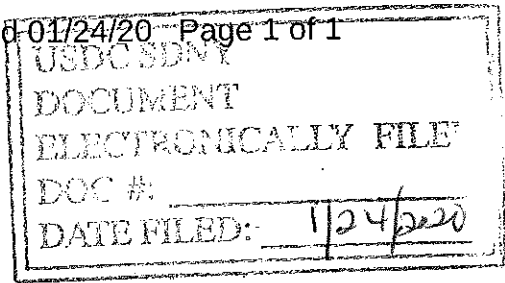


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January 24, 2020

Honorable Denise L. Cote
United States District Court
500 Pearl Street
New York, NY 10007

NOT ENDORSED

Re: SEC v. Lek Securities Corp., et al. Case No. 17 CV 1789 (DLC)

Your Honor:

On behalf of Defendants Avalon FA Ltd and Nathan Fayer and Sergey Pustelnik, I write pursuant to Paragraph 4.A of Your Honor's Individual Practices to respectfully request that Defendants be allowed to file certain affidavits under seal in connection with their opposition to the SEC's Motion for Judgment Including Remedies.

As part of their opposition, the individual Defendants will ask the Court to consider their current financial condition and ability to pay in determining the appropriate amount of civil penalties, if any, to award. Defendants will substantiate that request with affidavits that will contain sensitive personal and confidential financial information. For that reason, Defendants respectfully request that they be allowed to file those affidavits and attachments thereto under seal pursuant to Paragraph 4.A of Your Honor's Individual Practices.

Respectfully submitted,

Granted -
Denise Cote
1/24/20

J. M. Wines
James Wines