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**SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR THE COUNTY OF KING**

In re the Matter of

Case No. 22-4-08326-1 KNT

THE SHARON M. HAROLD  
IRREVOCABLE TRUST DATED  
NOVEMBER 12, 2004,

**THE HALO EFFECT AND ANCHORING  
BIAS SUPPLEMENTAL BRIEF IN  
SUPPORT OF JOINT VERIFIED  
OBJECTION (DKT 28)**

a Trust.

Respondents Charles A. Harold, Jr., John J. Harold, Angel Harold, and Josette Ramirez incorporate by reference all prior submissions, rulings, orders, and objections in Case No. 22-4-08326-1 KNT (TEDRA) and Case No. 23-2-03980-7 KNT (VAPO). This includes all previously submitted allegations, arguments, exhibits, and objections. These are restated in full in this Supplemental Brief supporting the Verified Joint Objection (Dkt. 28) to the Verified Petition for Approval of Interim Account, Discharge of Successor Trustee, and Appointment of Successor Trustee.

**I. INTRODUCTION**

On October 6, 2023, Judge Yip held a hearing for Petitioner Trustee David A. Paice's Motion for Partial Summary Judgment for attorney fees.

Despite clear and concise controlling California Probate law on this issue (Dkts. 201, 203, and 204), Mr. Schilbach omitted or misstated the law and facts in the case in violation of RPC 3.3 (Candor Toward the Tribunal), specifically, Rule 3.3(a)(3) which states a lawyer shall not knowingly "fail to disclose to the tribunal legal authority in the

1 controlling jurisdiction known to the lawyer to be directly adverse to the position of the  
2 client and not disclosed by the opposing party" along with RPC 8.4 (Misconduct), RPC  
3 3.1 (Meritorious Claims and Contentions) and RCW 9A.76.175 (Making a False  
4 Statement to a Public Servant).

5 During the hearing, Judge Yip said, "So again. Mr. Schilbach is an officer of the  
6 court, and I take him at his word for that."

7 Judge Yip's statement suggests a predisposition to believe one party over another  
8 based solely on Mr. Schilbach's status of being an "officer of the court." It's a perfect  
9 example of the Halo Effect and Anchoring Bias. Depending on the circumstances, Judge  
10 Yip's statement suggesting he automatically accepts an attorney's word could indicate a  
11 lack of impartiality under CJC Rule 2.2 (Impartiality and Fairness).

## 12 **II. THE HALO EFFECT AND ANCHORING BIAS**

13 The "Halo Effect" is a cognitive bias, a tendency to allow a positive impression to  
14 influence how other, unrelated traits or attributes are perceived. It leads people to make  
15 overly positive judgments based on positive characteristics, such as Mr. Schilbach being  
16 "an officer of the court."

17 An "Anchoring Bias" is another cognitive bias that occurs when an initial piece of  
18 information (the anchor) unduly influences subsequent judgments. For example, a  
19 "verified" petition signed by Gail Mautner serves as a powerful anchor in judicial decision-  
20 making.

21 Cognitive bias in legal contexts is a well-documented phenomenon, with judges  
22 and juries often swayed by initial information, even when it's misleading, i.e. "If it doesn't  
23 fit, you must acquit."

### 24 **A. The Reputation Fallacy**

25 A reasonable assumption might be drawn that a prestigious law firm, such as Lane  
26 Powell (soon-to-be Ballard Spahr as of January 2025), would never intentionally present  
27 unverified or misleading information to the court because doing so could cause them to  
28

1 lose their case or damage their 135-year reputation in the legal community. However, this  
2 rebuttable presumption is a prime example of cognitive bias in action.

3         Given the facts presented to the court in this case, wherein Lane Powell filed a  
4 verified petition for a 12-year retroactive account of trust that did not balance (Dkt. 149,  
5 Dkt. 157), despite knowing it violated and contradicted controlling California Probate Code  
6 (Dkt. 204), it is clear that even long-standing reputations do not guarantee ethical conduct  
7 in every instance. This case demonstrates that a reputation fallacy can lead to misplaced  
8 trust in people and their institutions, potentially allowing unethical practices to go  
9 unchallenged.

### 10         **B. Anchoring Bias and Rebuttable Presumptions**

11         Relying too heavily on an initial piece of information in decision making, such as  
12 Lane Powell's reputation, Gail Mautner's expertise, and the presumption that Lane Powell  
13 would never engage in misconduct is, in fact, rebuttable. This is clearly evidenced by  
14 Lane Powell's filing of a legally and ethically unsupportable "verified" petition for a 12-year  
15 retroactive account of trust, a false equivalence (Dkt. 203). The very fact that the Court  
16 allowed and tacitly endorsed legal and ethical misconduct underscores the danger of  
17 anchoring bias in legal proceedings. It highlights the importance of evaluating each action  
18 and piece of evidence on its own merits, rather than allowing an initial positive impression  
19 to overshadow subsequent unethical behavior.

### 20         **C. The Irony of Bias Correction**

21         Measures designed to correct and combat bias, like Washington State's Civil Rule  
22 11 can themselves become sources of new biases. CR 11 requires attorneys to certify  
23 that their pleadings, motions, and legal memoranda are "well grounded in fact" and  
24 "warranted by existing law or a good faith argument for the extension, modification, or  
25 reversal of existing law." However, the existence of this rule can create a false sense of  
26 credibility among legal professionals and the public, who may place undue faith in these  
27 safeguards, assuming that all information presented in court has been thoroughly vetted  
28 and is accurate simply because CR 11 requires it.

1 This overreliance on CR 11 can lead to several problematic outcomes.

- 2 1) **Reduced scrutiny:** Judges and opposing counsel might be less inclined to
- 3 critically examine filings, assuming CR 11 has ensured their validity.
- 4 2) **Inconsistent application:** As noted in Ninth Circuit cases, the application of
- 5 Rule 11 (the federal equivalent of CR 11) has not been uniform, leading to a
- 6 "veritable Tower of Babel" in interpretations.
- 7 3) **Potential for abuse:** Attorneys might use the threat of CR 11 sanctions to
- 8 intimidate opponents, particularly those with less resources or experience.
- 9 4) **Overemphasis on form:** The focus on compliance with CR 11 might
- 10 overshadow the substantive merits of a case.
- 11 5) **New forms of bias:** The rule itself might be applied unevenly, potentially
- 12 disadvantaging certain groups of attorneys or litigants.

13 Furthermore, Washington courts have been less specific than federal courts in  
14 delineating the powers of the court to sanction inappropriate conduct under CR 11. This  
15 lack of clarity can lead to inconsistent enforcement and potentially biased application of  
16 the rule.

17 The irony is that while CR 11 aims to ensure the integrity of legal proceedings, its  
18 very existence and inconsistent application can introduce new forms of bias into the legal  
19 system.

### 20 **III. GAIL MAUTNER AND THE HALO EFFECT**

21 Gail Mautner's impressive legal career and numerous accolades have established  
22 her as a prominent figure in the Washington legal community. Her expertise in estate and  
23 trust litigation, coupled with her active involvement in the Washington State Bar  
24 Association and contributions to continuing legal education (CLE) in TEDRA law, have  
25 earned her widespread recognition and respect.

#### 26 **A. Gail Mautner's Halo Effect On Legal Contexts**

27 The Halo Effect can have a significant impact on how Ms. Mautner's opinions and  
28 actions are perceived in legal settings:

1           **1) Enhanced Credibility:** Ms. Mautner's reputation may lead to her  
2           arguments being given undue weight, even in areas outside her direct  
3           expertise, such as litigating California Probate law in a Washington court.  
4           (Ms. Mautner has not been an active member of the California Bar since  
5           2005). **(EXHIBIT 001)**

6           **2) Influence on Decision-Making:** Legal professionals might rely too heavily  
7           on Ms. Mautner's guidance, potentially skewing outcomes in cases or  
8           educational settings.

9           **3) Perception of Authority:** Ms. Mautner's status as a top TEDRA expert  
10          could discourage critical questioning of her views, potentially leading to a  
11          homogenization of thought in the legal community.

12           **B. Interaction with Anchoring Bias.**

13           The Halo Effect can amplify the Anchoring Bias, where initial information serves  
14          as a reference point for subsequent judgments:

15           1) Ms. Mautner's initial recommendations may disproportionately shape final  
16           decisions due to her esteemed reputation.

17           2) Legal professionals, facing time constraints and complex information, might  
18           rely on these cognitive shortcuts, potentially leading to suboptimal judicial  
19           decisions.

20           3) The combination of these biases can create a powerful influence on legal  
21           decision-making, making it challenging to objectively evaluate subsequent  
22           information.

23           **C. The Rebuttable Presumption**

24           Despite Ms. Mautner's impressive achievements, it's crucial to recognize that her  
25          expertise does not guarantee infallibility. This forms a rebuttable presumption - her  
26          accolades do not ensure the accuracy of her legal applications or procedural decisions.

#### **IV. THE ANCHORING BIAS OF A "VERIFIED" PETITION**

##### **A. CR 11 Standards and Legal Expertise**

Given Gail Mautner's legal expertise, her actions should be held to a higher standard, particularly in light of Washington's Civil Rule 11 (CR 11). CR 11 mandates that verified petitions be:

- 1) Well-grounded in fact.
- 2) Warranted by existing law or good faith arguments for legal change.
- 3) Free from improper purposes.
- 4) Based on warranted denials or reasonable lack of information.

##### **B. Scrutiny of the "Verified" Petition**

Ms. Mautner's "verified" petition, sworn under the penalty of perjury, should have been thoroughly scrutinized against these criteria. However, it appears that Commissioner Judson may not have adequately examined the petition through the lens of CR 11. A proper examination would have revealed that California Probate Code § 3 simply did not permit Trustee Paice to escape and mitigate his fiduciary breaches of duty by retrospectively recreating a 12-year retroactive Account of Trust for prospective Court certification.

##### **C. The Anchoring Effect of "Verified" Petitions**

The term "verified" often serves as an anchor, influencing judges to presume the petition's accuracy and potentially biasing subsequent decisions. This anchoring effect can lead to:

- 1) Acceptance of stated facts as true.
- 2) Basing subsequent rulings on these "verified" facts.
- 3) Shaping the judge's perception throughout the case.

##### **D. Implications of Later Disproven Facts**

If verified facts are later proven untrue, significant implications arise:

- 1) Revaluation of Prior Decisions: All decisions based on the disproven facts may need review.
- 2) Loss of Credibility: The submitting party may face reduced trust from the court.
- 3) Due Process Concerns: Parties affected by false information may argue their right to a fair hearing was compromised.

#### **E. Importance of Rigorous Scrutiny.**

This case underscores the critical need for rigorous scrutiny of all petitions, even those from reputable sources. Such scrutiny is essential to:

- 1) Guard against cognitive biases in legal decision-making
- 2) Protect due process rights
- 3) Maintain the integrity of the legal process

The anchoring bias created by "verified" petitions can significantly impact legal proceedings. It's crucial for the court to maintain a critical eye and thoroughly examine all submissions, regardless of their source or verified status, to ensure justice and fairness in the legal process.

### **V. RULES OF PROFESSIONAL CONDUCT**

As officers of the court, Lane Powell is bound by the Rules of Professional Conduct, which mandate honesty before the court and third parties:

#### **A. Duty to Be Honest Before the Tribunal (RPC 3.3)**

- 1) **Disclosure of Adverse Legal Authority:** Lawyers must disclose known, directly adverse legal authority in the controlling jurisdiction if not disclosed by opposing counsel, such as California probate Code § 3.
- 2) **False Evidence:** Lawyers must not offer evidence known to be false and must take remedial measures, including possible disclosure to the tribunal, if they later discover falsity in material evidence, (such as a 12 year retroactive account of trust that does not balance).

1           **B. Duty to Be Honest with Third Parties (RPC 4.1)**

- 2           1) **False Statements:** Lawyers must not knowingly make false statements of  
3           material fact or law to third persons (such as stating mediation is required  
4           in this case when in fact under California Probate Code it is not (Dkt. 207)).  
5           2) **Disclosure of Material Facts:** Lawyers must disclose material facts to third  
6           persons when necessary to avoid assisting a client's criminal or fraudulent  
7           act, unless prohibited by Rule 1.6.

8           These rules establish a presumption of honesty and ethical conduct for Lane  
9           Powell in their legal practice. However, as demonstrated in the previous section, this  
10          presumption can be rebutted by evidence of misconduct, such as filing a petition that  
11          contradicts controlling law.

12          The tension between these ethical obligations and the actions taken in this case  
13          underscores the importance of vigilant adherence to professional standards, even for  
14          prestigious firms with long-standing reputations.

15                           **VI. THE CURIOUS CASE OF LOOMIS v. STATE**

16          The case of Loomis v. State, 881 N.W.2d 749 (Wis. 2016), provides a striking  
17          parallel to the situation with Gail Mautner's "verified" petition, particularly in illustrating the  
18          concept of "black box" decision-making in legal contexts.

19           **A. Understanding "Black Box" Decisions:**

20          A "black box" decision refers to a process where inputs and outputs are known,  
21          but the internal workings are opaque or not fully understood. In legal contexts, it means  
22          decisions are made without clear explanation of the reasoning or methodology. This lack  
23          of transparency can make it difficult to challenge or verify the decision-making process.

24           **B. Loomis Case Overview**

25          Eric Loomis was sentenced based partly on a COMPAS algorithm risk  
26          assessment. The algorithm, a literal "black box," classified Loomis as high-risk for  
27          recidivism. Loomis argued this violated his due process rights as he couldn't examine or  
28          challenge the proprietary algorithm.



1           **C. Parallel to Ms. Mautner's Case**

2           In Loomis, the COMPAS algorithm acted as an unquestionable authority. In  
3 Mautner's case, her status as a "Super Lawyer" and TEDRA expert served a similar role.  
4 Mautner's expertise functioned like a figurative "black box algorithm" - her reasoning and  
5 methods were accepted without scrutiny.

6           **D. Anchoring Bias in Both Cases**

7           **Loomis:** The algorithm's output anchored the judge's perception of Loomis's risk.  
8 **Mautner:** Her reputation and "verified" petition anchored the court's trust in her  
9 submissions. Both cases involve a "black box" decision-making process that influenced  
10 the court.

11           **E. The "Algorithm" Analogy**

12           Mautner herself can be seen as the "algorithm" in this case. Her "verified" petition  
13 acted as a "risk assessment," suggesting low risk of error to the court. The court, like in  
14 Loomis, accepted this "assessment" without thorough analysis.

15           **F. Proof of Concept**

16           Judge Yip's statement about Mautner's protégé, Mr. Schilbach, illustrates this bias.  
17 "So again. Mr. Schilbach is an officer of the court, and I take him at his word for that."  
18 Further proof can be found in court records in Dkt. 149 (Trustee's 2010 Account of Trust  
19 Does Not Balance), Dkt. 157 (Trustee's 2022 Account of Trust Does Not Balance), Dkt.  
20 203 (Lane Powell's Verified Petition if a False Equivalence) and Dkt. 204 (Retrospective  
21 v. Prospective Application of Codes).

22           **G. Implications**

23           Both cases highlight the danger of over-relying on perceived authority or expertise.  
24 They underscore the importance of transparent, challengeable decision-making  
25 processes in court. The parallels suggest a systemic issue in how courts may sometimes  
26 defer to perceived expertise without sufficient scrutiny. These examples emphasize the  
27 need for courts to maintain critical analysis, even when faced with seemingly authoritative  
28 sources.

1 This analysis illustrates how anchoring bias, whether from an AI algorithm or a  
2 reputable attorney, can potentially compromise due process and fair judicial outcomes. It  
3 emphasizes the critical need for transparency and the ability to challenge the reasoning  
4 behind legal decisions, whether they originate from technological tools or human experts.

## 5 **VII. COGNITIVE BIAS AGAINST PRO SE RESPONDENTS**

6 Pro se Respondents objecting to Lane Powell's "verified" petition face inherent  
7 cognitive biases in court. Their perceived lack of legal expertise compared to Lane Powell  
8 can create a rebuttable presumption and anchoring bias, potentially influencing the court's  
9 perception unfairly. To counteract these biases, key points from the Washington State  
10 Code of Judicial Conduct include:

- 11 a) Judges must uphold judicial independence, integrity, and impartiality  
12 (Canon 1).
- 13 b) Impartial application of the law is required in all judicial duties (Rule 2.2).
- 14 c) Reasonable accommodation for pro se litigants are permissible to ensure  
15 fair hearings (Rule 2.2 Comment).

16 These rules aim to mitigate potential biases against pro se litigants, ensuring fair  
17 treatment in legal proceedings and upholding constitutional rights to Equal Protection and  
18 the Right to Petition.

## 19 **VIII. COMMISSIONER JUDSON'S ANCHORING BIAS.**

20 Commissioner Judson's involvement in both the TEDRA and VAPO cases  
21 demonstrates a complex interplay of anchoring bias and confirmation bias that resulted  
22 in violations of the Code of Judicial Conduct:

### 23 **A. Initial TEDRA Hearing**

- 24 **1)** Judson, who attended a Lane Powell Continuing Legal Education (CLE)  
25 class, may have relied heavily on Lane Powell's "verified" petition. **(EXHIBIT**  
26 **002)**

1 2) Judson made a decision without fully reviewing all pleadings or hearing from  
2 the Grantor who he would not allow to speak at the initial hearing.  
3 3) Judson's choice to send the matter to trial led to lengthy proceedings and  
4 significant, illegal and unnecessary trust expenditures.  
5 4) Judson's decision resulted in approximately \$120,000 in trust assets being  
6 used to pay Lane Powell's invoices (to date), with an additional \$260,000 in  
7 fees and costs (approximate because Trustee refuses to disclose information)  
8 sought against the trust corpus, violating California Probate Codes and the  
9 ruling in DiMaria v. Bank of California, 237 Cal.App.2d 254 (1965).  
10 **5) Judson's rulings, inconsistent with both the Code of Judicial Conduct and**  
11 **probate code, have been questioned in the past as demonstrated in two ratings**  
12 **on Findlaw.com where one person said, "Commissioner Henry Judson is a wolf**  
13 **in sheeps clothing and is a total fraud." Another rating said, "This guy should**  
14 **be in jail he is in collusion with other attorneys that are lying under oath in order**  
15 **to attain my Aunt Eunie's \$\$ & HOUSE". (EXHIBIT 003).**

16 **B. Subsequent VAPO Case – CJC 2.11 Violation**

17 **1) Judson's assignment to the related VAPO case violated CJC 2.11(A)(6)(d),**  
18 **which requires judges to disqualify themselves in certain circumstances. (Dkt.**  
19 **96 in Case No. 23-2-03980-7 KNT)**  
20 2) This created a situation where Judson faced an anchoring bias against  
21 himself and his own first ruling.

22 **C. Confirmation Bias in Action**

23 1) Having made an initial decision in the TEDRA case, Judson was likely  
24 predisposed to interpret new information in the VAPO case in a way that  
25 confirmed his previous judgment. **(Dkt. 96 Case No. 23-2-03980-7 KNT).**  
26 2) This confirmation bias makes it psychologically challenging for a judge to  
27 contradict or undermine their own previous ruling.  
28

1           **D. Implications**

- 2           1) The combination of anchoring and confirmation bias potentially
- 3                 compromised Judson's ability to approach the VAPO case with the required
- 4                 impartiality.
- 5           2) This scenario violated due process and created inconsistencies in the legal
- 6                 proceedings.
- 7           3) It demonstrates how initial decisions can anchor subsequent rulings, even
- 8                 when they should be considered independently.
- 9           4) The situation creates an appearance of impropriety, which itself is a concern
- 10                 in maintaining public trust in the judicial system.

11                           **IX. OPINIONS AND CONCLUSION.**

12           The Respondents' brief presents a paradoxical microcosm of the very cognitive

13           biases it seeks to expose. While seemingly criticizing the influence of the Halo Effect and

14           Anchoring Bias in the legal system, the brief itself becomes a prime example of how these

15           biases can manifest in legal arguments.

16           **A. The Self-Fulfilling Prophecy**

17           By extensively detailing the concepts of the Halo Effect and Anchoring Bias, and

18           providing numerous examples of their alleged occurrence in this case, Respondents have

19           inadvertently created their own anchor in the court's mind. This self-scrutinizing approach

20           demonstrates the pervasive nature of cognitive biases, even in attempts to expose them.

21           **B. The New Halo Effect**

22           Respondents, in positioning themselves as enlightened observers of cognitive

23           biases, have effectively created a new Halo Effect around their arguments, presenting

24           themselves as the arbiters of objectivity, implicitly suggesting that their awareness of

25           these biases somehow immunizes them from their influence, mirroring the very

26           phenomenon they criticize.

1           **C. The Anchoring Paradox**

2           The extensive discussion of anchoring bias throughout the brief serves as a  
3 powerful anchor itself. By repeatedly emphasizing the concept, Respondents aim to make  
4 it the central point of reference for the court's decision-making process. This recursive  
5 application of the concept they seek to criticize underscores the complex, multi-layered  
6 nature of cognitive biases in legal proceedings.

7           **D. The Observer Effect In Action**

8           This case not only exemplifies the influence of the Halo Effect and Anchoring Bias  
9 but also serves as a cautionary tale about the subtle ways these biases can manifest,  
10 even in attempts to expose them. It demonstrates a legal version of the observer effect,  
11 where the act of analyzing biases inevitably introduces new biases into the process.

12           **E. The True Test for the Court**

13           The court now faces a maze of nested biases, where even the arguments meant  
14 to illuminate cognitive pitfalls may themselves be leading down a biased path. The true  
15 test for the court will be to recognize and transcend these multi-layered biases to arrive  
16 at a just and impartial decision based upon equity and the law.

17                           **X. RELIEF REQUESTED**

18           Today, December 2, 2024, marks the 2-year anniversary of Trustee's filing of their  
19 fraudulent "verified" petition (Dkt. 203) on December 2, 2022. It is time for the Court to  
20 end the fraud.

21           Given the evidence of "potentially nefarious" and "murky" behavior and misconduct  
22 by Trustee Paice and Lane Powell's apparent disregard for California Probate Code and  
23 Rules of Professional Conduct, we respectfully request the Court to exercise its sua  
24 sponte authority and:

- 25           1. Immediately remove David Allen Paice as Trustee of THE SHARON M. HAROLD  
26           IRREVOCABLE TRUST DATED OCTOBER 12, 2004;
- 27           2. Dismiss the TEDRA petition with prejudice due to its fraudulent nature;
- 28           3. Appoint an independent, court-supervised successor Trustee to manage the trust

- 1 in accordance with its terms and applicable law;
- 2 4. Order a comprehensive forensic audit and full accounting of the trust's assets and
- 3 transactions for the entire period of David Allen Paice's Trusteeship;
- 4 5. Order Trustee Paice to personally reimburse the Trust for all improperly incurred
- 5 legal expenses, including attorney-in-fact fees per California Probate Code 4204,
- 6 and return all misappropriated attorney fee funds to the Trust;
- 7 6. Prohibit the use of trust funds for any legal fees or expenses incurred by David
- 8 Allen Paice in defending against this removal action or in seeking personal
- 9 releases of liability;
- 10 7. Impose a constructive trust on any assets improperly transferred out of the trust by
- 11 David Allen Paice;
- 12 8. Ensure that all beneficiaries are granted full access to Trust documents and
- 13 financial records;
- 14 9. Investigate the potential ethical violations committed by Lane Powell and consider
- 15 appropriate sanctions;
- 16 10. Impose appropriate sanctions against Trustee Paice's attorney for filing fraudulent
- 17 documents with the court;
- 18 11. Refer the matter for potential criminal investigation into Trustee Paice's actions;
- 19 12. Prohibit David A. Paice from serving in any future fiduciary capacity;
- 20 13. Award Respondents their reasonable attorneys' fees and costs incurred in bringing
- 21 this action; and
- 22 14. Grant such other and further relief as the Court deems just and proper to protect
- 23 the interests of the trust and its beneficiaries.

24 Respectively Submitted,

25 DATED: December 2, 2024

s/Charles A. Harold, Jr. \_\_\_\_\_

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1 DATED: December 2, 2024

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6 DATED: December 2, 2024

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We certify that this memorandum contains 3,657  
words, in compliance with the Local Civil Rules.

**CERTIFICATE OF SERVICE**

I am and was at the time of service of these papers herein, over the age of eighteen (18) years.

On December 2, 2024, I caused the following documents: THE HALO EFFECT AND ANCHORING BIAS SUPPLEMENTAL BRIEF IN SUPPORT OF VERIFIED JOINT OBJECTION (DKT 28) to be electronically served on the interested parties in this action as follows:

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Residual Beneficiary, Pro Se

7 Nicole Loomis  
31688D U.S. 97  
8 Tonasket, WA 98855  
9 E-mail: crazyapples10@gmail.com

Residual Beneficiary, Pro Se

10 via the electronic filing system maintained by the Clerk's Office at the above-captioned  
11 court or by email if they were not registered to receive electronic service via the Clerk's  
12 Office.

13 I certify under penalty of perjury under the laws of the State of Washington that the  
14 foregoing is true and correct.

15 Dated December 2, 2024, at Apache Junction, Arizona.

16  
17  
18 s/Charles A. Harold, Jr.  
19 Charles A. Harold, Jr.

# EXHIBIT 001



Gail Eileen Mautner #107706

License Status: **Inactive**

Address: Lane Powell PC, 1420 5th Ave #4100, Seattle, WA 98101-2338

Phone: 206-223-7000 | Fax: 206-223-7107

Email: Not Available | Website: Not Available

More about This Attorney ▼

All changes of license status due to nondisciplinary administrative matters and disciplinary actions.

Date	License Status ⓘ	Discipline ⓘ	Administrative Action ⓘ
Present	Inactive		
1/1/2005	Inactive		
11/16/1998	Active		
1/1/1984	Inactive		
4/1/1983	Admitted to the State Bar of California		

Additional Information:

- About the disciplinary system



# EXHIBIT 002



Chuck Harold <chuckharold@gmail.com>

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**RE: [External]FOIA Request for Records**

1 message

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**Public Records** <publicrecords@wsba.org>

Mon, Dec 18, 2023 at 5:24 PM

To: Chuck Harold <chuckharold@gmail.com>

Dear Charles A. Harold, Jr.,

Please see the attached list of attendees for the relevant CLE programs. I have also attached the invoice for the costs of research services; please pay it at your earliest convenience.

Sincerely,



**Szilvia Szilágyi | Assistant General Counsel – Records and Contracts**

**Washington State Bar Association** | 206.239.2197 | [szilvias@wsba.org](mailto:szilvias@wsba.org)

1325 Fourth Avenue, Suite 600 | Seattle, WA 98101-2539 | [www.wsba.org](http://www.wsba.org)

The WSBA is committed to full access and participation by persons with disabilities. If you have questions about accessibility or require accommodation please contact [accommodations@wsba.org](mailto:accommodations@wsba.org).

---

**From:** Chuck Harold <[chuckharold@gmail.com](mailto:chuckharold@gmail.com)>

**Sent:** Monday, November 27, 2023 11:47 AM

**To:** Public Records <[publicrecords@wsba.org](mailto:publicrecords@wsba.org)>

**Subject:** Re: [External]FOIA Request for Records

Thank you for your response.

I will take whatever records you deem available and appropriate.

Cordially,

Charles Harold

On Mon, Nov 27, 2023, 12:36 PM Public Records <[publicrecords@wsba.org](mailto:publicrecords@wsba.org)> wrote:

Thank you.

As I wrote earlier, WSBA CLE did not serve as a sponsor for items 4, 8, 9, and 11; therefore, we do not have attendance data to share. Also, items 1, 2, 3, 5-7, 10, and 12 were part of a larger program. We do not keep records of who attended individual sessions when they were part of a larger program. Still, we can send you the attendees list for the complete programs.

Please let us know how you want us to proceed.

Sincerely,



**Szilvia Szilágyi | Assistant General Counsel – Records and Contracts**

**Washington State Bar Association** | 206.239.2197 | [szilvias@wsba.org](mailto:szilvias@wsba.org)

1325 Fourth Avenue, Suite 600 | Seattle, WA 98101-2539 | [www.wsba.org](http://www.wsba.org)

The WSBA is committed to full access and participation by persons with disabilities. If you have questions about accessibility or require accommodation please contact [accommodations@wsba.org](mailto:accommodations@wsba.org).

---

**From:** Chuck Harold <[chuckharold@gmail.com](mailto:chuckharold@gmail.com)>  
**Sent:** Monday, November 27, 2023 8:32 AM  
**To:** Public Records <[publicrecords@wsba.org](mailto:publicrecords@wsba.org)>  
**Subject:** Re: [External]FOIA Request for Records

Good morning Szilvia,

My apologies for the delay. I will review and get back to you today.

Cordially,

Chuck

On Mon, Nov 27, 2023 at 7:45 AM Public Records <[publicrecords@wsba.org](mailto:publicrecords@wsba.org)> wrote:

Dear Charles A. Harold, Jr.,

Regarding your request below and our follow-up email on October 2, we haven't yet received a response from you to our request for clarification. Please let us know if you still want to pursue your request. If we don't hear back from you by December 8, 2023, we will close your request.

Sincerely,



**Szilvia Szilágyi | Assistant General Counsel – Records and Contracts**

**Washington State Bar Association** | 206.239.2197 | [szilvias@wsba.org](mailto:szilvias@wsba.org)

1325 Fourth Avenue, Suite 600 | Seattle, WA 98101-2539 | [www.wsba.org](http://www.wsba.org)

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---

**From:** Public Records

**Sent:** Monday, October 2, 2023 4:25 PM

**To:** 'chuckharold@gmail.com' <[chuckharold@gmail.com](mailto:chuckharold@gmail.com)>

**Subject:** RE: [External]FOIA Request for Records

Dear Charles A. Harold, Jr.,

I am writing regarding your records request to the Washington State Bar Association on September 17, 2023, in which you requested “a list of names of the people, (attorneys or others), that attended each specific CLE class or seminar [listed in your email], whether or not they received CLE credit.”

Please note that the WSBA is not an agency subject to the Freedom of Information Act, 5 U.S.C. § 552. Public access to Bar records is regulated by Washington State General Rule (GR) 12.4.

We are working on your request, and before we proceed with collecting the relevant records, we'd like to ask for your assistance in clarifying the following points:

- Item 10 is a session within a longer program for which WSBA was the accreditation sponsor. We don't have records of who attended the live session, just who participated in the complete program.

Still, we did sell that session individually. Are you looking for records related to the on-demand product or the live event?

- Because our records retention practices have changed over the years, we may be unable to pull attendance for all the requested CLEs for which WSBA was the accreditation sponsor. We could, however, pull a registrant list. Would that work for you?
- Also, WSBA CLE did not serve as a sponsor for items 4, 8, 9, and 11; therefore, we do not have attendance data to share.

Based on the initial review of our records, it will take us approximately three hours to collect the relevant records for you (in addition to the one hour we already extended on your request).

Sincerely,



**Szilvia Szilágyi | Assistant General Counsel – Records and Contracts**

**Washington State Bar Association** | 206.239.2197 | [szilvias@wsba.org](mailto:szilvias@wsba.org)

1325 Fourth Avenue, Suite 600 | Seattle, WA 98101-2539 | [www.wsba.org](http://www.wsba.org)

The WSBA is committed to full access and participation by persons with disabilities. If you have questions about accessibility or require accommodation please contact [accommodations@wsba.org](mailto:accommodations@wsba.org).

---

**From:** Chuck Harold <[chuckharold@gmail.com](mailto:chuckharold@gmail.com)>

**Sent:** Sunday, September 17, 2023 10:20 AM

**To:** Public Records <[publicrecords@wsba.org](mailto:publicrecords@wsba.org)>

**Subject:** [External]FOIA Request for Records

You don't often get email from [chuckharold@gmail.com](mailto:chuckharold@gmail.com). [Learn why this is important](#)

September 17, 2023

Szilvia Szilágyi, Public Records Officer  
Washington State Bar Association  
1325 Fourth Ave., Suite 600  
Seattle, Washington 98101  
[PublicRecords@wsba.org](mailto:PublicRecords@wsba.org)  
Phone: 206-239-2197  
Fax: 206-727-8314



Dear Ms. Szilágyi,

Under the FOIA I would like to request the following CLE records.

Specifically, for each CLE class listed below, I would like a list of names of the people, (attorneys or others), that attended each specific CLE class or seminar, whether or not they received CLE credit.

1) March 24, 2022 Event / CLE  
Recent Changes in Estate Planning  
Washington State Bar Association | Virtual

2) December 2, 2021 Event / CLE  
Probate and Trust Seminar  
Washington State Bar Association | Virtual

3) March 26, 2021 Event / CLE  
Recent Changes in Estate Planning  
Washington State Bar Association | Virtual

4) March 18, 2021 Event / CLE  
  
Current Issues in Elder Abuse  
Snohomish County Estate Planning Council | Virtual

5) March 8, 2019 Event / CLE  
Recent Changes in Estate Planning  
Washington State Bar Association Law and Practice Refresher Seminar | Seattle

6) April 20, 2018 Event / CLE  
Identification, Proof and Consequences of Financial Exploitation and Undue Influence  
Washington State Bar Association Seattle

7) December 8, 2017 Event / CLE  
Anatomy of Trust and Estate Litigation – Disputes, Nuts and Bolts of TEDRA and ADR Plus Case Law and Statutory Updates  
Washington State Bar Association | Seattle

8) September 28, 2017 Event / CLE  
You Decant Take It With You... But We Have a Few Ideas to Share  
Lane Powell Trusts & 'Tinis Seminar | Seattle

9) September 28, 2017 Event / CLE  
You Decant Take It With You... But We Have a Few Ideas to Share  
Lane Powell Trusts & 'Tinis Seminar | Seattle

10) March 17, 2017 Event / CLE  
Recent Changes in Estate Planning  
Seminar | Seattle

11) April 26, 2016 Event / CLE  
Everything You Never Wanted the Public to Know About Your Estate Planning Clients  
East King County Estate Planning Council | Bellevue, Washington

12) May 7, 2014 Event / CLE  
Trusts and Estates: Annual Case Law and Legislative Update  
Washington State Bar Association | Seattle

I understand that I may view records at WSBA's offices without charge, except that I will be charged for any copies requested (scanned or paper copies), and for staff time expended in identifying and gathering responsive records, per the fee schedule on the WSBA website public records page. I also understand that WSBA may require a deposit or full payment before the records are provided. Please send me an estimate of the charges involved such as research time and copies per page.

Requested information format: Electronic copies

Requested method of delivery: Please email the records to me (for electronic copies – if feasible).

If you have any questions, please feel free to contact me at your convenience using any of the contact points listed below.

A signed copy of this request is attached in .PDF format.

Cordially,

Charles A. Harold, Jr.

1455 N. Tomahawk Rd.

Apache Junction, AZ 85119

[chuckharold@gmail.com](mailto:chuckharold@gmail.com)

Phone: (818) 652-6400

Fax: (818) 302-2300

---

**2 attachments**



**Records Request\_CLE records.pdf**

165K



**Invoice\_Harold 12-18-2023.pdf**

121K



**Probate and Trust Seminar 2021 ( Part of Annual Fall  
Probate and Trust Seminar 22497 12/2/2021)**

Douglas Owens	
Donald Elliott	
Ronald HENDRY	
robert leeds	
Gerald Reitsch	
Sandra Gay	
Dan Kellogg	
JANALEE TIERNEY	
John Panesko	
Bruce Buskirk	
Clifford Foster	
Deanna Franco	
Dianna Dryden	
James Kotschwar	
Gloria Rivera	
Shane Richardson	
Michael Howard	
Frederic Kutscher	
Celeste McDonell	
Julie Dickens	
WILLIAM WOOD	
Gail Mautner	
Terry Robinson	
Michael Currin	
Gaylen Payne	
Lenard Wittlake	
bruce hori	
Carol Vaughn	
Stuart Scarff	
Lovie Bernardi	
Peggy Sue Juergens	
William Crowley	
Jeannie O'Brien	
Gregory Ursich	
Douglass McCrae	
Roger Ellingson	
Nancy L Wright	
karl flaccus	
Mark Vohr	
erin fairley	
Wendy Goffe	
Brent Stanyer	
David Hammermaster	

Michael Jacobs	
David Jones	
Ann Manley	
Amber Myrick	
RANDOLPH PETGRAVE	
Jill Kinyon	
Dwayne Fowles	
Jennifer Young Wong	
Robert Faber	
ELIZABETH KANDIEW	
Neli Espe	
Katherine VanZanten	
Steven Wee	
Lisa Ellis	
Joan Kalhorn	
Karen Sowinski	
Eric Sachtjen	
Ronda Larson Kramer	
Stephanie Taylor	
Dale Crandall	
Brent Williams-Ruth	
Stephanie Haslam	
Hans Juhl	
Marketa Vorel	
Mary McHugh	
steven zipper	
Natasha Black	
Steven Skelton	
Robyn McGinnity	
Inge Fordham	
Megan Gebhardt	
Deanna Franco	
Rachel Leos	
Lars Anderson	
Daelyn Julius	
Annie Arbenz	
Michael Froehlich	
Jennifer Johnson	
Erin Fairley	
Allison Foreman	
Erin Hillier	
David McDorman	
Judith Luther-Shiflett	
Susan AMSTADTER	
Kjersti Stroup	
Aydin Firuz	
Sarah Smith	

Luke Larson	
Jennifer Doehne	
Phillip George	
Justin Jozwick	
David Kazemba	
Taylor Wallace	
Nicholas Alexander	
Jon Fritzler	
Ryan Blodgett	
Bradley Carnine	
Caitlyn Evans	
Emily Tyson-Shu	
Jessica Rullman	
Aleksander Schilbach	
Allison Beard	
Katie Hendricks	
Nathan Rudolph	
Gurneet Takhar	
Jason Corey	
Karen Malella-Manker	
Alexa Ritchie	
Casie Rodenberger	
Brady Blake	
Heather Ledgerwood	
Teresa Koza	
MELCHOR MATIAS	
Silvan Schuttner	
Gregory Hill	
Kate Vavrousek	
Kera Dexter	
Kai Subic-Skattum	
meghan DeSpain	
Carolyn Harding	

**Recent Changes in Estate Planning 22792 (Part of The  
Washington Law and Practice Refresher – Day 2 3/24/22)**

Richard Barney	
Russ Juckett	
Robert Sailer	
Darnell Nelson	
Susan Kirkpatrick	
karla hooper	
Bryan Poehler	
Gail E. Mautner	

Craig T. Kobayashi	
Paul Meyer	
Richard Wernette	
Lisa Sutton	
Mark Crohn	
Sandra Schilling	
Jeanne Marie Clavere	
James T. Yand	
Staci Severns	
Megan Slade	
Stacey L. Romberg	
Todd Cavanaugh	
Edward K Le	
michael Izak	
Signe Dortch	
John Shaffer	
Steven Baklund	
Elmer Ward	
Marc Rosenberg	
Karma L. Zaike	
Paul Kampmeier	
Alisha Molyneux	
Jenny7 Marston	
Sarah Kooistra	
Lisa Mitalski	
Mary Neil	
F Falkenberg	
Shilla Kim	
Carter Hick	
Kevin Savage	
Elijah Forde	
Jon Christian Markanich	
Freya Thoreson	
Andrea Salinas	
Daniel Morris	
john knettles	
Heather Sarver	
Michael Pope	
Jessica Adams	
Jonathan Quittner	
aaron atkission	
Jon Levin	
Michael Kittleson	
nikkita oliver	
Peter Montine	
Jenifer Jewkes	
Lucas Salava	

Erin Winkles	
Gerry Smeader	
Alex Kong	
Samuel Smith	
Jacob Mark	
Peter Smith	
Jacob Knutson	
Ryan Hamilton	
Charlotte Mikat-Stevens	
Justin Jones	
Bryce Linden	
Kate Vavrousek	
Brian Parrott	
Megan Paull	
Janet Harrison	
Jessi Cox	
Tracy Aerni	

**Recent Changes in Estate Planning 19793 ( Part of The  
Washington Law and Practice Refresher Course Day 2 3/8/2019)**

Dieter Struzyna	
Margaret Ross	
Elizabeth Verhey	
Troy Stewart	
John Creighton	
John Dziedzic	
Sean Devlin	
Jenna Henderson	
Rebecca Moua	
Paula Kurtz-Kreshel	
David Morado	
Thad Huse	
Meagan Foley	
Lori Kilberg	

**Identification, Proof and Consequences of Financial Exploitation  
and Undue Influence  
Washington State Bar Association Seattle 18498 (Part of 15th  
Annual Trust and Estate Litigation Seminar 4/20/2018)**

LINCOLN MILLER	
Levi Liljenquist	
Lisa Malpass	
dalynne singleton	
Judy Luther	



Kristen Fisher	
David McGrane	
Deborah Williams	
Wynnie Johnson	
Tygh Lybbert	
James Bush	
Tanya Pemberton	
David Kazemba	
Marshall Brown	
Rachel Brasso	
Aaron Harris	
Jenny Ling	
Jerimy Kirschner	
Thomas Hackett	
Christopher Kunz	
Benjamin Schestopol	
Maygan Hurst	
Donna Calf Robe	
Nancy L Wright	
Laura Nelson	
Jeannette Cyphers	
dean sargent	
John McDonald	
Joseph Wessman	
David Shotwell	
Ingrid McLeod	
Cam McGillivray	
Cory McBride	
Andrea Huff	
Eric Lanza	
Benjamin Spruch	
Barry Meyers	
Lori Bemis	
Dwayne Fowles	
Cynthia Cannon	
H. Clifford Tassie	
Denise Gorrell	
MIKA COGDILL	
Hillary Lovell	
David Mack	
Matthew Cruz	
Stephanie Bloomfield	
Steven Adelstein	
J. Patrick Quinn	
Andrea McNeely	
Jesse Rodman	
janey mccauley	

joel laike	
brecht jeff	
Elizabeth Rene	
Henry Judson	
Kimberley Prochnau	
Gail Mautner	
Brian Wichmann	
Paul Eklund	
Ann Wilson	
Kerry Brink	
Karl Flaccus	
Peter Triandafilou	
Bert Boughton	
Karen Bertram	
Jason Benjamin	
Michael Levelle	
William Pease	
Kevin Winters	
Ken Schubert	
Scott Feir	
Wendy Allard	
Karolyn Hicks	
Eric Nelsen	
Stephanie Taylor	
Kasey Huebner	
Hans Juhl	
M Gabrielson	
Shane Seaman	
Colleen LaMotte	
Michelle Nisle	
Anna Knudson	
Kathryn Rasmussen	
LaRee Beck	
Daelyn Julius	
Lisa Kremer	
Marisa Broggel	
Allison Foreman	
Carla Calogero	
Tiffany Gorton	
Alisson Wall	
Sharon Wilcoxon	
Robert Van Siclen	
Eric Laliberte	
Susan Fairchild	
Aydin Firuz	
Claire Bellefleur	
Katrina Durkin	

Kristi Richards	
Peter Dolan	
Nicholas Illario	
Catherine Eckert	
Shawna Shearer	
Mihaella Bayla	
Patrick Carter	
Kathryn Carr	
Marcia Fujimoto	
Deborah Phillips	
Mooi Wong	
Michael Zuccarini	
Emma Luton	
Marion (Ted) Knauss	
Denise Meador	

**Recent Changes in Estate Planning 21793 (The Washington Law and Practice Refresher Day 2 (3/26/2021))**

William Appel	
RICHARD DEJEAN	
Donald Wittenberger	
Iyle hanson	
Donald Stone	
KATHLEEN BENEDICT	
Charles Conrad	
Richard Levenson	
Donald Gough	
James Purcell	
Bruce King	
Terry Smith	
Susanna Neale Duke	
Mary Cardoza	
Robert Schultz	
Monte Bersante	
Winnie Clements	
Barbara Lock	
Lynn Hendrickson	
Candy Jacksom	
Joseph Sullivan	
Leonard Rolfes	
John Hayes	
kenneth grover	
Michael Brumback	
Brady Johnson	
Steven Crozier	
Felicia Soleil	

j scott Rainey	
Karen Peirolo	
Daiva Tautvydas	
Carol Mitchell	
marc hardy	
Kristin Lince	
Maureen Mitchell	
Rachael DelVillar	
KARMA ZAIKE	
Ralph Crear	
Scott Messinger	
Karen Cobb	
Sharon Kindred	
Abigail Burgess	
alison bond	
carter hick	
Dale Learn	
erica sloan	
Anna Knudson	
Katherine Stricker	
Corey Niles	
Erin Croman	
Ahmed Muhammed Puloglu	
Ryan Gregg	
benjamin sheridan	
Leigh Kim	
charlene yin	
Nikolaus Barta	
Zoe Maddox	
Jessica Kang	
thomas hutchinson	
Brienne Henderson	
Catherine Biestek	
Ryan Shephard	
Elizabeth Och	
Trevor Cartales	
Melody Alvarado Latino	
Pamela Glazner	
Westbrook Johnson	
Devin Murray	
Karina Bakhchinyan	

**Anatomy of Trust and Estate Litigation – Disputes, Nuts and Bolts of TEDRA and ADR Plus Case Law and Statutory Updates  
(Part of Part of Planning Outside the Box: State Specific Issues  
for Washington Estate Planners 12/8/2017)**

Rodman Miller	
Gail Mautner	
Harold Prukop	
Ann Fleck	
Judith Miller	
Stephanie Taylor	
Thomas Gates	
Walter Impert	
Jessica Allen	
Jessica Breitbarth	
James Brown	
Sandra Cairns	
David Bentsen	
Tiffany Gorton	
Todd Kimball	
Sharon Wilcoxon	
Aydin Firuz	
Lauren McCray	
Paul Barrera	
M. Kelly	
John Ennis	
Toby Thaler	
Jack Borland	
Julia Lindeman	
Jamie Aten	
Jerry BIRD	
Levi Liljenquist	
Phillip Long	
dave bayley	
Jack Miller	
Darnell Nelson	
Susan Teel	
Micheal Imboden	
Sara Hulford	
Brent Dille	
Katharine Brereton	
Mary Pfaff-Pierce	
gary tudor	
Susan Fairchild	
Richard Levenson	
Karen Malella-Manker	
James Jackson	
Julie Dickens	
Sabrina Lai	
Kathryn Higgs	
Vicki Mitchell	
John M Davis Jr	

Megan Gebhardt	
Thomas Doumit	
Eric Jeppesen	
Scott Snyder	
Stephen Fisher	
kathy tierney	
RICHARD ALGEO	
Mary McHugh	
Charles Sage	
Megan Gebhardt	
Alan L Montgomery	
Lenard Wittlake	
Russ Speidel	
Rachel Merrill	
Richard Padden	
Gerald Tarutis	
Ann Fleck	
Ryan Neal	
janey mccauley	
Steve Carroll	
Karin McMichael	
darnell Nelson	

**Recent Changes in Estate Planning 17793 (Part of The  
Washington Law and Practice Refresher Course Day 2  
3/17/2017)**

John Gray	
William Dempster	
Sachi Wilson	
Marjorie Schaer Gray	
Susan Kim	
Teresa Stanberry	
Barnaby Zall	
Richard M. Barney, Jr.	
A. Graham Greenlee	
Frank Morris	
James Miller	
Janice Moore	
kenneth grover	
Lisette Carter	
Marlene Kaplan	
Heather Gardner	
Helen Cooley	
Catherine Kelley	
Jeanie Lee	
Jared Bellum	

John Kincaide	
John Eyink	
Michael Miller	
Kathy Rall	
James Santoro	
James Swope	

<b>Trusts and Estates: Annual Case Law and Legislative Update 14498 (Part of 11th Annual Trust &amp; Estate Litigation 5/7/2014)</b>	
Robert Hailey	
Peter Goddu	
Hugh Spall	
Michael Higgins	
Richard Miller	
Gretchen Brevig	
James Hennessey	
Nathan Hayes	
J. Quinn	
Kimberly Harlington	
Nancy Wright	
Stanbery Foster	
Mark Vohr	
Janissa Strabuk	
Therese Greenen	
Barry Meyers	
David Jones	
Stuart Morgan	
Dwayne Fowles	
Isaac Anderson	
Craig Lindsay	
Saphronia Young	
Dubs Herschlip	
Kevin Copp	
Kelly Kenn	
Theodore Vanden-Bosch	
Brian Gerst	
Lisa Malpass Childress	
Dalynne Singleton	
Max Spring	
Mary McHugh	
Nicholas Kovarik	
Radhika Moolgavkar	
Lisa Marie Graefin von der Schulenburg	
Johanna Coolbaugh	
John Yu	

Denise Gorrell	
Gregory Noone	
David Webster	
Jill Mullins	
Roselee Simkins	
Winston Matthews	
Ingrid McLeod	
Ellen Jackson	
Nick Dupont	
Eva Luchini	
Andrew Mazzeo	
Jesse Burnham	
Gary Libey	
Alan Montgomery	
Thomas Nast	
Mary Julin	
Linda Collier	
James Handmacher	
J. Benson	
David Leshner	
Christon Skinner	
Marion (Ted) Knauss	
Joseph Vincent	
Sandrin McEwan	
John Holmes	
Henry Grenley	
Barbara Coster	
Robert Curran	
A. Kyle Johnson	
David Nelson	
Scott Ellerby	
Carol Vaughn	
Kathleen Wareham	
Scott Winship	
Karen Treiger	
Peter Triandafilou	
Walter Sinsheimer	
David Hammermaster	
Seanna Bodholt	
Linda Kemmerer	
Quentin Wildsmith	
Hartley Paul	
Laurel Monlux	
Scott Feir	
Darcy Roennfeldt	
Geir Jonsson	
Lori Rath	



John Sherwood	
Wendy Rocke	
Karolyn Hicks	
Elizabeth Stephan	
Jason Dennett	
Vanessa Power	
Eric Nelsen	
Stephanie Taylor	
Kasey Huebner	
Eric Stoll	
Mathew Harrington	
Richard Oettinger	
Adrienne McEntee	
Sean Russel	
Karen Cobb	
Andrew Rapp	
Charles Shillito	
Kristen Fisher	
Josephine Lai	
Matthew Tilghman-Havens	
Benjamin Kelly	
Tyler Hotchkiss	
Lisa Kremer	
Christopher Henderson	
Olivia Gonzalez	
Justin Elder	
Carla Calogero	
F Findley	
Ali Higgs	
Jeffrey Dore	
Holly Henson	
Seth Lubin	
Kimberly LaDuca	
John Clees	
Margaret McCartney	
Ivan Landreth	
Michael Hunsinger	
Thomas Keller	
Eric Olson	
Joseph Daggy	
Randy Boyer	
Kurt Lichtenberg	
Dennis Walters	
Deborah J. Phillips	
Carl J. Carlson	
Thomas M. Fitzpatrick	
Bruce R. Moen	

Hon. Eric B. Watness, Ret.	
Hon. Michael J. Trickey	
Hon. Carlos Y. Velategui	
Stew Cogan	
Amy E. Tucker	
Sheila Ridgway	
Gail E. Mautner	
Ann T. Wilson	
Page B. Ulrey	

# EXHIBIT 003

Search for legal issues  
Search for legal issues

For help near (city, ZIP code or  
county)

For help near (city, ZIP code or county)



[LAWYER DIRECTORY](#)

HENRY H JUDSON III

Seattle, WA

[HENRY H. JUDSON, III](#)



Henry H  
Judson III  
- Seattle,  
WA

Suite 602  
101 Yesler Way  
Seattle, WA  
98104 - 2580

Henry H.  
Judson, III

★★★★★ 2 reviews(206)

Write A Review

292-  
2156

## Map Location



## How Do I Choose A Lawyer?

Consider the following:

**Comfort Level** - Are you comfortable telling the lawyer personal information? Does the lawyer seem interested in solving your problem?

**Credentials** - How long has the lawyer been in practice? Has the lawyer worked on other cases similar to yours?

**Cost** - How are the lawyer's fees structured - hourly or flat fee? Can the lawyer estimate the cost of your case?

**City** - Is the lawyer's

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## Reviews



By mark d. on Nov. 18, 2021



Commissioner Henry Judson is a wolf in sheeps clothing and is a total fraud.. the only thing he delivers is anarchy and misjustice which in turn is a threat to justice everywhere ...without the law we wouldn't see evil and I just saw it today with Mr Henry Judson ...with people like him in charge I see why we are in turmoil in America today & with that I leave you with a quote by Martin Luther King Jr (A MISS JUSTICE ANYWHERE IS A THREAT TO JUSTICE EVERYWHERE )

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Value



Quality Of Service



Professional Competence



## Not Sure What Questions To Ask A Lawyer?

Here are a few to get you started:

- How long have you been in practice?
- How many cases like mine have you handled?
- How often do you settle cases out of court?
- What are your fees and costs?
- What are the next steps?

## Want To Check Lawyer Discipline?

It is always a good idea to research your lawyer prior to hiring. Every state has a disciplinary organization that monitors attorneys, their licenses, and consumer complaints. By [researching lawyer discipline](#) you can:

- Ensure the attorney is currently licensed to practice in your state



By Gayle H. on Jul. 02, 2019



This guy should be in jail he is in collusion with other attorneys that are lying under oath in order to attain my Aunt Eunie's \$\$ & HOUSE and HE IS RESOPNSIBLE FOR KEEPING MY 94 YEAR OLD AUNT PRISONER IN HER OWN HOME WITH ALL OF THEM SUCKING HER \$\$\$\$\$\$\$\$\$\$ HE SHOULD BE REMOVED FROM ALL COURTS AND SHOULD BE HIMSELF IN JAIL

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nis or ner historical disciplinary record, if any.

- Determine the seriousness of complaints/issues which could range from late bar fees to more serious issues requiring disciplinary action.

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# APPENDIX



## **Appendix of Authorities and Violations Cited**

### **California Probate Code Violations**

- California Probate Code § 3
- California Probate Code § 17206
- California Probate Code § 15642
- California Probate Code § 4204

## State of California

### PROBATE CODE

#### Section 3

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3. (a) As used in this section:

(1) “New law” means either of the following, as the case may be:

(A) The act that enacted this code.

(B) The act that makes a change in this code, whether effectuated by amendment, addition, or repeal of any provision of this code.

(2) “Old law” means the applicable law in effect before the operative date of the new law.

(3) “Operative date” means the operative date of the new law.

(b) This section governs the application of a new law except to the extent otherwise expressly provided in the new law.

(c) Subject to the limitations provided in this section, a new law applies on the operative date to all matters governed by the new law, regardless of whether an event occurred or circumstance existed before, on, or after the operative date, including, but not limited to, creation of a fiduciary relationship, death of a person, commencement of a proceeding, making of an order, or taking of an action.

(d) If a petition, account, report, inventory, appraisal, or other document or paper is filed before the operative date, the contents, execution, and notice thereof are governed by the old law and not by the new law; but any subsequent proceedings taken after the operative date concerning the petition, account, report, inventory, appraisal, or other document or paper, including an objection or response, a hearing, an order, or other matter relating thereto is governed by the new law and not by the old law.

(e) If an order is made before the operative date, including an order appointing a personal representative, guardian, conservator, trustee, probate referee, or any other fiduciary or officer, or any action on an order is taken before the operative date, the validity of the order or action is governed by the old law and not by the new law. Nothing in this subdivision precludes proceedings after the operative date to modify an order made, or alter a course of action commenced, before the operative date to the extent proceedings for modification of an order or alteration of a course of action of that type are otherwise provided by statute.

(f) No personal representative, guardian, conservator, trustee, probate referee, or any other fiduciary, officer, or person is liable for any action taken before the operative date that was proper at the time the action was taken, even though the action would be improper if taken on or after the operative date, and such a person has no duty, as a result of the enactment of the new law, to take any step to alter the course of action or its consequences.

(g) If the new law does not apply to a matter that occurred before the operative date, the old law continues to govern the matter notwithstanding its amendment or repeal by the new law.

(h) If a party shows, and the court determines, that application of a particular provision of the new law or of the old law in the manner required by this section or by the new law would substantially interfere with the effective conduct of the proceedings or the rights of the parties or other interested persons in connection with an event that occurred or circumstance that existed before the operative date, the court may, notwithstanding this section or the new law, apply either the new law or the old law to the extent reasonably necessary to mitigate the substantial interference.

(Enacted by Stats. 1990, Ch. 79.)

**State of California**

**PROBATE CODE**

**Section 17206**

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17206. The court in its discretion may make any orders and take any other action necessary or proper to dispose of the matters presented by the petition, including appointment of a temporary trustee to administer the trust in whole or in part.

(Enacted by Stats. 1990, Ch. 79.)

**State of California**

**PROBATE CODE**

**Section 15642**

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15642. (a) A trustee may be removed in accordance with the trust instrument, by the court on its own motion, or on petition of a settlor, cotrustee, or beneficiary under Section 17200.

(b) The grounds for removal of a trustee by the court include the following:

(1) Where the trustee has committed a breach of the trust.

(2) Where the trustee is insolvent or otherwise unfit to administer the trust.

(3) Where hostility or lack of cooperation among cotrustees impairs the administration of the trust.

(4) Where the trustee fails or declines to act.

(5) Where the trustee's compensation is excessive under the circumstances.

(6) Where the sole trustee is a person described in subdivision (a) of Section 21380, whether or not the person is the transferee of a donative transfer by the transferor, unless, based upon any evidence of the intent of the settlor and all other facts and circumstances, which shall be made known to the court, the court finds that it is consistent with the settlor's intent that the trustee continue to serve and that this intent was not the product of fraud or undue influence. Any waiver by the settlor of this provision is against public policy and shall be void. This paragraph shall not apply to instruments that became irrevocable on or before January 1, 1994. This paragraph shall not apply if any of the following conditions are met:

(A) The settlor is related by blood or marriage to, or is a cohabitant with, any one or more of the trustees, the person who drafted or transcribed the instrument, or the person who caused the instrument to be transcribed.

(B) The instrument is reviewed by an independent attorney who (1) counsels the settlor about the nature of their intended trustee designation and (2) signs and delivers to the settlor and the designated trustee a certificate in substantially the following form:

**“CERTIFICATE OF INDEPENDENT REVIEW**

I, \_\_\_\_\_, have reviewed  
(attorney's name)

\_\_\_\_\_ and have counseled my client,  
(name of instrument)

\_\_\_\_\_, fully and privately on the nature and  
(name of client)

legal effect of the designation as trustee of \_\_\_\_\_  
(name of trustee)

contained in that instrument. I am so disassociated from the interest of the person named as trustee as to be in a position to advise my client impartially and confidentially as to the consequences of the designation. On the basis of this counsel, I conclude that the designation of a person who would otherwise be subject to removal under paragraph (6) of subdivision (b) of Section 15642 of the Probate Code is clearly the settlor's intent and that intent is not the product of fraud, menace, duress, or undue influence.

”

\_\_\_\_\_  
(Name of Attorney)

\_\_\_\_\_  
(Date)

This independent review and certification may occur either before or after the instrument has been executed, and if it occurs after the date of execution, the named trustee shall not be subject to removal under this paragraph. Any attorney whose written engagement signed by the client is expressly limited to the preparation of a certificate under this subdivision, including the prior counseling, shall not be considered to otherwise represent the client.

(C) After full disclosure of the relationships of the persons involved, the instrument is approved pursuant to an order under Article 10 (commencing with Section 2580) of Chapter 6 of Part 4 of Division 4.

(7) If, as determined under Part 17 (commencing with Section 810) of Division 2, the trustee is substantially unable to manage the trust's financial resources or is otherwise substantially unable to execute properly the duties of the office. When the trustee holds the power to revoke the trust, substantial inability to manage the trust's financial resources or otherwise execute properly the duties of the office may not be proved solely by isolated incidents of negligence or improvidence.

(8) If the trustee is substantially unable to resist fraud or undue influence. When the trustee holds the power to revoke the trust, substantial inability to resist fraud or undue influence may not be proved solely by isolated incidents of negligence or improvidence.

(9) For other good cause.

(c) If, pursuant to paragraph (6) of subdivision (b), the court finds that the designation of the trustee was not consistent with the intent of the settlor or was the product of fraud or undue influence, the person being removed as trustee shall bear all costs of the proceeding, including reasonable attorney's fees.

(d) If the court finds that the petition for removal of the trustee was filed in bad faith and that removal would be contrary to the settlor's intent, the court may order that the person or persons seeking the removal of the trustee bear all or any part of the costs of the proceeding, including reasonable attorney's fees.

(e) If it appears to the court that trust property or the interests of a beneficiary may suffer loss or injury pending a decision on a petition for removal of a trustee and any appellate review, the court may, on its own motion or on petition of a cotrustee or

beneficiary, compel the trustee whose removal is sought to surrender trust property to a cotrustee or to a receiver or temporary trustee. The court may also suspend the powers of the trustee to the extent the court deems necessary.

(f) For purposes of this section, the term “related by blood or marriage” shall include persons within the seventh degree.

(Amended by Stats. 2020, Ch. 36, Sec. 43. (AB 3364) Effective January 1, 2021.)

## **State of California**

### **PROBATE CODE**

#### **Section 4204**

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4204. An attorney-in-fact is entitled to reasonable compensation for services rendered to the principal as attorney-in-fact and to reimbursement for reasonable expenses incurred as a result of acting as attorney-in-fact.

(Added by Stats. 1994, Ch. 307, Sec. 16. Effective January 1, 1995.)