

IN THE CIRCUIT COURT FOR BALTIMORE COUNTY, MARYLAND

ANDREW J. BRENNER, et al., Substitute Trustees, Plaintiffs, v. JEFFREY M. SCHATZ,
Defendant.

Case No. C-03-CV-24-003218 _____

DECLARATION OF METHODOLOGY — IDENTIFICATION AND AUTHENTICATION OF THE NOTE WITHIN GINNIE MAE POOL 082539, AND OF THE GINNIE MAE DOCUMENT-CUSTODIAN RECORDS

I, **Jeffrey M. Schatz**, Defendant *in propria persona*, declare under the penalties of perjury pursuant to **Md. Code Ann., Cts. & Jud. Proc. § 1-304** that the following is true and correct to the best of my knowledge, information, and belief, and that I performed, directed, and independently verified the analysis described below before signing.

1. Purpose

1. This Declaration documents (a) how the promissory note secured by 18 Edmondson Ridge Road, Catonsville, Maryland (the “Note”) was identified, to a documentary certainty, as a specific de-identified loan record within a specific Ginnie Mae security — **sequence number 1013782744 in Ginnie Mae II Pool 082539** — and (b) how the official Ginnie Mae records relied upon (including the Ginnie Mae Document Custodian Directory) were obtained and authenticated. It is offered as **identification and authentication**, not as a legal conclusion; it does not assert that any instrument is void, discharged, or paid.

2. The identifiers taken from the instruments

2. From the closing instruments alone, the Note is: (a) **FHA-insured**; (b) originated **April 13, 2010**, payable to **Wells Fargo Bank, N.A.**; (c) an **adjustable-rate** note with a **4.25%** start rate and an original principal of **\$254,308**; and (d) carrying a **first payment of June 1, 2010** and a **maturity of May 1, 2040**. These attributes formed the search key.

3. The data and the authority to use it

3. Ginnie Mae — a wholly-owned federal government corporation within HUD — publishes **loan-level disclosure files** reporting, for every loan in every Ginnie security, a set of de-identified attributes (the files contain **no borrower names**), and publishes an official **Document Custodian Directory** and security-level **prospectuses**. These are public, free, and downloadable from **ginniemae.gov**. No access-controlled, paid, or proprietary system was used. For evidentiary purposes these are official government publications subject to self-authentication under **Md. Rule 5-902(a)(5)** and to judicial notice under **Md. Rule 5-201**.

4. The method (record linkage)

4. Because the public loan-level files contain no names, identification is a **record-linkage** problem: link a known record (the Note) to a de-identified universe (Ginnie's data) on shared attributes. The technique proceeded in four disciplined steps:
 - a. **Deterministic multi-key match** — filter the universe to records matching all eight published keys (program, issuer, state, original balance, note rate, first-payment date, maturity, pool type) simultaneously.
 - b. **High-entropy disambiguation** — confirm against a near-unique fingerprint: the **penny-level current unpaid principal balance**, cross-checked to Wells Fargo's own produced servicing ledger for the same month.
 - c. **Falsification / elimination** — actively search the complete files across multiple periods for any other record that could satisfy the key, and confirm the loan had exited the security.
 - d. **Amortization-series reconciliation** — confirm the balances across time form one continuous pay-down.

5. The match

5. The October 2013 Ginnie Mae II loan-level record for sequence 1013782744 matches the Note on every field:

| Field | Ginnie Mae public record | The Note / WF ledger | Match |
|-------------------------------|--|--|------------------|
| Agency program | FHA | FHA | ✓ |
| Issuer | 3355 (Wells Fargo, N.A.) | Wells Fargo, N.A. | ✓ |
| State | MD | MD | ✓ |
| Original principal | \$254,000 (rounded to nearest \$1,000) | \$254,308 | ✓ |
| Note rate | 4.250% | 4.25% | ✓ |
| First payment | 06/01/2010 | 06/01/2010 | ✓ |
| Maturity | 05/01/2040 | 05/01/2040 | ✓ |
| Pool type | AF (adjustable-rate, FHA) | FHA ARM | ✓ |
| Current unpaid balance | \$230,478.84 | \$230,478.84 (WF ledger, Nov. 2013) | ✓ (exact) |

The penny-exact balance is the disambiguator: a coincidental \$254,000 loan would not also carry the Note's exact balance to the cent in the same month. Among all Maryland 4.25% loans and all Wells-Fargo-issued Maryland loans in the data, only sequence 1013782744 satisfies every criterion.

6. The scale of the search

6. To reach that single record, I parsed **more than one hundred million** individual loan records across more than a dozen complete Ginnie Mae monthly disclosure files. The re-pool **elimination sweep** alone streamed **nine complete Ginnie Mae II monthly files** spanning 2021 through 2026 — **97,318,235** loan records — and returned **zero** Maryland re-pool match (four additional months had no complete file published and were logged as gaps). The cross-check files added the April 2021 Ginnie II file (**10,273,191** records) and the December 2020 Ginnie I file (**1,327,885** records). One record survived.

7. Computing environment and hardware

7. The analysis required no specialized, proprietary, or forensic equipment. It was performed on **commodity, consumer-grade computing hardware** — a standard 64-bit personal computer — using a **standard Linux/Unix command-line environment** and an ordinary consumer internet connection. No access-controlled database, no licensed forensic suite, and no specialized hardware (no write-blockers, imaging devices, or proprietary appliances) was necessary, because the inputs are public text and PDF files and the operations are ordinary read, search, filter, and count operations on those files. The significance of this is evidentiary: the result does not depend on any tool, machine, or credential unique to me; it is reproducible by any person on any ordinary computer.

8. Programs and software used

8. Each program below was used for a **read-only** purpose with respect to the official source files; none was used to create, edit, synthesize, or alter the underlying Ginnie Mae data. The programs are standard, widely available, and free or open-source:
 - a. **A standard web browser** — to download the public files directly from ginniemae.gov: the **Disclosure Data Download** (bulk loan-level files) and **Disclosure Data History** portals; the **MBS/HMBS Prospectus** library; and the **Document Custodian Directory** ([/issuers/third_party_providers/Pages/document_custodian.aspx](http://issuers/third_party_providers/Pages/document_custodian.aspx)).
 - b. **pdftotext (poppler-utils), invoked with the -layout flag** — to convert PDF disclosures (the Pool 082539 prospectus, form HUD-11772-II) into faithful, position-preserving text for reading. This extracts existing text; it does not modify the source PDF.
 - c. **grep / ripgrep (rg)** — to stream-search the multi-gigabyte, pipe-delimited loan-level files for candidate records by fixed key values (issuer 3355, state MD, balance, rate). These tools only read and report matching lines; they do not write to the source.
 - d. **Standard Unix text utilities — wc -l, awk, cut, sort, uniq** — to count records (the totals stated in ¶6), isolate fields, and de-duplicate. These produce counts and field extracts; they do not alter the source.
 - e. **Python 3 (standard library and tabular-parsing routines)** — to perform the field-by-field deterministic multi-key filter (¶4(a)) and the penny-level balance

comparison (§4(b)) against the published field positions, and to reconcile the amortization series (§4(d)).

- f. **The official Ginnie Mae published file layouts / data dictionaries** — the “Single-Family MBS Loan-Level” disclosure layout and the liquidation-file record layout — used to map each delimited field (and each fixed position) to its defined meaning, so that every value cited is read **per Ginnie Mae’s own published schema**, not by guesswork. For example, the liquidation record for this loan reads, field-for-field per that layout: LR | CUSIP 36225Ezd7 | Pool 082539 | Ginnie II (M) | type AF | issue 20100501 | seq 1013782744 | issuer 3355 | period 201912 | ... | reason code 2.
- g. **A plain-text editor / viewer** — to open individual records and confirm, by eye, each figure quoted in this Declaration against the unaltered source line.

9. Process — the step-by-step protocol

9. The work followed a fixed, reproducible protocol:
 - a. **Acquire.** Download each public file from ginniemae.gov (§8(a)); retain each original file unmodified.
 - b. **Validate the file.** Confirm each file opened and parsed cleanly and record its line/record count (the counts in §6), so the search universe is defined and auditable.
 - c. **Map the fields.** Using the published Ginnie Mae layout (§8(f)), identify the column/position of each of the eight match keys and of the current-balance field.
 - d. **Filter (deterministic multi-key).** Apply all eight keys simultaneously (§4(a)) to reduce the universe to candidate records.
 - e. **Disambiguate (penny-level).** Compare the surviving candidate’s current unpaid balance to Wells Fargo’s produced servicing ledger for the same month; require an exact, to-the-cent match (§4(b), §5).
 - f. **Falsify (elimination sweep).** Search the complete files across 2020–2026 for any other record satisfying the key and for any re-pooling after December 2019 (§6); confirm zero competing or re-pool matches.
 - g. **Reconcile (amortization).** Confirm origination \$254,308 – \$230,478.84 (Nov. 2013) – \$186,397.89 (Dec. 2019 removal) form one continuous FHA-ARM pay-down (§13).
 - h. **Verify by hand.** Personally open each source file and confirm every figure stated herein against the unaltered line before signing (see the checklist appendix).
 - i. **Authenticate the custody records.** Retrieve the Ginnie Mae Document Custodian Directory entry (§12, row 7) confirming that **Deutsche Bank National Trust Company, 1761 East St. Andrews Place, Santa Ana, California 92705, is Ginnie Mae document custodian ID 000405**, and the Directory’s stated requirement that a document custodian “must hold documents related to the pooled mortgages on Ginnie Mae’s behalf for the life of the pool or loan package.”

10. Data integrity and non-alteration

10. I affirm the following regarding integrity: (a) every official Ginnie Mae file was retained in its **original, unmodified** form; (b) every program in ¶8 was used in a manner that **only reads, searches, counts, or extracts** from those files — none edited, generated, interpolated, or synthesized any datum within them; (c) every figure quoted in this Declaration is **transcribed verbatim** from the unaltered source file or from Wells Fargo’s own produced records; and (d) the entire process is **deterministic and reproducible** — a third party who downloads the same public files and applies the same standard operations will reach the same single record.

11. Technological assistance — candor

11. In candor to the Court: the parsing and searching of files too large to read by hand were **technologically assisted**. I directed an automated/AI-assisted analytical process to execute the read, search, filter, and count operations described in ¶8 and to organize the results. That assistance was confined to **reading and tabulating data that already exists in the official public files**; it did **not** create, alter, or generate any underlying record, value, or document offered as evidence. I am not a credentialed forensic expert, and this Declaration does not represent otherwise. The conclusion does not rest on credentials or on any black box: it rests on official public records, and it is independently **reproducible** by anyone. I personally confirmed every figure stated herein against the underlying public file and Wells Fargo’s produced records before signing.

12. Source-file provenance — every original record relied upon

12. The following lists each original record relied upon, its public source and format, whether the Note’s record appears in it, and the datum it supplies:

| # | Original record (public, ginniemae.gov) | Format | Reporting period | Record status | Datum it supplies |
|---|---|---------------------------------|------------------|--|--|
| 1 | llmon2_201310 (Ginnie II loan-level) | Pipe-delimited text | Oct 2013 | PRESENT — seq 1013782744, Pool 082539 | All 8 match fields + current UPB \$230,478.84 |
| 2 | GNMA_MB_S_SF_LIQ_082539 (pool liquidation file) | Pipe-delimited text (LR record) | period 201912 | PRESENT — seq 1013782744 removed | Removal Dec 2019, UPB \$186,397.89, reason code 2 — “Buyout of Delinquent Loan” (per |

| | | | | | |
|---|--|---------------------|--|-----------------------------------|---|
| 3 | 082539MA F (pool & CUSIP prospectus, form HUD-11772-II) | PDF | as-of disclosure | PRESENT (pool-level) | liquidation-file layout) CUSIP 36225EZD7; Ginnie II; pool type AF; pool issue 5/1/2010; Issuer 3355 |
| 4 | llmon1_202012 (Ginnie I loan-level) | Pipe-delimited text | Dec 2020 | ABSENT | Eliminates Ginnie I (corrects a prior mis-identification) |
| 5 | llmon2_202104 (Ginnie II loan-level) | Pipe-delimited text | Apr 2021 | ABSENT | Confirms loan exited the pool by Apr 2021 |
| 6 | Re-pool sweep: 9 complete Ginnie II monthly files (llmon2_202112 ... llmon2_2021506) | Pipe-delimited text | 2021-2026 | ABSENT (0 matches) | No re-securitization after the Dec 2019 buyout; 97,318,235 records read |
| 7 | Ginnie Mae Document Custodian Directory (/issuers/third_party_providers/Pages/document_custodian.aspx?letter=D) | Official webpage | retrieved June 26, 2026 (page last modified 8/26/2022) | PRESENT (custodian record) | DBNTC, 1761 E. St. Andrews Pl., Santa Ana, CA = Ginnie Mae document custodian ID 000405; rule that a custodian holds "on Ginnie Mae's behalf for the life of the |

pool or loan
package”

“Present” rows authenticate the affirmative identification; “absent” rows authenticate the elimination. Both are part of the proof.

13. Continuity of the loan through its history

13. The balances reconcile as one continuous FHA ARM: origination **\$254,308** (Apr. 2010) → **\$230,478.84** (Nov. 2013, the figure on both Ginnie’s record and Wells Fargo’s ledger) → **\$186,397.89** (Dec. 2019, removal from the pool). The same loan’s FHA case number appears on the March 2022 recorded Partial Claim (**\$41,473.09, Liber JLE 46541, page 0043**, recorded March 11, 2022), and the post-removal custody and release events (the “WF220C / GNMA-Review” coding, the Form HUD-11708 release references, and the September 2022 shipment to Deutsche Bank National Trust Company) attach to this same loan’s servicing record.

14. Limits

14. I state these limits expressly: (a) removal **reason code 2** means the loan was *bought out* of the security, **not** that the debt was paid or discharged; (b) the loan’s absence from the Ginnie pool after December 2019 does not, by itself, establish who held or owned the Note thereafter — that remains a matter for the record and discovery; and (c) the identification rests on Ginnie’s public data and Wells Fargo’s produced ledger and should be confirmed against the original servicing file.

15. Affirmation

I solemnly affirm under the penalties of perjury that the contents of the foregoing Declaration are true to the best of my knowledge, information, and belief.

Dated: _____, 2026 /s/ _____ Jeffrey M. Schatz,
Defendant *in propria persona* 18 Edmondson Ridge Road, Catonsville, Maryland 21228
(240) 490-0053 · thecornerspore@gmail.com

APPENDIX — VERIFY-BEFORE-YOU-SIGN CHECKLIST (remove before filing)

Before signing, personally confirm each against the source file: - [] ¶5: open llmon2_201310, locate seq **1013782744**, confirm the 8 fields + UPB **\$230,478.84**. - [] ¶5: open WF servicing-ledger (produced Ex. A), confirm **\$230,478.84** for **Nov. 2013**. - [] ¶7: confirm the **hardware / operating-system description matches your actual equipment**; adjust the generic wording if needed. - [] ¶8: confirm each **program listed is one actually used** (browser, pdftotext, grep/rg, awk/cut/sort/uniq/wc, Python, text editor); strike any you did not use; add any you did. - [] ¶11: confirm the **AI-assistance disclosure** is accurate to how the work was actually done; this candor paragraph protects you — do not delete it. - [] ¶12 row 2: open GNMA_MBS_SF_LIQ_082539, confirm removal period **201912**, UPB **\$186,397.89**, reason code **2**. - [] ¶12 row 3: open

082539MAF, confirm CUSIP **36225EZD7**, pool type **AF**, issue **5/1/2010**. - [] ¶12 row 7: open the Ginnie **Document Custodian Directory** (letter=D), confirm **DBNTC = ID 000405** at the Santa Ana address. - [] ¶6: confirm the sweep total **97,318,235** and the two cross-check counts (**10,273,191 / 1,327,885**). - [] ¶13: confirm Partial Claim **\$41,473.09, Liber JLE 46541/43**, and the FHA case number matches the Note. - [] Attach each record in ¶12 as a numbered exhibit; attach the WF ledger; attach the match demonstrative. - [] Confirm nothing in the body says the debt is “void,” “discharged,” or “paid.”