

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 17-cv-00210-RBJ

LIST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,
Plaintiff

v.

KNIGHTS OF COLUMBUS,
DAVID J. KAUTTER, IN HIS OFFICIAL CAPACITY AS (ACTING) COMMISSIONER OF
THE INTERNAL REVENUE SERVICE
Defendants.

KNIGHTS OF COLUMBUS,
Counterclaim Plaintiff,

v.

LIST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,
LEONARD S. LABRIOLA, WEBSINC.COM, INC., STEPHEN S. MICHLIK, JONATHAN S.
MICHLIK, AND TERRY A. CLARK,
Counterclaim Defendants.

AFFIDAVIT OF JEROME R. SCHAEFER

I, Jerome R. Schaefer, first being sworn, state from my personal knowledge:

1. I have served as Grand Knight of the Knights of Columbus Council, number 14806, at St. Mary's Cathedral in Colorado Springs, Colorado since 2015.
2. Council 14806's membership roster in January 2017 listed forty-seven members.
3. Twelve of the forty-seven did not pay their dues.
4. Of those twelve, four were priests. The council waived their dues to honor their vocation serving the Catholic Church.
5. Consistent with our Catholic values and the Order's values of charity, unity and fraternity, our council also waived the dues for the other eight individuals. One served in the

