

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

ANNA WHITE FERRARACCIO, PLAINTIFF,
v. CIVIL ACTION NO. 5:24-cv-00700
NEW PEOPLES BANK, DEFENDANT.

AFFIDAVIT OF L. MORI WILLIAMS

STATE OF WEST VIRGINIA,
COUNTY OF MERCER, TO-WIT:

L. MORI WILLIAMS, after being first duly sworn, states:

1. I am the Senior Vice-President and Commercial Loan Officer of New Peoples Bank (NPB) in Princeton, West Virginia.
2. I was the supervising loan officer in charge of a loan in 2024 requested by Plaintiff for Pipestem Spa and Chalet Corporation, a West Virginia Corporation (Pipestem Spa); the common stock of that corporation is owned by Plaintiff. That loan was processed by Jamie Cox-Kidd. This is the loan which is the subject of the Amended Complaint.
3. NPB made the loan to Pipestem Spa beginning with an appraisal completed in May, 2024.
4. NPB requested financial information from Pipestem Spa and Plaintiff that was received piecemeal, causing a delay in the processing of the loan.
5. Because of the number of outstanding loans Pipestem Spa had with NPB, this loan required a review by senior credit officers for approval.

6. Such approval was given and the loan closed July 29, 2024, in the amount of \$300,000.00, consolidating one existing loan into the new loan but otherwise in substantially the same terms as requested by Pipestem Spa.

7. Plaintiff was a guarantor of this loan but was not a maker nor did she receive the loan proceeds; those proceeds were distributed to the borrower Pipestem Spa.

And further the affiant saith not.

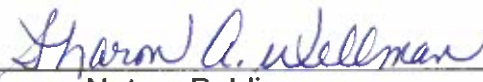


L. Mori Williams

Taken, subscribed and sworn before me this 24~~th~~ day of March, 2025, by
L. Mori Williams.

My Commission Expires May 6, 2027





Notary Public