

THE AGUIRRE LAW FIRM



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BY ELECTRONIC MAIL

September 6, 2011

Mark D. Cahn
General Counsel
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Re: Injunctive relief

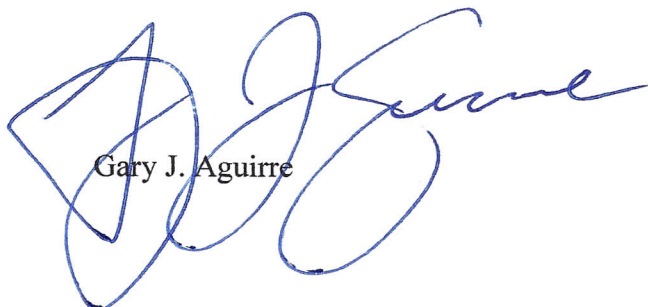
Dear Mr. Cahn:

On behalf of Mr. Flynn, I informed Chairman Schapiro this morning that the standing instructions to Mr. Flynn require him to direct the destruction of federal records pursuant to the Records Disposition Procedures for Closed Cases. On behalf of Mr. Flynn, I also requested Chairman Schapiro to order a freeze on any further destruction of documents until there is a schedule approved by NARA in place.

If no such freeze is put in place, we may need to seek injunctive relief from the U.S. District Court in Washington, D.C.

Obviously, time is of the essence, since the knowing destruction of federal records exposes the participants to criminal liability. Accordingly, would you kindly advise me at your earliest convenience whether the Commission will voluntarily direct a freeze on any further destruction of the documents in question until NARA has approved an SEC disposition schedule.

Sincerely,



Gary J. Aguirre