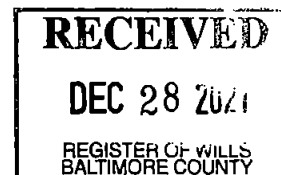


RENEE B. SULLIVAN
Email: Sullivan@CouncilBaradel.com
Telephone: (410) 268-6600 Ex. 3454

December 23, 2021

Jennifer Johnson, Personal Representative
8666 Side Saddle Court
Randallstown, Maryland 21133



Re: Estate of Sylvia H. Johnson
Estate No. 208430
CB File Number: 23844.01

Dear Ms. Johnson:

As you are aware, this Firm represents the American Cancer Society, the American Heart Association, the Alzheimer's Association, and NAMI Maryland (collectively, the "Charities"), with regard to the Estate of Sylvia H. Johnson ("Estate"). This correspondence seeks to address the following issues:

1. Request for Distributions to the Charities

The Second and Not Final Account filed with the Register of Wills on October 14, 2021, reflects that you made an in-kind distribution to yourself as a beneficiary of the Estate, in the amount of \$52,638.44. The Second and Not Final Account also reflects that there is \$1,943,329.04 in assets retained for the final distribution. This Estate has been open since June of 2020 and the Charities have not received any distributions to date.

As the appointed Personal Representative, you are a fiduciary of the Estate and, as such, you are under a legal duty to settle and distribute the Estate in accordance with the terms of the will and the law as expeditiously and with as little sacrifice of value as is reasonable under the circumstances. *Md. Code, Estates and Trusts, §7-101*. Sylvia H. Johnson's Last Will and Testament, dated August 21, 2017 ("Will"), probated by the Register of Wills, states that Five Percent (for a total of Twenty Percent) of the rest, residue, and remainder of the decedent's Estate shall be distributed unto each of the four Charities. *Item #6, Section A*.

There are no outstanding claims against the Estate reflected on the docket and your Notice of Proposed Payment to Personal Representative has been withdrawn. Your letter to Judge Fisher, dated December 3, 2021 ("Letter"), states that you are working to file the required tax returns for the Estate. With the understanding that you will need to reserve a certain amount of Estate assets to pay any required taxes owed as well as CPA fees, the Charities request that you make an early distribution to the Charities from the Estate at this time.

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Please notify me regarding when the Charities can expect to receive a distribution from the Estate, and the amount of each distribution.

2. Clarification of Your Letter to Judge Fisher, dated December 3, 2021

Your recent Letter to Judge Fisher implies that you believe that you have the ability to distribute the decedent's Estate in a manner you deem personally appropriate, instead of in accordance with the terms of the Will. This is highly concerning to the Charities for the reasons set forth below.

First, it is unclear from your letter, as well as your prior filings and correspondence, whether you intend to make distributions to the named Charities in the decedent's Will at all. In your Letter, you state, "...I would like to make this a much more suitable situation for me and much more specific and directly impactful blessing for whatever goes to charity." Your Letter also states that you were advised by your prior counsel, Mr. Housley, to distribute the Estate in accordance with Item #6 of the Will, but that you "...honestly do not understand his directions..."

Your Letter also implies that you believe, or previously believed, that Item #8 of the Will allows you to make distributions from the decedent's Estate at your own discretion, rather than in accordance with Item #6. While Item #8 gives the Personal Representative the ability to manage the assets of the Estate in a certain manner, Item #8 does not allow the Personal Representative to make distributions from the Estate as he or she deems personally appropriate. The language of the Will speaks for itself, and must be followed, whether you agree with it or not.

Please confirm that the Charities will each receive Five Percent of the decedent's residuary Estate, in accordance with the terms of the Will.

Second, the Charities are concerned that for any distributions made to the Charities, you will attempt to place certain restrictions on the use of such distributions. In your Letter, you state, "Because I am African American and I am sensitive to racial injustices in this country and the help that many African American and minority women could use especially in this season, I would like whatever money goes to the charities to either go to specific individuals that need help and/or the money to go to support existing programs specific to this demographic."



Jennifer Johnson, Personal Representative
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The law does not allow the Personal Representative to interject his or her own restrictions as to how a distribution is to be used by a beneficiary, absent clear language in a will. Regardless of what the decedent may have told you verbally before her passing, the Estate must be distributed in accordance with the decedent's Will or otherwise in accordance with Maryland law. The only stipulation in the decedent's Will for the distributions made to the American Heart Association, the American Cancer Society, and the Alzheimer's Association is that the distributions be used "for research." *Item #6, Section A*. No such restriction was included for the distribution to NAMI Maryland.

Please confirm your understanding that no restrictions, beyond what is included in the terms of the Will, can be imposed on the distributions made to the Charities.

Thank you for your attention to this matter. I look forward to your concise and prompt response.

Sincerely,

A handwritten signature in black ink, appearing to read "Renee B. Sullivan", with a long horizontal flourish extending to the right.

Renee B. Sullivan

cc: Register of Wills for Baltimore County, Maryland
Lacy Chaffin, Esq. (Via Email Only)
Andrew Fussner, Esq. (Via Email Only)
Michael Saenz, Esq. (Via Email Only)
Beverly Halloran, Esq. (Via Email Only)
Kate Farinholt, Executive Director (Via Email Only)