

4. The Debtors testified that they hold no ownership interest in Searchlight Trust, Mountain Property Management and Trust Company, National Holding Trust, or Equitable Financial Services.

5. To the best of my recollection River Mountain Ranch was never discussed at the Section 341 hearing.

6. LT & L is a corporation in good standing with the State of Idaho and is therefore licensed to do business in Idaho but has no business operations.

7. To the best of my knowledge there is no evidence that the entities listed by the trustee are required to be licensed to do business in Idaho or are doing business in Idaho.

8. The residence referred to in the *Declaration of Ford Elsaesser* (para. 3) was constructed by the trust not transferred to it.

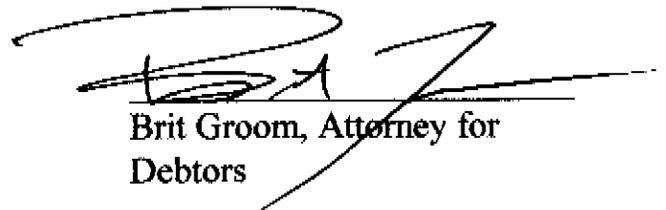
9. Searchlight trust was created as an estate planning vehicle for Debtors in 1994, almost 10 years prior to the filing of Debtors bankruptcy and several years before the existence of any creditor in Debtors' Bankruptcy.

10. The entities listed in the *Declaration of Ford Elsaesser* (para. 2) are not assets of the Debtors' estate, are not assumed names and are not the alter ego of Debtor's.

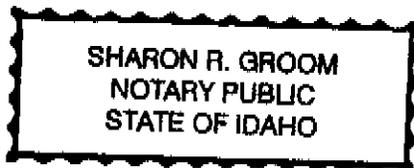
11. None of the entities listed in *Declaration of Ford Elsaesser* (para. 2) would properly be added or included in Debtors' petition.

12. The trustee's Motion to Amend Debtors' Petition is based upon conjecture, speculation, and supposition formed from a limited amount of information.

Dated this 14 day of March, 2004


Brit Groom, Attorney for
Debtors

SUBSCRIBED AND SWORN to before me on the 14th day of March, 2004.




Notary Public for Idaho
Residing at Cottonwood
My Commission Expires:
3/4/2010

CERTIFICATE OF SERVICE

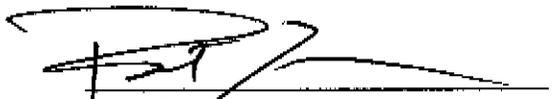
I hereby certify that on this 15 day of March, 2004, I served via the manner indicated below to the individuals indicated, a copy of the foregoing document.

Barry McHugh
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