

**WILLIAM K. SUMMERS, M.D.**  
**Neuropsychiatry and Internal Medicine**

August 20, 2005

Mr. Stuart Stein  
Stein Law Firm  
2155 Louisiana NE,  
Albuquerque, NM 87110  
Telé 505\ 889-0100

FAX: 505\ 889-0953

re: Bruce Clinesmith  
DOB: 08-02-1917

Dear Mr. Stein,

Thank you for the educational opportunity to have witnessed Mr. Clinesmith's review and signature of his Trust and Will papers at noon on August 18, 2005.

You ask for my observations which are as follows. The meeting began with Mr. Clinesmith, his wife Ruth Clinesmith, two witnesses from your office (Julie and Susan), Dr. Robert Kellogg, myself and you. The document's salient points, as discussed between you and Mr. Clinesmith on August 10, 2005, were again reviewed. Mr. Clinesmith clearly comprehended your discussion. He understood three principle points of 1) He was changing his Trust and Will 2) He strongly wanted all of the monies in the Trust belong to him and his wife. 3)The issue of who would be his trustee was discussed at some length. He was adamant that his wife be the principle trustee in the event of his being disabled. He accepted that the Bank of Santa Fe be the back up trustee, given that Ruth was not able to serve. He most specifically noted a distrust of other individuals in this capacity (eg his daughter, or another relative). 4)He wanted the four children associated with his wife and he to get equal amounts, and that those amounts would be higher than the \$100,000 ascribed in 1999 5)He clearly understood the size of his estate was in the neighborhood of ten million dollars..

At about the time you were discussing the four children and their inheritance, the process was disrupted by a Ms. Cathy Combs of Decades, LLC barging into the room. Ms. Combs proceeded to put a chill on the process by shrilly demanding that the meeting stop. She did not identify herself to her ward (Mr. Clinesmith) or his wife of 38 years. You pointed out that she was free to challenge the documents at a later time, but that you would need to proceed. Mrs. Combs sat down at the West wall of the room and began dialing her cell phone repeatedly. She spoke loudly in her conversations disrupting the process.

Nevertheless, Mr. Clinesmith began the process of identifying his intention to dissociate himself from the Moody Bible Institute immediately. When you reviewed the three new charities named

**EXHIBIT D**

page two -August 20, 2005

in the Trust he turned to his wife to briefly consult with her. Then he nodded his assent in understanding of point 6) The entire estate would be available to he and Ruth while either was alive. 7) The bulk of the residual estate (after the deaths of both he and Ruth) would be distributed to new charities. You named the three as the Salvation Army (which he commented to the effect that they were good people); a charity that funds the building of churches; and the Gideon Bible foundation. He consulted with his wife again about the second charity, but clearly was pleased with the Gideon Bible foundation.

While you were reviewing point 6) and 7) Ms. Combs was disruptive. She loudly made calls out and receive calls. Her cell phone was set to a particularly loud tune which she made no attempt to silence. The disruption was so obnoxious, that I requested that leave the room to make her telephone calls. She then got up and left the room at least three times, and returned as many times. With each exit or entry, there was no apparent attempt to be unobtrusive. Ms. Combs intent appeared to be to disrupt the procedure until others arrived. She displayed no interest in learning the intent of Mr. Clinesmith, but rather disrupting his intent. It is doubtful that she has any understanding of the topics you were discussing. This seemed a bit peculiar for one charged with the duty of knowing Mr. Clinesmith's intent.

Despite this disruption, Mr. Clinesmith was able to sign the first of the two documents.

Next a woman entered the room and identified herself as from Decades, LLC. She may have mentioned her name but I later learned it was a Ms. Nancy Oreola, an owner of Decades, LLC. You, Mr. Stein, were cordial to her and invited her to pull up a chair. She did. She positioned herself behind and to the right of Mr. Clinesmith. Her position was so close, that her knees touched Mr. Clinesmith's chair. She began leaning forward into Mr. Clinesmith's field of vision, obstructing at times his view of the document he was to review. Mr. Oreola would cock her head, smile broadly, and interrupt your conversation with Mr. Clinesmith with statements such as "Do you know what you are doing?" or "Do you know what you are signing?" or "Is this what you want? *Is this what you want?*".

The disruption was so intimidating, that I elected to use a psycho dynamic technique called mirroring. This allowed Ms. Oreola to move back from Mr. Clinesmith so he could complete signing the Will. Amazingly, Mr. Clinesmith remained focused and signed the Will. The Will was witnessed by your office staff.

Page three - August 20, 2005


I and Dr. Kellogg had to leave as further personal from Decades arrived. These were later identifies as attorneys for Decades, LLC.

In thirty years as a psychiatrist, I have not witnessed a more bizarre event. It was like a scene from "The Man from La Mancha", where his niece and a priest are conspiring to have Don Quixote declared insane. They use a series of techniques to confuse the old man. Of course control of Don Quixote's substantial estate is the true object of their efforts. Nevertheless, the song that explains their activities is entitled, "We are only thinking of him!".

From what occurred in that room, it seems clear to me that Decades, LLC has no business representing to the court that they would have a less intrusive, more beneficial regard for Mr. Clinesmith than his wife and partner of 38 years.

I wish you luck in Court trying to fend against Decades, LLC who probably know the song "We are only thinking of him" by heart.

Yours,

A handwritten signature in cursive script that reads "William K. Summers". The signature is written in dark ink and is positioned above the typed name.

William K. Summers, M.D.