

Paul Freese , Esq.
Correspondence

copy from Frances

KINDEL & ANDERSON

LAWYERS

TWENTY-SIXTH FLOOR

555 SOUTH FLOWER STREET

LOS ANGELES, CALIFORNIA 90071

(213) 680-2222

1020 NORTH BROADWAY
FOURTH FLOOR
SANTA ANA, CALIFORNIA 92701
(714) 556-7777

CABLE ADDRESS
KAYANDA
TELEX: 67-7497

REFER TO FILE NO.

51486-9 000 581

JOHN E. ANDERSON	KENNETH R. BENPASSAT
JAMES H. WINDLL, JR.	HUGH M. BOSS
ROF E. POTTS	MICHAEL J. GREENE
ANGEL J. PALMIERI	FRANK C. MOTHROCK
PAUL L. FREISE	L. KIRK WALLACE
KEITH A. PUPSEL	WILLIAM E. JOHNSON
JOHN W. ADRIAGOST	JEFFREY S. ALLEN
JOHN E. BRECKENRIDGE	GARY W. MAEDER
MALCOLM GEORGE SMITH	G. WEBSTER BURNS
NEAL M. BROCKMEYER	SHARON MCCASLIN
RUSSELL W. BOGDA	GEORGE L. O'CONNELL
KARUEL S. KLUSNER	WILLIAM W. REICHERT
VICTOR F. TACOLLO	LESTER S. ROSEN
WILLIAM L. YERKES	JOHN E. JAMES
ANN HOLLAND	DOUGLAS A. DODDS
CRAG & JORGENSEN	RONALD K. SEVERAID
JOSEPH W. BURDETT	DENNIS W. GHAN
RONALD S. RIZZO	BRUCE E. COOPERMAN
ROBERT H. TAREUCHI	ROBERT B. EVNIN
BRIAN G. PRENTICE	RICHARD S. WALLACE
ALAN H. WIENER	DAVID D. PARR
ROBERT C. IHRKE	WILLIAM A. YERRICK
ROBERT V. BRIGSCHAK	DAVID E. WHEELER
STEPHEN E. NEWTON	NANCY F. REISS
ALFRED E. AUGUSTINI	PATRICIA T. MULRYAN
ROBERT L. WHITMIRE	ROBERT C. HAYDEN
JAMES E. WILHELM	MICHAEL P. DUNN
GERARD C. BASTIAANSE	JAMES T. HANCOCK, JR.
DENNIS G. TYLER	ROBERT J. LOWE
CARLOS SOLIS	ELINOR J. VOTAW
JAMES F. CAREY	

OF COUNSEL:
FREDERICK B. MCBRIEN
BETTE B. LORENZ

William R. Nicholas, Esq.
Latham & Watkins
46th Floor
555 South Flower Street
Los Angeles, California 90071

Dear Mr. Nicholas:

After several months of effort to investigate the trustee conduct of James Kneubuhl in a spirit of trying to avoid inflammation of a broader family controversy, Mr. Smigiel and I are not satisfied that we have adequate information to reassure our client, Mrs. Opelle, that her interests have been respected or managed in compliance with fiduciary responsibility.

Moreover, we have information about actions and statements by James Kneubuhl at directors and shareholder meetings which have excited new antagonisms. While not strictly germane to the trust investigation, these recent developments have discredited our recommendation of seeking an informal resolution of outstanding questions.

I understand that, without solicitation, James Kneubuhl has asserted his willingness and desire to respond to me directly concerning any trust administration inquiries. If this be true, with your concurrence I would like to make one final effort to ascertain the extent of any basis for concern by Mrs. Opelle. I therefore ask you to consider whether a stipulated deposition can be arranged. If litigation is commenced, this would be an inevitable procedure and undoubtedly be much broader in scope than I currently envision.

KINDEL & ANDERSON

William R. Nicholas

Page Two

The following matters would be within the area of my proposed interrogation:

1. The Pasadena Marital Trust Savings Account:

a. The disbursement on or about December 30, 1977 of \$4,689.68. Only two checks, one for \$1,000 and one for \$500 were noted by Mr. Smigiel.

b. The propriety of withdrawal and charges for the purchase of a house in Samoa (10/3/77, \$4,884.31 and 3/6/78, \$1,252.19).

c. The extent of proper charges for a trip to American Samoa (9/22/78, \$2,475).

d. In view of the foregoing uncertainties, a review of all withdrawals to reconcile the opening balance of the account with its current balance is considered necessary.

2. Securities in Marital Trust:

Since the Wells Fargo Bank released control of the securities held in the Marital Trust, I understand that there has been no regular report of transactions. A review of the transactions and a regular reporting procedure are matters also within the scope of our requested inquiry.

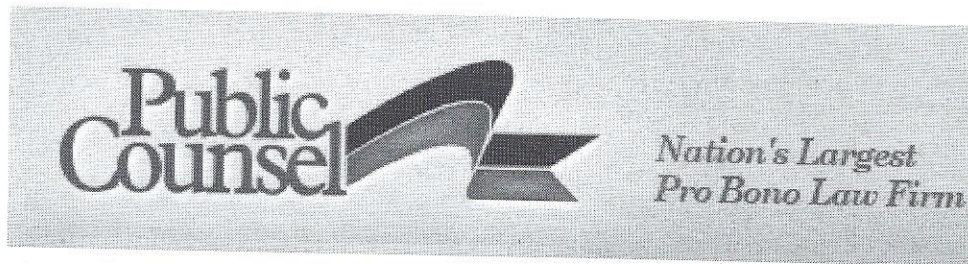
Please give this matter your prompt attention. While I cannot assure you that litigation can be avoided, a positive and complete response should at least reduce the risk of formal controversy.

Yours very truly,



Paul L. Freese
of KINDEL & ANDERSON

PLF/mcw



<http://www.site.org/home>


Paul Freese

Paul L. Freese, Jr., is the Vice President of Public Counsel, the public interest law office of the Los Angeles County and Beverly Hills Bar Associations and the largest provider of pro bono legal services in the United States. A member of the California State Bar since 1988 he worked as a litigation associate with the law firm of Perkins Coie until 1994 when he joined Public Counsel as Directing Attorney of the Homelessness Prevention Law Project. He was promoted in January 2001 to be Director of Litigation & Advocacy and again in 2010 to be the organization's first Vice President, and supervises more than 65 attorneys and their staff. From October 2007 through March, 2008, he was appointed as Public Counsel's Interim CEO. In July, 2012 the law firm, Irell & Manella, named Paul as their first Chair in Public Interest Law.

Paul serves on many committees, task forces and working groups focused upon the needs of the poor and marginalized. These include, Special Adviser on Veterans Advocacy to the ABA Commission on Homelessness & Poverty, Chair of the ABA Coordinating Committee on Veterans Benefits and Services; past Co-Chair of the Board of Directors of People Assisting The Homeless (PATH) Ventures (the affordable housing arm of PATH), He serves as a member of the Board of Directors for Reclaim Neighborhoods L.A., the Children's Law Center, Angels Nest, TLP,, JOB, and CORE (Coalition On Residential Education). In 2012 he was asked to serve as a founding Board member for the National Trust to End Youth Homelessness. He has served on the Advisory Committee for the Mayors Homelessness Policy Priorities; the L.A. County Transition Age Youth subcommittee for the Mental Health Services Act, the Leadership Committee of the Emancipation Planning Partnership for L.A. County, the Steering Committee for the launch of United Way's HomeWalk, the Juvenile Court Task Force of the Los Angeles County Bar Association (LACBA), and the Executive Committee of the LACBA Individual Rights Section. He served as Delegate for the City of Los Angeles to the Mental Health Services Act Early Intervention & Prevention Committee, as Director of LACBA's Cold/Wet Weather Homeless Advocacy Program; two years with the L.A. Superior Court Collaborative Courts Planning Committee which was responsible for establishing the widely acclaimed Homeless Court; two years on the Steering Committee of the Housing Roundtable for the Los Angeles

County Commission for Children & Family Services; five years as Chair of the Department of Public Social Services General Relief Joint Dialogue Task Force charged with responsibility for policy improvements in the County system for delivery of General Relief, Food Stamps and health benefits to impoverished and homeless individuals throughout L.A. County; eight years with the Emancipation Task Force of the L.A. County Commission for Children and Families, which makes policy recommendations regarding the health and welfare of the County's dependency and probation children; four years as an elected member of the Policy Advisory Committee of the Los Angeles Homeless Services Authority; five years on the Board of Directors for the Los Angeles Coalition to End Hunger & Homelessness; fifteen years as an Advisory Board member for Angels Flight, a shelter for homeless and runaway youth; and two years on the Substance Abuse Steering Committee of the Department of Public Social Services and the Department of Health Services for L.A. County; three years as an appointed member of the Task Force on Law Enforcement and the Mentally Disabled which reports to the Los Angeles Police Commission on public safety issues affecting the homeless mentally ill; one year on the Juvenile Justice Coordinating Council for Los Angeles County; and two years as an elected member of the Board of the Los Angeles County Emergency Food & Shelter Board. In 2004, he was elected to Co-Chair the public interest Director of Litigation & Advocacy state-wide conference. In 2010, he was selected as an expert on legal issues affecting homeless and runaway youth for the California Homeless Youth Project.

He has received numerous awards, including the Antonia Hernandez Public Interest Award from UCLA School of Law; the Mark Pearlman Outstanding Service Award from the California Youth Coalition, the "Courage Award" from the Los Angeles Coalition to End Hunger & Homelessness in February 2009, the Humanitarian of the Year Award from Toberman Neighborhood Center, March 2009, the "Hero of Hollywood Award" from My Friend's Place youth services center in October 2007, and the Info Line of Los Angeles' Community Corazones Unidos Award for "outstanding community service" in October 2005. He has received commendations from the L.A. County Commission for Children & Family Services for his contributions to efforts to assist the health and welfare of L.A.'s disadvantaged youth and from the L.A. County Commission for Public Social Services for policy work that benefited homeless individuals.

He has extensive public speaking experience and has appeared as a guest discussing welfare reform, foster youth, and homeless issues on many documentaries and talk shows. He has published many op-ed articles on public interest and human rights topics, including articles in both national and international press. He was featured in the Los Angeles Daily Journal in 2002 in an article entitled, "Guardian Angel for the Poor." He volunteered for three years of service with the United States Army and received an Honorable Discharge in 1976. He graduated magna cum laude from St. Mary's College in Winona, Minnesota in 1980 and is an alumnus of Loyola High School in Los Angeles. His experience includes working as a Group Worker for DuPage County Youth Home and working with developmentally disabled adults at Little Friends, in Naperville, Illinois. He was a Maryknoll Lay Missioner engaged in human rights work and was the first Maryknoll lay missioner to receive an appointment to a Regional Position, serving in his last year as the Justice & Peace Coordinator for the Philippine Region. He received his J.D. from UCLA School of Law in 1988 and was selected to be a commencement speaker. His other experience includes an externship with the Honorable Stephen V. Wilson, United States District Court Judge, and four years of part-time volunteer work with El Centro Legal in Santa Monica. He is married to Dr. Denise Freese, a family physician with UCLA Medical Group, and has two sons, David and Paul Leo.