

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CANDACE LOUISE CURTIS

*Plaintiff,*

V.

ANITA KAY BRUNSTING, AND  
AMY RUTH BRUNSTING

*Defendants.*

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4:12-CV-00592

RESPONSE OF DEFENDANTS TO REPORT OF MASTER

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Defendants Anita Kay Brunsting and Amy Ruth Brunsting file this Response to the Report of the Master. Defendants desire to clarify certain matters in the report and to provide to the Court relevant background information they provided to the Master and on which the Master relied in his report. To the extent necessary under Rule 53, and to the extent the Court treats any part of the Master’s report as a finding of fact, Defendant’s clarifying information may also be considered an objection to the related finding of fact, under Rule 53(f)(2) and (3).

RESPONSES TO MATTERS NOTED IN THE REPORT

1. In section II of the Report, at page 3, the Master notes that counsel for Defendants provided a letter in explanation of certain distributions on 7/15/2013. In section III of the Report, at page 4, the Master notes that he relied on information and explanations supplied in the 7/15/2013 letter. Another reference to the letter is made in Section VII at page 10. In order that the Court may have the benefit of that information, a true copy of the letter to the Master is attached as Appendix Item 1.

2. In section V of the Report, the Master notes certain exceptions to the Report and references missing documents. The Defendants have complied in good faith with the requests of the Master for information and assistance, which were all reasonable requests. The following explanations or comments address certain of the Master's noted exceptions.

A. At page 6, the Master notes that he did not receive monthly statements for payments on a Bank of America credit card. The payments to the Bank of America credit card were for Defendant Anita Brunsting's trustee fee compensation. The Master was advised of the payments to a personal card in the 7/15/2013 letter at paragraph 1. Other prior counsel for the Trust had calculated a reasonable fee for Ms. Brunsting, as also related in the 7/15/2013 letter. The payments to the credit cards are documented on the bank statements provided to the Master, as he notes.

B. At page 7, the Master notes that statements were not received for Bank of America checking account ending in 9546, from 12/14/2011 to the effective date of the Report. As noted in the 7/15/2013 letter, the Trustee was not a signatory on this account; rather, Defendants' mother placed their sister Carole Brunsting on the account as a Joint Tenant with Right of Survivorship, so Carole could assist with Mrs. Brunsting's day-to-day expenses. The Trustee did transfer funds into this account for her mother and Carole to write checks or make withdrawals for her mother's needs. Defendants believe the referenced account was closed approximately January 2012 but do not have the final statement. It was not obtained by their sister before the Master's tender of the report, but likely can be obtained.

C. The Master further notes that statements were not received for an account with Edward Jones ending in 5-1-6, after 4/26/2013 to the effective date of the Report. Defendants respond that no statements have been posted by Edward Jones after 4/26/2013, and therefore there are no documents that could be provided after that date and through May 31, 2013.

D. The Master further notes that statements were not received for a Chevron dividend investment account ending in 9423, from 12/31/2011 to 5/31/2013. Defendants respond that they are missing statements from 9/11/2012 through 6/9/2013, and no additional statements have been posted by Computershare. Defendants were not able to determine from Computershare why no statements have been posted, but did provide the transaction history to the Master to evidence of dividend reinvestment and that no funds had been removed from the account.

E. The Master notes that statements were missing for an ExxonMobil dividend reinvestment account ending in 6287, from 9/30/2012 to 5/31/2013. Defendants respond that they provided statements to the Master from 9/12/2012 to 5/10/2013 as part of a transmittal of supplemental documents on 7/5/2013. The fact that additional records were provided on 7/5/2013 is referenced at Section II, page 5, of the Master's report. Defendants' transmittal letter to the Master is attached as Appendix Item 2.

F. The Master notes that statements were missing for a John Deere dividend reinvestment account. Defendants comment that they did provide a May 2013 statement to the Master.

3. In Section VI of the Report, addressing Stock Distributed, the Master notes “[a] final accounting of 37.131 shares of CVX stock could not be determined since reports after 12/31/2011 were unavailable for one of the DRP accounts.” Defendants respond that they believe the Master is referring to the shares in the survivor’s trust Chevron account ending in 7657. The Defendants only have a tax statement for 2012 and did provide a 6/10/2013 statement as referenced in Appendix Item 2. There are currently 38.334668 shares in this account.

4. Additionally in Section VI, at page 9, the Master notes that 95 shares of Met Life Inc. shares were attributed to the Trust “however the only reports reflecting information on these shares were dated late in the review period and did not show whether the shares were available to the estate at the beginning of the period.” Defendants did provide the Master in the initial set of documents with an accounting (“the Vacek accounting”) that has a schedule B. That schedule is a survivor’s trust asset list and there notes a December 2010 value for the same 95 shares of Met Life Inc. stock. This is some evidence as to the shares available at the beginning of the Master’s report period.

5. Additionally in Section VI, at page 9, the Master notes that “[o]nly 0.04946 shares of [Deere and Company] were attributed to the estate at the end of the period. No reports reflected the balance as of the beginning of the period and 8.669 shares were not accounted for during the period.” Defendants did provide a transaction history at Bates number AABrunsting.Financials004272; also the Vacek accounting shows 9.5807 shares in December 2010 and 9.7125 shares March 2012, while the transaction history provided

to the Master on 7/5/13 evidences 9.9117 shares in the survivor's trust (and none in the decedent's trust). Defendants believe the shares are accounted for.

6. In Section VII, at page 10 the Master notes that he prepared an account titled *Payments to Credit Cards* in the Expense/Distributions section of the Report, and that this account references payments to a Bluebonnet credit card account. The Master does note monthly statements and some supporting documentation were provided for the credit card account. Defendants add that this was their mother's personal credit card and that she allowed caretakers to use it as needed to purchase groceries, medical supplies, and other similar necessities.

7. Finally, Defendants would emphasize that as to the Stock Distribution Analysis, attached as Exhibit 3 to the Master's Report, all of the distributions noted on that exhibit were during the life of Defendants' mother and at Mrs. Nelva Brunsting's directions. These distributions continued Nelva Brunsting's prior history of gifting and are discussed in several paragraphs of the 7/15/2013 letter.

#### CONCLUSION AND RELIEF SOUGHT.

8. Defendants are individuals, not financial professionals. They concede, as the Master notes, that they used the Quicken electronic files to maintain Trust records but neither they nor their parents had used a more fully integrated bookkeeping system. Still, Defendants have endeavored to meet their obligations under the Trust in good faith, notwithstanding the number of accounts involved; the transferences upon death of their parents; the transition of client records that resulted from Computershare purchasing BNYMellon; a life insurance trust, farm lease, and other matters. They have provided all

documents they had access to or were able to obtain from providers and vendors within the period of the Report.

Defendants Anita Kay Brunsting and Amy Ruth Brunsting pray that the Court take notice of this filing.

Respectfully submitted,

MILLS SHIRLEY L.L.P.

By: /s/ George W. Vie III  
George W. Vie III

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ATTORNEYS FOR DEFENDANTS

#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that service on known Filing Users will be automatically accomplished through the Notice of Electronic Filing; those who are not filing users will be served by email and regular mail. Additionally, non-party beneficiaries will be served by copy to any attorney-of-record for those parties in state court litigation.

/s/ George W. Vie III

George W. Vie III

# Appendix Tab 1

# MILLS SHIRLEY L.L.P.

ESTABLISHED 1846

GEORGE W. VIE III  
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July 15, 2013

Re: Case No. 4:12-cv-00592; *Candace Louise Curtis v. Anita Kay Brunsting et al* – In the United States District Court for the Southern District of Texas, Houston Division

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Mr. William G. West, C.P.A. & Bankruptcy Trustee  
Southern District of Texas  
12345 Jones Road, Suite 120  
Houston, TX 77070

Dear Mr. West:

We previously delivered three binders, a folder, CDs (Bates #s AABrunsting.Financials 002359-004082) and a chart of the Brunsting accounts to you as requested and pursuant to the Court's order. We also delivered an additional binder and CD (Bates #s AABrunsting.Financials 004083-0042832). We want to provide the following information to assist you in your review of the documentation and to provide some background and context you otherwise might not have.

1. Under the terms of the Living Trust and its sub-trusts, the Trustee is entitled to a fee. Anita Brunsting became Successor Trustee on December 21, 2010. Ms. Brunsting consulted with Vacek & Freed, the attorneys who prepared the Living Trust and its sub-trusts, to determine the percentage amount of her fee. Instead of taking her \$41,070.08 Trustee's fee in cash, Ms. Brunsting paid her personal credit cards with trust assets and paid for some of her children's college expenses beginning May 5, 2011, through November 8, 2011. During this period, two percent of the trust value was \$45,826.00; thus we contend the Trustee's fee was reasonable. (See Bates 002346).
2. Mr. and Mrs. Brunsting had a history of making financial gifts to their five children as well as their seven grandchildren. Numerous gifts were given to the older Brunsting children (Carl, Candace and Carole); Candace's sons, Kevan Curtis and Andy Curtis (currently in their mid-30s); and Carl's daughter, Marta Brunsting Huntsman (prior to Mr. Brunsting's death) to assist with their college, business and/or wedding expenses. Mrs. Brunsting continued gifting when she was



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Trustee. The financial documents we have provided will not show all of the gifts to the older children and the older grandchildren, since many gifts were made prior to Mr. Brunsting's death. Because Anita and Amy are the youngest children and, in turn, their children are the youngest grandchildren, gifts to them may seem to predominate, when in fact all previous gifts to the older children and older grandchildren may not be reflected in the records. (See Bates 002341-002343). Further, prior to Anita becoming Trustee, Mr. and Mrs. Brunsting gave Candace Curtis at least \$42,000.00 and loaned her an additional \$20,000.00 against her inheritance. After Anita became Trustee, her mother requested that an additional \$11,000.00 in gifts be made to Candace Curtis (detailed below). See enclosed spreadsheet detailing gifts.

3. When Anita Brunsting became Trustee in December 2010, Mrs. Brunsting wanted to continue her history of gifting to her children and grandchildren. In May 2011, at her mother's direction, Anita transferred stock from the Survivor's Trust to Amy so that Amy could pay off her mortgage, and in June 2011 transferred stock from the Decedent's Trust to Carole so that Carole could update her home and pay off her mortgage. Note that Mrs. Brunsting wanted to ensure that Amy's and Carole's homes were paid off as she and her husband did the same for Anita in approximately 2005. (See Bates 002342-002343). Amy and her husband divorced and Mrs. Brunsting was concerned about the welfare of Amy and her children since Amy's ex-husband terminated his parental rights and was not paying any child support. Mrs. Brunsting also instructed Anita to make gifts to Amy's two children, J.B. and A.B., and for Anita's two children, Katie Riley and Luke Riley for future car and college expenses. Each of the four grandchildren received 135 shares of Chevron stock from the Survivor's Trust in June 2011. (See Bates 002343) Before Anita transferred the stock at her mother's instructions, she consulted with attorney Candace Freed of Vacek & Freed, the attorneys who prepared the Living Trust and its sub-trusts, and accountant Rich Rikkens confirming it was not improper to make these transfers.
4. In November 2010, Mrs. Brunsting sent an e-mail to Amy Brunsting stating Mrs. Brunsting was gifting Amy \$13,000.00, although the transfer was not complete until 2011. Specifically, \$7,000.00 was given on December 31, 2010, and \$6,000.00 was given on January 19, 2011 (See Bates 002333, 002360).
5. Mrs. Brunsting informed Anita that she had been giving money to Candace and instructed her to continue to give Candace what she needed. In April 2011, Anita gave \$3,000.00 to Candace Curtis. (See Bates 002334,002374) In June 2011, Anita gave \$2,000.00 to Candace Curtis. (See Bates 002336, 002384). In August 2011, Anita gave \$2,000.00 to Candace Curtis. (See Bates 002337, 002395) In October 2011, Anita gave \$2,000.00 to Candace Curtis. (See Bates 002338, 002404) In November 2011, Anita gave \$2,000.00 to Candace Curtis. In November 2011, Mrs. Brunsting instructed Anita to give \$2,000.00 for her son,

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Luke Riley's education. (See Bates 002339, 002408-002409). Anita distributed \$12,585.60 in Exxon stock from the survivor's trust to Candace Curtis in June 2011 for a reserve to help Candace Curtis with expenses, should Mrs. Brunsting passed away.

6. In approximately July 2010, Carl Brunsting became very ill. He was hospitalized and, for a period of time, lived with Mrs. Brunsting instead of his wife, Drina Brunsting. Mrs. Brunsting paid almost \$47,000.00 for personal care providers for Carl. (See Bates 002344-002345).
7. Anita Brunsting resides in Victoria, Texas, approximately two hours and approximately 120 miles from her parents' home in Houston. Because Anita could not be with her mother on a daily basis, it was not practical for Anita to oversee her mother's daily incidentals. Thus, Mrs. Brunsting placed Carole Brunsting as a Joint Tenant with Right of Survivorship on one of her Bank of America accounts (ending in 9546), so Carole could assist with Mrs. Brunsting's day-to-day expenses. Since Anita was not a signatory on this account she, as Trustee, transferred funds into this account for her mother and Carole to write checks or make withdrawals for her mother's needs. Note that on April 7, 2011, a \$3,000.00 gift was given to Candace Curtis from this account. (See Bates 002336-002340). (This is in addition to the gifts to Candace Curtis described above.)
8. The Brunsting family home was sold in March 2012 and \$433,129.52 was deposited into the Survivor's Trust at Bank of America (account ending in 3523). (See Bates 002439) Because the deposits would exceed the FDIC limit, Anita Brunsting transferred \$167,000.00 to a Bank of America account ending in 3536. (See Bates 002459, 002524) However, this is an account of the Decedent's Trust, not the Survivor's Trust, so the funds were then transferred to a Survivor's Trust savings account at Bank of America (account ending in 8577). (See Bates 002527, 002576).

If you have any questions regarding the funds or transfers between accounts, my clients and I will be happy to answer them.

Thank you.

Sincerely,

*/s/ George W. Vie III*

George W. Vie III

Date	Gift	Stock price	amount	Person	purpose
<b>Mom/Dad were trustees</b>					
12/21/2010	trxf		\$ 7,000.00	Amy Brunsting	mom wanted to help w/ the child support that Amy lost by the kids' dad waiving his parental rights
1/4/2011	trxf		\$ 6,000.00	Amy Brunsting	mom wanted to help w/ the child support that Amy lost by the kids' dad waiving his parental rights
6/22/2009			\$ 1,000.00	Amy Brunsting	college fund
7/14/2009			\$ 1,000.00	Amy Brunsting	college fund
11/14/2007	chk# 5715		\$ 5,000.00	Amy Brunsting	unsolicited gift
1/20/2006	chk# 5143		\$ 200.00	Amy Brunsting	
2/11/2002	chk# 3526		\$ 200.00	Amy Brunsting	college fund
12/31/2002	chk# 3911		\$ 200.00	Amy Brunsting	college fund
	<b>Total Amy Brunsting</b>		<b>\$ 20,600.00</b>		
10/2/2009	chk# 6359		\$ 1,000.00	Andy Curtis	
2/8/2010	chk# 6518		\$ 5,000.00	Anita Brunsting	unsolicited gift
6/24/2009	chk# 6278		\$ 1,000.00	Anita Brunsting	graduation gift to me for finishing my doctorate
7/14/2009	chk# 6294		\$ 1,000.00	Anita Brunsting	college fund
9/8/2009	chk# 6338		\$ 1,000.00	Anita Brunsting	college fund
10/19/2009	chk# 6403		\$ 1,250.00	Anita Brunsting	
1/20/2006	chk# 5142		\$ 200.00	Anita Brunsting	college fund
1/31/2006	chk# 5155		\$ 150.00	Anita Brunsting	mom wanted to pay for housekeeper - I didn't have a housekeeper, mom wanted me to get one
2/21/2006	chk# 5172		\$ 150.00	Anita Brunsting	mom wanted to pay for housekeeper - I didn't have a housekeeper, mom wanted me to get one
4/1/2006	chk# 5233		\$ 150.00	Anita Brunsting	mom wanted to pay for housekeeper - I didn't have a housekeeper, mom wanted me to get one
1/10/2003	chk# 3920		\$ 200.00	Anita Brunsting	college fund
2/11/2002	chk# 3527		\$ 200.00	Anita Brunsting	college fund
	<b>Total Anita Brunsting</b>		<b>\$ 10,300.00</b>		
3/17/2010	chk # 6386		\$ 750.00	Candy Curtis	
1/27/2009	chk # 6124		\$ 2,000.00	Candy Curtis	
7/29/2009	chk# 6309		\$ 4,000.00	Candy Curtis	
7/8/2008	chk # 5917		\$ 2,000.00	Candy Curtis	
8/3/2009	chk# 5944		\$ 1,500.00	Candy Curtis	
7/6/2001	trxf		\$ 20,000.00	Candy Curtis	
1/19/2010			\$ 5,000.00	Candy Curtis	
3/29/2010			\$ 7,000.00	Candy Curtis	
6/22/2010			\$ 20,000.00	Candy Curtis	Taken against inheritance (documentation on file w/ Vacek & Freed) expenses, divorce
	<b>Total Candy Curtis</b>		<b>\$ 62,250.00</b>		
11/10/2005	chk# 5070		\$ 10,000.00	Carl Brunsting	
3/12/2003	chk# 3986		\$ 9,000.00	Carl Brunsting	
4/9/2003	chk# 4017		\$ 11,000.00	Carl Brunsting	
9/17/2001	chk# 3347		\$ 2,000.00	Carl Brunsting	
10/6/2010			\$ 25,000.00	Carl Brunsting	medical bills
2010-2011			\$ 21,899.61	Carl Brunsting	paid one medical bill (\$1565.70) and to caretakers directly for his care from 7/13/2010 through 1/9/2011, (additional days occurred from Jan-April 2011 than included payment to caretakers as well as groceries and his medical supplies, but specific dates in this time period were not recorded)
	<b>Total Carl Brunsting</b>		<b>\$ 78,899.61</b>		
6/27/2009	chk# 6285		\$ 2,000.00	Carole Brunsting	
2/12/2009	chk# 5794		\$ 500.00	Carole Brunsting	
3/18/2008	chk# 5821		\$ 250.00	Carole Brunsting	
11/13/2007	chk# 5713		\$ 600.00	Carole Brunsting	
1/5/2006	chk# 5129		\$ 1,000.00	Carole Brunsting	loan?
7/1/2006	chk# 5287		\$ 1,200.00	Carole Brunsting	
3/23/2005	chk# 4785		\$ 450.00	Carole Brunsting	
12/8/2005	chk# 5090		\$ 1,500.00	Carole Brunsting	
7/2/2005	chk# 4901		\$ 350.00	Carole Brunsting	
10/2/2005	chk# 5016		\$ 2,500.00	Carole Brunsting	
10/21/2003	chk# 4232		\$ 1,000.00	Carole Brunsting	
12/12/2002	chk# 9878 ?		\$ 1,500.00	Carole Brunsting	
12/17/2002	chk# 3883 ?		\$ 5,000.00	Carole Brunsting	
3/23/2010			\$ 7,000.00	Carole Brunsting	
5/18/2010			\$ 1,000.00	Carole Brunsting	
10/1/2010			\$ 20,000.00	Carole Brunsting	original intent to take against inheritance, but no letter/documentation found to date; will be treated as a gift; to fix house
	<b>Total Carole Brunsting</b>		<b>\$ 45,850.00</b>		
10/2/2009	chk# 6358		\$ 1,000.00	Kevan Curtis	

Date	Gift	Stock price	amount	Person	purpose
<b>Anita became trustee Dec. 2011</b>					
5/11/2011	1120 shares Exxon Survivors trust	\$ 81.12	90854.4	Amy Brunsting	to pay off house
	Total Amy Brunsting		\$ 90,854.40		
5/10/2011			\$ 5,443.22	Anita Brunsting	pay off Luke's truck
6/3/2011			\$ 5,750.51	Anita Brunsting	pay off Honda for Katie
6/14/2011	135 shares chevron Survivors trust	\$ 100.60	\$ 13,581.00	Anita Brunsting	borrowed against inheritance - for college expenses
6/15/2011	160 shares Exxon Survivors trust	\$ 78.66	\$ 12,585.60	Anita Brunsting	borrowed against inheritance - for college expenses
	Total Anita Brunsting		\$ 37,360.33		
4/7/2011			\$ 3,000.00	Candy Curtis	property taxes
6/8/2011			\$ 2,000.00	Candy Curtis	new bed?
6/15/2011	160 shares Exxon Survivors trust	\$ 78.66	\$ 12,585.60	Candy Curtis	for reserve after mom passed away to keep helping her w/ expenses if trust money was not available
8/24/2011			\$ 2,000.00	Candy Curtis	expenses
10/26/2011			\$ 2,000.00	Candy Curtis	medical bills
11/10/2011			\$ 2,000.00	Candy Curtis	travel to see mom
	Total Candy Curtis		\$ 23,585.60		
6/15/2011	1325 shares Exxon Decedents trust	\$ 78.66	\$ 104,224.50	Carole Brunsting	to pay off/fix house
	Total Carole Brunsting		\$ 104,224.50		
6/14/2011	135 shares chevron Survivors trust	\$ 100.60	\$ 13,581.00	J.B. (grandchild)	gift for future car/college exp
6/14/2011	135 shares chevron Survivors trust	\$ 100.60	\$ 13,581.00	A.B. (grandchild)	gift for future car/college exp
6/14/2011	135 shares chevron Survivors trust	\$ 100.60	\$ 13,581.00	Katie Riley UGMA (grandchild)	gift for college exp
6/14/2011	135 shares chevron Survivors trust	\$ 100.60	\$ 13,581.00	Luke Riley (grandchild)	gift for college exp

## Appendix Tab 2

# MILLS SHIRLEY L.L.P.

ESTABLISHED 1846

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FACSIMILE (409) 763-2879  
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July 5, 2013

Re: Case No. 4:12-cv-00592; *Candace Louise Curtis v. Anita Kay Brunsting et al* – In the  
United States District Court for the Southern District of Texas, Houston Division

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Mr. William G. West, C.P.A. & Bankruptcy Trustee  
Southern District of Texas  
12345 Jones Road, Suite 120  
Houston, TX 77070

Dear Mr. West:

Enclosed are a binder and a CD (Bates #s AABrunsting.Financials004083-004283) containing additional financial documents. We are working with our clients to obtain the outstanding statements as quickly as possible.

- **Bank of America account # [REDACTED] 1143**
  - December 1, 2010 - December 31, 2010 statement
  - January 1, 2012 - January 31, 2012 statement
  - February 1, 2012 - February 29, 2012 statement
  - Missing March 1, 2012 – March 31, 2012, April 1, 2012 – April 30, 2012 (requested from Bank of America)
  - *Note account was closed in April 2012, not April 2013 – Quicken account erroneously noted it was closed in 2013*
  
- **Bank of America account # [REDACTED] 3523**
  - May 10, 2013 - June 7, 2013 statement
  - Copy of retainer refund and deposit slip
  - **Complete**
  
- **Bank of America account # [REDACTED] 3536**
  - May 14, 2013 – June 11, 2013 statement
  - **Complete**

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- **Bank of America account # [REDACTED] 8577**
  - April 23, 2013 – May 22, 2013 statement
  - May 23, 2013 – June 20, 2013 statement
  - **Complete**
  
- **Bank of America account # [REDACTED] 9546**
  - December 31, 2010 – December 14, 2011 statements
  - The statement reflecting the \$1,540.47 deposit on January 3, 2012, is in the possession of Carol Brunsting. Anita Brunsting was not on this account. We requested the statement from Carole Brunsting and the deposit into the account and hope to have it shortly.
  
- **Bank of America account # [REDACTED] 6643**
  - Missing April 14, 2011 and March 16, 2012 statements
  - This account was owned by the Brunsting Life Insurance Trust and is not part of this lawsuit. All proceeds of this account were evenly distributed to the five Brunsting children.
  
- **Edward Jones account [REDACTED] 5-1-6**
  - November 26, 2011 – December 31, 2011
  - Missing April 26, 2013, to date statements because no statements have been posted by Edward Jones
  - **Complete**
  
- **Edward Jones account [REDACTED] 6-1-9**
  - Missing May 31, 2013, to date statements because no statements have been posted by Edward Jones
  - **Complete**
  
- **Edward Jones account [REDACTED] 9-1-8**
  - November 26, 2011 – December 31, 2011
  - Missing May 31, 2013, to date statements because no statements have been posted by Edward Jones
  - **Complete**
  
- **Edward Jones Portfolio Summary November 26, 2011 – December 31, 2011**
  
- **Bluebonnet Visa [REDACTED] -6626**
  - this account was closed in December 2011 – the last statement shows a zero balance
  - **Complete**
  
- **Chevron/Computershare [REDACTED] 9423**
  - June 10, 2013
  - Missing September 11, 2012 – June 9, 2013 statements – no additional statements are available, please refer to transaction history
  - **Complete**

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- **John Deere/Computershare [REDACTED] 6354**
  - May 1, 2013
  - Missing February 3, 2010 to April 30, 2013
  - Note the Trustee had major difficulties obtaining statements from BNY Mellon
  - There were only 9 shares of stock in this account
  
- **Exxon/Computershare [REDACTED] 0102**
  - March 24, 2011 to date statements – Mrs. Nelva Brunsting split this account between [REDACTED] 7769 and [REDACTED] 7777 in March 2011 so there are no statements after March 2011
  - **Complete**
  
- **Exxon/Computershare [REDACTED] 7769**
  - June 11, 2011, June 15, 2011
  - March 24, 2011 Direct Registration Advice (2)
  - March 24, 2011 Account Summary
  - June 15, 2011 Direct Registration Advice
  - June 11, 2012 Account Summary
  - September 12, 2012 Direct Registration Advice
  - September 12, 2012 Account Summary
  - October 10, 2012 Account Summary
  - No other statements available
  - Note that in September 2012, Amy Brunsting was added as a Co-Trustee and the account was changed to [REDACTED] 6261 and [REDACTED] 3319, so there are no statements after September 2012
  - **Complete**
  
- **Exxon/Computershare [REDACTED] 6261**
  - September 12, 2012 Reinvestment Confirmation
  - September 12, 2012 Account Summary
  - December 10, 2012 Account Summary
  - 2012 Form 1099
  - March 11, 2013 Statement
  - June 10, 2013 Statement
  - **Complete**
  
- **Exxon/Computershare [REDACTED] 3319**
  - October 10, 2012 Direct Registration Advice
  - October 22, 2012 Reinvestment Confirmation
  - December 10, 2012 Account Summary
  - March 11, 2013 Statement
  - June 10, 2013 Statement
  - **Complete**

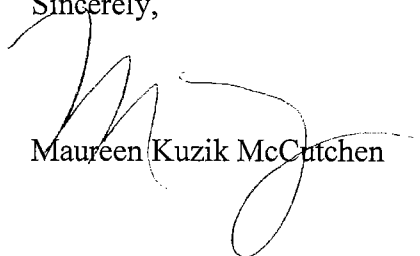


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- **Exxon/Computershare [REDACTED] 7777**
  - September 10, 2012 Account Summary
  - September 12, 2012 Account Summary (2)
  - statements after September 12, 2012 - Amy Brunsting was added as a Co-Trustee and the account was changed to [REDACTED] 6287 and [REDACTED] 3301 so there are no statements after September 2012
  - **Complete**
  
- **Exxon/Computershare [REDACTED] 6287**
  - September 12, 2012 Reinvestment Confirmation
  - September 12, 2012 Account Summary
  - March 11, 2013 Statement
  - June 10, 2013 Statement
  - Missing statements from September 12, 2012, to March 10, 2013
  - Please refer to transaction history
  
- **Exxon/Computershare [REDACTED] 3301**
  - March 11, 2013 Statement
  - June 10, 2013 Statement
  - **Complete**
  
- **Computershare/Chevron/Exxon - Decedent's Trust Recent Transactions**
  
- **Computershare/Chevron/Deere/Exxon - Survivor's Trust Recent Transactions**

Please let me know if you have questions. Thank you.

Sincerely,



Maureen Kuzik McCutchen

MKM/mn/254612/100925.3  
Enclosures