

IN THE COURT OF APPEALS
EIGHTH APPELLATE DISTRICT
CUYAHOGA COUNTY, OHIO

MICHAEL J. SKINDELL,)
) CASE NO. CA-15-103976
 Plaintiff/Appellant,)
)
 v.)
) On Appeal from Cuyahoga County
 MARY LOUISE MADIGAN, et al.,) Court of Common Pleas
) Case No. CV-15-855961
 Defendants/Appellees.)
)

AFFIDAVIT OF JENNIFER PAE

STATE OF OHIO)
) SS:
 COUNTY OF CUYAHOGA)

Jennifer Pae, being first duly sworn according to law, states as follows:

1. I am the Finance Director for the City of Lakewood and have served the City in that capacity since February 6, 2006.
2. As part of my duties as Finance Director, I am aware of the financial transactions that have occurred and will occur as a result of the passage of Ordinance 49-15 on December 21, 2015, which authorized the City to enter into the Master Agreement

with the Cleveland Clinic Foundation (“CCF”) and Lakewood Hospital Association (“LHA”).

3. The City entered into the Master Agreement with CCF and LHA on December 21, 2015 after the passage of Ordinance 49-15.
4. On December 31, 2015, the City received \$6,644,731 (\$6,800,000 payment less title and closing costs) of the total \$8,200,000 required to be paid by the Master Agreement from CCF for the sale of LHA’s property at 850 Columbia Road, Westlake, Ohio to CCF. The remaining \$1.4 million will be paid to the City by CCF when the new Family Health Center (“FHC”) opens on the southwest corner of Belle and Detroit.
5. On February 22, 2016, \$500,000 (of the total \$7,000,000.00 required to be paid by the Master Agreement) was paid to the City by CCF for demolition and/or rehabilitation of the current Lakewood Hospital site (the southeast corner of Belle and Detroit) to be used at the City’s sole discretion. The remaining \$6,500,000 will be paid by CCF when the FHC opens.
6. On February 22, 2016, the City received \$1,557,083.89 (the appraised fair market value of \$1,576,000.00 less closing costs) from CCF for the sale of the land on the southwest corner of Bell and Detroit on which the parking garage and professional office building resided and on which the new FHC and garage will be built.
7. On February 23, 2016, the City paid \$1 to LHA for the Curtis Block building (permanent parcel number 314-07-007) and three residential homes that were owned by LHA (permanent parcel numbers 314-04-042, 314-04-030, and 314-04-034).

8. On March 31, 2016 and June 30, 2016, CCF and/or LHA made payments of \$383,333.33 to the City under the modified 1996 Lease of Lakewood Hospital to LHA. In addition to the \$766,666.66 already paid, CCF and/or LHA are required by the Master Agreement to pay to the City up to another \$2,120,833.34 through June 30, 2018.
9. On March 1, 2016, \$200,000 was paid by CCF to the City to begin the process of forming a new community wellness foundation. The Master Agreement requires an additional \$32,200,000 be paid to the City by CCF for the community wellness foundation in various installments over 15 years commencing when the FHC opens.
10. To date, the City of Lakewood has received a total of \$9,668,481.55 in payments from CCF and/or LHA as a result of entering into the Master Agreement.
11. The Master Agreement requires that CCF and/or LHA make additional payments to the City totaling \$42,220,833.34.
12. The total cash payments that the City will receive from CCF and/or LHA as a result of the Master Agreement will total \$51,889,314.89.


FURTHER AFFIANT SAYETH NAUGHT.



JENNIFER PAE

SWORN TO AND SUBSCRIBED before me and in my presence this 13 day of October, 2016.

**KEVIN M. BUTLER, ATTORNEY
NOTARY PUBLIC • STATE OF OHIO
My commission has no expiration date
Section 147.03 O.R.C.**



NOTARY PUBLIC