

Ex. D

Subject: 1) CD works; 2) Greupner's confidential info on CD; 3) missing documents
From: Bob Pickle
Date: Fri, 04 Apr 2008 13:34:33 -0500
To: Jerrie Hayes
CC: "G. Arthur Joy"
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Ms. Hayes:

The replacement for CD #1 arrived yesterday, and I was able to read the first part of the file but not the entire thing. However, after cleaning some spots off the disk, I was able to read and copy the rest of it.

 What I did find puzzling, though, was with all the overwrought concern about confidential information, why you would send us James R. Greupner's Rollover Contribution Form, complete with his social security number and financial account numbers. If we really are so prone to publicize everything as you have so often and falsely claimed, why would you send us that? Was Mr. Greupner aware that you were going to be releasing his confidential information?

 Then there is Kristen LeBrasseur's resume, Callie Marie Wahl's email to Char Wahl regarding Char's wedding, and the 2007/08 academic calendar for the University of St. Thomas School of Law, which presumably has something to do with Callie Marie Wahl.

Will you be initiating a clawback regarding the Rollover Contribution Form and perhaps the resume? Alternatively, we could destroy or return the CD's you sent after first being provided with replacements containing files that have those documents removed.

It would appear that the materials on these CD's are deficient as well. As I look at the Plaintiffs' initial disclosures, I see that you listed the following categories of materials:

1. Save3ABN webpages.
2. BlackSDA webpages.
3. Maritime-SDA webpages.
4. Adventist Today documents.
5. Correspondence to Defendants (apparently from attorneys).
6. Correspondence to Defendants (apparently to and from the Defendants to others than attorneys).
7. Correspondence to 3ABN.
8. Correspondence within 3ABN.
9. Administrative records.
10. Outreach materials.
11. Financial records.

While I found plenty of Save3ABN and BlackSDA webpages, and some Adventist Today documents, I did not find Maritime-SDA webpages. I assume the only document relating to #5 is Gerry Duffy's letter, which is included in the Save3ABN webpages. I found nothing relating to #6, #7, and #8 save what has already been filed with the Court as exhibits. #10 seemed to be missing as well. Whatever was related to #9 and #11 didn't look all that helpful for the Plaintiffs' case, and so I assume that there must have been something missing there as well.

And I was at a loss to identify the 500 pages or less of materials that you referred to last November.

Please advise as to when we might receive the missing materials.

Have a good weekend.

Bob Pickle, *pro se*