

AFFIDAVIT OF OLE ANTHONY

Exhibit B

B1 & B2: copy of two-page letter from Dennis Brewer to John Casoria and David Loe, dated March 2, 2004

B3 & B4: copy of draft two-page letter from Dennis Brewer to John Casoria, dated May 10, 2004

***DENNIS G. BREWER, SR., P. C. And ASSOCIATES***

**Dennis G. Brewer, Sr. • William Clifford Couch • Brooke A. Asiatico**

**FOUNDER OF BREWER, BREWER, ANTHONY & MIDDLEBROOK LAW FIRM IN 1955**

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dbrewer@dgbrewersrlaw.com

March 2, 2004

**VIA FACSIMILE 714-665-2168**

Mr. John B. Casoria  
17 Weather Ledge, Suite A  
Trabuco Canyon, CA 92679

**VIA FACSIMILE 562-901-3062**

Mr. David Loe, Esq.  
110 Pine Avenue, Suite 600  
Long Beach, CA 90802

Re: 73 Y 199 274 03 ARC

Dear John and David:

The following is in response to the recent letter that we all received from American Arbitration Association abating our case for nonpayment by both sides.

I would like to give you my thoughts, to-wit:

1. In that the case has been abated, I presume that the arbitrator will not act on our application for an order requiring Zech to provide us with a copy of the transcript.
2. I would like to encourage payment of TBN's portion of the fee which I believe is \$3,000 in order to escape the possibility that AAA would dismiss the case and thus give rise to the possibility of Zech going back into the court that issued the injunction and moving the court to vacate the injunction in view of the failure of the arbitration proceeding to materialize by reason of mutual nonpayment.
3. Do you feel there is any danger of AAA attempting to dismiss the arbitration "with prejudice" or dismissing the arbitration and creating a res judicata situation.

AFFIDAVIT OF OLE ANTHONY

Exhibit #

**B.1**

Ole Anthony

*[Signature]*

Notary Public

*[Signature]*

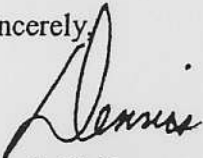
Mr. Davie Loe and  
Mr. John Casoria  
March 2, 2004  
Page 2

4. If we pay our \$3,000 and Zech does not pay Lonnie Ford's \$3,000 - what about going back into the District Court asking the court to adjudicate the release. I assume Lonnie is busted and if Zech will not advance the \$3,000 for the arbitrator, I wonder if he would abandon him in the superior court action.

I am absolutely amazed that Lonnie hasn't gone to Penthouse or Dianne Sawyer with his manuscript, notwithstanding the injunction. It is my opinion that the only reason he has not is because of fear of incarceration under a contempt order which is similar to a death sentence to a hard addict like Lonnie. Also, I am concerned that Lonnie may be a danger to Paul. I have the advantage of having spent several hours with Lonnie face to face and he is a treacherous vindictive devil and demonstrated his boldness when he jumped over the rail and slapped Paul with his manuscript.

Let me know if there is anything you would like for me to do.

Sincerely,



Dennis G. Brewer, Sr.  
DGBSr/pw

FAT\B\NFORD\LTR TO DAVID LOE AND JOHN CASORIA - 3-2-04.doc

AFFIDAVIT OF OLE ANTHONY

Exhibit # 3.2

Ole Anthony [Signature]

Notary Public DGB

**DENNIS G. BREWER, SR., P. C. And ASSOCIATES**

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May 10, 2004

VIA FACSIMILE 972-665-2168

Mr. John B. Casoria  
17 Weather Ledge, Suite A  
Trabuco Canyon, CA 92679

AFFIDAVIT OF OLE ANTHONY

Exhibit # **B.3**

Ole Anthony *[Signature]*

Notary Public *[Signature]*

**DRAFT**

Re: Crouch vs. Ford, Superior Court of the State of California

Dear John:

I am just in receipt of the Los Angeles Times' Pleadings and Exhibits.

David questioned me about the Licciardello deposition and the issue of <sup>the possible breach of issue</sup> disseminating the Release of persons with knowledge of allegations or facts regarding the Lonnie Ford claims and assertions.

<sup>outside of attorney</sup> There is one situation that came to my mind after our conversation concluded, which I feel that I should relate to you, to wit:

1. About five years ago, during the Lonnie Ford settlement period (I do not recall if this was before or after the settlement was signed) David Middlebrook came to me and told me that he had received a call from Matt Crouch and that Matt had called him as a friend. David related the conversation to me which I of course do not recall verbatim but the part of the conversation that I recall went something like this:

"I am devastated; I am confronted with having to face the fact that my father is a homosexual."

I, of course, admonished David that the conversation should never be mentioned to anyone else, etc., etc. I have not heard anything about that conversation since the occasion of David relating same to me. As you are probably aware, a year or so after I separated from the firm, David Middlebrook's wife sued him for divorce and went to the District Attorney and claimed that he had molested their son or sons and David was <sup>in Dallas County</sup> ~~indicted~~ <sup>indicted</sup> by the Grand Jury. <sup>Don't recall if I related to you a call I had from Benny a few</sup> weeks ago. Benny said that he had been confronted by Paul concerning testimony by Mario Licciardello

but the hearsay is that the case is going back to the Grand Jury for what this highly confidential information is worth if anything.

Mr. John Casoria

May 10, 2004

Page 2 of 2

*which I took in Tulsa about four years ago*

*in presence of hearing*  
~~when I took Mario's deposition wherein, in my best recollection, Mario testified that Benny had made a statement on an airplane coming back from overseas in his presence and named a number of other people who were present regarding the Lonnie Ford allegations. Benny asked me to relate to Paul what his reaction was when I confronted him after the deposition. Benny vehemently denied that he had made any such statement to Mario or anyone else. You may want to run the traps with Matt. I cannot imagine where Matt got the information that there was a Lonnie Ford situation, although I can think of a number of possibilities if you are interested.~~

*in the first place.*

Sincerely,

Dennis

DGBSr/mkh

FAT\B\FORD\tr to John Casoria re Los Angeles Times.doc

Cc: David Loe

AFFIDAVIT OF OLE ANTHONY

Exhibit #

*B.4*

Ole Anthony

Notary Public

*[Signature]*  
*[Signature]*