

----- Original Message -----

From: Michael M. Buchman

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<james.rogers@oag.state.ny.us>

Cc: 'RMS@avhlaw.com' <RMS@avhlaw.com>

Sent: Sat Dec 27 13:14:25 2008

Subject: Re: BAYSIDE URGENT

It has come to my attention within the past hour from a confidential informant who recently spoke with [REDACTED], that approximately 3 to 4 boxes of highly relevant documents were transferred from Congregation Shaare Zedek in Manhattan to Bayside Cemetery's office in Ozone Park.

The confidential informant had a conversation with [REDACTED] regarding the contents of the boxes. [REDACTED], informed the confidential informant that [REDACTED] reviewed the boxes and they contained documents concerning repairs to the synagogue's roof among other things. [REDACTED] further told the confidential informant that [REDACTED] was instructed by Congregation Shaare Zedek to destroy these documents.

I am writing to you in this urgent email to bring this matter of utmost importance to your immediate attention. Based upon your own statements in newspaper articles, these documents are without question highly relevant to this case. We believe that an immediate phone call is necessary with the Attorney General's office to ensure that they have received copies of these documents and that other copies or data images of these documents exist and are preserved. In other words that these are not the sole set of these documents which are being destroyed in violation of the federal rules of civil procedure and any civil investigative demand issued by the AG.

If we do not hear from you by 11 AM on Monday morning (Dec 29, 2008) giving written assurances that these documents and all other relevant documents are being preserved, we intend to bring this matter immediately before Chief Judge Dearie and Magistrate Judge Azrack.

If you wish to discuss this matter over the weekend, my cell phone number is [REDACTED].

Thank you for your immediate attention to this matter.