	[Name Withheld] Witness Immunity Request	Attachment					See above re: Document 2.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
4	04/27/2012 11:16 EDT	Immunity Request	Questions about your Immunity Request	Email without Attachment	Robert De La Cruz, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	N. Creola Kelly and Brent Mitchell, SEC			See above re: Document 2. Documents 4-9 are emails between SEC attorneys and a DOJ attorney regarding questions from PSEU for information to assist the DOJ's making a decision whether to grant immunity, including inquiries about potentially related investigations by a U.S. Attorney's Office.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
5	04/27/2012 11:49 EDT	Immunity Request	Questions about your Immunity Request	Email without Attachment	Robert De La Cruz, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	Brent Mitchell, SEC			See above re: Documents 2 and 4.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
6	04/27/2012 11:49 EDT	Immunity Request	Questions about your Immunity Request	Email without Attachment	Brent Mitchell, SEC	Robert De La Cruz, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	Stephen Jones and N. Creola Kelly, SEC		See above re: Documents 2 and 4.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
7	04/27/2012 13:15 EDT	Immunity Request	Questions about your Immunity Request	Email without Attachment	Brent Mitchell, SEC	Robert De La Cruz, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	N. Creola Kelly, SEC		See above re: Documents 2 and 4.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
8	04/27/2012 13:16 EDT	Immunity Request	Questions about your Immunity Request	Email without Attachment	Robert De La Cruz, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	Brent Mitchell, SEC			See above re: Documents 2 and 4.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege

**November 3, 2016 Amended Privilege Log
In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
9	04/27/2012 13:19 EDT	Immunity Request	Questions about your Immunity Request	Email without Attachment	Brent Mitchell, SEC	Robert De La Cruz, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	N. Creola Kelly, SEC		See above re: Documents 2 and 4.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
10	04/30/2012 09:33 EDT	Immunity Request	Immunity Authorization Attached	Email with Attachment	Robert De La Cruz, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice	Brent Mitchell, SEC	Tina Barber, Angela Coit, Sheila Franklin, and Debora Morris, Policy and Statutory Enforcement Unit, Office of Enforcement Operations, Dep't of Justice		See above re: Document 2. Documents 10-11 are an email and attachment between the DOJ lawyer and the SEC lawyer, copying PSEU staff, approving the request for witness immunity.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
11	04/30/2012 09:33 EDT	Immunity Request		Attachment					See above re: Documents 2 and 10.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
12	07/16/2012 13:03 EDT	Investigative Information	Borrowing a conference room in Arizona	Email without Attachment	Norma Fontana, AUSA, U.S. Attorney's Office, District of Arizona	Brent Mitchell, SEC	Amanda DeRoo and N. Creola Kelly, SEC		Document 12 is an email between SEC lawyers and a lawyer at a U.S. Attorney's Office to facilitate the ongoing Commission investigation into Respondents, related in particular to issues raised about a company in Respondents' portfolio.	Work Product Doctrine

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In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
13	04/04/2013 18:11 EDT	Investigative Information Request	contact info	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			Documents 13-40 and 48-66 are emails and attachments between SEC lawyers and Special Agent Lance Stamper, an investigator with the Defense Investigative Service, part of the DOD's Office of Inspector General. The DOD investigator sought access to confidential Commission investigative files in connection with a DOD investigation into a company that was in Respondents' portfolio.	Work Product Doctrine; Law Enforcement Privilege
14	04/04/2013 18:30 EDT	Investigative Information Request	contact info	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Allison Lee, SEC		See above re: Document 13. Documents 14-15 are communications in which Division attorneys arrange discussions with the DOD investigator regarding the investigation of Respondents and which informed the information access request discussed in subsequent documents.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
15	04/04/2013 18:32 EDT	Investigative Information Request	contact info	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Allison Lee, SEC		See above re: Documents 13 and 14.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege

**November 3, 2016 Amended Privilege Log
In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
16	04/05/2013 16:38 EDT	Investigative Information Request	Patriarch Access Request Form	Email with Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	N. Creola Kelly and Allison Lee, SEC		See above re: Document 13. Documents 16-27 are emails that are part of a chain that involve communications between Division attorneys and a DOD investigator regarding a formal request by the DOD for access to confidential Division investigation files. These documents include a template provided by the Division attorney that other federal agencies complete and use to request confidential investigative information from the Commission, guidance by the Division attorney to the DOD investigator about completing the form, and the DOD's submission of the information access request.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
17	04/05/2013 16:38 EDT	Investigative Information Request	Access Request by Federal Agency Other than a Financial Institution Supervisory Agency	Attachment					See above re: Document 16.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
18	04/05/2013 16:38 EDT	Investigative Information Request	Patriarch Access Request Form	Email with Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	N. Creola Kelly and Allison Lee, SEC	Brent Mitchell, SEC	See above re: Document 16.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege

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In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
19	04/05/2013 16:38 EDT	Investigative Information Request	Patriarch Access Request Form	Attachment					See above re: Document 16.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
20	04/08/2013 12:33 EDT	Investigative Information Request	Patriarch Access Request Form	Email with Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 16. Documents 20-21 are the email and attachment in which DOD formally requests access to Commission information. The request includes a description of the purpose of the request, which is to conduct an investigation and potentially commence proceedings, and acceptance of certain conditions regarding the information provided (for example, confidentiality and notice of any public use of any documents provided pursuant to the request).	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
21	04/08/2013 12:33 EDT	Investigative Information Request	SEC Patriarch Partners email request	Attachment					See above re: Documents 16 and 20.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
22	04/08/2013 12:33 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 20.	Work Product Doctrine; Law Enforcement Privilege

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In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
23	04/09/2013 21:40 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 16 and 20.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
24	04/10/2013 16:51 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 16 and 20.	Work Product Doctrine; Law Enforcement Privilege
25	04/10/2013 16:53 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 20.	Work Product Doctrine; Law Enforcement Privilege
26	04/10/2013 16:54 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 16 and 20.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
27	04/10/2013 16:55 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 20.	Work Product Doctrine; Law Enforcement Privilege
28	04/11/2013 14:09 EDT	Investigative Information Request	Access Request Granted Ltr	Email with Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Gina Blow, SEC		See above re: Document 16. Documents 28-29 are an email and attachment from a Division attorney to the DOD investigator providing the approval for the request for access to information. The letter approval, Document 29, reflects the Commission's internal deliberations and decision to permit confidential documents to be provided to the DOD subject to the conditions outlined in the request and approval.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
29	04/11/2013 14:09 EDT	Investigative Information Request	Letter Granting Access Request	Attachment					See above re: Documents 16 and 28.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
30	04/18/2013 08:24 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	N. Creola Kelly, Allison Lee, Laura Metcalfe, and Reid Muoio, SEC		See above re: Document 16. Documents 30-35 are a continuation of the email chain in Documents 16-27. These documents discuss and disclose technical details including timing of production of electronic documents pursuant to the DOD's information access request, as well as inquiries regarding computer program platforms for retaining, reviewing, and producing documents.	Work Product Doctrine; Law Enforcement Privilege

**November 3, 2016 Amended Privilege Log
In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
31	04/18/2013 10:25 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 30.	Work Product Doctrine; Law Enforcement Privilege
32	04/24/2013 15:47 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 30.	Work Product Doctrine; Law Enforcement Privilege
33	04/24/2013 16:28 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 16 and 30.	Work Product Doctrine; Law Enforcement Privilege
34	04/24/2013 16:29 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 30.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
35	04/24/2013 16:31 EDT	Investigative Information Request	Patriarch Access Request Form	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 16 and 30.	Work Product Doctrine; Law Enforcement Privilege
36	06/03/2013 10:53 EDT	Investigative Information Request	Patriarch	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 16. Documents 36-40 involve communications between a Division attorney and the DOD investigator regarding questions and strategies regarding a DOD search warrant based, at least in part, on previous discussions related to the Commission's granting the information access to the DOD. In addition, the communications involve a discussion of Division investigative techniques for obtaining emails.	Work Product Doctrine; Law Enforcement Privilege
37	06/07/2013 09:41 EDT	Investigative Information Request	Patriarch emails	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 36.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
38	06/07/2013 10:24 EDT	Investigative Information Request	Patriarch emails	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 16 and 36.	Work Product Doctrine; Law Enforcement Privilege
39	06/07/2013 10:24 EDT	Investigative Information Request	Patriarch emails	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL		Brent Mitchell, SEC	See above re: Documents 16 and 36.	Work Product Doctrine; Law Enforcement Privilege
40	06/07/2013 11:27 EDT	Investigative Information Request	Patriarch emails	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 16 and 36.	Work Product Doctrine; Law Enforcement Privilege
41	06/21/2013 16:27 EDT	Investigative Information Request	Talk Patriarch	Calendar Entry	Brent Mitchell, SEC	Pat Meadows, AUSA, U.S. Attorney's Office, Northern District of Alabama			Documents 41-47 are communications between Division lawyers and an Assistant United States Attorney for the U.S. Attorney's Office in Alabama that we understand adopted, either in whole or at least in part, the DOD investigation discussed above related to a company in Respondents' portfolio.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
42	06/25/2013 15:44 EDT	Investigative Information Request	Talk Patriarch	Calendar Entry	Brent Mitchell, SEC	Pat Meadows, AUSA, U.S. Attorney's Office, Northern District of Alabama			See above re: Document 41.	Work Product Doctrine; Law Enforcement Privilege
43	07/08/2013 10:06 EDT	Investigative Information Request	Access Request for the DOJ	Email with Attachment	Brent Mitchell, SEC	Ramona Albin, AUSA, U.S. Attorney's Office, Northern District of Alabama	N. Creola Kelly, Allison Lee, Laura Metcalfe, Reid Muoio, and John Smith, SEC	Brent Mitchell, SEC	See above re: Document 41. Documents 43-46 are a Division attorney's communications with the AUSA to provide her with an information access request form so that she could obtain evidence that the DOJ believed might be relevant to one of its ongoing investigations.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
44	07/08/2013 10:06 EDT	Investigative Information Request	Access Request by Federal Agency Other than a Financial Institution Supervisory Agency	Attachment					See above re: Documents 41 and 43.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
45	07/08/2013 10:06 EDT	Investigative Information Request	Access Request for the DOJ	Email with Attachment	Brent Mitchell, SEC	Ramona Albin, AUSA, U.S. Attorney's Office, Northern District of Alabama	N. Creola Kelly, Allison Lee, Laura Metcalfe, Reid Muoio, and John Smith, SEC		See above re: Documents 41 and 43.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
46	07/08/2013 10:06 EDT	Investigative Information Request	Access Request by Federal Agency Other than a Financial Institution Supervisory Agency	Attachment					See above re: Documents 41 and 43.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege

**November 3, 2016 Amended Privilege Log
In the Matter of Lynn Tilton, et al., AP File No. 3-16462**

Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
47	07/08/2013 11:30 EDT	Investigative Information Request	Access request for the DOJ	Email without Attachment	Ramona Albin, AUSA, U.S. Attorney's Office, Northern District of Alabama	Brent Mitchell, SEC			See above re: Documents 41 and 43. Document 47 acknowledges receipt of the form requesting access to the Commission's investigative information.	Work Product Doctrine; Law Enforcement Privilege
48	08/22/2013 15:53 EDT	Investigative Information Request	[Company Name Withheld] Investors	Email with Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 16. Documents 48-66 are continued communications between Division attorneys and the DOD investigator following and concerning production of information to the investigator pursuant to the request for access, discussed above, regarding a company held in Respondents' portfolio. Documents 48-50 include in the chain of emails an earlier email seeking to confirm that the DOD investigator had received the requested documents. These documents include communications between a Division attorney and the DOD investigator in which they discuss information discovered by the investigator which he believed may be of interest or relevance to the Division's investigation.	Work Product Doctrine; Law Enforcement Privilege
49	08/22/2013 15:53 EDT	Investigative Information Request	[Company Name Withheld] Investors	Attachment					See above re: Documents 16 and 48.	Work Product Doctrine; Law Enforcement Privilege
50	08/22/2013 15:59 EDT	Investigative Information Request	[Company Name Withheld] Investors	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Allison Lee, SEC		See above re: Documents 16 and 48.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
51	08/26/2013 12:43 EDT	Investigative Information Request	[No Subject]	Email with Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 48. Documents 51-53 are an email from the DOD investigator to a Division attorney and two attachments (the latter of which is a blank page). The first attachment is a contract relevant to the company in Respondent's portfolio being investigated by the DOD. The email represents the DOD investigator's identification and compiling of information that he considered relevant to his and the Division's investigation.	Work Product Doctrine; Law Enforcement Privilege
52	08/26/2013 12:43 EDT	Investigative Information Request	Shared Services Agreement	Attachment					See above re: Documents 48 and 51.	Work Product Doctrine; Law Enforcement Privilege
53	08/26/2013 12:43 EDT	Investigative Information Request	[Blank Document]	Attachment					See above re: Documents 48 and 51.	Work Product Doctrine; Law Enforcement Privilege
54	10/31/2013 14:25 EDT	Investigative Information Request	New Tilton info	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 48. Documents 54-60 are emails in a chain between Division attorneys and the DOD investigator regarding the information access request and the company in Respondents' portfolio.	Work Product Doctrine; Law Enforcement Privilege
55	10/31/2013 14:53 EDT	Investigative Information Request	New Tilton info	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Documents 48 and 54.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
56	10/31/2013 14:53 EDT	Investigative Information Request	New Tilton info	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Amy Sumner, SEC	Brent Mitchell, SEC	See above re: Documents 48 and 54.	Work Product Doctrine; Law Enforcement Privilege
57	10/31/2013 14:53 EDT	Investigative Information Request	New Tilton info	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Amy Sumner, SEC		See above re: Documents 48 and 54.	Work Product Doctrine; Law Enforcement Privilege
58	10/31/2013 14:55 EDT	Investigative Information Request	New Tilton info	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Amy Sumner, SEC	Brent Mitchell, SEC	See above re: Documents 48 and 54.	Work Product Doctrine; Law Enforcement Privilege
59	10/31/2013 14:55 EDT	Investigative Information Request	Talk Patriarch	Calendar Entry	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 48 and 54.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
60	10/31/2013 14:55 EDT	Investigative Information Request	New Tilton info	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Amy Sumner, SEC		See above re: Documents 48 and 54.	Work Product Doctrine; Law Enforcement Privilege
61	11/01/2013 13:12 EDT	Investigative Information Request	Cornyn floor speech	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 48. Documents 61-62 are emails between a Division attorney and the DOD investigator concerning a speech by a U.S. Senator deemed relevant by the investigator to the investigation of the company held in Respondents' portfolio.	Work Product Doctrine; Law Enforcement Privilege
62	11/01/2013 13:14 EDT	Investigative Information Request	Cornyn floor speech	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Amy Sumner, SEC		See above re: Documents 48 and 61.	Work Product Doctrine; Law Enforcement Privilege
63	11/12/2013 17:38 EST	Investigative Information Request	LT Zohar Funds	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 48. Documents 63-64 are emails between a Division attorney and the DOD sharing and commenting on an online article regarding an investor in and insurer of Respondents.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
64	11/12/2013 20:00 EST	Investigative Information Request	LT Zohar Funds	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 48 and 63.	Work Product Doctrine; Law Enforcement Privilege
65	01/23/2014 13:50 EST	Investigative Information Request	American LeFrance	Email without Attachment	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL	Brent Mitchell, SEC			See above re: Document 48. Documents 65-66 are emails between a Division attorney and the DOD regarding American LeFrance, a company that had dealings with the company in Respondents' portfolio that was being investigated by the DOD.	Work Product Doctrine; Law Enforcement Privilege
66	01/23/2014 14:00 EST	Investigative Information Request	American LeFrance	Email without Attachment	Brent Mitchell, SEC	SA Lance Stamper, Defense Criminal Investigative Service, Huntsville Post of Duty, Redstone Arsenal, AL			See above re: Documents 48 and 65.	Work Product Doctrine; Law Enforcement Privilege
67	04/23/2015 12:05 EDT	Investigative Information Request	Meeting today	Email without Attachment	Dugan Bliss, SEC	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York			Documents 67-70 are two email chains between a Division attorney and an Assistant United States Attorney setting up a call to discuss the possibility of an access request by the DOJ seeking information from the Division's investigation of Respondents Lynn Tilton and Patriarch Partners.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
68	04/23/2015 12:06 EDT	Investigative Information Request	Meeting today	Email without Attachment	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Dugan Bliss, SEC			See above re: Document 67.	Work Product Doctrine; Law Enforcement Privilege
69	04/23/2015 12:40 EDT	Investigative Information Request	Patriarch	Email without Attachment	Michael Osnato, SEC	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York			See above re: Document 67.	Work Product Doctrine; Law Enforcement Privilege
70	04/23/2015 12:46 EDT	Investigative Information Request	Patriarch	Email without Attachment	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Michael Osnato, SEC			See above re: Document 67.	Work Product Doctrine; Law Enforcement Privilege;
71	04/23/2015 17:03 EDT	Investigative Information Request	access request	Email with Attachment	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Michael Osnato, SEC	Christopher Frey and Telemachus Kasulis, AUSAs, U.S. Attorney's Office, Southern District of New York		Documents 71-74 are emails and attachments in which the DOJ requests and the Commission grants the DOJ's request for access to information that is part of the Commission's confidential investigative file related to Respondents.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
72	04/23/2015 17:03 EDT	Investigative Information Request	Patriarch.pdf	Attachment					See above re: Document 71. Document 72 is the DOJ's request for access to information.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
73	04/24/2015 15:07 EDT	Investigative Information Request	access request	Email with Attachment	Amy Lam, SEC	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Laura Metcalfe, Michael Osnato, and Amy Sumner, SEC		See above re: Document 71.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
74	04/24/2015 15:07 EDT	Investigative Information Request	Letter Granting Access Request	Attachment					See above re: Document 71. Document 74 is the Commission's Letter granting the request for access to information.	Work Product Doctrine; Law Enforcement Privilege; Deliberative Process Privilege
75	04/27/2015 10:06 EDT	Investigative Information Request	Patriarch Partners - Attorney Contact Information	Email without Attachment	CPT Eric M. Liddick, Attorney-Advisor, Procurement Fraud Branch, Contract and Fiscal Law Division, U.S. Army Legal Services Agency, Fort Belvoir, VA	Dugan Bliss, SEC			Documents 75-82 are communications between a Division attorney and a DOD attorney concerning contact information for Respondents Lynn Tilton's and Patriarch Partner's counsel. We understand that this request was in follow-up to the earlier grant of access to information by the Commission to the DOD.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
76	04/27/2015 10:06 EDT	Investigative Information Request	Patriarch Partners - Attorney Contact Information	Email with Attachment	CPT Eric M. Liddick, Attorney-Advisor, Procurement Fraud Branch, Contract and Fiscal Law Division, U.S. Army Legal Services Agency, Fort Belvoir, VA	Dugan Bliss, SEC			See above re: Document 75. This is a duplicate of document 75, but which contains an error when converting the email from the archives (a conversion error) that was corrected in Document 75.	Work Product Doctrine; Law Enforcement Privilege
77	04/27/2015 10:06 EDT	Investigative Information Request		Attachment					See above re: Documents 75 and 76. This is a document identifying the conversion error.	Work Product Doctrine; Law Enforcement Privilege
78	04/27/2015 10:09 EDT	Investigative Information Request	Patriarch Partners - Attorney Contact Information	Email without Attachment	Dugan Bliss, SEC	CPT Eric M. Liddick, Attorney-Advisor, Procurement Fraud Branch, Contract and Fiscal Law Division, U.S. Army Legal Services Agency, Fort Belvoir, VA			See above re: Document 75.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
79	04/27/2015 10:09 EDT	Investigative Information Request	Patriarch Partners - Attorney Contact Information	Email without Attachment	Dugan Bliss, SEC	CPT Eric M. Liddick, Attorney-Advisor, Procurement Fraud Branch, Contract and Fiscal Law Division, U.S. Army Legal Services Agency, Fort Belvoir, VA			See above re: Document 75. This is a duplicate of document 78, but which contains a conversion error that was corrected in Document 78.	Work Product Doctrine; Law Enforcement Privilege
80	04/27/2015 10:10 EDT	Investigative Information Request	Patriarch Partners - Attorney Contact Information	Email with Attachment	CPT Eric M. Liddick, Attorney-Advisor, Procurement Fraud Branch, Contract and Fiscal Law Division, U.S. Army Legal Services Agency, Fort Belvoir, VA	Dugan Bliss, SEC			See above re: Document 75. This is a duplicate of document 82 but which contains a conversion error that was corrected in Document 82	Work Product Doctrine; Law Enforcement Privilege
81	04/27/2015 10:10 EDT	Investigative Information Request		Attachment					See above re: Documents 75 and 80. See below re: Document 82. This is a document identifying the conversion error in Document 80.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
82	04/27/2015 10:10 EDT	Investigative Information Request	Patriarch Partners - Attorney Contact Information	Email without Attachment	CPT Eric M. Liddick, Attorney-Advisor, Procurement Fraud Branch, Contract and Fiscal Law Division, U.S. Army Legal Services Agency, Fort Belvoir, VA	Dugan Bliss, SEC			See above re: Documents 75, 80 and 81.	Work Product Doctrine; Law Enforcement Privilege
83	04/28/2015 12:11 EDT	Investigative Information Request	Meeting today	Email without Attachment	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Dugan Bliss, SEC			Documents 83-89 are emails between Division attorneys and staff and an Assistant United States Attorney discussing the timing of production of documents in response to the AUSA's information access request.	Work Product Doctrine; Law Enforcement Privilege
84	04/29/2015 13:10 EDT	Investigative Information Request	follow up	Email without Attachment	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Michael Osnato, SEC			See above re: Document 83.	Work Product Doctrine; Law Enforcement Privilege
85	04/29/2015 13:15 EDT	Investigative Information Request	follow up	Email without Attachment	Michael Osnato, SEC	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York			See above re: Document 83.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
86	04/29/2015 13:15 EDT	Investigative Information Request	follow up	Email without Attachment	Michael Osnato, SEC	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York			See above re: Document 83.	Work Product Doctrine; Law Enforcement Privilege
87	04/29/2015 13:18 EDT	Investigative Information Request	follow up	Email without Attachment	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Michael Osnato, SEC			See above re: Document 83.	Work Product Doctrine; Law Enforcement Privilege
88	04/29/2015 15:49 EDT	Investigative Information Request	Lynn Tilton and Patriarch Partners (D-3350, HO-11665)	Email without Attachment	Judy Bizu, Paralegal Specialist, SEC	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Amy Sumner, SEC		See above re: Document 83. Document 88 is an email from a Division paralegal concerning a disk of requested materials that was sent pursuant to the grant of access to information.	Work Product Doctrine; Law Enforcement Privilege
89	04/30/2015 13:18 EDT	Investigative Information Request	Lynn Tilton and Patriarch Partners (D-3350, HO-11665)	Email without Attachment	Katherine Goldstein, AUSA, U.S. Attorney's Office, Southern District of New York	Judy Bizu, Paralegal Specialist, SEC	Amy Sumner, SEC		See above re: Documents 83 and 88. Document 89 is an email from Assistant United States Attorney concerning the disk.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
90	05/11/2015 18:03 EDT	Investigative Information Request	Tilton/Patriarch Partners	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Amy Sumner, SEC	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		Documents 90-113 are emails and attachments between Division attorneys and staff and Assistant United States Attorneys regarding the Commission providing information pursuant to the previously-described information access request to assist the DOJ in an investigation. Documents 90-93 are emails in a chain arranging communications by Division lawyers with AUSAs regarding the DOJ's investigation of Respondents Tilton and Patriarch Partners.	Work Product Doctrine; Law Enforcement Privilege
91	05/12/2015 09:41 EDT	Investigative Information Request	Tilton/Patriarch Partners	Email without Attachment	Amy Sumner, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		See above re: Document 90.	Work Product Doctrine; Law Enforcement Privilege
92	05/12/2015 12:40 EDT	Investigative Information Request	Tilton/Patriarch Partners	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Amy Sumner, SEC	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		See above re: Document 90.	Work Product Doctrine; Law Enforcement Privilege
93	05/12/2015 13:09 EDT	Investigative Information Request	Tilton/Patriarch Partners	Email without Attachment	Amy Sumner, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		See above re: Document 90.	Work Product Doctrine; Law Enforcement Privilege
94	05/20/2015 17:41 EDT	Investigative Information Request	Patriarch Partners (D-3350)	Email without Attachment	Judy Bizu, Paralegal Specialist, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Dugan Bliss, Nicole Nesvig, and Amy Sumner, SEC		See above re: Document 90. Document 94 is an email from a Division paralegal concerning a disk of requested materials that was sent pursuant to the grant of access to information.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
95	05/20/2015 17:41 EDT	Investigative Information Request	Patriarch Partners (D-3350)	Email without Attachment	Judy Bizu, Paralegal Specialist, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Dugan Bliss and Amy Sumner, SEC		See above re: Document 90. Document 95 is an email from a Division paralegal concerning a disk of requested materials that was sent pursuant to the grant of access to information.	Work Product Doctrine; Law Enforcement Privilege
96	05/20/2015 17:43 EDT	Investigative Information Request	Patriarch Partners (D-3350)	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Judy Bizu, Paralegal Specialist, SEC	Dugan Bliss, Nicole Nesvig, and Amy Sumner, SEC		See above re: Document 90. Document 96 is an email from an Assistant United States attorney responding to Document 94.	Work Product Doctrine; Law Enforcement Privilege
97	05/29/2015 13:00 EDT	Investigative Information Request	Patriarch Partners (D-3350)	Email without Attachment	Judy Bizu, Paralegal Specialist, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Dugan Bliss and Amy Sumner, SEC		See above re: Document 90. Document 97 is an email from a Division paralegal concerning a disk of requested materials that was sent pursuant to the grant of access to information.	Work Product Doctrine; Law Enforcement Privilege
98	05/29/2015 13:43 EDT	Investigative Information Request	Patriarch Partners (D-3350)	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Judy Bizu, Paralegal Specialist, SEC	Dugan Bliss and Amy Sumner, SEC		See above re: Document 90. Document 98 is an email from Assistant United States attorney responding to Document 97.	Work Product Doctrine; Law Enforcement Privilege
99	06/09/2015 13:52 EDT	Investigative Information Request	Tilton	Email without Attachment	Amy Sumner, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York			Documents 99-104 are a chain of emails and attachments between a Division attorney and an AUSA concerning access to documents filed by Respondents in this Administrative Proceeding.	Work Product Doctrine; Law Enforcement Privilege
100	06/09/2015 13:52 EDT	Investigative Information Request	Tilton	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Amy Sumner, SEC	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		See above re: Document 99.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
101	06/09/2015 17:04 EDT	Investigative Information Request	In the Matter of Lynn Tilton, et al. (File No. 3-16462)	Email with Attachment	Amy Sumner, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York			See above re: Document 99. Document 101 is an email from a Division attorney to an Assistant United States Attorney concerning the requested documents.	Work Product Doctrine; Law Enforcement Privilege
102	06/09/2015 17:04 EDT	Investigative Information Request		Attachment					See above re: Document 99.	Work Product Doctrine; Law Enforcement Privilege
103	06/09/2015 17:04 EDT	Investigative Information Request		Attachment					See above re: Document 99.	Work Product Doctrine; Law Enforcement Privilege
104	06/09/2015 17:08 EDT	Investigative Information Request	In the Matter of Lynn Tilton, et al (File No. 3-16462)	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Amy Sumner, SEC			See above re: Document 99. Document 104 is an email from the Assistant United States Attorney to the Division Attorney concerning the requested documents.	Work Product Doctrine; Law Enforcement Privilege
105	06/16/2015 12:00 EDT	Investigative Information Request	Patriarch Partners	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Amy Sumner, SEC	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		Documents 105-108 are a chain of emails between a Division attorney and AUSAs regarding materials that had been provided to the AUSAs pursuant to the grant of access to information and that they had been reviewing.	Work Product Doctrine; Law Enforcement Privilege
106	06/16/2015 12:04 EDT	Investigative Information Request	Patriarch Partners	Email without Attachment	Amy Sumner, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		See above re: Document 105.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
107	06/16/2015 12:05 EDT	Investigative Information Request	Patriarch Partners	Email without Attachment	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Amy Sumner, SEC	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		See above re: Document 105.	Work Product Doctrine; Law Enforcement Privilege
108	06/18/2015 15:08 EDT	Investigative Information Request	Patriarch Partners	Email without Attachment	Amy Sumner, SEC	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York		See above re: Document 105.	Work Product Doctrine; Law Enforcement Privilege
109	06/30/2015 16:54 EDT	Investigative Information Request	Patriarch	Email without Attachment	Amy Sumner, SEC	Christopher Frey and Daniel Goldman, AUSAs, U.S. Attorney's Office, Southern District of New York			Documents 109-113 are a chain of emails between a Division attorney and an AUSA identifying and discussing witnesses and attorneys that had dealings with Respondents.	Work Product Doctrine; Law Enforcement Privilege
110	06/30/2015 17:10 EDT	Investigative Information Request	Patriarch	Email without Attachment	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York; Amy Sumner, SEC			See above re: Document 109.	Work Product Doctrine; Law Enforcement Privilege
111	07/27/2015 18:10 EDT	Investigative Information Request	Patriarch	Email without Attachment	Daniel Goldman, AUSA, U.S. Attorney's Office, Southern District of New York	Christopher Frey, AUSA, U.S. Attorney's Office, Southern District of New York; Amy Sumner, SEC			See above re: Document 109.	Work Product Doctrine; Law Enforcement Privilege

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Doc. #	Doc. Date	Category	Subject	Doc. Type	Email From	Email To	Email CC	Email BCC	Explanation	Privilege(s)
112	07/28/2015 09:55 EDT	Investigative Information Request	Patriarch	Email without Attachment	Amy Sumner, SEC	Christopher Frey and Daniel Goldman, AUSAs, U.S. Attorney's Office, Southern District of New York			See above re: Document 109.	Work Product Doctrine; Law Enforcement Privilege
113	07/28/2015 10:01 EDT	Investigative Information Request	Patriarch	Email without Attachment	Amy Sumner, SEC	Christopher Frey and Daniel Goldman, AUSAs, U.S. Attorney's Office, Southern District of New York			See above re: Document 109.	Work Product Doctrine; Law Enforcement Privilege