

trust benefitting his wife, with a remainder interest in the Criswell Center. The trust instruments and other necessary documents were never prepared.

IV.

Paige Patterson is the president, and Dorothy Patterson is the secretary of the Criswell Center. Beginning approximately three (3) weeks prior to Farry's death, Paige Patterson and Dorothy Patterson began a series of visits to Mr. Farry and Velma Farry, who was attending him in the hospital. During these visits the Pattersons made strenuous efforts to persuade the Farrys to convey all their belongings immediately to the Criswell Center for Biblical Studies, on several occasions even bringing a typewriter and deed forms to the hospital for this purpose. Finally, by the use of threats, intimidation, and misrepresentations, the Pattersons induced Mr. Farry and Velma Farry to sign the deeds, copies of which are attached hereto and marked Exhibits "B", "C", "D", conveying to the Criswell Center all of the real property owned by the Farrys. They also induced Mr. Farry and Velma Farry to execute the document attached hereto, marked Exhibit "E", conveying to the Criswell Center all of the personal property owned by the Farrys.

V.

Among the misrepresentations made by the Pattersons were that the documents attached hereto as Exhibits "B" - "E" were simply the documents that needed to be executed to create the trust Mr. Farry had been discussing with his attorney, and that the Criswell Center would furnish Mrs. Farry with a house and money adequate for her needs during her lifetime.

VI.

At the time the Farrys executed the documents attached hereto as Exhibits "B" - "E" both were in weakened mental and physical condition. Nelson Farry was near death, and Velma Farry was exhausted by the need to attend him and the