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October 21, 2010

VIA U.S. MAIL

Douglas Bacon
LATHAM & WATKINS LLP
Suite 5800 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606

Re: *United States v. Michael Segal*, Case No. 02 CR 0112

Dear Doug:

In certain court papers, your client, the Trustee in the above-referenced matter has taken a position as to who owns certain partnership assets. Mr. Segal would like an explanation of how those conclusions were reached. It is my understanding that your client's role is to determine whether any assets exist, as opposed to determining the ownership of those assets.

Previously, I raised this issue orally when I asked for a list of all assets that were potentially subject to forfeiture. I would like to receive a response in writing regarding how the ownership conclusions were reached.

Mr. Segal would also like the following documents from your client:

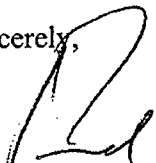
- The Government's Exhibit SES6 lists various partnership assets -- Mr. Segal seeks the accounting entry in NNIB's books which substantiates the ownership of NNIB and other sources of verification to support the record of ownership
- The Government's Exhibit 19 only includes the assets of the corporation and no corresponding liabilities or equities section -- Mr. Segal seeks documentation regarding the corresponding liabilities or equities
 - An analysis of the balance as to period activity and a year to date balance for Account 1370 EMP advances to employees
 - An analysis of period activity and reconciliation and a year to date balance for Account 1370 MS advances to Mike Segal
 - Original posting and transactions relating to the \$10 million and \$2 million loan transactions
- An analysis of the \$696,834 partnership investment distributions deposit in Segal's personal checking account

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- An analysis of the \$365,394 investment partnership distribution applied to Segal's exchange account
- Closing documents for the same of the Highland Park property and any related accounting transactions

Thank you.

Sincerely,



Edward T. Joyce

Jennifer Doherty

From: Jennifer MacDougall
Sent: Wednesday, November 17, 2010 4:51 PM
To: douglas.bacon@lw.com
Subject: US v Segal
Attachments: 2010-10-21 Letter to D. Bacon re ownership of certain partnership assets.pdf

Mr. Bacon:

I am writing to follow up on the attached letter that Ed Joyce sent to you on October 21, 2010. When can we expect a response to this letter?

Thank you,

Jenn

Jennifer L. Doherty
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