

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

COMMISSION FOR LAWYER
DISCIPLINE,

Plaintiff,

vs.

TY CLEVINGER,

Defendant

Case No. 29143M

AFFIDAVIT OF WADE ROBERTSON

My name is Wade Robertson, I am greater than 18 years of age and competent to testify, and hereby do testify as follows:

1. On January 25, 2014, at my direction a third-party process-server served a deposition subpoena upon Dr. Stanley Slater of 9127 Marseille Dr., Potomac, MD. 20854 at that same address. I was present, witnessed said service, and personally spoke with Dr. Slater at that time.

2. And at that time, I asked Dr. Slater if he wished to be deposed by me simultaneously with his deposition by Ty Clevenger for the above-captioned case. Dr. Slater stated that this was his preference, and he selected a deposition date of February 3, 2014.

3. Also at that same time, Dr. Slater spoke to me regarding a psychiatric patient of his named William C. Cartinhour, Jr., who he is allegedly no longer treating. Previously, in the years 2010 and 2011, Dr. Slater had been a witness in a civil case for which both myself and Mr. Cartinhour were parties—styled as *Robertson v. Cartinhour*, in the United States District Court



for the District of Columbia, docketed there as civil case No. DDC 09-cv-1642. Upon Mr. Cartinhour's own authorization, release, and waivers, Dr. Slater had produced in that civil case medical records and notes regarding his psychiatric treatment of Mr. Cartinhour. In addition, subsequent to that document production, Dr. Slater had testified in a videotaped *de bene esse* trial deposition for that same civil case.

4. One issue that arose in the course of the above-noted civil case was whether or not Mr. Cartinhour was competent as to his ability to make financial decisions for himself, or to otherwise handle his own financial affairs. Dr. Slater was asked questions regarding this issue during his trial deposition in the civil case. And, on information and belief, Dr. Slater was further asked questions regarding this same issue in the months that followed the trial in that civil case. For instance, after the trial in that case, the presiding judge had ordered an inquiry regarding whether or not some type of financial guardian needed to be appointed for Mr. Cartinhour before the court would release a large amount of monies to him. In conjunction with that order, the judge had engaged some attorneys in Maryland (including Rob Grant) to investigate the matter on behalf of the court. I am informed and believe that those Maryland attorneys conducted interviews, and also reviewed documents which included Dr. Slater's trial deposition transcript. In addition to those Maryland attorneys, the judge also received additional information on this subject from Cartinhour's own attorneys in that case: including Patrick Kearney, Michael Bramnick, and Robert Selzer.

5. During my above-noted January 25, 2014 conversation with Dr. Slater, he informed me that he was in possession of at least two documents from attorneys pertaining to the inquiry into Mr. Cartinhour's mental health and/or Mr. Cartinhour's financial competency. Dr.

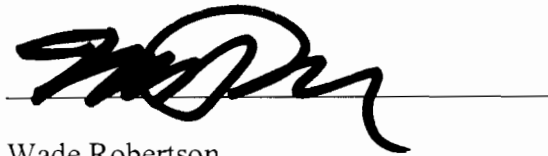


Slater also told me that he had formerly informed the attorneys, and the “court,” that Mr. Cartinhour was indeed impaired in his ability to make financial decisions for himself based on his mental conditions.

I solemnly affirm under the penalties of perjury that the contents of the foregoing paper are true to the best of my knowledge, information, and belief.

Feb. 24, 2014

{date}

A handwritten signature in black ink, appearing to read 'Wade Robertson', written over a horizontal line.

Wade Robertson

Handwritten initials in black ink, possibly 'MR'.