

# **EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF INDIANA  
NEW ALBANY DIVISION

IN RE: )  
 )  
EASTERN LIVESTOCK CO., LLC, ) CASE NO. 10-93904-BHL-11  
 )  
Debtor. )

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**DECLARATION OF STEPHEN A. WEIGAND**

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STATE OF OHIO )  
 ) SS:  
COUNTY OF HAMILTON )

1. I am making this Declaration based upon personal knowledge and I am competent to testify in the matters stated below.
2. I am an attorney licensed to practice law in the State of Ohio, and an attorney in the law firm of Faruki Ireland & Cox P.L.L. I am counsel for The First Bank and Trust Company ("First Bank").
3. Since February 2011, First Bank has served formal and informal requests for information on various parties in an attempt to identify the location of cattle that were owned personally by Thomas P. Gibson and subject to First Bank's lien, and to trace the proceeds from the sale or other disposition of such cattle.
4. Although First Bank has acquired and reviewed documents and information from multiple parties, additional time is still needed for First Bank to obtain and

review additional documents to identify purchase money security interests in the cattle for which the Trustee for Eastern Livestock Co., LLC ("Eastern Livestock") has collected funds.

5. To date, First Bank has requested and obtained information from multiple feedlots and made several visits to Eastern Livestock's office in New Albany, Indiana to review documents. First Bank, along with counsel for Trustee Kathryn Pry in the Estate for Thomas and Patsy Gibson, have requested that the Eastern Livestock Trustee provide copies (or the originals) of specific boxes and file folders of documents currently in the possession of the Eastern Livestock Trustee. Counsel for First Bank documented many of the requested boxes and files in a digital video while on site at Eastern Livestock's offices on June 23, 2011. In addition, First Bank is undertaking efforts to obtain forensic computer images relating to Thomas P. Gibson from AC Forensics, but the computer data has not yet been released.

6. More specifically, for First Bank's requests to feedlots, First Bank and the feedlots generally used a two-phased approach to producing documents. Under Phase 1, the feedlots would provide a summary report or reports of cattle that were on feed at a particular feedlot for a specified period of time. After reviewing the summary reports, First Bank specified only those transactions that involved or might involve cattle that were owned by Thomas P. Gibson and subject to First Bank's lien. Under Phase 2, the feedlots would provide underlying source information to First Bank for those transactions that First Bank requested additional information.

7. First Bank has obtained documents under Phase 1 and Phase 2 from Cactus Growers, Inc., Friona Industries, Inc., J & F Oklahoma Holdings, Inc., Heritage Feeders, Inc., and Horizon Beef. First Bank has obtained documents under Phase 1, but has either not

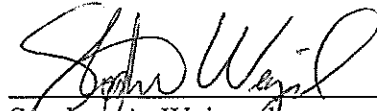
received or not yet specified transactions to be produced under Phase 2, for Cattlemen's Feedlot, Ltd. and Agri Beef. First Bank has not received any documents from Irsik & Doll, and this Court granted on July 26, 2011 First Bank's motion for the production of documents under Fed. R. Bankr. P. 2004 to Irsik & Doll.

8. Additionally, counsel for First Bank reviewed documents in the possession of the Eastern Livestock Trustee in New Albany on three separate occasions: April 5, 2011, June 15, 2011, and June 23, 2011.

9. From the on-site visits to Eastern Livestock's offices, First Bank has received to date approximately 1083 pages of documents. In addition, on June 23, 2011, First Bank, along with counsel for Trustee Kathryn Pry, requested copies (or the originals) of several specific boxes of documents that relate to Thomas P. Gibson, although none of these documents have yet been made available to counsel for First Bank or Trustee Kathryn Pry. On July 20, 2011, First Bank supplemented this request by specifying in a Microsoft Excel chart prepared by Development Specialists Inc. additional file folders and boxes for which First Bank would like to obtain copies of such documents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 26th day of July, 2011 in Cincinnati, Ohio.

  
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Stephen A. Weigand