

**K**irshenbaum &  
**K**irshenbaum  
ATTORNEYS AT LAW, INC.

APPENDIX U

Alfred Factor  
Paul J. Russo  
Charles A. Hirsch  
Albert J. Mainelli  
John E. McCann, III  
Neil P. Philbin  
Jason D. Monzack  
Matthew J. Elliott  
Brian G. Goldstein  
William F. Holt  
Christopher L. Russo  
Geoffrey A. Regan  
Robyn K. Cossack

BY FAX AND THEREAFTER  
BY REGULAR MAIL

May 17, 1995

John F. Cullen, Esq.  
Cullen & Resnick  
Historic Navy Yard  
Shipway Place C-3  
Boston, MA 02129

Joseph M. DiOrio, Esq.  
Hinckley, Allen & Snyder  
1500 Fleet Center  
Providence, RI 02903

Cambridge Meridian Group  
ATTN: Michael Weingarten  
50 Church Street  
Cambridge, MA 02138

Seymour Posner, Esq.  
U.S. Attorney's Office  
10 Dorrance St., 10th Fl.  
Providence, RI 02903

Stephen C. Rothemich  
Postal Inspector  
P.O. Box 2217  
Boston, MA 02205-2217

John Truslow  
Special Agent, FBI  
10 Dorrance Street  
Suite 900  
Providence, RI 02903

RE: Cumberland Investment Corp.  
Bk No. 89-11051

Gentlemen:

Please be advised that at a hearing held in the United States Bankruptcy Court for the District of Rhode Island regarding the above-captioned matter, a redemption coin holder, Warren Taft, requested that he be provided with certain documentation for the purpose of determining a chain of custody for Debtor's assets from the time those assets were taken into the possession of the Chapter 11 Trustee to today. Judge Votolato directed that I make written requests for that information. Judge Votolato has continued this matter for hearing to June 8, 1995 at 9:30 a.m. Judge Votolato has also stated that I may make written requests for Orders to compel a response should a voluntary response not be forthcoming promptly.

Accordingly, would you please provide me with a list of any and all documents which you have which would aid in the determination of the aforementioned chain of custody. I seek copies of any documentation which would show assets coming into the bankruptcy estate, the disposition of any assets (detailing what assets were sold or otherwise disposed of and what funds were received from the disposition of those assets and how those funds were disposed of), and the movement of any assets from location to location.

The documents I seek, include, but are not limited to the following:

1. All inventories taken by Per Baverstan and/or Cambridge Meridian Group.
2. All records of Ernst & Whinney regarding the inventories.
3. Complete accounting of superpriority loan previously approved by the Court, including all checks showing receipt and/or disbursement of funds.
4. Videos, photographs and stenographic records when inventory was removed from Debtor's premises to Marquette Credit Union.
5. Yellow notebooks (inventory books) containing lists of redemption coins.
6. Sign-in and sign-out cards for Eastland Bank in Cranston for the Debtor's inventory.
7. Videos of appraisals done at Eastland Bank in Cranston.
8. Documents regarding the private sale offer for 31,000 silver dollars and other assets completed by Russell Kayes, consultant to Christie's.
9. Transcripts of assets removed from Debtor's premises on August 17, 1990.

10. Any appraisals of possessory or non-possessory inventory.

11. Any and all inventories taken by the Examiner, including any inventories in long-hand and any computer inventories.

Should anyone receiving either an original or a copy of this letter have knowledge or information of the existence and/or the location of records not in your possession, which would aid in the determination of the chain of custody of the Debtor's assets, please provide me with a detailed description of those documents and where you believe these documents are currently located.

If anyone receiving an original or a copy of this letter wish that it be sent to anyone not receiving an original or a copy, please advise me of the name and address of that party, and I will forward the letter to that party.

Finally, if anyone receiving an original of this letter cannot substantively respond to me within ten (10) days, please advise when I may expect to be in receipt of your response with the copies requested.

Very truly yours,  
KIRSHENBAUM & KIRSHENBAUM  
Attorneys at Law, Inc.

Jason D. Monzack

JDM:med

cc: John P. Fitzgerald, Asst. U.S. Trustee  
Frank M. Cadigan, Esq.  
Z. Hershel Smith, Esq.  
Edward J. Bertozzi, Jr., Esq.  
Scott A. Lutes, Esq.  
Harold F. Chorney