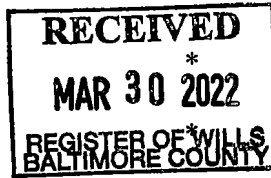


IN THE ESTATE OF  
SYLVIA H. JOHNSON



IN THE ORPHANS' COURT  
FOR BALTIMORE COUNTY, MARYLAND

\* ESTATE NO. 208430

\* \* \* \* \*

**MEMORANDUM IN SUPPORT OF THE SHOW CAUSE ORDER FOR REMOVAL**

COMES NOW, NAMI Maryland, Inc., The American Heart Association, The American Cancer Society, and The Alzheimer's Association, Interested Persons of the Estate of Sylvia H. Johnson (collectively, the "Petitioners"), by and through their attorneys, Renee B. Sullivan, Brian S. Burkett, Samuel C. Draper, and Council, Baradel, Kosmerl & Nolan, P.A., to provide this Memorandum in Support of the Show Cause Order for Removal ("Memorandum") and state as follows:

**FACTS**

1. On August 21, 2017, Sylvia H. Johnson executed a Last Will and Testament ("Will").

2. The Will directs the Personal Representative to make the following distributions:

**"Section A. Five percent (5%) unto each (for a total of twenty percent of the total rest, residue and remainder of my estate) of the four (4) following named charitable organizations", namely The American Heart Association, the American Cancer Society, the Alzheimer's Association and the Alliance for the Mentally Ill of Maryland, Inc....**

**Section B. Fifty percent (50%) unto my granddaughter, Jennifer E. Johnson...**

**Section C. Thirty percent (30%) unto my friend, Michael T. Pratt"**

3. On February 2, 2020, Sylvia H. Johnson ("the Decedent") departed this life, testate, a resident of Baltimore County, Maryland.

#57

4. Jennifer Johnson, granddaughter of the Decedent, and Michael T. Pratt, friend of the Decedent, were named as co-Personal Representatives in the Will.

5. On June 26, 2020, Jennifer Johnson (“Jennifer”) filed a Petition for Administration with the Orphans’ Court for Baltimore County, Maryland.

6. Jennifer was subsequently appointed the Personal Representative of the Estate of Sylvia H. Johnson (“Estate”) and the Decedent’s Will was admitted to probate.

7. On October 29, 2020, Jennifer filed an Inventory and Information Report with the Court.

8. The Inventory reported the total value of the probate estate to be \$2,448,170.31, consisting of the following assets:

- a. Real Property ground rents totaling \$14,600.00;
- b. M&T Checking and Savings Accounts totaling \$24,327.01; and
- c. Stock, Brokerage and Investment Accounts, a Life Insurance Policy, and an Annuity totaling \$2,409,243.30.

9. On February 12, 2021, Jennifer filed an Amended and Supplemental Inventory.

10. The Amended and Supplemental Inventory reported the total value of the probate estate to be \$2,067,780.33, consisting of the following assets:

- a. Real Property ground rents totaling \$14,600.00;
- b. M&T Checking and Savings Accounts and Discover Bank CD totaling \$34,752.79;  
and
- c. Stock, Brokerage and Investment Accounts, a Life Insurance Policy, and Annuities totaling \$2,018,427.54

11. On February 22, 2021, Jennifer filed a Petition for Personal Representative's Commissions in the amount of \$25,000.00, which was approved by the Court and reflected as an expense on the Amended First Interim Account.

12. On March 23, 2021, Jennifer filed an Amended First Interim Account reflecting an ending balance of \$2,118,583.47, which was approved by this Court.

13. On April 22, 2021, Jennifer, through her counsel, Alex R. Housley, Esquire, filed a Notice of Proposed Payment in which she proposed paying herself, individually, \$1,995,084.00 ("Claim Amount") for "outstanding debt owed for care-taking of the decedent[.]"

14. An exception was filed by the undersigned attorneys on May 12, 2021 in which it was requested that the Claim Amount be denied because of Jennifer's failure to provide reasonable detail for the basis of her request. (See Docket # 29 for a more in-depth explanation as why the Claim should have been denied).

15. The Court subsequently scheduled a Hearing for July 21, 2021 which was cancelled by the Court when Jennifer withdrew her Notice of Proposed Payment on July 9, 2021.

16. Jennifer sent a letter to Council Baradel (Attached as **Exhibit A** and referred to as "the Letter"), which was then forwarded to the Petitioners by the undersigned. The Letter is Jennifer's response to the exceptions noted in the May 12, 2021 exception filed by the undersigned.

17. The Letter contains the following statements, quoted in part below:

- a. "[M]y grandmother definitely expected me to pay myself and would have had it no other way.";
- b. "I don't have to supply you with a copy of lost wages[.]";
- c. "[I]f my grandmother was alive trust and believe she would not give you anything especially after you responded in the manner in which you did with your entry to

the courts. I am being far kinder to your organizations then they have been to me or to my deceased grandmother . . . . Additionally, please draw your attention to the will Item 8, which starts at the bottom of page 1 and continues to page 2 where it clearly states among many [sic] other things (f) that the personal representative has the power to do any and all things necessary and proper to complete the administration of my estate all as fully as I could do if living.”;

- d. “Now I reiterate the fact that if my grandmother was alive your charities would not be getting anything, again I am being nice.”;
- e. “It would behoove you to withdraw your entry to the courts before I along with numerous friends and family do detrimental damage to your organization’s reputations and financial streams of donations.”; and
- f. “I further promise if you want to pursue this matter further I will have an internal campaign run that will further take donors from all 3 of your organizations.”

18. The Letter was signed by Jennifer in her capacity as Personal Representative of the Estate.

19. Additionally, note that the Letter was accompanied by “letters of reference” that are not included in the attached letter.

20. On October 14, 2021, Jennifer filed a Second Interim Account in which she reflected that she, as the Personal Representative of the Estate, made an in-kind distribution of stock to herself, as a beneficiary, in the amount of \$52,638.44, and an ending balance of \$2,046,240.07.

21. No distributions have been made to the remaining beneficiaries to date.

22. On December 6, 2021, Jennifer filed a correspondence, along with attachments, to the Court (Docket # 48).

23. The correspondence from the Personal Representative, in relevant part, contains the following statements quoted in part below:

- a. “Alex Housley, the lawyer I am currently working with . . . I have tried to work with him and honestly do not understand his directions[.]”;
- b. “I have reached out to a few other attorneys but no one to date will take the case”;
- c. “I would like to make this a much more suitable situation for me”;
- d. “I would like whatever money goes to the charities to either go to specific individuals that need help”; and
- e. “It would be nice if [my best friend fighting cancer] could somehow get blessed out of whatever money is going to the American cancer society.”

24. As a result of the correspondence filed, this Court ordered a status hearing be scheduled.

25. On January 28, 2022, a status hearing was held before the Honorable Judge Juliet Fisher.

26. As a result of the hearing, the Court issued a Show Cause Order for Removal directing the Personal Representative to show cause, in writing, on or before April 1, 2022, why the Court should not terminate her appointment.

27. Upon information and belief, Jennifer does not have legal representation at this time.

28. The Petitioners file this Memorandum in support of the removal of Jennifer Johnson as Personal Representative of the Estate.

**LAW GOVERNING THE REMOVAL OF A PERSONAL REPRESENTATIVE**

29. Md. Code Ann. Est & Trusts §7-101 states in relevant part:

- (a)(1) A personal representative is:
  - (i) A fiduciary; and
  - (ii) Under a general duty to settle and distribute the estate of the decedent in accordance with the terms of the will and the estates of decedents law as expeditiously and with as little sacrifice of value as is reasonable under the circumstances.
- (2) A personal representative shall use the authority conferred on the personal representative by:
  - (i) The estates of decedents law;
  - (ii) The terms of the will;
  - (iii) Orders in proceedings to which the personal representative is a party; and
  - (iv) The equitable principles generally applicable to fiduciaries, fairly considering the interests of all interested persons and creditors.
- (b) Unless the time of distribution is extended by order of court for good cause shown, the personal representative shall distribute all the assets of the estate of which the personal representative has taken possession or control within the time provided in § 7-305 of this title for rendering the first account.

30. Further, if a Personal Representative exercises his or her power contrary to the provisions of the Will, there may be a breach of the fiduciary duty. Md. Code Ann. Est & Trusts. § 7-403.

31. § 6-306(a) of the Maryland Estates & Trusts Articles states:

- (a) A personal representative shall be removed from office on a finding by the court that the personal representative:
  - (1) Misrepresented material facts in the proceedings leading to the personal representative's appointment;
  - (2) Willfully disregarded an order of the court;

- (3) Is unable or incapable, with or without the personal representative's own fault, to discharge the personal representative's duties and powers effectively;
- (4) Has mismanaged property;
- (5) Has failed to maintain on file with the register a currently effective designation of an appropriate local agent for service of process as described in §5-105(c)(6) of this article; or
- (6) Has failed, without reasonable excuse, to perform a material duty pertaining to the office.

32. Where any of the causes named above are found, after notice and hearing, removal of the Personal Representative is mandatory. *Richards v. Richards*, 27 Md. App. 1 (1975).

33. A Personal Representative may also be removed for conduct amounting to fraud, bad faith, collusion, breach of trust, or prejudice to the estate. *Smith v. Waller*, 225 Md. 94 (1961).

#### **JENNIFER'S FAILURE TO ADMINISTER THE ESTATE**

34. The Petitioners hereby restate and incorporate herein, all previous paragraphs in the "Facts" and "Law Governing the Removal of a Personal Representative" sections above.

35. Jennifer, as Personal Representative of the Estate, has a legal and fiduciary duty to administer the Estate pursuant to the terms of the Will.

36. In a direct breach of her fiduciary duty, Jennifer has, thus far, failed to administer the Estate pursuant to the terms of the Will and has, in the alternative, taken actions as the Personal Representative of the Estate that benefit only herself in her individual capacity.

37. For that reason, the Petitioners are in support of removing Jennifer as Personal Representative of the Estate.

38. Jennifer is unable or incapable, with or without the personal representative's own fault, to discharge the personal representative's duties and powers effectively.

39. Jennifer has shown she will act in her own personal interests and in ways which are prejudicial to the Estate. This is evidenced both by the Notice of Proposed Payment noted in Paragraph 13 above, quotes from the Letter received from Jennifer in her capacity as Personal Representative indicated in Paragraph 17, and the aforementioned correspondence detailed in paragraph 23.

40. Jennifer has breached, and shown she likely will breach, her fiduciary duty by not distributing or restricting the distributions pursuant to the terms of the Will.

41. In the alternative, Jennifer has shown that it is her intent to alter the terms of the Will and distribute the assets of the Estate as she deems appropriate.

42. While the Petitioners have requested that the Personal Representative make an early distribution, to date, no distributions have been made, even though the Personal Representative has reflected an early distribution to herself, no claims have been filed against the Estate, and the Estate has been opened for over a year and a half.

43. The Petitioners are concerned that Jennifer will continue to act in her own personal interest, at the expense of the Estate and against the testamentary intent of the Decedent as stated in her Will, if she is permitted to remain the Personal Representative of the Estate.

44. The Letter and the December 6, 2021 correspondence provided to the Court confirms that Jennifer believes that as Personal Representative she can make distributions from the Decedent's Estate at her own personal discretion, rather than follow the terms of the Will.

45. Additionally, rather than permitting the American Cancer Society to use funds directed to it for research as stated within Item # 6, Section A. subsection 2 of the Will, Jennifer would like to divert those funds to her friend.



46. The Will authorizes the Personal Representative to utilize the services of an attorney, accountant and any other professional as may be necessary in the administration of the Will.

47. Jennifer previously retained counsel to represent her in her capacity as Personal Representative and to aid in the administration of the Estate, but has since not followed her counsel's instructions, and has acted in direct contravention of her counsel's advice and in contrast to the terms of the Will.

48. Jennifer has made clear that she lacks the ability to properly, timely, and efficiently file Tax Returns and Court filings, and discharge her duties as Personal Representative, without assistance from counsel.

49. Jennifer's actions reflect adversely on her honesty, trustworthiness, and/or fitness to perform the duties of a Personal Representative.

50. Given the previously noted actions of Jennifer, Petitioners believe that Jennifer is unable and incapable to discharge her duties and powers effectively.

51. It follows that in the interest of justice, the Petitioners support the removal of Jennifer Johnson as Personal Representative of the Estate in order to protect and preserve the assets of the Estate.

#### **SPECIFIC RELIEF REQUESTED**

52. On the Amended First Account, Jennifer took Personal Representative's Commissions in the amount of \$25,000.00 for reasonable compensation for services. If Jennifer is removed as Personal Representative for not properly performing her duties, the Petitioners request that the \$25,000.00 be reflected as an outright distribution to Jennifer, rather than a Personal Representative Commission.

53. Petitioners support the removal of Jennifer as Personal Representative, however, if this Court determines that it is in the best interest of the Estate for her to remain serving as Personal Representative, the Petitioners request the following:

a. The bond of the Estate be increased to cover the assets of the Estate.

b. An early distribution be made to the Petitioners within thirty (30) days of the date of the Order to Remove in the amount of \$90,000 to each of the four Petitioners. The current balance of the Estate assets as of the Second Interim Account is \$2,046,240.07. Twenty Percent (20%) of the balance is \$409,248.01, and Five Percent (5%) is \$102,312.00. An early distribution of \$90,000 to each of the four Petitioners would allow sufficient funds to cover Estate expenses.

c. A disinterested Court-appointed attorney be appointed as a Co-Personal Representative. The Petitioners recommend Coryn Rosenstock, Esquire, a Director at Frost Law.

**WHEREFORE**, the Petitioners respectfully request that this Honorable Court issue an Order:

- A. Revoking the Letters of Administration granted to Jennifer Johnson;
- B. Removing Jennifer Johnson as Personal Representative of the Estate of Sylvia H. Johnson;
- C. Appointing a disinterested Maryland attorney to serve as Personal Representative;
- D. In the alternative, appointing a disinterested Maryland attorney to serve as co-Personal Representative with Jennifer Johnson;
- E. In the alternative, increasing the bond filed in the Estate to cover all estate assets;

F. Directing the Personal Representative, or co-Personal Representatives, to make an early distribution of \$90,000 from Estate assets to each Petitioner within thirty (30) days of the date of the Order to Remove;

G. Directing the Personal Representative, or co-Personal Representatives, to amend the Amended First Account to reflect the \$25,000 Personal Representative Commissions as an outright distribution to Jennifer Johnson; and

H. Providing any further relief that this Court deems appropriate.

[Rest of Page Left Intentionally Blank]

Respectfully submitted,

COUNCIL, BARADEL,  
KOSMERL & NOLAN, P.A.

Date: March 29, 2022

By: Brian S. Burkett (sco)

Renee B. Sullivan, Esquire

CPF/AIS#: 1412170298

Brian S. Burkett, Esquire

CPF/AIS #: 1712130071

Samuel C. Draper, Esquire

CPF/AIS #: 1812110103

125 West Street, 4<sup>th</sup> Floor

Annapolis, Maryland 21401

Telephone: (410) 268-6600

Facsimile: (410) 269-8409

[Sullivan@councilbaradel.com](mailto:Sullivan@councilbaradel.com)

[Burkett@councilbaradel.com](mailto:Burkett@councilbaradel.com)

[Draper@councilbaradel.com](mailto:Draper@councilbaradel.com)

*Counsel for the Petitioners*

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 29th day of March, 2022, a copy of the foregoing was mailed first-class, postage prepaid to all interested persons and creditors (if applicable) as follows:

Jennifer Johnson, Personal Representative

8666 Side Saddle Court

Randallstown, Maryland 21133

*Personal Representative*

Michael Pratt

719 Silver Creek Road

Pikesville, Maryland 21208

*Interested Person*

Brian S. Burkett (sco)

Brian S. Burkett

So first let me be really clear, you will address my deceased grandmother as Ms. Sylvia H. Johnson, as she did not allow anyone to address her in any other fashion in life, so we will not start doing it in her death and secondly you can decide how you best want to move forward after you read this. But I thank you so very much for cutting off all future donations from my black family for not 1, 2 but 3 organizations that you are representing to which every person in my family has given generously in the past.

I will address some of your entry to the courts but not all, we will start at number 15 below as all entries prior to number 15 only list out the general timeline of events for this being processed and are your attempts to pad your entry to the courts and provide no real value. Anything that was submitted to the courts and all mailings were done by my attorney's office and were filed and mailed in the allowable timeframes. Additionally your timeline failed to take into account a very serious matter which has affected the world, my family is not immune to that nor are my friends, and that is the pandemic and COVID19.

15 The personal representative failed to provide reasonable detail for the basis of her request for payment in the notice and as much the notice must be denied

**My response to your 15: That is your opinion. I provided a high level overview and anything else is honestly none of your business some things are personal and private and out of respect for my grandmother and myself, I have given enough information for you to clearly see it was a very horrific experience and it is a miracle my grandmother survived as long as she did and lived as well as she did. Five management changes for any organization is very extreme and chaotic for all parties involved in less than five years.**

16 The notice does not provide reasonable detail of when Ms. Johnson provided care for her grandmother. The only

timeframe referenced by the notice merely states that Ms. Johnson cared for her grandmother "prior to death" of the decedent beginning in 2016 until the day she passed away. Any professional care giver would have kept records of the work performed and the dates performed. Ms. Johnson did not present any such information.

**My response to your 16: This again is your opinion as you can clearly see I don't claim to be "professional", I just did my duties with excellence and effectiveness as you will see from now 16 letters of character reference from people who were extremely close to the situation. Furthermore I also stated in my original message to the courts, I could gladly provide upon request 400 emails and then 2 letters of reference (that number has grown to now 16 and I can get more) that give much more of the detail you are looking for and capture dates and times, but keep reading at this point I will not be supplying you with these.**

17 Ms. Johnson states that at no point did my grandmother expect me to take on this role for many years without being compensated. Ms. Johnson did not substantiate this statement with any supporting documentation she did not attach invoices, evidence of prior payments made by decedent during her lifetime, a formal contract or an informal written agreement showing the decedent intended to pay Ms. Johnson for care provided

**My response to your 17: This again is your opinion and I do not have to provide you with invoices, etc. I clearly shared with you I not only did my job but the jobs of at minimum 5 other people and saved my grandmother from any harsh damage or cruel demise. Also, my grandmother definitely expected me to pay myself and would have had it no other way.**

18 Ms. Johnson did not attach any evidence of lost wages that she incurred as a result of caring for her grandmother

**My response to your 18: You are correct and I don't have to supply you with a copy of lost wages, just as you do not have to show me your hourly rate which is likely on the low end \$125 per hour but more likely is \$300- \$700 an hour. Yes these are the going hourly rates for lawyers in the state of Maryland.**

19 Although the beneficiaries sympathies are with the family of the decedent for their loss and have no doubt Ms. Johnson may have provided assistance to her grandmother in her elderly years, the claim amount is unreasonable and should not be approved by this honorable court

**My response to your 19: Your sympathy is masked by your lack of compassion, your nasty reply picking apart the very life and eventual death of the woman who was kind enough to want to leave anything to your organizations. Your sympathy is further masked by the lack of even a basic thank you from any of your charities even being included in the will in your entry to the courts. Your sympathy is further masked by the very late arrival of any sympathy cards from the Alzheimer's Association or American Cancer Society, as my grandmother died on February 2nd of 2020 and the only sympathy cards from Alzheimer's Association and American Cancer Society came within the month of April and May of 2021. Also it is masked by the fact your sympathy is not mentioned until number 19 out of 25 in your entry to the courts. Also, the sympathy cards came only after failed attempts to "get the money" from my lawyer and very pushy emails to my lawyers office and finally my paralegal saying the truth which was their firms client was very upset at the way your "charities" had handled things and the fact you did not express any condolences. Your sympathy is further masked by the American Heart Association, being part of your entry to the courts as they already received \$30,000 from my grandmother's death. Your entry to the courts honestly makes me wonder if Jeff Mueller, Advisor, Charitable Estate Planning for the American Heart Association is even aware of**

**you representing his organization in this matter as he really seemed to have a genuine liking for my grandmother. Yet since he failed to respond to a recent email I sent him regarding this matter, it indicates to me he was likely well aware.**

20 Based on the numbers provided by Ms. Johnson in the notice and while giving Ms. Johnson the benefit of the doubt that she worked for her grandmother starting January 1, 2016 until her death on February 2, 2020, Ms. Johnson is claiming that she is entitled to repayment of \$40,716.00 per month or \$9,370.00 per week during the year to care for her grandmother. At her requested rate of \$50.75 per hour this would mean that Ms. Johnson worked about 184.5 hours per week. The problem here is that only 168 hours exist in a week. The claim amount that Ms. Johnson has requested at her rate of 50.75 per hour is illogical and therefore must be denied.

**My response to your 20: Check your math it is wrong, however I don't care and I know for a fact my deceased grandmother would definitely not care what is illogical to you in this situation. I could also say that it is illogical for a lawyer such as yourself to be representing charities in the manner you do and yet seemingly have no tact or compassion and in fact represent everything that is the antonym of anything closely resembling a charity. Additionally, I could say lawyer's fees of \$300 plus dollars an hour are illogical. I could further say that it is illogical for anyone not to say thank you if someone gives you \$1 but instead you give them thousands of dollars and they don't say thank you but rather say "it is illogical that you didn't give us more and you must deny yourself any payment for all the work you did and you must give us more."**

21 the typical salary range for caregivers in Maryland is between \$13 and \$20 per hour depending on certifications, qualifications and experience. Ms. Johnson states her rate is \$50.75 per hour yet has presented no certifications,



Qualifications, or experience that would justify her above average rate

**My response to your 21: You are somewhat correct but those people who get paid \$13-\$20 an hour also most times do not do their jobs, hence why many family members such as myself have to stand in the gap and take care of their loved ones, while many others just completely walk away leaving their loved ones to die cold miserable lonely harsh cruel deaths. Absolutely no one should die alone. As for my credentials and certifications and qualifications, I have a Bachelor of Science Degree in Chemistry and an MBA from one of the best business schools in the country for operations management hence why I get oxygen management and process. Also if you do the math  $\$13 \times 5 = \$65$  my rate is \$50.75 I have already discounted my rate. I have given more then enough.**

22 The decedent was also living in a facility during the time period for which Ms. Johnson claims she should be compensated. Ms. Johnson even sates in the notice that she hired additional "sitter" to care for her grandmother. It is unreasonable to think that in addition to the professional care provided by the assisted living facility and an additional sitter Ms. Johnson is owed \$488, 592.00 per year for additional care that she provided to the decedent during her lifetime. While it is an unfortunate situation that Ms. Johnson seemed to be unhappy with the quality of care provided by the assisted living facility, this does not mean that she is entitled to retroactively take a such unreasonable payment

**My response to your 22: First and foremost your math is wrong. However, this overall statement is again your opinion and further the situation was very extreme and many people's loved ones were harmed to the point of death. It did not happen to my grandmother because I actively took excellent care of her.**

23 The descriptions of the duties or task performed by Ms Johnson do not qualify for reimbursement. Many of these tasks and chores were taken on to help her elderly grandmother and were not professional services that should now considered a debt of the decedent prior to her death. Many of these task that Ms. Johnson lists in the notice to the attached letter for which she is now seeking payment, are not things that anyone would typically seek payment for, such as planning birthday parties, attending family gatherings, asking friends and family to send messages or love and flowers, interior designing living space, and providing weekly floral arrangements. The nature of the tasks coupled with the fact that Ms. Johnson has produced no evidence that the decedent had ever paid Ms. Johnson for these tasks while she was alive, must lead to a denial of the notice

**My response to your 23: Again this is your opinion but if you ever cared for anyone you would know ones mental health is very important and is strengthened by things such as keeping a clean home, having flowers and celebrating life. If I outsourced these items I most certainly would have had to pay even more and likely would have not had as good an end product. Additionally, all of these things are very normal to provide to ones loved one and there are tons of professional party planners, I actually work with a few; as for transportation there are certainly professional drivers and car services, there are also professional interior designers and design firms and there are tons of online and free standing floral shops. Also, I believe strongly in giving people their flowers while they are here on earth and able to enjoy them, not when they are deceased.**

25 because the personal representative failed to provide reasonable detail for the basis of her request for payment in the notice outlined above the notice of proposed payment for personal representative in the amount of \$1,995, 084 should be denied.

**My response to your 25: Again this is your opinion, but if my grandmother was alive trust and believe she would not give you anything especially after you responded in the manner in which you did with your entry to the courts. I am being far kinder to your organizations then they have been to me or to my deceased grandmother and to my family as a whole as we have all previously contributed generously to all 3 organizations you represent through our time as volunteers and through financial contributions. Additionally, please draw your attention to the will Item 8, which starts at the bottom of page 1 and continues to page 2 where it clearly states among many other things (f) that the personal representative has the power to do any and all things necessary and proper to complete the administration of my estate all as fully as I could do if living. Now I reiterate the fact that if my grandmother was alive your charities would not be getting anything, again I am being nice.**

### **In Closing**

It would behoove you to withdraw your entry to the courts before I along with numerous friends and family do detrimental damage to your organization's reputations and financial streams of donations. However, if you want to argue or pursue or protest that language mentioned in my response to your number 25, that is your right. But I will ensure that all of my friends and family never donate another dollar to any of the charities you represent, and I will ensure they post a social media campaign that encourages other people in their networks to also not donate any money ever again to the charities you represent. Let me indicate, what that network of friends and family look like, some are old and will pass soon and may or may not have your charities listed in their wills, I know for a fact some do. I will ensure they remove your charities and give those funds to other organizations. My network is inclusive of blacks, whites, many are Jewish as I grew up in a predominantly Jewish neighborhood and Asian and many others are international in their origin. Some are church and

some are not, if you read my initial claim, you will see I took my grandmother to church, that is 3 congregations your organizations stand to lose support from as many remember me bringing my grandmother to church and would gladly support my efforts as there are other organizations that will gladly accept any donation. Additionally, things work fast in social media and this would quickly reach several thousand followers and go "viral" very easily.

Additionally, since you chose to respond the way you did, let me be clear no one in my family will give any of the organizations you represent another dime, dollar, volunteer hour or anything else for that matter. So you lost 1 millionaire donor that in fact had been to numerous American Heart Association balls and was likely going to follow in my grandmother's footsteps and be a future donor and attendee because their overall cause is dear to me, but you blocked that opportunity. You also lost someone who has generously given to all of your organizations in the past. Additionally not only did you lose 1 millionaire donor, what I promise and I always keep my promises is that you have now lost several others. Additionally, connections matter right, well I belong to one of the largest predominantly African American Sororities in this world with over 300,000 college educated women and our parent organization has 2.5 million male and female college educated members and growing, I further promise if you want to pursue this matter further I will have an internal campaign run that will further take donors from all 3 of your organizations. Also, I can't control how other people will run their mouths so I can't tell you the number of other donors your organizations will lose. I can only tell you that my friends and family are very well connected and compassionate and charitable givers and what the loss would look like for your organizations would make a very significant impact.

So, I will have the checks cut and have some verbiage for your organizations to sign left at my lawyer's office for you to pickup

EXHIBIT A

any business day after June 19, 2021. I do sincerely hope we have all learned a valuable lesson here, as I believe we can all learn from one another whether we are rich or poor black or white female or male old or young we are all 1<sup>st</sup> and foremost human and should treat each other with respect, when someone gives you a gift even if it is \$1 you should receive it and say thank you. When someone dies you should acknowledge that person's death and express sincere condolences in a timely fashion and not just so you can collect what you think you are owed. And if someone ever shares with you the trauma their deceased loved one went through you should respect it, say you are so sorry you went through all of that and say thank you for the donation instead of trying to discount their experience and pick it apart.

Additionally, I politely request that the funds for each of your organizations be split into equal amounts and given to two local black females that are in need of assistance from your charities. One of the ladies should be from the Annapolis Maryland area as that is where my grandmother was born and raised and one from the Baltimore Metropolitan Area, where my grandmother spent most of her adult life. I also request that all the funds for the American Cancer Society go directly to a single mother, in the Baltimore area, currently battling cancer yet stepped outside of herself and showed compassion and helped in the care of my grandmother, her name is Kimberly Ringgold and her contact information is enclosed in one of the attached letters of character reference. See when she called the American Cancer society trying to get help, she was told they do not have a list or anyway to directly get funds to people like her that are in need.

Sincerely,

Ms. Jennifer Johnson  
Personal representative for Ms. Sylvia H. Johnson

EXHIBIT A