

**IN THE CHANCERY COURT OF SULLIVAN COUNTY TENNESSE  
BLOUNTVILLE, TENNESSEE**

IN THE MATTER OF THE ESTATE OF:

Mary Alice Carr,  
Deceased

No: 19-PR-22478

**Affidavit to preserve the recollection of a recent telephone conversation and notification  
to the court of the circumstance(s) as described herein.**

This affidavit is made to preserve my recollection of a conversation I had with Mary Anne Lawson, Executor of the  
Mary Alice Carr Estate.

- 1      A call was received in my Nissan Murano via a Bluetooth cellular interface.
- 2      The call was received in Idaho Falls, Idaho on December 30, 2019 at approximately 4 PM Mountain Standard Time.
- 3      The call was originated by the caller, Mary Anne Lawson.
- 4      Initially small talk was centered primarily on my son's request for a disbursement from his trust account. Mary Anne's transmission of a check to his bank, Legacy Texas in Frisco, and its deposit into his account were the subject of the early part of this conversation.
- 5      I questioned Mary Anne about the sale of the estate's real estate and was told that it might be a couple of years before the sale was completed. When I pressed the issue, she indicated the real estate would not likely be sold in the coming year.
- 6      I told her that my son needed the money for college beginning next year and at 65 (66 in May) I didn't want to wait over a year to sell. I suggested selling via public auction in the coming year. When I pointed out that the asking price they wanted was significantly above (9.75 vs approximately 3.6 million) the certified appraisal they had commissioned in early 2019 and would not likely to lead to a prompt sale, Mary Anne became agitated and told me that if I pressed it I would make co-executor Mack Jr. mad. She referred me to the will which places my monies in a trust under their (Mary Anne and Mack Jr.'s) control.

More significantly, she indicated that because they (Mary Anne and Mack Jr.) were in control of my monies via the a trust as outlined in the Mary Alice Carr Will, they would take punitive action by only approving an nominal amount or nothing at all as an annual withdrawal from that trust irrespective of the amount in the account or its' annual investment gain. Mary Anne told me that it would be up to Mack Jr. and that I'd better not make him mad.

- 7 When I returned from Idaho on January 2<sup>nd</sup>, A FedEx Envelope was on my doorstep with a letter referencing the enclosed will. Mary Anne knows that I already have multiple copies of the will as she and/or her husband, estate attorney Rob Lawson, have provided them to me.
- 8 To me, it was a clear indication that my siblings intended to extort my silence and compliance by threatening a vindictive and punitive response. This signaled to me that they would purposefully, spitefully, withhold monies from the trust that my mother had provided for me in her will.
- 9 This is especially significant to me because my life expectancy is 76 years. I will be 66 in May. Moreover, I constantly worry about liver damage from the frequent use of acetaminophen (Tylenol) during the past three decades.

In 1986 I had radial keratotomy of both eyes. Unfortunately the results left me with extensive double, up to 16x vision which is not correctable with lenses. Rather than being round or oblong, my corneas were asymmetrically misshapen. This situation draws similarities to the manner of a partially deflated basketball abused on the playground

In the years that followed I have had 18 eye surgeries in 3 countries on two continents and 4 states in an effort to improve vision.

During much of this time, I made extensive use of over the counter drugs to reduce the constant headaches from the distorted vision. Aspirin and/or acetaminophen formulations being my primary painkillers.

Unfortunately, this experience greatly diminished earnings during my working life and I only have meager Social Security benefits.

This experience has left me especially vulnerable and I'm certain Mary Anne and Mack Jr. understand my situation and how susceptible I am to any deception. Moreover, living in Texas reduces my ability to maintain oversight of the Mary Carr estate.

10. The current listing price of the Mary Alice Carr Real Estate is 9,750,000. Originally, on the website I created to sell the property, I listed the real estate at 9,750,000 OBO to indicate negotiation flexibility. However, Mary Anne sent me an email asking me to remove the OBO as she wanted to stand firm on the price. I complied and made the change to the listing.

Later, after hearing of the news that the Hard Rock casino might become the operators of the Bristol casino, Mary Anne sent me an email asking me to increase the price substantially.

I declined and sent two emails, expressing my opinion of the folly of that assumption.

In the spring of 2019, a real estate appraisal was commissioned for the Mary Carr real estate. The total for all of the property came to an amount slightly less than 3.6 million.

Although I originally agreed with listing for a higher amount, I now believe I was duped. I believe the asking price is so significantly higher than the certified appraisal that it disproportionately

serves the interests of the executors and doesn't represent a good faith effort to sell the real estate.

11. Delay disproportionately benefits the executors as they are both younger with statistically longer lifespans. Mary Anne is 63 with a statistical lifespan of 81 years (18 years remaining) and Mack Jr. is 53 with a remaining statistical lifespan of 76 (23 years remaining). He also has a large number of working years remaining.

Moreover, when recently speaking with Mary Anne, I expressed concern that my son will need cash for his collage expenses beginning next summer. Her response was that he might have to start collage without those monies in his trust.

At 65 (66 in May), I am currently semi-retired and also desire cash from my trust.

Not having those monies available unnecessarily impacts the lives of Matthew and myself. I am especially apprehensive about not having ready cash available to cover unexpected health expenses.

I doubt my mother's last wishes were to fund my siblings ambitions in real estate speculation.

I believe that my mother sincerely wanted to provide for my continuing health and welfare as she was especially mindful of the challenges I've faced. Moreover, I know she loved my son and wanted to provide him with funds for outstanding educational experiences along with monies for his usual and customary living expenses.

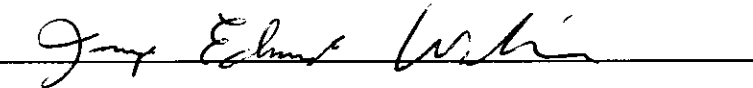
I am certain my mother's noble intentions are being co-opted by greed, indifference and deception.

### PRAYERS

That this court see clearly and takes the action(s) that it determines to be fit and proper to preserve the integrity of the probate process under the laws of the State of Tennessee and to secure the assets of the Mary Alice Carr Trust and of the monies in the Matthew Willis Trust account(s).

All other prayers are reserved.

I UNDERSTAND THAT I AM AFFIRMING UNDER OATH THE TRUTHFULLNESS OF THE DECLARATIONS MADE IN THIS AFFADAVIT AND THAT PUNISHMENT FOR KNOWINGLY MAKING A FALSE STATEMENT INCLUDES FINES OR INPRISONMENT.



Joseph Edward Willis, Beneficiary, pro se  
Signed and dated this 15<sup>th</sup> day of January, 2020

