



July 16<sup>th</sup>, 2018

Via email: ( [REDACTED] )

Attn: Mr. Darren K. Indyke  
DARREN K. INDYKE, PLLC

[REDACTED]  
New York, New York 10022

RE: Jeffrey Epstein and LSJE, LLC v. Radyca, Inc. correspondence / RESPONSE LETTER

Dear Mr. Indyke:

In response to your email, I would like to clarify that the monies you are referring to as “your client’s advance to my firm”, were actual payments towards invoices for rendered services produced over months of constant work requested by Mr. Epstein.

To clarify further, RADYCA is indeed an internationally recognized design firm; actually, because of such recognition and reputation Mr. Epstein found us and first approached us. We never introduced ourselves as “architectural and landscape design professionals” as you state in your correspondence; landscape and local architects and civil engineers are some of the many professionals we suggested to Mr. Epstein in our “Master Concept Design Phase II” proposal as part of the consultants needed to complete the team for the entire project. Please refer to page 5 of the attached “Exhibit B”.

In regards to the landscape architecture consultants, we sent Mr. Epstein the resumes of four world renowned firms for his consideration (“Exhibit B.1”). We analyzed with him the strengths of each one, and he was inclined towards WATG which we engaged for the project on his behalf. On May 18<sup>th</sup>, WATG decided to withdraw from the project and resigned stating that they “had received information that negatively impacted WATG’s association with the project”. As of that date, RADYCA and WATG had one work meeting in person, two conference calls and had scheduled a full team visit to the island which was cancelled by Mr. Epstein a few days before the team’s trip.

To give you some context I would like to state the facts of our involvement up to date:

Our initial proposal for PHASE I was accepted by Mr. Epstein and included “Survey & Digitalization services”; please refer to the attached “Exhibit A”. The retainer for this proposal in the amount of \$47,760 was received Dec 9<sup>th</sup>, 2017. All deliverables described were personally presented and delivered during our Feb 5<sup>th</sup>, 2018 meeting with Mr. Epstein in our office in Miami, fully achieving this proposal’s schedule and scope.

The remaining balance of \$31,840 was paid in full on Feb 7<sup>th</sup> 2018, finalizing this agreement for “Survey & Digitalization services” and moving onto the PHASE II “Master Concept Design Phase”.



During the above mentioned visit, Mr. Epstein met my team and saw our studio and installations; we displayed a complete digital presentation of ideas and mood images showing the overall style we envisioned for his project on both Little St. James & Great St. James islands. Mr. Epstein and his staff were very impressed and commented how he had never experienced such a good understanding and approach from any design firm in his past years of dealing with this industry. I also explained to him that all the design documentation for a project of this caliber would take over 14 months of work and that the total design fees would be in the \$2 Million Dollar range.

After such very successful and productive meeting we sent the PHASE II "Master Concept Design Phase" proposal for approval on Feb 7<sup>th</sup>, 2018, including a schedule for work to begin on the 2<sup>nd</sup> week of Feb, 2018 and finalize on the 3<sup>rd</sup> week of May, 2018. Please refer to attached schedule "Exhibit C". The 30% retainer for this proposal was paid accordingly as per the agreement and to this date is the only payment received towards PHASE II, regardless of numerous attempts to collect progress payments.

As per the aforementioned schedule, during the month of February, we prepared a comprehensive digital Master concept presentation, following the deliverables listed on our PHASE II "Master Concept Design Phase" proposal. Please refer to the attached "Exhibit D". This presentation included deliverables such as:

- a) Conceptual diagrams
- b) Concept sketches
- c) Illustrative site plan for all structures
- d) Circulation diagrams on all levels
- e) 3D rendering views prepared in-house
- f) Mood photos that illustrate the concept for all areas

We diligently complied with the schedule during the months of March and April sending numerous presentations following Mr. Epstein's direction on replicating the "Soori hotel look". These included conceptual schematic floor plans, elevations, sections and several photo realistic renderings (see attached "Exhibit E" and "Exhibit E.1").

Additionally, Mr. Epstein began to request scaled and detailed architectural design documents (schematic design layouts and interior renderings) which were explicitly not included in our scope of work, but regardless we continued the work under his directions. Please see attached "Exhibit F" and "Exhibit I", showing only a few of countless documents we produced out of good faith which were never even billed as additional services.

During the meeting held in Mr Epstein's residence in Palm Beach on April 28<sup>th</sup> 2018, we insisted that PHASE II was only a conceptual stage with the purpose of defining the aesthetic design of the exterior areas and overall massing of the buildings and that we needed to visit the islands to mark the buildings on-site for his approval in order to continue with the next phase of the project; he agreed and we proceeded to secure flights and hotel accommodations for our team visit on May 29<sup>th</sup> 2018. This trip was again abruptly cancelled by Mr. Epstein the night before our departure. Following this trip's cancellation, we received several communications from Mr. Epstein completely changing the direction of design from the "Soori hotel look" to a "French Chateau look". He sent us several images of Chateau L'Horizon and requested we copied it, completely changing the previously agreed design concept and therefore altering the schedule. Regardless, we followed his direction and proceeded with his request. Please see attached "Exhibit G".

A handwritten signature in black ink, consisting of a stylized 'A' or similar character, located at the bottom right of the page.



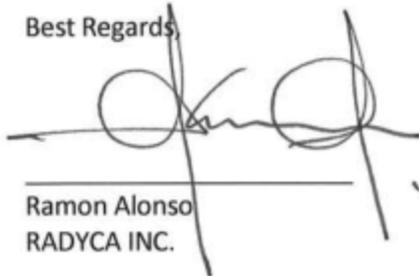
We have substantial documentary evidence showing all the work produced immediately following any of Mr. Epstein's requests. We went over and beyond producing not only one, but two different concepts for the "looks" as per his specific directions. The latest communications with Mr. Epstein evidence a long list of his specific requirements for space planning and areas for the chateau, which we followed exactly on the latest space planning presentation submitted to him on June 29<sup>th</sup>, 2018. See attached "Exhibit J".

We have not only followed and completed the deliverables promised on the "Master Concept Design Phase" proposal (Refer to "deliverables" on page 3 of enclosed "Exhibit B") but have also delivered additional services not included in our scope of work (i.e.: Little St. James furniture selection services & Interior design), which were specifically requested by Mr. Epstein; please refer to "Exhibit H" for which we are also due payment.

We have never acted with any dishonesty, negligence or misconduct and I was always in constant and direct communication with Mr. Epstein throughout this process, following up on all of his requests and having my team act accordingly. Unfortunately, all these efforts did not achieve to please him.

It still is our intention to continue working for Mr. Epstein and see this project successfully completed but we can only achieve this by having a clear understanding of the design process, scope of work and no outstanding payments. If this is not feasible, we are certainly willing to resolve this matter amicably and proceed with a fair and reasonable termination process in which my company receives owed compensation for all produced and delivered work including the additional services we provided. Please see attached current statement and all supporting invoices.

Best Regards,



Ramon Alonso  
RADYCA INC.

*ENCLOSED:*

*EXHIBIT A: Survey & Digitalization Proposal*  
*EXHIBIT B: Master Concept Proposal*  
*EXHIBIT B.1: Landscape Architecture Firms*  
*EXHIBIT C: Schedule*  
*EXHIBIT D: Master Concept presentation*  
*EXHIBIT E: Soori Concept*  
*EXHIBIT E.1: Master Concept Schematic floor plans, elevations and sections.*  
*EXHIBIT F: Architectural Design documents*  
*EXHIBIT G: French Chateau*  
*EXHIBIT H: Furniture Selection*  
*EXHIBIT I: Additional Interior Renderings*  
*EXHIBIT J: Chateau Space planning diagrams*  
*STATEMENT & INVOICES*

C.C. Louis R. Montello