


Settlement Proposal

From: Anita Brunsting (akbrunsting@outlook.com)
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 Date: Friday, March 5, 2021, 10:44 AM PST

Amy and I are sending the settlement proposal below for everyone to consider based on the valuation of the trust on 12/31/2020. Please hit "reply all" so that everyone will see your comments/counter-offers/questions/ or consents regarding the proposal. As indicated below, a final proposal will have to be a written agreement signed by the parties and approved by the court. The specifics are:

<u>Settlement Proposal</u>	<u>Amount</u>		
<u>Values per Dec. 2020 Accounting</u>			
Liquid Value of Trusts	\$ 1,229,252.97	<u>Legal Fee Allocation</u>	\$ 537,000.00
Farm Value	\$2,125,000.00	Anita	\$ 150,000.00
Less Admin/Partition Fees	(\$30,000.00)	Candy	\$ 150,000.00
Total	\$ 3,324,252.97	Carole	\$ 79,000.00
Divided by 5/siblings	\$ 664,850.59	Carl	\$ 79,000.00
Candy - cash	\$ 664,850.59	Amy	\$ 79,000.00
Less Atty's Fees	\$ (150,000.00)		\$ 537,000.00
Less \$ against inheritance	\$ (20,000.00)	Notes:	
Total	\$ 494,850.59		
Carole - cash	\$ 239,850.59	1. This offer is confidential under the Texas Rules of Evidence, and not an admission of liability by any person.	
farm	\$ 425,000.00	2. Acceptance of this proposal is not binding. Any agreement must be in writing and approved by the Court.	
Less atty's fees	\$ (79,000.00)	3. Acceptance requires full and total releases of all claims, indemnifications, and dismissal by final judgment by the parties connected to the case.	
Total	\$ 585,850.59	4. Every person is responsible for their own tax obligations, if any, for assets received or sold.	
Carl - cash	\$ 664,850.59	5. Legal fees do not include fees related to the RICO case.	
Less atty's fees	\$ (79,000.00)	6. All values in the proposal subject to verification.	
Total	\$ 585,850.59	7. No personal assets trusts for anyone.	
Amy - cash	\$ 664,850.59	8. Please respond to the foregoing by 5:00 p.m. Friday, March 12, 2021. A lack of response will be considered a rejection of the proposal.	
Less atty's fees	\$ (79,000.00)		
Total	\$ 585,850.59		
Anita - cash	\$ 664,850.59		
Less atty's fees	\$ (150,000.00)		
Less \$ against inheritance	\$ (23,878.00)		
Total	\$ 490,972.59		

Regards,