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August 28, 2002

VIA FAX (310) 552-4909

Wayne Pariser, Esq.
1925 Century Park East
Suite 2000
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Re: *Shafir v. Nicherie 01-01507 CAS (JWJx)*

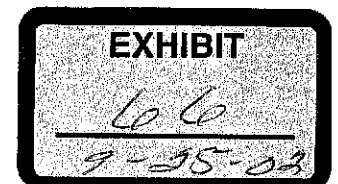
Dear Mr. Pariser:

Attached is a purported "Resolution of the board of directors of Amtec Audiotext, Inc. notice of trustee appointment" executed by your client Daniel Nicherie dated May 10, 2002 and Notice of Appointment. Apparently, your client purports to be the sole trustee for the Amtec Audiotext, Inc. Profit Sharing Plan and claims to be possessed with authority to sell, assign and transfer any and all assets of the Profit Sharing Plan.

On behalf of Ami Shafir, I request that you provide me with the following information relating to the pension plan. Please provide me with the details relating to the manner that Daniel Nicherie was "appointed" including reference to applicable authority and witnesses to this purported act. Please provide me with the support that Daniel Nicherie claims entitles him to sell, assign and transfer the plan assets.

Ami Shafir hereby requests that Daniel Nicherie provide him with the following documents:

- 1) **Summary Plan Description** (this summary of the pension plan explains what the plan provides and how it operates);
- 2) **Summary of Material Modifications (SMM)** (this summarizes material changes to the plan);
- 3) **Summary Annual Report** (this summarizes the annual financial reports that most pension plans file with the Department of Labor);
- 4) **Annual Report (Form 5500 Series)** (this is the annual financial reports that most pension plans file with the Department of Labor);
- 5) **Individual Benefit Statement** (this statement describes the total accrued and vested benefits required to be provided by most pension plans);
- 6) **Documents and instruments under which the plan is established or operated** (this includes, the plan document and trust agreement with any



- amendments including the SPD, SMM, and latest annual report); and
- 7) **Disclosure Notice** (if the plan is less than 90% funded the participants must be informed about the plan funding level and limits on PBGC's guarantees).

If Daniel Nicherie desires to hold himself out as the trustee of the pension plan, it is incumbent on him to comply with applicable statutory requirements.

As you know, Daniel Nicherie is exercising control over the plan documents and assets without proper authorization and he is interfering with Ami Shafir's lawful rights under the plan. I am instructing you to properly advise your client in this regard. In addition to the reporting requirements that include production of the plan documents, I am making a continuing demand on behalf of Ami Shafir that Daniel Nicherie cease the meritless litigation relating to the pension plan in addition to all other actions that have been caused by Daniel Nicherie and which are being maintained for improper purposes.

Moreover, during the period that Daniel Nicherie purports to be the trustee for Amtec Audiotext, Inc.'s pension plan, notwithstanding the fact that it is an unlawful exercise of control over the pension plan assets, documents and records, all responsible parties will be held accountable. These parties act at their own peril in violation of applicable laws and duties as purported trustee, advisor, counsel or otherwise.

Again, Daniel Nicherie's actions, specifically relating to Amtec Audiotext, Inc.'s pension plan are without authority and I am making this demand for Daniel Nicherie to turn over the books and records of Amtec Audiotext Inc's pension plan, to render the appropriate accountings including those set forth herein, to cease the meritless and unauthorized counterclaim maintained by Amtec Audiotext, and to extract himself from any and all interference with Ami Shafir and his businesses, immediately.

I furthermore advise you to make sure you have done a complete and thorough conflicts check. If you have any questions, please call.

Very truly yours,



Mark Estes, Esq.