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August 4, 2016

**VIA ELECTRONIC MAIL**

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*William Douglas Campbell, et al. v. Vadim Mikerin, et al.*, Case No. 1:16-cv-01888-MJG  
(D. Md.) – Voluntarily Dismissing Suit

Dear Doug:

This letter is to confirm the substance of our telephone conversation yesterday. As you recall, we shared with you serious concerns raised by Messrs. Ephraim Wernick of the Department of Justice and Michael Packard of the U.S. Attorney's Office in Maryland regarding your proceeding with the above-captioned civil litigation. Their concerns are, generally, that the pursuit of the civil litigation is in violation of a Non-Disclosure Agreement ("NDA") you signed in January 2008; the allegations in the Complaint are contrary to certain facts they have developed during their investigation; your prior requests for reimbursement from DOJ cannot be completely verified; and you received from TENEX payments before you were authorized to do so by DOJ.

Messrs. Wernick and Packard made it clear to us that, if you choose to proceed with the civil litigation, they will seek to stay the litigation and seek to formally interview you. Moreover, they made clear that when required, they will provide unfavorable testimony and evidence about your allegations, actions, and reputation. Most importantly, although Messrs. Wernick and Packard said that they are not currently pursuing criminal charges, they made clear that you will be at risk of criminal prosecution for violation of the NDA if you proceed with the litigation.

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While we cannot independently confirm the concerns raised by Messrs. Wernick and Packard, we strongly urge and recommend that you voluntarily dismiss the civil litigation so as to protect your reputation and liberty.

Please send us an e-mail us to confirm your receipt of this letter and your agreement to voluntarily dismiss the civil litigation. Once we have your confirmation, we will file a notice of voluntary dismissal with the court and contact Messrs. Wernick and Packard to inform them not only of the dismissal, but also of your continued support of their efforts and willingness to cooperate in future investigations.

Very truly yours,

Linda Dale Hoffa

LDH:mr

cc (via e-mail): James Hennessey  
Malini Rao