

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CANDACE LOUISE CURTIS	§	
Plaintiff,	§	
	§	
versus	§	CIVIL ACTION NO. 4:12-cv-00592
	§	Jury
ANITA KAY BRUNSTING, et al.	§	
Defendants.	§	

**PLAINTIFF'S AFFIDAVIT IN SUPPORT OF**  
**APPLICATION FOR INJUNCTION**

Comes now Plaintiff Candace Louise Curtis, the undersigned affiant, who does declare under penalty of perjury pursuant to the laws of the United States and does state the facts alleged in Plaintiff's application for injunctive relief are true and based upon personal knowledge except for those things alleged upon information and belief and as to those things I believe them to be true as well.

Defendants' own accounting spreadsheets support Plaintiff's application for restraint and show that (1) Plaintiff is likely to succeed on the merits of the underlying litigation; (2) Plaintiff is likely to suffer immediate, irreparable harm in the absence of preliminary relief; (3) the balance of equities weighs in favor of injunctive relief; and (4) an injunction in this instance is in the public interest.

Defendants' continue to use trust funds for their personal obligations, including paying their lawyers to defend their breaches of fiduciary in this action. Defendants have provided no acceptable accounting in either form or content,

continue to refuse to communicate any information regarding the existence or administration of any trust, refuse to provide valid unaltered copies of any trust instruments.

The only thing Plaintiff Curtis has received from Defendants subsequent to the filing of this suit is the accounting-like spreadsheets offered into evidence as admissions exceptions to the Hearsay rule. The synopsis of these schedules and spreadsheets was kept brief, but there are anomalies and false assertions of alarming proportions raising very serious questions regarding what may have happened to large sums of money and why known assets remain unaccounted for.

Plaintiff has received no information from Carl Brunsting that may have been produced in any of the three state court actions and Plaintiff is concerned about that fact.

I declare under penalty of perjury, pursuant to the laws of the United States, that the above statement of facts is true and correct and based upon personal knowledge.

March 11, 2013

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