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William E. Kelly
Senior Counsel

100 Summer Street
Boston, MA 02110-2131

Via Federal Express

March 30, 2018

Mr. Richard Kahn
HBRK Associates Inc.
575 Lexington Avenue, 4th Floor
New York, New York 10022

Dear Rich:

Samuel E. Bain, Jr., Managing Partner of our client, Bainco International Investors LLC ("Bainco"), has informed me that he received a call on Thursday, March 29, from one of Bainco's investment advisory clients, Max Kohlenberg, a co-trustee of the Carol Chomsky Exempt Marital Trust and the Carol Chomsky Non-Exempt Marital Trust (together, "Carol Chomsky's Trusts"), reporting that you had communicated with him on behalf of Noam Chomsky and had advised him that Bainco and Mr. Chomsky had recently entered into a Confidential Settlement Agreement and Mutual Release of Claims (the "Settlement Agreement"). Mr. Kohlenberg told Mr. Bain that you had disclosed to him the subject matter of the Settlement Agreement and the amount paid by Bainco to Mr. Chomsky pursuant thereto.

I am writing to remind you that Section 15 of the Settlement Agreement contains a covenant by the parties to keep the Settlement Agreement confidential and not to disclose to any third parties the Settlement Agreement or any information regarding its terms and conditions. On the assumption that you were acting as Mr. Chomsky's agent in making the call to Mr. Kohlenberg, the disclosure that you made is a direct violation of Mr. Chomsky's confidentiality obligations under the Settlement Agreement.

The Carol Chomsky Trusts are active and valued clients of Bainco and your unauthorized disclosure to Mr. Kohlenberg has put in jeopardy Bainco's beneficial business relationship with those clients.

On behalf of Bainco, we hereby demand that you immediately cease making statements to any third party (including Mr. Kohlenberg and Harry Chomsky, his co-trustee) regarding the Settlement Agreement, the terms thereof, or the claims released thereby. Without waiving any rights or remedies Bainco may have with respect to yesterday's breach of Mr. Chomsky's non-disclosure obligations under the Settlement Agreement, we advise you that Bainco reserves all of its rights under the Settlement Agreement and intends, in the event of any further breach, to pursue all available remedies against Mr. Chomsky.

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Please feel free to contact me if you have any questions or comments regarding this matter.

Very truly yours,


William E. Kelly