

CREDITOR STATEMENT

Creditor: J. Michael Schaefer

CLAIM: \$28,000

Affidavit:

Undersigned declares under penalty of perjury the following to be true of his personal knowledge, he being competent to so testify if called upon as a witness:

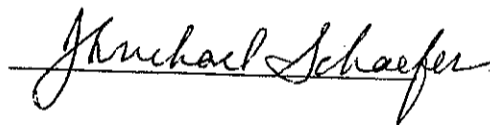
1. The claim is for services provided, beneficial to decedent, at specific request of decedent, creditor expecting to be paid for said services, decedent accepting benefits of said services and expecting to compensate claimant from his estate if not prior to his passing.
2. Claimant is not related by blood or marriage to decedent.
3. The reasonable value of the services is \$1000 per month, for food, beverage, costs of vehicle operation, errands run, collectibles purchased, claimant deferring all other obligations to be always of service per request, from September, 2006 through April, 2011, a period of 56 months.
4. Fulltime caregiver-assistants are paid a reasonable compensation of \$3000 to \$5000 per mo., creditor services being part-time are reasonably worth \$1,000 per mo. but for purposes of respect to the Estate and other demands, is reduced 50% to a modest amount consistent with the modest demeanor of decedent, an amount he would have readily embraced if he had had access to any of his financial resources(all of which were controlled by purported power of attorney).
5. Claimant's relationship with decedent commenced in 1985, on a social basis, decedent and creditor meeting up in Oklahoma and elsewhere, and sharing civic events such as the dedication of the Hilda Mae Snoops fountain in Annapolis, exchanging warm letters over the gubernatorial and controller years. In September 2006, decedent invited claimant to lunch in Annapolis; hosted by claimant as is traditional, or socially graceful, when dining with Maryland's First Citizen. Decedent at that time stated "you invited me to go out to lunch with you monthly when I retire; I want to negotiate twice a month". (Decedent has just lost primary election).
6. Claimant responded multi-fold, actually escorting decedent **three times a week** to breakfast, lunch, dinner, civic appearances, coordinating events with his limo drivers Ross Freistat and Brian Mills, sometimes going with said driver in decedent's limo, but generally decedent riding shotgun in claimant's 2004 Toyota Scion. Events varied from breakfast at Pete's Grill, 32nd and Greenmont, to a dozen Kiwanis Lunch events at Germanos Little Italy(claimant being President of said 90 year old civic-service club), to dinner at Outback Steakhouse in Annapolis with former Governor Martin Mandel and ex Security Chief for Comptroller, Larry Tolliver. At decedent request claimant had a Congressman Hoyer Congressional resolution framed, purchased at least a dozen copies of the Schaefer Biography for decedent to sign and give as extraordinary gifts, and was constantly providing decedent with \$2.00 new bills, in sequences, sometimes padded 25 at a

time; these were purchased at Wynn Casino in Las Vegas, decedent when asked commonly saying "I want ten, and I'll pay for them". Claimant never billed or asked decedent for money.

7. Decedent expressed his strong desire to provide for claimant's extraordinary family-like services by several times stating "I am going to update my will", and when claimant would seek to borrow a video tape of book from massive Schaefer Library, decedent would state "take whatever you want, take them all, they are all yours". He maintain two residential condos on Springhouse St., one in honor of his deceased lady friend Hilda Mae Snoops, and one for his subsequent longtime companion Jean Bell, who became his power-of-attorney and often travelled with decedent. Decedent offered claimant the condo he was occupying, "you can have the house, the whole house". Claimant knew that real estate transfers require written instruments and preferred to have the promised "updating of my will" to provide decedent's frequently acknowledged obligation to claimant for many years of constant service and assistance. A several day trip to Las Vegas was planned, with hotel room adjacent to elevator to minimize walking, planned visit to table-dealers whose identification indicated being from "Maryland", and being a guest of honor at Old Timers Dinner for 800 where several former Democratic Nevada Governors attend, and knew decedent, or knew of him and his good-works.

8. Purported power of attorney in October 2008 sought to ban claimant from continuing his service, per attached Exhibit A, a letter drafted by her, with a strange signature for decedent, "Don Schaefer" for an official document, as if he were saying "my arm is being twisted". A former attorney for decedent has stated, "he will sign anything Lainy puts in front of him, or she yells at him, and he does not like to be yelled at". Lainy followed up with an attack on claimant's character, twice accusing him of petty theft (both times her staff promptly found what they claimed was missing, (a) Hippodrome tickets, and (b) keys to his usually unlocked retirement apartment, and filing pleadings suggesting claimant deposited a \$2300 retirement check into a "personal account" (meaning claimant account) when the deposit slip, provided by decedent's nurse, was imprinted William Donald Schaefer, and promptly was used to deposit the check for benefit of decedent. POA also filed affidavit suggesting claimant was 'dangerous' based on a 20 year old assault conviction. Claimant is a retired lawyer, former city prosecutor, and like decedent a multi-term City Councilman. Claimant continued his services, including private Christmas dinner December 25, 2010 with decedent signing official authority for claimant to continue his assistance into 2011, per Exhibit B. On at least three visits to decedents home, at his request, purported power of attorney summoned security to remove claimant, decedent sending away security the first time, and claimant voluntarily leaving without security issues other times—one time **with decedent demanding "sit down, I'm not finished talking to you yet"**. [Nursing & security personnel ignored decedent's written authority for claimant visit, were unaware that in any power of attorney, the power is in the grantor and the "attorney" is servant.]

Executed June 13, 2011 at Baltimore, MD.



2 of 2

GOVERNOR WILLIAM DONALD SCHAEFER OCT 23 2008
SERVING THE PEOPLE OF MARYLAND FOR OVER 50 YEARS

October 10, 2008

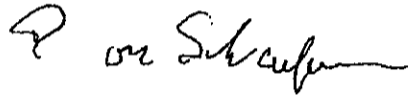
Mr. Garrett A. Falcone
Executive Director
Erickson Retirement Communities
719 Maiden Choice Lane
Catonsville, MD 21228

Dear Mr. Falcone:

I know that it has been a real problem for you and everyone at Charlestown in terms of my friendship with Michael Schaefer. This letter is to clarify that I do not wish to be visited by Michael Schaefer at my home. I really appreciate all of the effort to follow my instructions and as of now, this is my wish. If I should change my mind about this, Lainy LeBow-Sachs will notify you.

Thanks for your help with this.

Sincerely,



William Donald Schaefer
Governor

CANTON TOWER 16TH FLOOR
1501 SOUTH CLINTON STREET
BALTIMORE, MARYLAND 21224

EX. A

EX. B

12-25-10

OK for Mike Schaefer
to visit me from time
to time at Erickson
Retirement, during 2011.

Walt A. Schaefer

EX. B