Ø**(Š)ÒÖ** G€GHÁT ŒÜÁEÎ ÁEJK⊖EÁŒT SOPÕÁÔUWÞVŸ ÙWÚÒÜOUÜÁÔUWÜVÁÔŠÒÜS ÒËØŠÖÖ

ÔŒÌÒÂKŒ ÜË UÌ €Ë ÆÞV SUPERIOR COURT OF THE STATE OF WASHINGTON FOR THE COUNTY OF KING

Charles A. Harold, Jr., Petitioner,	No. 23-2-03980-7 KNT
v.	□ Petitioner Exhibits
David Allen Paice, Respondent.	☐ Respondent Exhibits
	Code: WEXL

ELECTRONIC EXHIBIT LIST – PROTECTION ORDER

Exhibit No.	Offered By	Title/Description of Exhibit		
7	Petitioner	4/27/22 Letter from Amy Jane Small to David A. Paice		
8	Petitioner	Photographs of Sharon M. Harold's Injuries on 3/6/22		
9	Petitioner	Phone Call and texts log between Sharon M. Harold and David A. Paice, his wife, and his mother-in-law		
10	Petitioner	Chart of diversion of financial records through U.S. mail		
11	Petitioner	Record of Phone Call between U.S. Postal Inspector and Petitioner		
12	Petitioner	10/9/22 Letter from Amy Jane Small to Aleksander Schilbach, Esq., P. Ohainle, Esq. and S. Webb of Lane Powell law firm		

Exhibit 7

Amy Jane Small PO Box 352 Graeagle, CA 96103 (805) 827.0051 aj.harold9@gmail.com



April 27, 2022

David Allen Paice 16644 Marine View Dr Sw, Burien, WA 98166-3210 (206) 331.2150

Subject: The Sharon M. Harold Irrevocable Trust dated 11/12/2004

Dear David.

The intent of this letter is to request a full accounting of The Sharon M. Harold Irrevocable Trust dated 11/12/2004 for the sole purpose of establishing an end-of-life plan for my mother, Sharon M. Harold so the financial burden does not fall to all or any of her children, of which many cannot afford. Therefore, I need to have a complete & transparent accounting of her finances so that quality decisions can be made on her behalf and in her best interests. In all of the years that you have been Trustee [since early 2009, according to some of my mother's paperwork], none of the Beneficiaries have received any accountings ... ever. When asked over the years for any information regarding the trust, by myself as well as some other of my siblings, you have stated that we are not entitled to that information and we have to go through our mother for it.

The controlling law of The Sharon M. Harold Irrevocable Trust dated 11/12/2004 is the state of California, as stated on page 13 in the Trust paperwork.

I. CALIFORNIA LAW

This trust has been accepted by the Trustee in the State of California, and unless otherwise provided in this instrument, or required by the laws of another state where property is situated, its validity, construction and all rights hereunder shall be governed by the laws of California. This Paragraph shall apply regardless of any change of residence of the Trustee or any beneficiary, or appointment or substitution of a Trustee residing in another state.

According to California Probate Code sec. § 16062, the Trustee is required to render accounts at least annually for any trusts created after June 30, 1987.

Therefore, I am requesting all documents from each year that they have not been provided, per the above stated code. The documents I am requesting include, but are not limited to, those listed below

Account Statements

- Including those showing the Principal Balance of the trust the day you became
 Trustee and what the Principal Balance is as of the most recent statement.
- ALL movements of any monies to and from the trust. This includes:
 - Wire/Electronic Transfers of funds to all /any accounts. I know for a fact that my mother's monthly distribution goes into her USAA account of which she is the ONLY owner of and it has no co-signers. This is the only account that her distributions should be going into and directly from the trust account. If any funds have ever or are currently being transferred into or from any account(s) other than the two stated above, I am requesting the Institution name, account number(s), owner(s) &/or co-signer(s) on those accounts so it can be validated that no trust laws have been, or are currently, being violated according to:
 - California Probate Code § PC 16062-16069
 - Checks copies of all checks written, accompanied by all supporting documentation such as a bill or ledger stating the purpose for the check.
- Person(s) and Company(ies), Corporations(s) or Firm(s) [current & prior] making the trust investments along with all of their business contact information; job titles, phone numbers, emails, etc. This includes any employees of BECU and its affiliates that have been involved in the management or investments of the trust in any way.
- All investment statements showing gains, losses, dividends, etc. In other words the Trusts Income.
- Trust tax documents
- Charitable donations this includes all organizations whether non-profit or otherwise, businesses, personal investments or contributions, personal gifts or school tuitions and anything else that my mother has considered 'charitable'.
- Miscellaneous Lien holds, loans (personal or business) for anyone regardless of relationship, any monies distributed to Sharon or anyone else that is outside of Sharon's standard and regular monthly distribution to be accompanied by a ledger or other documentation stating the reason why the additional funds were needed &/or requested with any applicable receipts, etc.

Over the past few months my mother has been in & out of the emergency room at least 2-3 times. She is a danger to herself and continues to decline. Decisions need to be made quickly and it is impossible to do any proper planning without knowledge of what the trust can afford for my mother's care. Thank you in advance for your urgent attention & prompt response to this request.

I respectfully request all above documents be provided to me no later than 30 days from the date of this letter. If not received with-in the 30 days, my next step will be to obtain them through the legal process of retaining an attorney, petitioning the court as well as consideration of all other options available to me.

Lastly, I am requesting that all communication regarding The Sharon M. Harold Irrevocable Trust dated 11/12/2004 be done in writing via either U.S Certified Mail or email.

- Mailing address: Amy Jane Small PO Box 352 Graeagle, CA 96103
- Email address: aj.harold9@gmail.com

Regards

Amy Jane Small

CC: Charles A. Harold, Jr.

John J. Harold

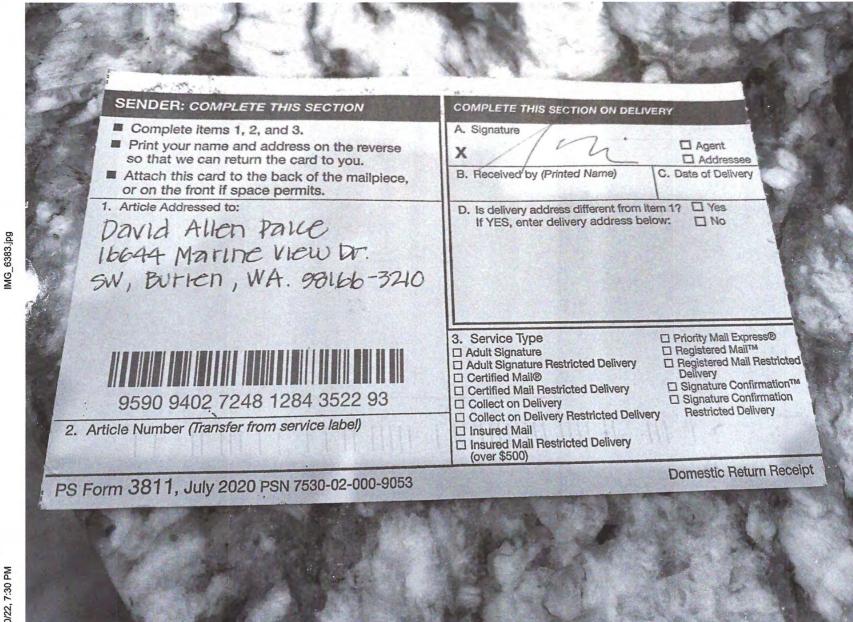
Jennifer F. Sawyer

Angel M. Harold

Josette M. Ramirez

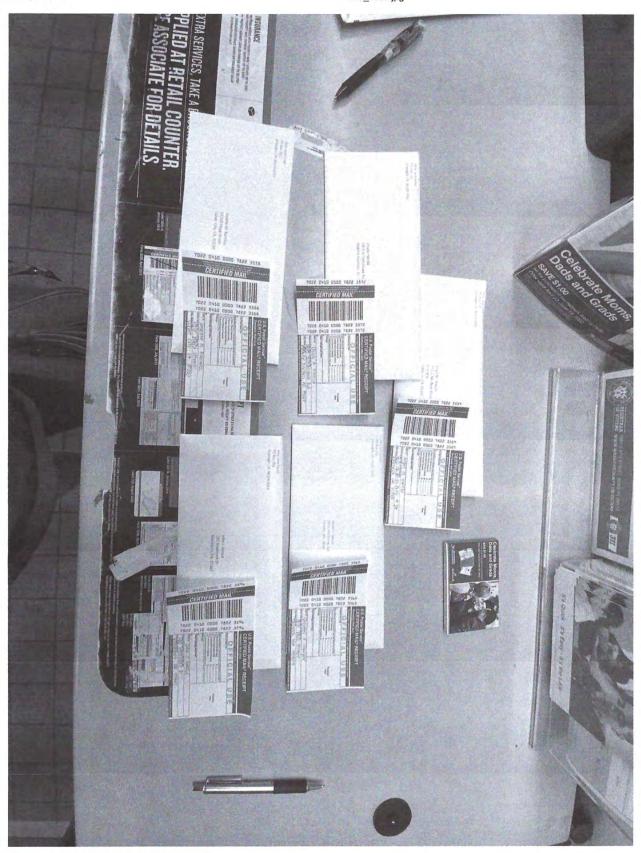
51

https://mail.google.com/mail/u/0/#label/For+Lawyer?projector=1



8/10/22, 7:30 PM

8/10/22, 7:28 PM IMG_4507.jpg



https://mail.google.com/mail/u/0/#label/For+Lawyer?projector=1

Exhibit 8



Exhibit 9

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Brieana Paice, his mother-in-law Jenifer (Harold) Sawyer and his attoneys Lane Powell, Aleksander Schilbach and attorney Roger Gould. These records demonstrate the undo influence respondent David Paice and others have exercized over Protected Party through their serious of calls and texts that coorespnd with major manuplated events in this case.

6/9/2022 12:31	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	2
6/9/2022 12:46	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	1
6/9/2022 13:56	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	4
6/10/2022 15:40	SHARON HAROLD TO/FROM	ESQ Lane Powell Spear	206.223.6117	Incoming, CL	WIFI	1
	Amy Jane (Harold) Si	mall, Sharon's POA. The	letter tells Amy t	hat David is now	represented by L	ane Powel
6/10/2022 16:03	and closes with; "The Harold, and the othe manner." Sharon Ha	ank you for anticipated er residual beneficiaries rold was NOT represent	cooperation. We of the Trust in a c	look forward to cooperative and p	working with you productive	, Ms. Sharo
6/10/2022 16:03 6/10/2022 16:03	and closes with; "The Harold, and the othe	ank you for anticipated er residual beneficiaries	cooperation. We of the Trust in a c	look forward to cooperative and p	working with you productive	, Ms. Sharo
	and closes with; "The Harold, and the othe manner." Sharon Ha SHARON HAROLD	ank you for anticipated or residual beneficiaries rold was NOT represent RESPONDENT David	cooperation. We of the Trust in a c ed by Lane Powe	look forward to cooperative and plooperative and plooperative and plooperative at	working with you productive torney at the tim	, Ms. Sharo
6/10/2022 16:03	and closes with; "The Harold, and the other manner." Sharon Ha SHARON HAROLD TO/FROM SHARON HAROLD	ank you for anticipated or residual beneficiaries rold was NOT represent RESPONDENT David Paice	cooperation. We of the Trust in a code by Lane Power 206.331.2150	look forward to cooperative and plooperative and plooperative and plooperative at	working with you productive torney at the tim WIFI Multimedia	, Ms. Sharo
6/10/2022 16:03 6/13/2022 16:13	and closes with; "The Harold, and the other manner." Sharon Ha SHARON HAROLD TO/FROM SHARON HAROLD TO/FROM SHARON HAROLD	ank you for anticipated or residual beneficiaries rold was NOT represent RESPONDENT David Paice RESPONDENT David Paice RESPONDENT David Paice RESPONDENT David	cooperation. We of the Trust in a code by Lane Power 206.331.2150	look forward to cooperative and parties and parties and parties and parties are seen as a seen and parties are seen as a seen and parties are seen as a seen	working with you broductive torney at the tim WIFI Multimedia messaging	Ms. Sharde.
6/10/2022 16:03 6/13/2022 16:13 6/13/2022 17:56	and closes with; "The Harold, and the other manner." Sharon Harold TO/FROM SHARON HAROLD TO/FROM SHARON HAROLD TO/FROM SHARON HAROLD TO/FROM SHARON HAROLD	ank you for anticipated or residual beneficiaries rold was NOT represent RESPONDENT David Paice RESPONDENT David Paice RESPONDENT David Paice RESPONDENT David Paice RESPONDENT David Paice	cooperation. We of the Trust in a code by Lane Power 206.331.2150 206.331.2150	look forward to cooperative and parties and parties and parties and parties are seen are seen and parties are seen are seen and parties are seen and parties are seen	working with you broductive torney at the tim WIFI Multimedia messaging WIFI	9 15

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Brieana Paice, his mother-in-law Jenifer (Harold) Sawyer and his attoneys Lane Powell, Aleksander Schilbach and attorney Roger Gould. These records demonstrate the undo influence respondent David Paice and others have exercized over Protected Party through their serious of calls and texts that coorespnd with major manuplated events in this case.

6/13/2022 20:07	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	3
6/13/2022 20:35	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/14/2022 11:43	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	1
6/14/2022 11:48	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	4
6/14/2022 12:49	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	6
6/14/2022	2:00 PM	Sharon Harold's cale	ndar shows an ap	pointment to see	e Esq. Roger Gould	d
6/14/2022 14:00	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	SDDV	3
6/14/2022 14:02	Sharon arrives at Go	uld Law Firm - Verified l	by Sharon's Goog	le Map History		
6/14/2022 14:30	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	3
6/14/2022 14:43	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	15
6/14/2022 14:44		Law Firm - Verified by see & Sharon's grandsor				
		H				

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Brieana Paice, his mother-in-law Jenifer (Harold) Sawyer and his attoneys Lane Powell, Aleksander Schilbach and attorney Roger Gould. These records demonstrate the undo influence respondent David Paice and others have exercized over Protected Party through their serious of calls and texts that coorespnd with major manuplated events in thsi case.

6/14/2022 17:31	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	6
6/15/2022 15:59	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	11
6/16/2022 13:54	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	SDDV	5
6/16/2022 16:30	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	2
6/20/2022 17:10	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	1
6/20/2022 19:17	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566		Text / instant messaging	
6/21/2022 9:30	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	5
6/21/2022 9:43	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Call Wait	WIFI	5

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Brieana Paice, his mother-in-law Jenifer (Harold) Sawyer and his attoneys Lane Powell, Aleksander Schilbach and attorney Roger Gould. These records demonstrate the undo influence respondent David Paice and others have exercized over Protected Party through their serious of calls and texts that coorespnd with major manuplated events in thsi case.

6/22/2022 9:02	Schilbach. The letter writing to update yo 2004 ("Trust"). We h process of reviewing We anticipate that the accountings complete	Powell sends Sharon and is addressed to Amy Janu on the accountings for ave now obtained drafts the accountings will be counting the accountings will be counting the accountings and the accountings will be counting that day	ne (Harold) Small, r the Sharon M. H is of the trust acco oviding the accou ompleted either la countings to you a	Sharon's daugh arold Irrevocabl ountings from th ntant with our c ater this week o and to those ind	ter. The letter sta e Trust dated Nov le accountant and comments for fina r next week. Once ividuals authorize	tes: We are vember 12, are in the dizing them. It we have the d to receive
6/22/2022 0:00	Attorney Roger Gould signs letter revoking Amy's power of attorney					
6/23/2022 9:50	Attorney Roger Gould mails Amy Jane (Harold) Small the revocation of power of attorney letter. She does not receive it until July 7th.					
6/23/2022 20:31	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	4
6/24/2022 9:28	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
6/24/2022 10:45	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
6/24/2022 13:11	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
6/24/2022 13:12	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Brieana Paice, his mother-in-law Jenifer (Harold) Sawyer and his attoneys Lane Powell, Aleksander Schilbach and attorney Roger Gould. These records demonstrate the undo influence respondent David Paice and others have exercized over Protected Party through their serious of calls and texts that coorespnd with major manuplated events in this case.

6/24/2022 13:22	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
6/24/2022 13:28	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/24/2022 17:11	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/24/2022 17:11	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/24/2022 17:12	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/25/2022 11:53	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	14
6/25/2022 12:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	3
6/26/2022 12:36	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/27/2022 6:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
6/27/2022 6:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
6/27/2022 6:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/27/2022 8:38	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Brieana Paice, his mother-in-law Jenifer (Harold) Sawyer and his attoneys Lane Powell, Aleksander Schilbach and attorney Roger Gould. These records demonstrate the undo influence respondent David Paice and others have exercized over Protected Party through their serious of calls and texts that coorespnd with major manuplated events in this case.

6/27/2022 8:39	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/27/2022 9:32	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/27/2022 10:11	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
6/27/2022 13:11	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	2
6/27/2022 15:04	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
6/28/2022 9:26	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	SDDV	2
6/28/2022 14:54	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	2
6/29/2022 9:15	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	2
6/29/2022 9:16	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	2
6/29/2022 10:38	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Incoming, CL	WIFI	3
6/29/2022 11:38	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	SDDV	1

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Brieana Paice, his mother-in-law Jenifer (Harold) Sawyer and his attoneys Lane Powell, Aleksander Schilbach and attorney Roger Gould. These records demonstrate the undo influence respondent David Paice and others have exercized over Protected Party through their serious of calls and texts that coorespnd with major manuplated events in thsi case.

7/7/2022 10:16	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Call Wait	WIFI	5	
7/7/2022 14:16	In a phone conversation with Roger Gould on 2-24-23, Roger Gould told Charlie Harold that he only met Sharon Harold once, on July 7th in the afternoon.						
7/7/2022 0:00	Sharon M. Harold's handwritten not on her calendar for this ady states, "Jeni, Joie only access to medical, changed to Charlie Amy later date."						

Exhibit 10

307 BECU (Trust Account) and BECU Investment Services (LPL Financial) statements for the Sharon M. Harold Irrevocable Trust DDT 11-12-04 were personally reviewed by Charles A. Harold, Jr. POA for his mother Sharon M. Harold. The following demonstrates the number of times Sharon M. Harold was "informed" of her investments. Out of 307 total investment statements created between 2010 and 2022 for the benefit of Sharon M. Harold, only 91 of them were mailed directly to her. The rest, 216 of them, were mailed to David A. Paice and Brieanna M. Paice.

This means Sharon was "informed" only 29% of the time.

David received Sharon's "informed" financial statements 71% of the time.

Span of years confidential financial records required to "inform" Sharon M. Harold of the status of her investments were mailed and delivered through United States Postal Service	This is the United States Postal Service recepient's mailing address set up in financial records by David A. Paice to deliver confidential financial records required to "inform" Sharon M. Harold of the status of her investments	This is a description of the property location where confidential financial records required to "inform" Sharon M. Harold of the status of her investments were delivered by the United States Postal Service	Number of months in 12 years (2010 to 2022) tha confidential financial records required to "Inform" Sharon M. Harold of the status of her investments were delived to her address or David A. Paice and Brieana M. Paice's personal addressses
2010 to 2022	Sharon Harold 100 Riverbend Rd. #103 Reedsport, OR 97467	SHARON M. HAROLD Personal residence	91
2010	#BWNKKNN The Sharon M. Harold Irrevocable Trust PO Box 48218 Seattle, WA 98148-0212	DAVID A. PAICE & BRIEANA M. PAICE Personal PO Box also used as an address for Brienan M. Paice's potography business	10
2010 to 2017	The Sharon M. Harold Irrevocable Trust PO Box 48218 Seattle, WA 98148-0212	DAVID A. PAICE & BRIEANA M. PAICE Personal PO Box also used as an address for Brienan M. Paice's potography business	73
2010 to 2014	The Sharon M. Harold Irrevocable Trust DTD 11-12-04 David A Palce TTEE PO Box 48218 Seattle, WA 98148-0212	DAVID A. PAICE & BRIENNA M. PAICE Personal PO Box also used as an address for Brienan M. Paice's potography business	56
2017 to 2022	The Sharon M. Harold Irrevocable Trust 16444 Marine View Dr. SW Burlen, WA 98166-3210	DAVID A. PAICE & BRIEANA M. PAICE Personal residence also used as mailing adress for Brieana M. Paice's Interior design business	71
2017 & 2022	The Sharon M. Harold Irrevocable Trust OTO 11-12-04 David A Palca TTEE 16444 Marine View Dr. SW Burlen, WA 98166-3210	DAVID A. PAICE & BRIEANA M. PAICE Personal residence also used as mailing adress for Brieana M. Paice's interior design business	6

On March 10, 2010, David A Paice, Trustee opened an account at BECU for the Sharon M. Harold Irrevocable Trust DDT 11-12-04. The opening balance was \$533,529.59

On December 31, 2022, the ending balance of the Sharon M. Harold Irrevocable Trust DDT 11-12-04 was \$522,722.56

In September 2022, Sharon Harold sent letters to David Paice and his attorney asking them to stop spending her money on attorny fees and provide her with a his attorney bills. They refused. As the third party payer of David Paice's bills, from her trust, Sharon Harold is entitled to them.

Between Sept. 2022 and Nov. 2022. Sharon Harold inexplicably stopped receiving her monthly investment translatement from David Paice and LPL Financial. Her December statement reflects cash outflows of \$32,944.67 for the 4th quarter of 2022. For the year, the statement showed \$122,263.78 in total cash withdrawls. David Paice nor LPL Financial have not explained where this money went or what it was used for. Sharon Harold only received approximately \$10,000 in total monthly distributions for the 4th quarter. That leaves \$112,263.78 unaccounted for and unexplained.

Exhibit 11

6:02 3 3 43% =

<

Uriah Compton

U.S. Postal Inspector 🖋

+1 623-570-6147









February 13

- 4:00 PM
 Outgoing call, 18 mins 28 sec
- 9:22 AM
 Outgoing call, 0 mins 25 sec
- 9:21 AM
 Outgoing call
- 9:19 AM
 Declined call



Exhibit 12

Sharon M. Harold 100 River Bend Road, Spc #103 Reedsport, OR. 97467 1 (541) 664-1937 email: smharold7@gmail.com

Sunday, October 9, 2022

Aleksander Shilbach, Paul Ohainle and Silvia Webb
Lane Powell
1420 Fifth Avenue, Suite 4200
Seattle, WA. 98101-2375
Via Email – SchilbachA@LanePowell.com, OhainleP@lanePowell.com, WebbS@LanePowell.com, paice.da@gmail.com

Subject: Cease & Desist

Dear David, Alexsander, Paul & Silvia,

To date, I have not received confirmation of the email that I sent to you on October 5, 2022 notifying you that I revoke my release of the Release and Discharge of Successor Trustee document. I have also sent 2 subsequent emails requesting confirmation on October 6 and October 7, 2022 with no response. Therefore, I am now taking further steps to verify the accounting by having a forensic accounting done on all my accounts.

During the accounting and until further notice, I am limiting David Paice's trustee duties and authority as follows.

- 1. David Paice shall stop using my trust money to pay his attorney fees. I do not approve any attorney fees to be billed to or paid from my Trust during my review. I am directing David Paice and his attorneys to discontinue all conversations about regarding my trust. This includes David to his attorneys, David to me, David's attorneys to me, etc until I have completed my review of the accounting.
- 2. The Lane Powell law firm and you shall return any balance of a retainer you received from my trust money for David Paice's attorney fees, costs or any other reason.
- 3. David Paice is to limit his duties to one thing, my monthly trust disbursement until further notice by me or unless at my direction for a specific need I have.

1012

- 4. David Paice shall direct any/all persons making investment decisions, transferring money, or doing anything regarding the money in any of my bank accounts or investment accounts until further notice by me. No changes are to be made to any of my investments. I will contact Brian if and when I choose to make any changes.
- David Paice shall stop talking to or corresponding with anyone about the status or management of my trust including David's employer, investment account managers, fund managers, attorneys, friends or family.
- 6. David Paice and his attorney(s) and Lane Powell employees shall fully cooperate with David Llewellyn and provide him with any information he needs about my trust, including bank account and investment fund information. David Paice, his attorney and law firm are not authorized to speak to David Llewellyn about anything regarding my trust status except to provide David Llewellyn the information he needs.
- 7. Specifically, David Paice shall immediately send me the bank statements from all 5 bank accounts listed in David Llewellyn's report for all years David Paice has managed my trust. They are to include all pages as the documents state (including numbered blank pages). I am requesting printed copies via U.S Mail, not emailed copies. They are to be organized by year. They are also to include copies of all checks, including cashier checks.
- 8. David Paice shall immediately send me all bank records for any and all bank accounts besides the 5 accounts, he has transferred my trust money to or from.
- 9. I also want David Paice, you and your law firm, to acknowledge my previous email where I asked you to withdraw my agreement where I previously accepted David Llewellyn's accounting. To say it again, I no longer accept David Llewellyn's accounting and will be conducting my own forensic accounting.

All items, 1 to 8, are to take place immediately upon the receipt of this email.

A hard copy of this letter shall be sent to you via U.S mail.

Amy Turner Op June 21, 2024

Regards,

OMHarold 10-12-2022

Sharon M. Harold

OCTOBER 12, 2022

OFFICIAL STAMP
Amy Turner

NOTARY PUBLIC-OREGON
COMMISSION NO. 1001244

MY COMMISSION EXPIRES JUNE 21 ,2024

142



cease and desist

Sharon Harold <smharold7@gmail.com>
To: David Paice <paice@outlook.com>

Tue, Oct 11, 2022 at 7:38 F

Dear David,

Attached is a letter that I sent to your lawyers last week and to date have not received any acknowledgement of receipt so I am now sending it to you in the event they have not forwarded it to you or made you aware.

I have also not received any acknowledgement of the email that I sent to your lawyers on October 5th, 6th & 7th, 2022 revoking my release and approval of the accounting. I am informing you of this as well, in the event that they have failed to inform you of this also. I do not approve the accounting from you and David LLewellyn and will be having an independent forensic accounting performed.

In addition to the items on the attachment I am also requesting you immediately send me all detailed bills submitted to the trust from the Chrisman/Kvale Law Firm along with supporting documents showing payment(s) made.

I am also requesting you immediately send me all bills submitted to the trust from the Lane Powell Law Firm along with supporting documents showing payment(s) made.

To date I have absolutely no knowledge how much of my trust money has been spent on all these different attorneys, as you have to date not provided me any information. I do not want a total, I want the actual statements and canceled checks and receipts.

Until my independent accounting and review is complete, I do not authorize any further monies from my trust to be used for your legal representation. I am the Trustor and do not agree with the accounting therefore you have no need to retail an attorney.

Respectfully,

Sharon M. Harold

-----Forwarded message -----

From: Sharon Harold <smharold7@gmail.com>

Date: Sun. Oct 9, 2022 at 6:54 PM

Subject: cease and desist

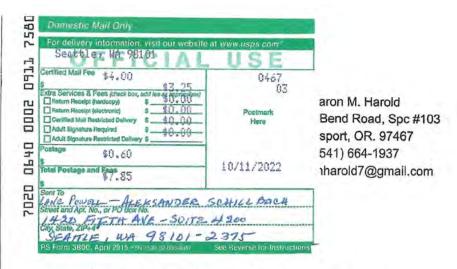
To: Schilbach, Aleksander <SchilbachA@lenepowell.com>, Webb, Silvia <WebbS@lanepowell.com>, Ohainle, Paul <OhainleP@lanepowell.com>

Please confirm receipt via email

Cease and Desist from Sharon M.pdf

OFFICIAL STAMP
Amy Turner
NOTARY PUBLIC-OREGON
COMMISSION NO. 1001244
MY COMMISSION EXPIRES JUNE 21, 2024

Douglas County, Oregon 10-12-22 Amy Turker exp. June 21, 2024



Aleksander Shilbach, Paul Ohainle and Silvia Webb
Lane Powell
1420 Fifth Avenue, Suite 4200
Seattle, WA. 98101-2375
Via Email – SchilbachA@LanePowell.com, OhainleP@lanePowell.com,
WebbS@LanePowell.com, paice.da@gmail.com

Subject: Cease & Desist

Dear David, Alexsander, Paul & Silvia,

To date, I have not received confirmation of the email that I sent to you on October 5, 2022 notifying you that I revoke my release of the Release and Discharge of Successor Trustee document. I have also sent 2 subsequent emails requesting confirmation on October 6 and October 7, 2022 with no response. Therefore, I am now taking further steps to verify the accounting by having a forensic accounting done on all my accounts.

During the accounting and until further notice, I am limiting David Paice's trustee duties and authority as follows.

- 1. David Paice shall stop using my trust money to pay his attorney fees. I do not approve any attorney fees to be billed to or paid from my Trust during my review. I am directing David Paice and his attorneys to discontinue all conversations about regarding my trust. This includes David to his attorneys, David to me, David's attorneys to me, etc until I have completed my review of the accounting.
- 2. The Lane Powell law firm and you shall return any balance of a retainer you received from my trust money for David Paice's attorney fees, costs or any other reason.
- 3. David Paice is to limit his duties to one thing, my monthly trust disbursement until further notice by me or unless at my direction for a specific need I have.

- 4. David Paice shall direct any/all persons making investment decisions, transferring money, or doing anything regarding the money in any of my bank accounts or investment accounts until further notice by me. No changes are to be made to any of my investments. I will contact Brian if and when I choose to make any changes.
- 5. David Paice shall stop talking to or corresponding with anyone about the status or management of my trust including David's employer, investment account managers, fund managers, attorneys, friends or family.
- 6. David Paice and his attorney(s) and Lane Powell employees shall fully cooperate with David Llewellyn and provide him with any information he needs about my trust, including bank account and investment fund information. David Paice, his attorney and law firm are not authorized to speak to David Llewellyn about anything regarding my trust status except to provide David Llewellyn the information he needs.
- 7. Specifically, David Paice shall immediately send me the bank statements from all 5 bank accounts listed in David Llewellyn's report for all years David Paice has managed my trust. They are to include all pages as the documents state (including numbered blank pages). I am requesting printed copies via U.S Mail, not emailed copies. They are to be organized by year. They are also to include copies of all checks, including cashier checks.
- 8. David Paice shall immediately send me all bank records for any and all bank accounts besides the 5 accounts, he has transferred my trust money to or from.
- 9. I also want David Paice, you and your law firm, to acknowledge my previous email where I asked you to withdraw my agreement where I previously accepted David Llewellyn's accounting. To say it again, I no longer accept David Llewellyn's accounting and will be conducting my own forensic accounting.

All items, 1 to 8, are to take place immediately upon the receipt of this email.

A hard copy of this letter shall be sent to you via U.S mail.

Regards,

Sharon M. Harold

8m Harold



Mound Paice

Disbursement

toreiterale

1 message

Sharon Harold <smharold7@gmail.com>

Fri, Oct 21, 2022 at 9:00 PM

To: David Paice <paice@outlook.com>, "david paice@live.com" <david.paice@live.com>, David Paice <paice.da@gmail.com>, David & Brieana Paice <dbpaice@comcast.net>

Dear David,

I need an immediate disbursement from my trust fund of \$65,000 by October 31, 2022 to pay for my attorney's fees as was suggested on pages 5 and 6 of your attorney's letter dated October 13, 2022. This will be used to review the accounting of my trust, which I do not agree with.

Please send me a copy of all check registers and canceled checks showing payment and approval of your attorney's fees as stated on page 4 of your attorney's letter dated October 13, 2022.

Thank you,

Smygrold Sharon M. Harold



Sharon Harold <smharold7@gmail.com>

RE: Disbursement

4 messages

Sharon Harold <smharold7@gmail.com>

Fri, Oct 28, 2022 at 2:16 PM

To: David Paice <paice.da@gmail.com>, David Paice <paice@outlook.com>, "david paice@live.com" <david.paice@live.com>, "Schilbach, Aleksander" <SchilbachA@lanepowell.com> Cc: Michelle Blackwell <mblackwell@blackwell.law>

Dear David and Mr Schilbach,

This is my 3rd request.

I need an immediate response from you. Are you going to send me my \$100,000. for attorney fees by October 31, 2022?

Sharon M. Harold

On Wed, Oct 26, 2022, 12:58 PM Sharon Harold <smharold7@gmail.com> wrote: Dear David and Mr Schilbach.

I need to know if you are going to send the \$100,000 I requested for attorney fees. Please reply YES or NO within 28 hrs.

Sharon M. Harold

On Wed, Oct 26, 2022 at 12:36 PM Michelle Blackwell mblackwell@blackwell.law wrote:

Mr. Shilbach,

This email responds to yours dated October 25, 2022. Please continue to correspond directly with Ms. Sharon Harold until further notice.

As of this moment, Ms. Sharon Harold is not yet represented by counsel. I anticipate representing her soon, but I am not yet formally engaged. There is one housekeeping matter that requires Ms. Harold's attention before I can confirm the representation with you.

Ms. Harold,

Please feel free to continue to communicate directly with Mr. Shilbach regarding your request below.

Very sincerely,

Michelle

Michelle A. Blackwell

Attorney | Managing Shareholder

BLACKWELL LAW, P.C. dba BLACK LETTER LAW

Oregon | California | Idaho | Washington

747 Blair Blvd

PO Box 10326

Eugene, OR 97440

P: 541 345-8800

www.blackletter.law

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From: Schilbach, Aleksander < Schilbach A@Lane Powell.com>

Sent: Tuesday, October 25, 2022 12:18 PM

To: Michelle Blackwell <mblackwell@blackwell.law>

Cc: Ohainle, Paul <OhainleP@LanePowell.com>; Webb, Silvia <WebbS@LanePowell.com>;

MautnerG@LanePowell.com Subject: RE: Disbursement

Removing Ms. Sharon Harold and Mr. David Paice from the E-mail

Dear Ms. Blackwell,

On the understanding that you may represent Ms. Sharon Harold, I'm reaching out to ask if you have a few minutes free to discuss Ms. Harold's request below. Please let me know if you have time available today for a call. I'm generally available from now until 4:30 PM. Thank you, and I look forward to connecting with you soon.

Best regards,

Sascha

Image removed by sender.

ALEKSANDER "Sascha" SCHILBACH

Associate Bio | vCard

Gmail - RE: Disbursement

(He/Him) schilbacha@lanepowell.com D 206.223.7094 C 206.436.9909

From: Sharon Harold <smharold7@gmail.com> Sent: Saturday, October 22, 2022 4:44 PM

To: David Paice <paice@outlook.com>; david paice@live.com <david.paice@live.com>; David Paice <paice.da@gmail.com>

Cc: Schilbach, Aleksander <SchilbachA@LanePowell.com>; Ohainle, Paul <OhainleP@LanePowell.com>; Webb,

Silvia <WebbS@LanePowell.com>; Michelle Blackwell <mblackwell@blackwell.law>

Subject: Disbursement

CAUTION: This is an external email. Do NOT click links or open attachments unless you are certain the content is safe.

Dear David,

I have not received a reply from my email to you yesterday, therefore I am asking you again to send me the check registers from all my bank accounts immediately.

Since you have not sent me what I have asked for and in light of your attorney's letter, I have now retained counsel and require a revised distribution of \$100,000 from my trust as a retainer for legal fees.

Please send me the revised retainer funds of \$100,000 by October 31, 2022.

Thank you,

Sharon M. Harold

This message is private or privileged. If you are not the person for whom this message is intended, please delete it and notify me immediately, and please do not copy or send this message to anyone else.

Sharon Harold <smharold7@gmail.com>
To: "Webb, Silvia" <WebbS@lanepowell.com>
Cc: Michelle Blackwell <mblackwell@blackwell.law>

Fri, Oct 28, 2022 at 2:59 PM

Dear Silvia

I am forwarding this to you because of the automatic reply from Mr Schilbach

Sharon

[Quoted text hidden]

 $https://mail.google.com/mail/u/0/?ik=d91877460e\&view=pt\&search=all\&permthid=thread-a\%3Ar-5726018099243695266\&simpl=msg-a\%3Ar4462036\dots$

Schilbach, Aleksander < Schilbach A@lanepowell.com>

Fri, Oct 28, 2022 at 4:17 PM

To: Sharon Harold <smharold7@gmail.com>, David Paice <paice.da@gmail.com>, David Paice <paice@outlook.com>, "david paice@live.com" <david.paice@live.com>

Cc: Michelle Blackwell <mblackwell@blackwell.law>, "Mautner, Gail" <MautnerG@lanepowell.com>, "Webb, Silvia" <WebbS@lanepowell.com>

Dear Ms. Harold:

Thank you for your email. We are trying to arrange a time to discuss these matters early next week with Ms. Blackwell, but Mr. Paice as trustee has determined that a \$100,000 distribution is not appropriate at this time.

Ms. Blackwell:

We would very much like to discuss Ms. Harold's request with you and this matter generally early next week. Can you please let us know what time you are available for a call on Monday, October 31? We look forward to connecting with you to discuss this. Thank you.

Kind Regards, Sascha



ALEKSANDER "Sascha" SCHILBACH

Associate

(He/Him)

schilbacha@lanepowell.com

D 206.223.7094 C 206.436.9909

LANEPOWELL.COM

From: Sharon Harold <smharold7@gmail.com> Sent: Friday, October 28, 2022 2:16:36 PM

To: David Paice <paice.da@gmail.com>; David Paice <paice@outlook.com>; david paice@live.com

<david.paice@live.com>; Schilbach, Aleksander <SchilbachA@LanePowell.com>

Cc: Michelle Blackwell <mblackwell@blackwell.law>

Subject: RE: Disbursement

[Quoted text hidden]

Schilbach, Aleksander < Schilbach A@lanepowell.com>

Mon, Oct 31, 2022 at 2:08 PM

To: Michelle Blackwell <mblackwell@blackwell.law>

Cc: "Mautner, Gail" <MautnerG@lanepowell.com>, "Webb, Silvia" <WebbS@lanepowell.com>, Sharon Harold <smharold7@gmail.com>

Removing Mr. Paice

Dear Ms. Blackwell,

I'm following up on my e-mail below and my voicemail to you this afternoon. I would appreciate it if you could call me back when you have a moment. I look forward to connecting. Thank you.

Best regards,

Sascha



ALEKSANDER "Sascha" SCHILBACH Associate Bio | vCard

(He/Him)
schilbacha@lanepowell.com
D 206.223.7094 □ 206.436,9909
LANEPOWELL.COM

[Quoted text hidden] [Quoted text hidden]

Letter to David Paire Countdoor temes of hous told you to stop pendings money on attonneys. I hope you are spending is out of your chet and not my trust for wheat you have refused one money to pay an attorney for my fees for which my attorney resign because of could not come up with another 10,000 relainer, Thave asked for an accounting checke Theek registers etc, for my trust none of Johnsh were forth arming, freestwent (3004) Atold Brean to cash put & rounsent, he. did, I notes I sa a couple of stalements, Count 20 Then I stapped gelling invastruents statements all together for the year 2022 I motessed FEIAY & FSTAX were 4 m quarter BEOU Statement of removed from LPLF, NANCIAL - which shows a value of 706,58598 Jan 1, 2022 where did \$173,863.42 from my trust when I only received approximately \$ 30,000 annu celly

February 22, 2023

Dear David,

As Grantor of the Sharon M. Harold Irrevocable Trust, I have asked you on numerous occasions to stop spending trust money on attorney fees. I hope what you are spending is coming out of your pocket and not my above named trust. I have asked you several times for fees for an attorney to represent me and no funds were forthcoming. After exhausting all my credit cards on attorney fees, my attorney resigned because I could not come up with another \$10,000 retainer fee.

I have asked for an accounting of expences, checks and check registers, etc for my trust, none of which were forthcoming since 2010. In 2019 or 2020 I asked you to cash out some investments and you told me to call Brian Locke and tell him to do it because you had nothing to do with investments.

Therefore I called Brian Locke and told him to cash out 3 or 4 investments (including FEIAX & FSTAX) that showed a minus sign in the "Unrealized Gain/Loss (\$)" column. Brian stated "That does not mean they are losing money." Brian removed the investments and in the following year my Trust increased \$100,000.00 (I guess minus means minus.) In 2022 I stopped getting BECU statements altogether.

Then in the BECU 4th quarter statement (January 1, 2022 – December 31, 2022 from LPL I noticed that FEIAX and FSTAX were back in the minus column again and the value of \$706,585.98 on Jan 1, 2022 had dropped to \$522,722.56 on Dec 31, 2022.

Concidering my annual income is approximaty \$30,000, where is the rest of the \$173,863.42? Myself or my attorney didn't get any of that money and I have never gotten any statements from you.

Sincerely,

Grandma Sharon

Sharon M. Harold 100 River Bend Rd #103 Reedsport, Oregon 97467