

1 Foundation. He also reiterated that the program would continue to independently pay tribute to
2 Addison, and specifically acknowledging that it was Addison's encouragement, faith, courage,
3 love for life and a commitment to make a difference that singularly inspired the Starlight Navy
4 (now WishCruise Navy) concept to occur. And while I don't recall the specifics, there was some
5 discussion about my being affiliated with the WishCruise Navy program - possibly as a Board
6 Member and/or consultant.

7 We also talked about the ADDY-G Foundation with my explaining that it no
8 longer existed, and why; and that my wife, Cindee, and I had divorced, but were now back
9 together again.

10 Prior to this 2013 phone conversation, from 2001 to 2005, or 2006, I remember
11 there being some phone calls and some email exchanges between Mr. Foster and me, each being
12 a progress report on how the program was developing. I was also given the a website address to
13 review and provide input. I remember looking at, and liking the website which included a page
14 about Addison. **[A copy of the initial and revised page are attached as Exhibits #2 and #3]**

15 5. *[As previously written]* I am the father of Addison Glines.

16 6. *[As previously written]* Addison died on November 2, 2001 due to
17 complications associated with his Ewing's Sarcoma.

18 7. *[Amended to read as follows:]* I am aware of Addison having, ~~or there was a~~
19 developing personal or business relationship between he and Mr. Foster but I can't remember any
20 specifics.

21 8. *[Amended to read as follows:]* In my former Affidavit I said that Addison
22 never expressed any interest in pirates or pirate ships which is understandable given the initial
23 intent of the Starlight Navy program leading up to the time of Addison's death involved the
24 intended use of loaned luxury yachts. It's my understanding now that the decision to obtained
25 and use a "pirate ship" in conjunction with the now, WishCruise Navy program didn't happen
26 until 2012 or 2013.

27 9. *[Amended to read as follows:]* While I previously stated Addison never
28 formed a company with Chuck Foster, I do know, however, that Mr. Foster created a company

Knowing Chuck and may have been a

1 which had something to do with Addison but I^{don't} know or can't remember the specifics, primarily
2 because this was a very stressful and difficult time in both my and my wife Cindee's life. I'm
3 reasonably sure that the company Mr. Foster created was not for the purpose of raising money for
4 children battling cancer, but to provide "wishcruise" experiences – an entertainment opportunity
5 for the seriously ill child and their family to spend private, quality time with celebrities.

6 10. *[As previously written]* Addison, with my assistance and with the assistance of
7 Addison's mother, Cindee C. Glines, started a foundation (Addison's Day Dreaming Yields
8 Generosity) to expose children having an interest in the arts.

9 11. *[Amended to read as follows:]* As previously stated, Addison's passion up to
10 his death was the arts; it was also about making a difference in people's lives, children in
11 particular.

12 12. *[As previously written]* We continued the foundation for several years after
13 Addison's death but eventually dissolved it due to the amount of work it required.

14 13. *[Amended to read as follows:]* I recall discussions with Chuck Foster, or
15 possibly with Addison, regarding the ADDY-G foundation receiving funds generated by the
16 Starlight Navy program.

17 14. *[Amended to read as follows:]* We never received any contributions from Mr.
18 Foster for the foundation, nor are we aware of any funds donated to the foundation due to Chuck
19 Foster's efforts. It's my understanding that the reason that no funds were received was because
20 the Starlight Navy program had not been officially launched, and quite possibly because the
21 ADDY-G foundation ceased to exist.

22 15. *[Amended to read as follows:]* I previously and mistakenly stated that after
23 our son's death, Chuck Foster asked for our permission to use Addison's story to assist him in
24 raising money. As I now recall, the only discussion Mr. Foster had with me involving Starlight
25 Navy was my providing input about the website and approving the photo that was being used.

26 16. *[Amended to read as follows:]* I previously stated that we never gave Chuck
27 Foster permission to use our son's name or his story to raise money. In proper context, Mr.
28 Foster never asked me or my wife to use Addison's name as he apparently had Addison's

1 approval who, as an adult, our approval was not needed. Again, Mr. Foster never asked,
2 suggested or implied that his use of Addison's name or his story was to "raise money" but to
3 credit Addison as the inspiration for the Lighthouse Navy program and wanting to "make a
4 difference" in people's lives.

5 17. *[Amended to read as follows:]* My prior affidavit also indicated that "Until
6 recently, we were not aware that Chuck Foster had been using our son's name and story to solicit
7 donations from people." However, I had been aware of Mr. Foster's use of Addison's image and
8 story as previously indicated. Further, it's my understanding that he has not been using
9 Addison's name to "solicit donations from people" as being claimed by Ms. Keeping and the
10 subject matter of current litigation.

11 18. *[Amended to read as follows:]* As previously indicated above, our son never
12 new, nor could he have known about WishCruise Pirate Adventures or WishCruise Navy prior to
13 his death because the initial Starlight Navy program had, to my knowledge, not yet been
14 conceived.

15 19. *[Amended to read as follows:]* I have reviewed the image of our son Addison
16 on the www.wishcruisenavy.org website and, as previously stated, Mr. Foster did not have, nor
17 did he need my or my wife's permission to use Addison's name and story.

18 B. Noteworthy is that Cindee had very little contact with Mr. Foster prior to, and I don't
19 believe there was any contact with her after Addison's death. Furthermore, dealing with
20 Addison's cancer battle, then his untimely death was tremendously stressful - so stressful in fact
21 that it was ^Athe contributing factor to Cindee's chronic depression, ~~which~~ ^{we were} eventually ~~led our~~
22 divorced.

23 C. I am aware, and for the above stated reasons, understand that the statements set forth
24 within Cindee's affidavit are, in many instances, conflicting with this/my revised sworn
25 declaration. **[See attached Exhibit #4]**

26 To this day, Addison's death remains a difficult and sensitive topic for Cindee,
27 and I have not, nor has Mr. Foster, asked her to reconsider or amend the incorrect information
28 that her affidavit contains.

1 D. Why is this/my declaration, in part, different from my March 4, 2014, affidavit? And
2 why have I agreed to provide this revised Declaration?

3 Speaking for both Cindee and myself, we were shocked, and understandably
4 concerned given the allegations made by Ms. Keeping's private investigator about Mr. Foster.

5 In fact we were made to feel that our cooperation with this investigator was
6 necessary in order to distance ourselves from whatever unlawful conduct Mr. Foster purportedly
7 had been, or was currently involved.

8 Now, however, having had the opportunity to calmly reflect upon my prior
9 affidavit; reviewing case-related documents, including emails seemingly authored by Ms.
10 Keeping and her associate, Dale Merkel; reading several declarations of other third-party
11 witnesses, coupled with recent conversations and meetings with Mr. Foster, I believe it was
12 necessary and just to acknowledge any known mistakes, clarifying, or further explaining
13 statements made in my March 4, 2014 affidavit.

14 I further declare that this revised/amended affidavit is given freely and without
15 any threat, coercion, intimidation, compensation, favor or promise of same. I also declare that I
16 am of the current opinion and belief that the selective information given to, or withheld, from
17 Cindee and me by Ms. Keeping's private investigator was itself an intentionally wrongful and
18 deceptive act. Furthermore, had this investigator shared with us the facts and documents
19 produced by Mr. Foster, my and Cindee's initial affidavit statement would have been
20 significantly different, if at all.

21 Executed this 1st day of March, 2015, in Riverside, California, I
22 attest and affirm, under penalty of perjury under the laws and statutes of the State of
23 California, that, to my best recollection and belief, the foregoing is true and correct, and
24 would so testify during any deposition, hearing or trial.

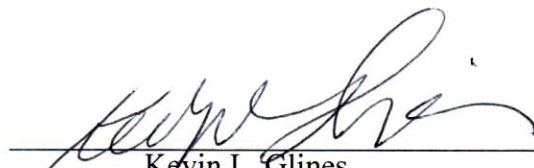
25
26
27 
28 _____
Kevin L. Glines

Exhibit 1 *AKA*

AFFIDAVIT OF KEVIN L. GLINES

1. My name is Kevin L. Glines.
2. I live in Corona, California.
3. I met Chuck Foster about 13 years ago.
4. I last heard from Chuck Foster about 3 years ago.
5. I am the father of Addison Glines.
6. Addison died 2001 at age 20 from complications associated with Ewing's Sarcoma.
7. Addison did not have a personal or professional relationship with Chuck Foster.
8. Addison never expressed any interest in pirates or pirate ships.
9. Addison never formed a company with Chuck Foster to raise money for children battling cancer.
10. Addison, with my assistance and with the assistance of Addison's mother, Cindee C. Glines, started a foundation (Addison's Day Dreaming Yields Generosity) to expose children to the arts.
11. Addison's passion up to his death was the arts.
12. We continued the foundation for several years after Addison's death but eventually dissolved it due to the amount of work it required.
13. Chuck Foster on occasion offered to raise money for the foundation.
14. We never received any contribution from Chuck Foster for the foundation nor are we aware of any funds donated to the foundation due to Chuck Foster's efforts.
15. After our son's death, Chuck Foster asked for our permission to use Addison's story to assist him in raising money.
16. We never gave Chuck Foster permission to use our son's name or his story

AFFIDAVIT OF KEVIN L. GLINES

1 to raise money.

2 17. Until recently we were not aware that Chuck Foster had been using our
3 son's name and story to solicit donations from people.

4 18. Our son never knew anything about WishCruise Pirate Adventures or
5 WishCruise Navy.

6 19. I have reviewed the photograph of our son Addison on Mr. Foster's website
7 at www.wishcruisenavy.org Mr. Foster did not have permission from me or
8 my spouse to use Addison's photo in any capacity.

9
10
11 I declare under penalty of perjury that the foregoing is true and correct.

12 Executed on 4th March, Corona, CA

13
14 

15
16 Kevin L. Glines

17
18
19 Sworn to me on this 4th day of _____ 2014.

20
21
22
23 _____
24 Notary Public

25
26
27
28
AFFIDAVIT OF KEVIN L. GLINES



The Beginning!



ADDISON GLINES declared "war" on

Ewing's Sarcoma, a rare cancer afflicting one in every 600,000 adolescent males. On November 2, 2001, Addison lost his cancer battle but not his dream -- a "dream" that his life could somehow be responsible for helping make dreams and wishes possible for other kids with life-threatening illnesses.

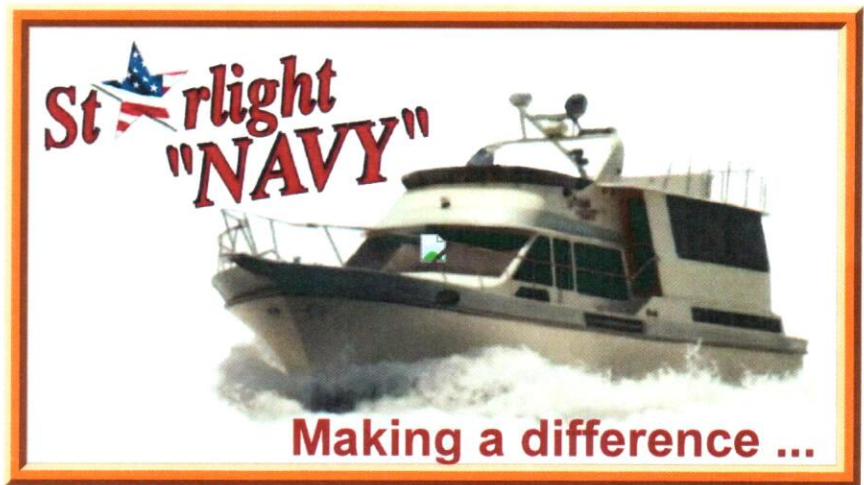
From Addison's "dream" came the inspiration for the STARLIGHT NAVY® which, in addition to celebrity "STARS" generating promotion, publicity and support revenue for the

programs that "Make a difference ..."

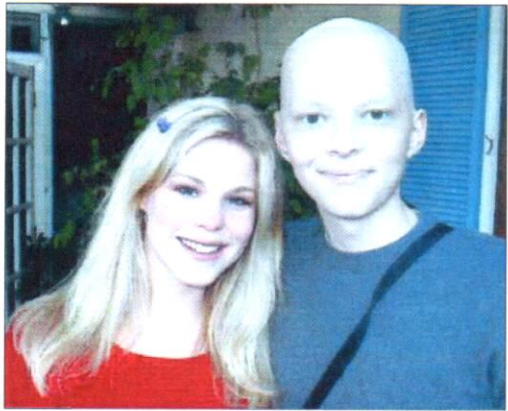
has the annual challenge of making at least **200+** "wish cruises" a reality.

Note: Each "wish cruise" results in the placement of special electronic pain-distraining equipment in a children's hospital of your choice!

Please read on and find out what Addison's "dream" inspired; also how we, you, your company or service organization can help keep this truly remarkable dream alive and growing!



A.D.D.Y. - G. FOUNDATION:
www.addyfoundation.com



ADDISON GLINES declared "war" on Ewing's Sarcoma, a rare cancer afflicting one in every 600,000 adolescent males.

On November 2, 2001, leukemia-related complications caused him to lose that battle but not his

dream -- a "wish" that he could be responsible for creating something to help make dreams and wishes possible for other kids with life-threatening illnesses.

From Addison's "wish" came the

STARLIGHT
"NAVY"



a unique concept which, in addition to gen-

erating publicity and revenue for the

Starlight Children's Foundation®, has an annual goal of making at least **"208"** children's "wishes" come true!

Addison's "wish" inspired the dream; now you, your company or service organization can be part of making this truly remarkable challenge possible!

Web Site; addygfoundation.org
Web Site: www.starlightnavy.com
Email: captainchuck@starlightnavy.com
Telephone: (714) 614-2838
Contact; Chuck Foster

EXHIBIT 4 KPA

AFFIDAVIT OF CINDEE C. GLINES

1. My name is Cindee C. Glines.
2. I live in Corona, California.
3. I met Chuck Foster about 13 years ago.
4. I last heard from Chuck Foster about 3 years ago.
5. I am the mother of Addison Glines.
6. Addison died in 2001 at age 20 from complications associated with Ewing's Sarcoma.
7. Addison did not have a personal or professional relationship with Chuck Foster.
8. Addison never expressed any interest in pirates or pirate ships.
9. Addison never formed a company with Chuck Foster to raise money for children battling cancer.
10. Addison, with my assistance and with the assistance of Addison's father, Kevin L. Glines, started a foundation (Addison's Day Dreaming Yields Generosity) to expose children to the arts.
11. Addison's passion up to his death was the arts.
12. We continued the foundation for several years after Addison's death but eventually dissolved it due to the amount of work it required.
13. Chuck Foster on occasion offered to raise money for the foundation.
14. We never received any contribution from Chuck Foster for the foundation nor are we aware of any funds donated to the foundation due to Chuck Foster's efforts.
15. After our son's death, Chuck Foster asked for our permission to use Addison's story to assist him in raising money.
16. We never gave Chuck Foster permission to use our son's name or his story

AFFIDAVIT OF CINDEE C. GLINES

1 to raise money.

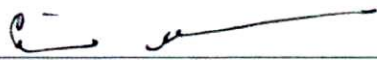
2 17. Until recently we were not aware that Chuck Foster had been using our
3 son's name and story to solicit donations from people.

4 18. Our son never knew anything about WishCruise Pirate Adventures or
5 WishCruise Navy.

6 19. I have reviewed the photograph of our son Addison on Mr. Foster's website
7 at www.wishcruisenavy.org Mr. Foster did not have permission from me or
8 my spouse to use Addison's photo in any capacity.
9

10 I declare under penalty of perjury that the foregoing is true and correct.

11 Executed on 4/4/14 in, Corona, CA
12

13
14 
15 _____
16 Cindee C. Glines
17

18
19 Sworn to me on this _____ day of _____ 2014.
20

21
22 _____
23 Notary Public
24
25
26
27
28

AFFIDAVIT OF CINDEE C. GLINES