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March 15, 2010

VIA EMAIL ([REDACTED], [REDACTED])
and First Class Mail

Jay Goldberg, Esq.
[REDACTED]

New York, New York 10177

Re: Agreement for Design Services dated May 15, 2009 ("Design
Services Agreement") by and among Juan Pablo Molyneux, J.P.
Molyneux Studio, Ltd., L.S.J., LLC and Jeffrey Epstein

Dear Jay:

I have attached sample photos of the cabinetry installed in the library on Little St. James Island. These photos conclusively demonstrate that, if Mr. Molyneux did indeed decide that the finish of the woodwork is adequate for the overall ambiance of the space, then that decision was not made in good faith and could not withstand even the slightest scrutiny. As exemplified by the photographs, in most places the wood is rough and/or splintery, and it is even cracked in places. Decorative holes have not been drilled through in a great many places and have not been sanded at all. In many places, the cabinetry is not finished at all. Where it is finished, the workmanship is shoddy and the finish appears poorly applied, discolored and uneven. The wood looks more like it is water stained, than actually stained with color. Further examples of the shoddy workmanship can be seen in the tortoise shell application on the woodwork. You will see from the pictures, that the application is cheap-looking of poor quality. It is blemished in places, chipped in places, delaminating in other places and in still other places was applied in a sloppy piecemeal fashion, making it comprised of scraps, look like patchwork. I have also attached photos showing cracked and broken, meshwork in the cabinet doors. Even the layman can see that this level of finish is both inconsistent with and inappropriate for a room of the superlative degree of opulence intended for the library the multi millions dollars transferred to your client.

Mr. Epstein has forwarded the attached photos and others showing equally shoddy workmanship on the part of Fanceli. When asked about them, Mr. Molyneux was unable to explain why the work is of such poor quality. You may not have been provided with the background here, but you should know that Mr. Epstein originally requested that woodwork be performed by certain French millworkers with whose fine woodwork Mr. Epstein was familiar. Mr. Molyneux was adamant that the work should be done by Fanceli whose craftsmanship Mr. Molyneux assured Mr. Epstein was unrivaled.

Regarding the so called "numerous" finish samples for the woodwork proposed by Mr. Molyneux, Mr. Epstein received a single sample board to which was applied only five stains of very similar light colors, none of which reflected a darker color as Mr. Epstein has requested over and over again. As I stated in my February 25, 2010 letter, this has been an issue for the past two years. Mr. Epstein originally requested and ordered dark walnut cabinetry, but Mr. Molyneux would only deliver light oak. Evidenced by his original renderings. During settlement discussions in 2009, Mr. Molyneux sought to put off this issue by requesting that the cabinetry first be installed in the room. He refused to send photos, he refused to pre finish the cabinets. Now that the cabinetry has been installed, it is clear that the materials, color and finish are as inadequate as Mr. Epstein told Mr. Molyneux they were long ago. Much time was wasted while Mr. Epstein waited for the sample board to be sent to him. Not only did Mr. Epstein receive samples of colors that were not what he requested, but Mr. Molyneux admitted to Mr. Epstein that Mr. Molyneux has never even seen the sample board that was sent. Jay, I do not believe you are getting the full story here.

In connection with Mr. Molyneux's correcting the problems with the cabinetry and its finish, as the photos clearly demonstrate, the tortoise shell application on the cabinetry is cheaply done and patched and must be replaced. In addition, as I advised you in my March 1, 2010 letter, the blackboards provided by Mr. Molyneux are unusable. They are not built of typical blackboard material, and chalk literally slides off the surface when you try to write on them. They too need to be replaced.

Mr. Epstein has already suggested to Mr. Molyneux that Fanceli's representatives come to the site on March 18 and 19 to correct the woodwork and installation problems which Mr. Epstein and his representatives have detailed to Mr. Molyneux, both verbally and in writing. I have provided you with only a sampling of the issues. With all the work yet to be done on the library, the room would not be clean for staining for many days after Fanceli begins its work. Rather than wasting any more time sending sample boards back and forth overseas and delaying Fanceli's arrival until the parties reach agreement, it makes much more sense, as Mr. Epstein suggested, for Fanceli to come to the Island to finish correcting the installation work, and for the wood color and finish solution to be resolved while all parties, including Mr. Molyneux, are on site in the same room looking at the same materials at the same time.

Finally, as I advised you in my February 25, 2010 letter, pursuant to Exhibit B of the Design Services Agreement, Mr. Molyneux is required to provide back-up for his costs for the items listed in Exhibit B and not merely his unsubstantiated schedule of items provided. We have still received no such back-up and request that Mr. Molyneux provide the same as soon as possible.

Sincerely,

/s/ Darren K. Indyke

Darren K. Indyke



Discoloration, white stripe of foreign material evident, uneven application of stain.



Splintery, rough and pocked wood, uneven application of stain, and apparently no finish in many places. Tortoise shell application marred at bottom right hand corner of bottom photo.



Wood materials and finish substandard in the top picture. In the top picture, shoddy materials with discoloration throughout. Bottom picture shows finish which looks like it was not applied in some places and appears water stained in other places. Decorative holes uneven, not drilled through and not sanded.



Unsanded holes. Rough unfinished appearance.



Uneven application of stain. Water stained appearance. Holes not completely drilled through or sanded.



More examples of holes not drilled through and sanded and uneven application of stain appearing like water stains.



Additional example of holes not drilled through. Again no even application of staining.



Shoddy workmanship. Edges and surface of wood rough and uneven; discolored and unfinished appearance.



Shoddy workmanship. Edges and surfaces of wood rough, uneven, chipped and cracked. Discoloration and unfinished appearance.



Edges of wood discolored, chipped. Enormous gap between window frame and outside frame. Unfinished appearance.



Cracked wood. Rough unfinished edges and surfaces. Screw apparent. Gap between Window frame and outside frame. Discoloration.



Examples of broken mesh work on cabinet doors. Poorly finished wood. Rough splintery wood. Uneven application of color.



Rough, pockmarked wood with no apparent or poor finish. Tortoise Shell application patched and chipped.



Rough, pocked unevenly finished wood. Fingerprints on tortoise shell application. Patchwork on tortoise shell. Pinholes in tortoise shell. Poor finish on additional applied butterfly carving.



Larger picture of shoddy workmanship. Tortoise shell surface unclean. Patchwork tortoise shell. Butterfly unfinished with wood putty still evident. Rough wood surfaces and edges. Uneven application of color. Unfinished appearance.



Patchwork tortoise shell. Tortoise shell not completely covering in areas (see top picture). Pin holes in tortoise shell. Surface of Tortoise shell blemished. Color finish on wood looks incomplete. Rough and pocked surface of wood. Stain color unevenly and incompletely applied.



Chipped and delaminating tortoise shell. Rough and pocked wood surfaces with color unevenly applied to wood, creating substandard appearance.



Nail holes in frog carving. Uneven application of color to frog and wood work.



Additional frog carving unfinished. Wood putty apparent on frog. Nail hole on frog.