



ZAMANI & ASSOCIATES PLLC

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February 22, 2018

Via U.S. Mail & Electronic Mail

Blake La Pierre
539 24th St., NE
Washington, DC 20002
blakelapierre@gmail.com

Re: La Pierre Property

Dear Mr. La Pierre,

As we indicated to you in our settlement communication of January 29, 2018, Ms. La Pierre's goal is to ultimately reach a comprehensive property settlement agreement with you that will address both your and her needs moving forward. However, in the interim, Ms. La Pierre again requests that you sell two of the Bitcoin acquired during the marriage so that she is able to meet her immediate financial needs. We relayed this request in our January 29th letter and Ms. La Pierre herself has also directly requested the sale of Bitcoin, both orally on January 7, 2018 and January 19, 2018 and in emails to you on January 10, 2018, January 17, 2018, and February 15, 2018.

Ms. La Pierre now reiterates her request that you sell two of the marital Bitcoin in your possession and transfer the proceeds to her. Ms. La Pierre agrees to deduct this amount from her portion of marital assets should you reach agreement on the division of assets in the future. In addition, Ms. La Pierre consents to you selling up to half of the Bitcoin for your own benefit, which would, of course, be later deducted from your share of the marital assets.

As you may be aware, the dollar value of Bitcoin has declined greatly since Ms. La Pierre first requested you sell two Bitcoin for her, and Ms. La Pierre is concerned that any further delay may lead to an even greater reduction in the net proceeds of any Bitcoin sale in the future. Therefore, Ms. La Pierre asks that you sell the two Bitcoin as requested above by no later than close of business on Friday, February 23, 2018. If you do not comply with Ms. La Pierre's request by that date, we will consider the decreased value of the Bitcoin a result of your delay, and will therefore ask the court to assign Ms. La Pierre a greater portion of any distribution of marital assets to compensate for this loss.

Although we are prepared to litigate the issues related to your and Ms. La Pierre's separation, I want to reiterate Ms. La Pierre's desire to resolve the issues between you outside of court. If you would like to discuss this possibility with us, please provide the documents we requested in our letter of January 29, 2018, attached hereto for your reference, by no later than Friday, March 2, 2018.

Sincerely,

ZAMANI & ASSOCIATES, PLLC

A handwritten signature in blue ink that reads "A Sow, esq".

Amanda Sow, Esq.

cc: Kimberly La Pierre
Sogand Zamani

Encl.



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January 29, 2018

FOR SETTLEMENT PURPOSES ONLY & WITHOUT PREJUDICE

VIA U.S. & ELECTRONIC MAIL

Blake La Pierre
539 24th St., NE
Washington, DC 20002
blakelapierre@gmail.com

Re: La Pierre Family Matter; Settlement Communication

Dear Mr. La Pierre,

We have been retained to represent Ms. La Pierre in connection with your separation. Ms. La Pierre wishes to undertake this separation as amicably as possible. We hope to eventually provide you with an offer of settlement that you will find equitable, recognizing that Ms. La Pierre does not earn an income that will sustain both of you at your current standards of living while living apart.

Of immediate importance, we understand that you have requested that Ms. La Pierre continue paying the rent for the home in which you are living. While Ms. La Pierre does not wish to cause you hardship, she is not able to pay your rent, as well as her own, without accumulating debt. So that you do not default on your lease, we propose selling one of the Bitcoins jointly owned by you and Ms. Pierre and using the proceeds towards the rent. If the rent or other expenses go unpaid, both of your credit scores will be harmed. Therefore, if Ms. LaPierre is blocked from accessing the small portion of marital assets needed to meet reasonable expenses during your separation, we will have no choice but to seek court intervention. We certainly hope this is not necessary given that there are sufficient assets to help support two households and to get both of you on your own feet as you move forward. To that end, we need to know what efforts you are making towards becoming employed. Please list the jobs for which you have applied, and the employment offers you have received, over the past five years.

Additionally, with tax season upon us, Ms. La Pierre would like to file tax returns in the way that makes the most financial sense for both of you, which will likely be jointly. Ms. La Pierre would like to take responsibility for this filing. Please provide us with any tax documents you have received or receive in the near future, including any documentation regarding California tax returns from 2016, so that Ms. La Pierre may consult with an accountant and file

the necessary returns. Contingent upon your cooperation, she agrees to equally split any refund with you.

Ms. La Pierre's goal is to present a comprehensive property settlement agreement that will address both your and her needs moving forward. In order to do so, we require additional information from you. Please provide us with the following documentation:

- Retirement account statements for the past 12 months, including for accounts that you established in Ms. La Pierre's name;
- Any personal or business bank account statements for the past 12 months;
- Credit card statements for all accounts in your name, either solely or jointly, from the past 12 months;
- Statements for any investment accounts from the past 12 months; and
- A current credit report.

Last, we understand that when Ms. La Pierre came to your home to retrieve her belongings, you behaved in a way that was both intimidating and upsetting, causing her to leave without all of the property and personal belongings for which she had come. When Ms. La Pierre next comes to retrieve her belongings, we ask that you refrain from communicating with her and blocking her movement through the house, allowing her the space she needs to safely remove her possessions. Once we receive confirmation that you will abide by these requests, Ms. LaPierre will provide possible dates for retrieval of her items.

If you have retained your own attorney, please provide his or her contact information so we can make contact directly. Otherwise, please provide the requested documents within two weeks from the date of this letter. If we do not receive a response, we will assume you are not interested in settlement and will proceed accordingly.

Sincerely,

ZAMANI & ASSOCIATES PLLC



Amanda Sow, Esq.

cc: Kimberly La Pierre
Sogand Zamani, Esq.