

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

**ETHAN S. PARKER,  
PLAINTIFF,**

**v.**

**WELLS FARGO BANK, N.A.,  
DEFENDANT.**

**Case No.: 1:23-cv-00766-UA-JLW**

**DECLARATION OF SHANNON KITE**

I, Shannon Kite, make the following unsworn declaration pursuant to 28 U.S.C. § 1746.

1. I am over the age of 18 and am competent to testify in this matter.
2. I am an Operations Processing Manager at The Variable Annuity Life Insurance Company (“VALIC”).
3. Based upon my review of VALIC’s documents related to Gwendolyn Parker’s accounts, the following statements are true:
  - a. Ms. Parker had two retirement accounts with VALIC at the time of her death: a 403(b) account (numbered 3003626) and a 457(b) account (numbered 7136269) (collectively referred to as the “Accounts”).

- b. Ethan Parker was a named beneficiary for both of the Accounts at the time of Ms. Parker's death.
  - c. On or about September 22, 2022, VALIC issued a check in the amount of \$207,765.07 to Mr. Parker. This check represented the amount he was owed on Account 3003626.
  - d. VALIC also issued a check in the amount of \$9,707.82 to Mr. Parker. This check represented the amount he was owed on Account 7136269.
  - e. The records confirm that Mr. Parker was one of the intended beneficiaries of Ms. Parker's Accounts. He provided all necessary information to us, and the two checks listed above were properly issued to him.
4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 14, 2023

*Shannon Kite*

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Shannon Kite