

Direct Line: +1.212.859.8182
Email: janice.macavoy@friedfrank.com

October 31, 2024

John M. Nolan
Chair, Member Selection Committee
c/o American College of Real Estate Lawyers
220 N. Market Street, Suite 100
Frederick, MD 21701

**Re: *Nomination of Xenia Garofalo as a Fellow of The American
College of Real Estate Lawyers***

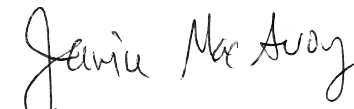
Dear Mr. Nolan:

I am pleased to second Xenia Garofalo as a Fellow of The American College of Real Estate Lawyers. I have known Xenia since she was an associate in the Washington D.C. office of my firm. Although Xenia was primarily a funds tax lawyer at the time, I worked with her on various real estate matters, particularly complicated REIT structures. Xenia was extremely knowledgeable and highly skilled at communicating complex tax issues to the lay person (like me, when it comes to tax issues!). She was also an active member of the Fried Frank's Women's Initiative, and was well liked by her colleagues. I have also reviewed Xenia's resume, and am incredibly impressed with her writing, speaking engagements and general level of engagement with the community. I have discussed it with Xenia, and I am confident that she will bring the same level of commitment to the College, as well as fostering the College's general commitment to giving back to the community at large.

I have received and reviewed the Proposal for Membership submitted by Allison Prince and certify that Xenia Garofalo satisfies the criteria for selection to the College as set forth in Section 4 of the Guidelines for Regular Member Selection. In my opinion and to my knowledge, the Nominee satisfies ACREL's Statement of Professionalism and exemplifies the standards of professional integrity and civility as provided in the Guidelines. I am not (a) in the same firm, business entity, faculty or other organization as the Nominee, (b) related by birth or marriage to the Nominee, or (c) a current Governor or member of the Member Selection Committee of the College. Neither the nominee nor her employer regularly employs or retains me or my law firm, and I have no business relationships with the nominee.

I highly recommend Xenia for membership into the College.

Sincerely,



Janice Mac Avoy

JM:hw