

From: Denholtz, Tracy [OPD] Tracy.Denholtz@opd.nj.gov
Subject: Documents in the Tiago matter
Date: Jan 11, 2024 at 4:17:24 PM
To: carla050627@gmail.com
Cc: Errico, Daniel [OPD] Daniel.Errico@opd.nj.gov

Carla:

Please see the below email I received from the prosecutor today. Call me to discuss at your convenience.

Many thanks,

Tracy

Tracy L. Denholtz, Esq.

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From: McDonald, Michael
Sent: Thursday, January 11, 2024 4:10 PM
To: Denholtz, Tracy [OPD] <Tracy.Denholtz@opd.nj.gov>
Cc: Thomas, Ryan
Subject: [EXTERNAL] Documents in the Tiago matter

Hi Tracy, Det. Thomas advised me that the requested documents from the victims have now been sent. For ease of review, the documents were grouped into 4 separate "categories" if you will, which mirror the requests you made for same.

One package contains all documents related to your client's employment file with Piemonte and Liebhauser. The second package contains all documents related to the policies and procedures of Piemonte and Liebhauser. The third package contains documents related to internal card documentation for the credit cards. Finally, the last package are documents related to the account "Sevendust".

In connection with your request, the victims have made me aware of the following, which as a

courtesy I pass along to you:

The victims are not in possession of any records pertaining to "Monthly Cash Reports" for Mr. Lyon, Mr. Burnley and Mr. Jerome. The firm does not do cash reports for credit cards.

Their response regarding incoming and outgoing emails of your client during her employment remains the same. Those emails have long since been purged as the firm migrated as you know to another server after your client's conduct and dismissal from the firm. However, you will see emails that were saved related to disciplinary action taken by the firm relative to your client, contained in her employment file documents, as well as emails in connection with the account "Sevendust" which you will see was an account that terminated their relationship with Piemonte and Liebhauser because they believed that your client was using their personal information without permission, that your client failed to pay bills for the account and told them she did, as well as her not returning calls from the client. Sevendust also accused her of stealing from them (Sevendust) although those allegations never resulted in legal action (your client is lucky).

Finally, as you know the Pre-Trial Conference is your client's last opportunity to resolve this matter before we go to trial. The State will not entertain a plea once a trial date is set. As I have told you from the beginning from when we both met about this case, I am open to resolving the matter, even willing to take a flat state prison sentence to my bosses for approval, but you must advise me prior to the conference if your client's view on resolving the matter changes. I have stated this to you verbally, but to memorialize same in black and white for your client, if she chooses to take this case to trial, and is convicted, the State will be seeking the maximum sentence of 20 years in prison with an appropriate period of parole ineligibility. That is not a threat, it is a promise. You can also advise your client that at trial the State intends on calling every individual identified in the discovery who benefitted from your client's conduct and went on all those trips, etc. with her. They will all be served with trial subpoenas, and I will put them on the stand to testify, and if after they testify, I can prove that at any time they lied on the stand on behalf of your client, I will do everything in my power to establish perjury charges against them. The evidence against your client is overwhelming, and while jury nullification is always a possibility with a trial, here she already swore an oath and admitted her guilt to the crimes in front of the Judge who will try the case, and the only reason why we are even here is because of circumstances outside of both of our control.

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