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HONORABLE HENRY JUDSON
Hearing Date: April 20, 2023

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

CHARLES A. HAROLD, JR., on behalf of
Vulnerable Adult SHARON M. HAROLD,

Petitioner,

vs.

DAVID ALLEN PAICE,

Respondent.

Case No. 23-2-03980-7 KNT

**PETITIONER'S REPLY IN SUPPORT
OF PETITION FOR PROTECTION
ORDER**

**I. RESPONDENT'S TEDRA PETITION IS LITIGIOUS AND SHOULD BE
DISMISSED WITH PREJUDICE.**

Ironically, when Respondent was asked for an Accounting of the Trust in April 2022, he could have simply resigned and none of his fiduciary breaches would have been discovered because the successor trustee could have accepted "as conclusive any accounting and statement of assets furnished to such successor by his/her predecessor," as stated in Article V.C. of the Trust instrument.

However, Respondent elected instead to be "hoisted with one's own petard," victimized by his own scheme, and now cries foul before the TEDRA Court using his constructed, litigious legal proceeding in an attempt to ratify his malfeasance and penalize Protected Party Sharon M. Harold ("PP").

Why does Petitioner and PP believe this? We turn to the words of Respondent's

1 wife, Briana Paice, in a comment she made to her aunt Harmony Harold. (See
2 Declaration of Harmony Harold.)

3 "My daughter just died, and they're checking out my fucking house? I will
4 tie up every penny of that trust and no one will get anything."

5 Why does Petitioner believe Respondent's wife could tie up every penny of
6 PP's Trust? Respondent told us as much when he said in a text, "I'll have Briana
7 call you to coordinate she does all the money stuff." (Ex. 1.)

8 Why does Petitioner and PP believe Respondent, his wife, mother-in-law and
9 attorneys have engaged in a coordinated effort to defeat the "primary purpose" of the
10 Trust? This is demonstrated in the attached document, a chronology of events in this
11 case that comingles phone calls, text messages, emails and other information. We
12 draw the Courts attention to June 14, 2022 wherein Respondent participated in having
13 PP's daughter Amy Jane Small removed from power of attorney. (Ex. 2.) On this
14 same date, June 14, 2022, Respondent lists a charge to the "Integrity Law Firm" in his
15 2022 Accounting of Trust but provides no receipt to verify the charge.

16 Why is Petitioner's sister, Respondent's mother-in-law, Jenifer (Harold) Sawyer
17 silent in all this when she could be helping PP? The Reedsport Police Department
18 provided us with a partial explanation from the transcript of a disturbance call at PP
19 residence on September 4, 2023. Audio file is available upon request.

20 "This is Sharon Baugh. There was an incident with my neighbor, and I'm
21 worried about her and I didn't know what to do about, you know, there was
22 a car that came in there earlier this morning...She's just across the street,
23 here in the River Road mobile homes. And anyway, they got in just awful
24 loud arguments for quite a while. And he was telling her, the one lady that,
25 there was a lot of foul language, there was a lot of this and that...The
26 problem is, this lady has taken off with her...Well they were fighting all
27 morning and then she got her and was trying to take her into her car and
28 take off and she wouldn't get into her car...Should I come down maybe
and just make a report? I'm worried about this lady. But I don't know, you
know. I know that it must have been a relative just from the talks they were
doing...But it was down to **"I hate you. I'm going to kill you" and then
she said, "You want me dead?"** And it just and then they took off and
so, they're not back and I just keep worrying[.]"

What was Respondent's mother-in-law Jeni doing at PP's home on September

1 4, 2023? Jeni's sister, Josette Harold Ramirez, provides an answer in her sworn
2 declaration filed concurrently herewith, which states:

3 "On September 4, 2022, my sister, Jenifer (Harold) Sawyer, and I
4 were having a conversation on the phone. She told me she was at
5 our Mom's house looking through some papers. I asked her, "What
6 are you looking at?" Jeni told me that she was going through all of
7 Mom's mail and legal paperwork that had to do with the Trust. I then
8 asked Jeni, "Why are you doing that? Isn't that illegal or something?
Jeni then told me that she was taking pictures of some documents
and removing copies of others just in case the "Evil Siblings"
(referring to my brothers and sisters Charlie Harold, John Harold,
Amy (Harold) Small and Angel Harold) decided to change or hide
something."

9 One of the perplexing discoveries in this case is the fact that the TEDRA Court
10 believes PP is deceased and for the past several weeks has listed as such in the
11 Court docket. (Ex. 3.)

12 To put the Protection Order case in layperson's terms, a Grandson
13 (Respondent/Trustee) is suing his Grandma (Protected Party/Grantor) and using her
14 Trust money to do so simply because Grandma asked Grandson for an accounting of
15 her Trust, which Grandson as Trustee had not done in 12 years. (*See In re Sharon M.*
16 *Harold*, Case No. 22-4-08326-1 KNT.) Grandson threatened to spend Grandma's
17 Trust money on litigation if she did not sign a release of liability for Grandson's
18 accounting. (Ex. 4.) This was not a voluntary release and therefore in violation of
19 California Probate Code § 16004.5, which states:

20 (a) *A trustee may not require a beneficiary to relieve the trustee of liability*
21 *as a condition for making a distribution or payment to, or for the benefit*
22 *of, the beneficiary, if the distribution or payment is required by the trust*
instrument.

23 In violation of Section 16004.5, Respondent denied PP Trust funds for her own
24 attorney fees to defend herself in the TEDRA action even after she asked for them
25 numerous times. (Ex. 5.) Respondent's denial of trust funds for PP to retain a lawyer
26 is also a violation of RCW 9A.56.130.

27 Respondent and his lawyers tried to have a LGAL appointed for PP because
28 they claimed she was mentally incompetent. Their motion was denied. (Ex. 6.)

1 In Respondent's second Motion for Continuance of Trial in the TEDRA matter,
2 (the first was denied), PP and the beneficiaries did not file any opposition because
3 they wanted to save PP Trust money since Respondent is paying his attorney's fees
4 and costs with PP's Trust money. Respondent's lawyers filed an unnecessary 6-page
5 reply brief to an unopposed motion (Ex. 7.)

6 After approximately 10 months of writing letters and filing motions,
7 Respondent's attorneys have billed approximately \$141,000 which Respondent has
8 paid with PP's Trust money to attack PP in an attempt to confuse the Court and hide
9 his malfeasance; none of which has anything whatsoever to do with his Accounting of
10 Trust. (Ex. 8.)

11 Last week, the TEDRA matter was set for trial in November. At this late point in
12 PP's life, there is no time to replenish the Trust account with additional funds, which
13 she needs now. By the time this matter goes to trial in November, there will be
14 insufficient funds for PP's future living and medical expenses. Respondent and his
15 lawyers will continue filing motions, propounding discovery, and churning their attorney
16 fees until there are no funds left for its original purpose, which is to take care of PP.

17 This Court granted Petitioner's Motion to Strike Respondent's Opposition to
18 Petition for Protective Order as untimely and instructed Respondent's counsel to
19 resubmit those documents. For some reason, these stricken documents remain on
20 the docket, and Respondent's counsel, knowing full well that those documents were
21 stricken, ignored this Court's decision and took another bite at the apple with a
22 Supplemental Opposition along with additional declarations from Mr. Schilbach and
23 Respondent. Another example of Respondent and his lawyer's complete disregard
24 for PP's financial situation.

25 **II. RESPONDENT MAY NOT USE PROTECTED PARTY TRUST TO PAY HIS**
26 **ATTORNEY'S FEES.**

27 TEDRA stands for the Trust, Estate, Dispute Resolution Act., but Petitioner
28 questions, "What dispute?" The only "dispute" was the one artificially constructed by

1 Respondent when he was asked to fulfill his fiduciary duty and provide an accounting
2 of the Trust so PP could be placed in assisted living. Respondent has an affirmative
3 duty to do so as stated in the Trust instrument.

4 *“ARTICLE II DISTRIBUTION OF INCOME AND PRINCIPAL DURING*
5 *GRANTOR'S LIFETIME - B. INCAPACITY ...the Trustee shall apply for*
6 *the Grantor's benefit the amounts of net income and principal necessary*
7 *or desirable in the Trustee's discretion for the Grantor's health, support,*
8 *tax obligations, comfort, enjoyment, and welfare.”*

8 In the TEDRA matter, the legal filing lists Respondent as the “Petitioner” and PP
9 as the Respondent. In actuality, Respondent is using the TEDRA court as an
10 instrument to defend himself for his numerous breaches of fiduciary duty and possibly
11 criminal acts, disguising his actions as a champion for the Trust.

12 Common sense dictates that a trustee cannot use trust funds to defend himself
13 in a legal action for breaching his fiduciary duties because when a trustee breaches
14 his fiduciary duty, he is liable to the very same trust and its beneficiaries for any
15 damages that result from that breach. Tendering his own self-serving defense is a
16 clear conflict of interest.

17 Had Respondent not denied PP her own Trust funds, she would have hired an
18 attorney and Respondent would have easily been removed as Trustee under
19 California Probate Code § 17200(a), which states:

20 *(a) Except as provided in Section 15800, a trustee or beneficiary of a*
21 *trust may petition the court under this chapter concerning the*
22 *internal affairs of the trust or to determine the existence of the trust.*

22 Lane Powell saw access to a substantial pool of trust money, and they have
23 tried to justify taking it by narrowly interpreting the Trust, using select paragraphs,
24 words and Washington statutes as a legal pretext, despite the clear statement in the
25 Trust that California law dictates. The TEDRA proceeding is frivolous, unnecessary
26 and abusive, and the definition of financial elderly abuse. PP needs protection from
27 Lane Powell as well.

28 In determining whether Trust money can be used to pay legal fees, the issue is

whether Respondent's legal defense (camouflaged as a benevolent TEDRA proceeding) is a personal benefit to Respondent individually or whether it is in fulfillment of the primary objective of the Trust: to provide for PP. To answer this issue, we turn the Court's attention to the Trust instrument itself and California Probate Code.

The Trust in Article IV states:

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.

California Probate Codes regarding the administration of a trust can be found at Sections 16000-16504. The following California Probate Codes help us understand how the Trust instrument operates.

ARTICLE 1. Trustee's Duties in General

16004(a). The trustee has a duty not to use or deal with trust property for the trustee's own profit or for any other purpose unconnected with the trust, nor to take part in any transaction in which the trustee has an interest adverse to the beneficiary.

ARTICLE 1. Liability for Breach of Trust

16400. *A violation by the trustee of any duty that the trustee owes the beneficiary is a breach of trust.*

ARTICLE 2. Remedies for Breach of Trust

16420. (a) If a trustee commits a breach of trust, or threatens to commit a breach of trust, a beneficiary or co-trustee of the trust may commence a proceeding for any of the following purposes that is appropriate:

- (1) To compel the trustee to perform the trustee's duties.
- (2) To enjoin the trustee from committing a breach of trust.
- (3) To compel the trustee to redress a breach of trust by payment of money or otherwise.
- (4) To appoint a receiver or temporary trustee to take possession of the trust property and administer the trust.
- (5) To remove the trustee.
- (6) Subject to Section 18100, to set aside acts of the trustee.
- (7) To reduce or deny compensation of the trustee.
- (8) Subject to Section 18100, to impose an equitable lien or a constructive trust on trust property.
- (9) Subject to Section 18100, to trace trust property that has been wrongfully disposed of and recover the property or its proceeds.

1 (b) The provision of remedies for breach of trust in subdivision (a) does
2 not prevent resort to any other appropriate remedy provided by statute
or the common law.

3 California probate law clearly describes how to read and interpret a trust
4 instrument. California Probate Code § 21120 states:

5 The words of an instrument are to receive an interpretation that will give
6 every expression some effect, rather than one that will render any of the
expressions inoperative. Preference is to be given to an interpretation of
7 an instrument that will prevent intestacy or failure of a transfer, rather than
one that will result in an intestacy or failure of a transfer.

8 In addition, California Probate Code § 21122 states:

9 All parts of an instrument are to be construed in relation to each other and
10 so as, if possible, to form a consistent whole. If the meaning of any part of
an instrument is ambiguous or doubtful, it may be explained by any
11 reference to or recital of that part in another part of the instrument.

12 Finally, California Probate Code § 21121 states:

13 The words of an instrument are to be given their ordinary and grammatical
14 meaning unless the intention to use them in another sense is clear and
their intended meaning can be ascertained. Technical words are not
15 necessary to give effect to a disposition in an instrument. Technical words
are to be considered as having been used in their technical sense unless
16 (a) the context clearly indicates a contrary intention or (b) it satisfactorily
appears that the instrument was drawn solely by the transferor and that
17 the transferor was unacquainted with the technical sense."

18 The primary purpose of the Trust is stated in Article IV:

19 The primary purpose of the Trust shall be to provide for the Grantor,
20 (Sharon) and the rights and interests of remaindermen are subordinate
and incidental to that purpose. To that end all the provisions governing the
21 Trust shall be construed liberally in the interest of and for the benefit of the
Grantor."

22 The many powers of the Trustee (Respondent) are also listed in Article IV of the
23 Trust instrument.

24 C. CHARGES TO TRUST ESTATE All property taxes, assessments, fees,
25 charges and other expenses incurred by the Trustee in the administration
or protection of this Trust, including the compensation of the Trustee, shall
26 be a charge upon the Trust Estate and shall be paid by the Trustee.

27 Respondents failed in his duty to administer and protect the Trust when he
28 failed to provide PP an accounting for 12 years, therefore he may NOT use Trust

1 funds to defend his malfeasance.

2 F. POWERS OF THE TRUSTEE

3 To carry out the purposes of the Trust, and subject to any limitation stated
4 elsewhere herein, the Trustee and any successor Trustee are hereby
5 vested with the following powers and discretions, in addition to those now
or hereafter conferred by law:

6 11. To employ counsel to assist and advise in the management,
7 preservation and administration of the Trust Estate; and to compromise,
8 arbitrate, settle, or litigate any matters pertaining thereto. The Trustee
shall pay reasonable compensation therefor, and the same shall be
charged against income and/or principal in such manner as the Trustee
shall deem just and equitable.

9 “[M]anagement, preservation and administration of the Trust Estate:” are active
10 verbs, ongoing acts carried out in the present or planned for in the future, not the past.
11 Failing to provide an accounting for 12 years is not “management” of the Trust; it is the
12 definition of mismanagement. Respondent has hired an attorney to advise him on his
13 past mistakes, his past breaches of fiduciary duty which are in direct conflict with the
14 primary purpose of the Trust: “to provide for [PP],” and therefore a personal benefit to
15 him, not the Trust.

16 Respondent had a duty to “to compromise, arbitrate, settle, or litigate any
17 matters pertaining thereto.” Petitioner, PP and the beneficiaries filed no claim,
18 litigation, cause of action, or challenge of any kind which contests or questions the
19 validity of the Trust or a trustee's authority to act on behalf of the Trust. PP and PP's
20 daughter under her full power of attorney simply asked Respondent to fulfill his
21 fiduciary duty under California Probate Code 16062. Filing a TEDRA petition to
22 “litigate” AGAINST PP (Grantor) violates “the primary purpose of the Trust shall be to
23 provide for the Grantor.”

24 What has Respondent received for approximately \$141,000 in attorney fees to
25 date? His TEDRA petition has been sent to trial, his motions have been denied, his
26 malfeasance exposed and his attorney has now exposed him to potential criminal
27 liability. Therefore, the attorney fees Lane Powell has billed Respondent and paid from
28 PP's Trust is hardly “reasonable compensation therefor.”

1 Another duty of Respondent as Trustee in the Trust, states::

2 16. To do all other acts and things whatsoever that an absolute owner of
3 such property could do and perform in his/her own right as the Trustee
4 shall deem to be for the best interests of the Trust hereunder and the
beneficiaries thereof.

5 Let's assume Respondent was acting as the PP (Grantor) "*could do and*
6 *perform in his/her own right.*" How can Respondent "*deem*" his many fiduciary
7 breaches "*to be for the best interests of the Trust hereunder and the beneficiaries*
8 *thereof.*" Could or would PP ever sue herself to release herself from liability for not
9 providing an accounting of the Trust for 12 years?

10 18. All discretions in this Trust conferred upon the Trustee shall, unless
11 specifically limited, be absolute and its exercise conclusive on all persons
12 interested in this Trust or the Trust Estate. The enumeration of certain
13 powers and discretions of the Trustee is not to be construed as limiting the
14 Trustee's general powers and discretions, the Trustee being vested with
and having, as to the Trust Estate, and in the execution of the trusts
created herein, all the powers and discretions that an absolute owner of
property has or may have.

15 All Respondent's acts of malfeasance, meticulously documented in the
16 evidence presented to the TEDRA and Protection Courts are actions outside his
17 fiduciary duties as Trustee and NOT done in the interest of PP or for benefit of the
18 Trust. Therefore, Respondent taking and using over \$141,000 of PP's Trust funds
19 should be considered personal income of Respondent and thus taxable income.

20 Respondent knew his use of Trust funds to pay his attorney was "objectively
21 unreasonable" but proceeded with taking the money anyway in a malicious attempt to
22 get back at PP for challenging his accounting, and for his family members questioning
23 his lifestyle that objectively appears to exceed his personal income level.

24 **III. RESPONDENT IS NOT A LEGITIMATE TRUSTEE .**

25 Examining the following chronological history of the original Trustee of the
26 Sharon M. Harold Irrevocable Trust, the appointment of Respondent as the successor
27 Trustee is highly questionable at best.

1 **December 2, 2009 to March 19, 2010** – Robert Hatch, a professional Trustee,
2 resigned as Trustee of Sharon’s Trust and over the course of the next several
3 months initiated a series of detailed letters and emails to document his transfer
4 of Trust assets to David Llewelyn, Sharon’s accountant. Hatch followed the
5 trust instrument and Probate Code in doing so. Respondent has NOT followed
6 this procedure. (Ex. 9.)

7 **February 17, 2010, 1:51 PM** – A document entitled “Acceptance of David Allen
8 Paice to Act As Successor Trustee of the Sharon M. Harold Irrevocable Trust
9 dated November 12, 2004” (“Acceptance”) was faxed to respondent. The
10 Acceptance listed David Paice as First Trustee then a nominee of Paice as the
11 Second Trustee then Joseph C. Chrisman as the Third Trustee and finally a
12 nominee of Joseph Chrisman as the Fourth Trustee. (Ex. 10.) The Acceptance
13 document lacks certain characteristics of authenticity.

- 14 1) Respondent did not provide IRS Form 56, used to notify the IRS of the
15 creation or termination of a fiduciary relationship under section 6903 and
16 provide the qualification for the fiduciary relationship under section 6036.
- 17 2) The Acceptance document is not page numbered, so it is unclear if it
18 constitutes the entire document; it has not been accepted or recognized by a
19 California court or any court.
- 20 3) The Acceptance document is not dated.
- 21 4) The Acceptance document is not notarized as is the controlling Sharon M.
22 Harold Irrevocable Trust document itself.
- 23 5) No power of attorney was submitted by Respondent along with the
24 Acceptance document.
- 25 6) No receipts of Trust assets was passed from predecessor Trustee David
26 Llewelyn to Respondent for the transfer of assets in excess of \$500,000.
- 27 7) No petition for appointment of a successor Trustee was located in public
28 records searches of court documents.

1 8) Respondent did not provide notice to the beneficiaries of the Trust when he
2 took over as “acting” Successor Trustee, as required by Cal. Probate Code
3 § 1601.7(a)(2). That is a responsibility assigned specifically to a successor
4 Trustee.

5 It is difficult to imagine that ANY financial institution would accept this single
6 document as legitimate proof that Respondent was the verified Trustee of the Trust.

7 **IV. RESPONDENT’S OPENING “TRUST” ACCOUNT**
8 **STATEMENT IS HIGHLY QUESTIONABLE .**

9 Petitioner examined the opening account statement for the alleged “Trust”
10 account (Ex. 11) and found the following NEW discrepancies:

- 11 1) This BECU statement has no BECU logo on it as do other subsequent
12 statements.
- 13 2) The statement period is 3-10-2010 to 3-12-2010 and the “Opening Balance” is
14 \$0.00. The normal statement period is approximately 30 days, even if there is
15 zero activity.
- 16 3) The last line of page 1 of the BECU “Request to Open Revocable or Irrevocable
17 Trust Accounts” document reads, **“Trust Accounts are not eligible for**
18 **‘Member Advantage.’** However the rest of the trust application requires
19 information that Respondent did not possess without PP participation. She was
20 never consulted during the establishment of the “Trust” accounts so where did
21 Respondent obtain this information (Ex. 12 [relevant page only].)
- 22 4) It is not difficult to change the name of a bank account. All one’s needs to do is
23 login online and name your bank account something like, “The Sharon M.
24 Harold Irrevocable Trust” and the account looks like a “Trust” account as shown
25 in the following example of Petitioner’s personal bank account that is NOT a
26 trust account. (Ex. 13.)
- 27
28

1 **V. RESPONDENT HAD A JOINT BANK ACCOUNT WITH**
2 **PRODUCTIVE PARTY FOR 12 YEARS**

3 Respondent's attorney states that the USAA bank account was NOT a joint
4 bank account. USAA disagrees with him. (See Declaration of Amy Jane Small filed
5 concurrently herewith.)

6 **VI. RESPONDENT'S ACCOUNTINGS ARE UNCERTIFIABLE ON THEIR FACE**
7 **WITH NO SUPPORTING DOCUMENTS.**

8 Respondent submitted his original accountings in the TEDRA matter with no
9 supporting documents for 2010 through 2022. Yes, they all add up. However, neither
10 Petitioner nor any other beneficiary can verify that the numbers used in the accounting
11 are accurate. Unless the values can be matched to and verified by a financial
12 institution statement or a receipt, they are just meaningless numbers. Respondent
13 knows this and yet denies the ability of PP and this Court to verify his accountings by
14 not providing back up documentation like receipts. How is this behavior not malicious,
15 obstructive, and lacking clarity?

16 With his latest declaration, Respondent provided an accounting for 2022 yet for
17 backup documents he provided BECU and LPL Financial statements for 2023! This
18 does not make any sense. Why would Respondent provide backup statements for
19 2023 but omit backup documents for 2022? A perfect example of Respondent's lack
20 of clarification that creates confusion and a general sense of untrustworthiness.

21 Until Respondent's accounting can be verified, Respondent should not be
22 rewarded with immunity by ratifying his accounting because that would leave PP
23 without any recourse if any additional malfeasance or dishonesty is discovered.

24 **VII. ATTORNEY SCHILBACH IS A WITNESS IN THE TEDRA CASE.**

25 Yet, he continues to churn his attorney fees after being asked to stop. (Ex. 14.)

26 **VIII. CONCLUSION.**

27 For all the reason stated herein, Petitioner and PP respectfully request that:
28

- 1 1. This Court grant all the remedies requested in the Petition for Protective
- 2 Order;
- 3 2. Respondent be ordered to reimburse Protected Party all funds withdrawn
- 4 from any of Protected Party's accounts to pay for any and all fees
- 5 associated with the prosecution of the TEDRA matter in an amount to be
- 6 determined;
- 7 3. Respondent be ordered to reimburse Protected Party all funds withdrawn
- 8 from any of Protected Party's accounts to pay for any and all fees
- 9 associated with this proceeding in an amount to be determined; and
- 10 4. All further relief that this Court deems just and proper.

11
12 DATED: April 17, 2023

s/Charles A. Harold, Jr.

13 Charles A. Harold, Jr., Residual Beneficiary and
14 Respondent in pro se
15 1455 N. Tomahawk Rd.
16 Apache Junction, AZ 85119
Tel: 818-652-6400
E-mail: chuckharold@gmail.com

17 DATED: April 17, 2023

s/Sharon M. Harold

18 Sharon M. Harold, Vulnerable Adult
19 100 River Bend Rd. #103
20 Reedsport, OR 97467
Tel: (541) 662-1937
Email: smharold7@gmail.com

EXHIBIT 1

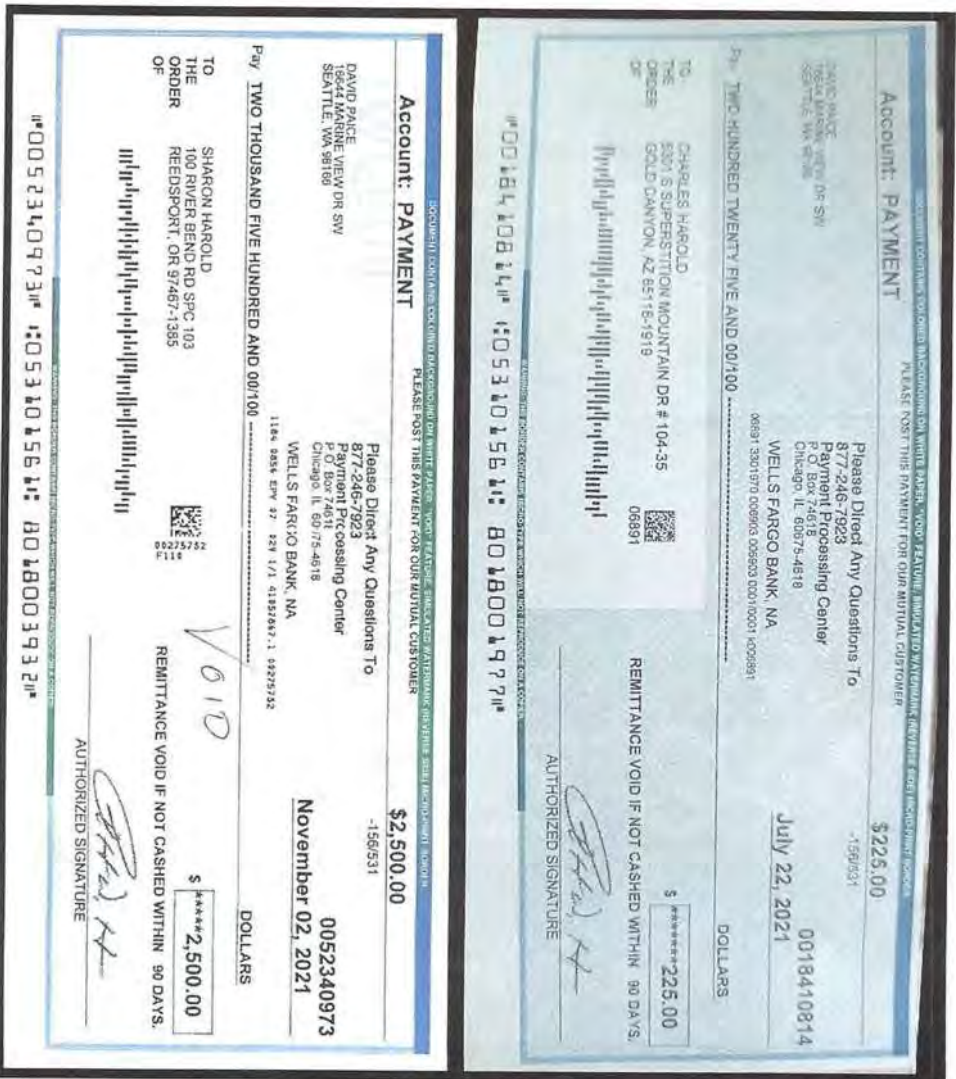
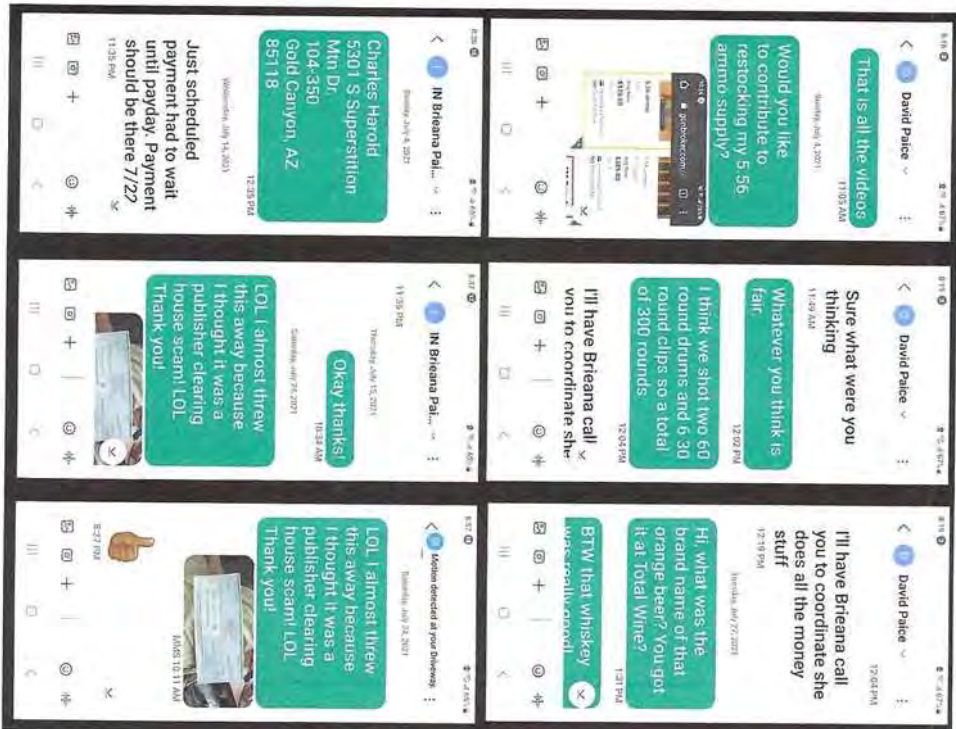


EXHIBIT 2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/25/2021 16:32	SHARON HAROLD TO/FROM	Microsoft Security Code Text	58419		Text / instant messaging Text /	
9/25/2021 16:36	SHARON HAROLD TO/FROM	Microsoft Security Code Text	51789		instant messaging Text /	
9/25/2021 16:36	SHARON HAROLD TO/FROM	Microsoft Security Code Text	51789		instant messaging Text /	
11/1/2021 12:16	SHARON HAROLD TO/FROM	Microsoft Security Code Text	51789		instant messaging Text /	
11/4/2021 22:08	SHARON HAROLD TO/FROM	Microsoft Security Code Text	58419		instant messaging Text /	
12/18/2021 13:55	SHARON HAROLD TO/FROM	Microsoft Security Code Text	51789		instant messaging Text /	
1/27/2022 20:38	SHARON HAROLD TO/FROM	Microsoft Security Code Text	58419		instant messaging Text /	
1/30/2022 17:25	SHARON HAROLD TO/FROM	Microsoft Security Code Text	58419		instant messaging Text /	
4/22/2022 23:19	SHARON HAROLD TO/FROM	Microsoft Security Code Text	58419		instant messaging Multimedi	
5/5/2022 11:27	SHARON HAROLD TO/FROM	Microsoft Security Code Text	51789		a messaging Text /	
5/10/2022 13:09	SHARON HAROLD TO/FROM	Microsoft Security Code Text	51789		instant messaging	
6/7/2022 8:33	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
6/7/2022 11:04	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	3
6/7/2022 15:14	Sharon & David Paice RESPONDENT's attorney Jeanne Kvale sent Amy a letter stating they no longer represent Sharon Harold and David Paice RESPONDENT due to a "conflict of interest."					
6/8/2022 10:44	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	9

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

6/8/2022 17:44	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	10
6/8/2022 18:49	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	19
6/8/2022 19:41	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
6/8/2022 20:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	10
6/9/2022 8:00	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 8:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	14
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
6/9/2022 17:12	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:13	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:15	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:15	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:17	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:17	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

6/9/2022 17:17	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:18	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:18	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/9/2022 17:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	27
6/9/2022 18:51	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	40
6/10/2022 7:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
6/10/2022 8:00	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	2
6/10/2022 13:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/10/2022 13:53	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/10/2022 15:40	SHARON HAROLD TO/FROM	ESQ Lane Powell Spear	206.223.6117	Incoming, CL	WIFI	1
6/10/2022 16:03	Silvia Webb of Lane Powell law firm sends Sharon an email with a letter attached. The letter is addressed to Amy Jane (Harold) Small, Sharon's POA. The letter tells Amy that David is now represented by Lane Powell and closes with; "Thank you for anticipated cooperation. We look forward to working with you, Ms. Sharon Harold, and the other residual beneficiaries of the Trust in a cooperative and productive manner." Sharon Harold was NOT represented by Lane Powell or any other attorney at					
6/10/2022 16:03	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	9
6/10/2022 18:15	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

6/11/2022 7:12	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	2
6/11/2022 8:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	3
6/11/2022 9:33	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	WIFI	12
6/11/2022 17:46	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
6/12/2022 9:13	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	5
6/12/2022 9:14	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Call Wait	WIFI	4
6/13/2022 8:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	4
6/13/2022 12:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
6/13/2022 16:13	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
6/13/2022 17:56	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	15
6/13/2022 19:18	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	28
6/13/2022 20:06	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	1
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 7:07	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

6/14/2022 9:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	3
6/14/2022 9:08	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
6/14/2022 9:35	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Call Wait	WIFI	6
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 12:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	10
6/14/2022 12:49	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	6
6/14/2022 13:36	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	10
6/14/2022	2:00 PM	Sharon Harold's calendar shows an appointment to see Esq. Roger Gould				
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 Gould Law Firm - Verified by Sharon's Google 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	Sharon leaves Gould Law Firm - Verified by Sharon's Google Map History. She calls David Paice RESPONDENT - Trustee & Sharon's grandson-in-law as she is leaving and speakes for 15 minutes					
6/14/2022 15:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	22

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

6/14/2022 15:53	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	5
6/14/2022 17:31	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	6
6/14/2022 19:09	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	12
6/14/2022 19:22	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
6/14/2022 19:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	5
6/15/2022 9:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/15/2022 9:34	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
6/15/2022 11:48	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Incoming, CL	WIFI	3
6/15/2022 15:59	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	11
6/16/2022 9:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/16/2022 10:21	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
6/16/2022 10:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
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
6/17/2022 11:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

6/17/2022 19:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	4
6/18/2022 8:02	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/18/2022 8:02	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	4
6/18/2022 8:07	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/18/2022 17:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	8
6/18/2022 18:11	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	4
6/19/2022 14:29	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	5
6/20/2022 9:10	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	4
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 9:35	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	8
6/21/2022 9:43	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Call Wait	WIFI	5
6/21/2022 9:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
6/21/2022 9:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	3

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

6/22/2022 0:00	Attorney Roger Gould signs letter revoking Amy's power of attorney					
6/22/2022 7:53	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
6/22/2022 9:02	Silvia Webb of Lane Powell sends Sharon an email with a letter attached from David's attorney Aleksander Schilbach. The letter is addressed to Amy Jane (Harold) Small, Sharon's daughter. The letter states: We are writing to update you on the accountings for the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust"). We have now obtained drafts of the trust accountings from the accountant and are in the process of reviewing the accountings and providing the accountant with our comments for finalizing them. We anticipate that the accountings will be completed either later this week or next week. Once we have the accountings completed, we will send the accountings to you and to those individuals authorized to receive them under California law." at the time this was sent, Lane Powell and David already knew Amy had been removed from POA that day					
6/22/2022 12:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	5
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 15:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
6/23/2022 16:00	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	7
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		Multimedi a messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

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	
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 16:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
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	
6/24/2022 19:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	2
6/25/2022 9:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
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 8:08	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
6/26/2022 12:36	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 Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

6/26/2022 17:45	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	4
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 7:59	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
6/27/2022 8:38	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
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 11:07	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	4
6/27/2022 11:16	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
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	
6/27/2022 19:21	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/27/2022 19:21	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

6/27/2022 19:21	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/27/2022 19:22	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/27/2022 19:23	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/27/2022 19:32	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
6/28/2022 8:20	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	5
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 9:30	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	19
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
6/29/2022 17:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	11
6/30/2022 15:41	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	1
7/1/2022 7:59	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	9

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

7/1/2022 13:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	5
7/1/2022 17:46	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	4
7/4/2022 13:42	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	6
7/6/2022 12:42	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	22
7/7/2022 10:14	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	3
7/7/2022 10:16	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Call Wait	WIFI	5
7/7/2022 12:22	Amy pickes up her letter revoking her power of attorney. This was not emailed to Amy.					
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 with Sharon Harold once, on July 7th in the afternoon.					
7/7/2022 0:00	Sharon M. Harold's Google Map history says she was home all day. Her calendars have no appoints that day with anyone.					
7/8/2022 10:00	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	3
7/8/2022 19:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
7/8/2022 20:53	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
7/11/2022 9:44	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma, WA	WIFI	3
7/11/2022 12:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma, WA	WIFI	2
7/11/2022 19:27	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma, WA	WIFI	2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

7/12/2022 16:33	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	8
7/12/2022 17:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	4
7/12/2022 18:29	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	2
7/12/2022 19:51	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma, WA	WIFI	12
7/13/2022 9:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma, WA	WIFI	18
7/13/2022 11:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
7/13/2022 11:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
7/13/2022 11:50	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
7/14/2022 9:58	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	6
7/14/2022 12:51	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	6
7/15/2022 11:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	6
7/15/2022 12:12	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	
7/15/2022 12:12	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	
7/15/2022 12:12	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	
7/15/2022 12:19	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

7/15/2022 12:34	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
7/15/2022 12:34	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedia messaging	
7/15/2022 16:03	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	4
7/15/2022 16:19	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
7/15/2022 16:39	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	6
7/15/2022 16:50	Attorney Aleksander Schilbach of Lane Powell sends Sharon M. Harold and email stating, "Good afternoon Ms. Harold, Attached please find a copy of correspondence of today's date in the above matter." The attachment was a letter emailed to Amy that said, "Dear Amy, Thank you for reaching out regarding the status of the accountings for the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust"). We anticipate that the CPA will deliver the final accountings for the Trust to us any day now. Once we receive the final accountings, we will send them to Ms. Sharon Harold and her attorney, if any, for their review and comment. At that point, and subject to any comments received from Ms. Harold and her attorney, we will provide them to those individuals entitled to the accountings under California law. Thank you for your continued cooperation." At the time, Lane Powell and David Paice RESPONDENT					
7/17/2022 13:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
7/17/2022 14:59	Gary Kirk Shareholder in LPL asks attorney Alec in the above email string, "Shouldnt we be copying her (Sharons) attorney"					
7/17/2022 17:32	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	15
7/17/2022 19:36	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
7/19/2022 9:35	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	17

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

7/20/2022 10:44	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	7
7/21/2022 8:32	Silvia Webb of Lane Powell sends Sharon M. Harold and email stating, Good morning Ms. Harold, Attached please find copy of correspondence addressed to you in the above matter. I have also enclosed copy of correspondence to Ms. Small. Hard copies shall follow in today's mail." There are two letteres attached. 1) A letter to Sharon M Harold stating in part, "Dear Ms. Harold, We are writing on behalf of Mr. David Paice RESPONDENT ("David" or "Trustee"), as trustee of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust"). We understand that you are not currently represented by an attorney. If you are represented by an attorney, however, then please forward this letter to your attorney and have your attorney contact us directly. We recommend that you review this letter and its enclosures with your own independent counsel." Also attached was the first accounting. 2) Letter to Amy stating she was no longer entitled to an accounting since her POA was revoked. I Lane Powell					
7/21/2022 9:11	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	6
7/21/2022 10:04	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	2
7/21/2022 10:07	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
7/21/2022 10:16	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	6
7/21/2022 18:09	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	7
7/22/2022 7:32	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	2
7/22/2022 10:45	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
7/23/2022 8:09	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	1
7/23/2022 8:13	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

7/23/2022 8:13	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Multimedia a messaging Multimedia
7/23/2022 8:13	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	a messaging Multimedia
7/23/2022 13:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 13:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Multimedia
7/23/2022 17:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	a messaging Text / instant
7/24/2022 8:02	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	messaging Text / instant
7/24/2022 8:18	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	messaging Text / instant
7/24/2022 8:24	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	messaging

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

7/24/2022 8:28	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
7/24/2022 8:28	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
7/24/2022 8:29	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
7/24/2022 8:31	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
7/24/2022 10:00	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
7/24/2022 10:01	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
7/24/2022 17:17	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	2
7/25/2022 8:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	7
7/25/2022 16:05	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	8
7/26/2022 11:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
7/26/2022 13:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	9
7/26/2022 19:41	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	1
7/27/2022 10:18	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	8
7/27/2022 21:07	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	4
7/28/2022 7:01	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

7/28/2022 11:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	4
7/28/2022 19:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
7/28/2022 21:08	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	3
7/29/2022 17:47	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	2
7/29/2022 18:24	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	6
7/31/2022 10:17	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
7/31/2022 16:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	1
7/31/2022 16:20	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
8/1/2022 6:53	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
8/3/2022 9:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	6
8/3/2022 10:02	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
8/3/2022 10:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
8/3/2022 10:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
8/3/2022 10:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
8/3/2022 10:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/3/2022 10:04	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/3/2022 10:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	10
8/3/2022 10:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
8/3/2022 21:47	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/3/2022 21:47	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 7:18	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 7:19	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 7:19	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 7:20	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 7:28	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 10:12	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 10:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 10:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 10:18	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 10:21	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 Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/4/2022 10:23	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 10:26	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/4/2022 19:38	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	4
8/4/2022 19:41	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	1
8/4/2022 19:42	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	2
8/4/2022 19:43	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	1
8/4/2022 19:43	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
8/4/2022 19:44	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	1
8/4/2022 19:44	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
8/5/2022 7:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/5/2022 7:40	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	5
8/6/2022 8:37	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
8/6/2022 12:36	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/6/2022 12:37	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/6/2022 12:37	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/6/2022 12:38	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/6/2022 12:38	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/6/2022 12:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/6/2022 13:18	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/6/2022 15:50	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	4
8/8/2022 11:23	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
8/8/2022 13:55	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/8/2022 15:56	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/8/2022 18:34	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	11
8/8/2022 19:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	10
8/8/2022 20:36	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/8/2022 20:38	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/8/2022 20:39	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/9/2022 12:10	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	23
8/9/2022 12:50	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/9/2022 14:21	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
8/9/2022 15:09	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/9/2022 15:21	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	27
8/9/2022 19:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	33
8/10/2022 7:35	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	Text / instant messaging	9
8/10/2022 7:36	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/10/2022 7:51	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		WIFI	
8/10/2022 7:51	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/11/2022 9:54	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Text / instant messaging		
8/12/2022 18:55	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	Text / instant messaging	2
8/12/2022 19:28	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/13/2022 8:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		WIFI	
8/13/2022 12:00	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/13/2022 16:45	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	Text / instant messaging	
8/13/2022 18:28	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		WIFI	2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/13/2022 20:18	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Text / instant messaging Text /		
8/13/2022 20:18	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Multimedi		
8/13/2022 20:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	a messaging Text /		
8/13/2022 20:20	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Text /		
8/13/2022 20:20	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Text /		
8/13/2022 20:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Text /		
8/13/2022 20:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Text /		
8/13/2022 20:28	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Text /		
8/14/2022 8:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Text /		
8/14/2022 8:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging		
8/14/2022 9:22	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
8/14/2022 9:56	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Multimedi a messaging Multimedi		
8/14/2022 10:00	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	a messaging Text /		
8/14/2022 12:58	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging Text /		
8/14/2022 14:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	instant messaging		

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/14/2022 18:06	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
8/14/2022 18:09	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
8/14/2022 18:10	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Incoming, CL	WIFI	3
8/14/2022 19:18	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	25
8/14/2022 20:16	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/15/2022 11:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
8/15/2022 11:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/15/2022 14:33	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/15/2022 14:34	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/16/2022 9:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	32
8/17/2022 8:23	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	6
8/18/2022 11:30	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	4
8/18/2022 19:27	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	4
8/18/2022 20:14	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	3
8/18/2022 20:49	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		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, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/18/2022 21:25	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/18/2022 21:25	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/19/2022 8:28	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/19/2022 11:38	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/19/2022 12:08	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/19/2022 20:43	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/20/2022 15:46	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	
8/20/2022 16:10	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	24
8/20/2022 16:39	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	
8/21/2022 6:17	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/21/2022 7:20	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
8/21/2022 19:47	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/21/2022 20:15	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	7
8/22/2022 19:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	10
8/23/2022 18:15	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	12

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/24/2022 9:26	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
8/25/2022 10:21	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	6
8/26/2022 15:53	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	Multimedia messaging	1
8/26/2022 17:03	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Multimedia messaging	
8/26/2022 19:12	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
8/26/2022 19:23	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
8/26/2022 21:12	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
8/27/2022 8:10	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541			
8/28/2022 13:32	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
8/28/2022 13:56	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	3
8/28/2022 14:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/28/2022 16:34	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	2
8/28/2022 16:36	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	15
8/28/2022 19:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/28/2022 19:08	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	WIFI	12

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, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/29/2022 11:03	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Multimedia messaging	
8/29/2022 11:11	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	7
8/29/2022 14:04	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:05	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:05	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:08	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:09	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:10	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:13	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:13	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:13	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:15	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:15	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:17	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 14:25	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

8/29/2022 14:25	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 17:32	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 17:32	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
8/29/2022 17:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
8/30/2022 13:47	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/30/2022 13:47	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/30/2022 13:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/30/2022 13:51	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/30/2022 14:01	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/30/2022 14:02	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/31/2022 8:46	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	4
8/31/2022 10:47	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
8/31/2022 11:24	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
8/31/2022 11:30	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	5
8/31/2022 14:42	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undue influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

8/31/2022 14:42	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/1/2022 7:49	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
9/1/2022 7:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
9/1/2022 7:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/1/2022 7:53	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	5
9/1/2022 7:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/1/2022 7:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/1/2022 7:58	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	6
9/1/2022 8:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
9/1/2022 11:15	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
9/1/2022 18:41	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	8
9/2/2022 9:12	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Multimedia a messaging	
9/2/2022 9:21	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
9/2/2022 9:21	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Multimedia a messaging	
9/2/2022 9:22	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/2/2022 9:22	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Multimedia a messaging Text / instant messaging	
9/2/2022 9:22	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541			
9/2/2022 9:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/2/2022 10:05	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
9/2/2022 10:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	6
9/2/2022 12:25	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
9/2/2022 13:38	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/2/2022 13:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/2/2022 13:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	8
9/2/2022 13:47	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	4
9/2/2022 13:47	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/2/2022 19:44	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/3/2022 7:39	JOIE HAROLD TO/FROM		(661) 675-9674	PIdl PIdl CA	Text	Outgoing
9/3/2022 7:39	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/3/2022 7:39	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/3/2022 8:29	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	to Tacoma WA	T-Mobile to T- Mobile	1 Min
9/3/2022 8:38	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 8:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/3/2022 8:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 8:40	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 8:40	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/3/2022 8:41	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 8:41	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/3/2022 8:42	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 9:32	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/3/2022 11:28	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 11:29	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 11:58	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/3/2022 18:23	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	9

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/4/2022 14:54	Reedsport Police Department is dispatched to Sharon Harold's residence: "Neighbor in 103 a female possibly a relative came over this morning and they were fighting all morning saying things like "I hate you" and "I want you dead" then left a while ago in a vehicle gray small PC unknown license plate PR does not know her neighbor's name but is concerned about her welfare She is still not home. Jenifer (Harold) Sawyer identified as was her car.					
9/4/2022 18:27	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/4/2022 18:28	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/4/2022 18:29	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/5/2022 20:28	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	to Tacoma WA	T-Mobile to T-Mobile	36 Min
9/6/2022 9:05	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
9/6/2022 9:27	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	1
9/6/2022 11:11	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/8/2022 11:38	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	SDDV	4
9/8/2022 13:17	Aleksander Schilbach of Lane Powell emailed Sharon Harold a letter asking her to sign the "Release and Discharge of Trustee ("Release") to approve the actions taken by David." He adds, "If we do not obtain executed releases from all of the residual beneficiaries, then David will need to file a petition to approve the Trust's accountings with the court.					
9/8/2022 15:08	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	SDDV	1
9/8/2022 15:21	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	14

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

9/8/2022 16:30	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	to Tacoma WA	T-Mobile to T- Mobile Text / instant messaging	12 Min
9/8/2022 16:52	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150			
9/8/2022 17:02	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Incoming	to T- Mobile	1 Min
9/8/2022 17:03	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Incoming	to T- Mobile	8 Min
9/8/2022 17:18	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming
9/8/2022 17:18	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming
9/8/2022 17:39	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/8/2022 17:39	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/8/2022 17:40	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/8/2022 20:44	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	8
9/9/2022 9:16	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
9/9/2022 14:34	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
9/9/2022 17:40	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Incoming	T-Mobile to T- Mobile	1 Min
9/9/2022 19:46	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
9/10/2022 8:36	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/10/2022 8:36	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:36	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming
9/10/2022 9:00	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Incoming	T-Mobile to T- Mobile Multimedi a messaging	46 Min
9/10/2022 12:39	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264			
9/10/2022 13:43	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/10/2022 14:50	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
9/10/2022 15:59	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging Text /	
9/10/2022 16:01	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		instant messaging Text /	
9/10/2022 16:04	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/10/2022 16:04	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/10/2022 16:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/10/2022 16:07	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/10/2022 16:31	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/10/2022 16:31	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/10/2022 17:25	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/11/2022 18:33	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/11/2022 18:33	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/11/2022 22:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
9/11/2022 22:50	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 5:04	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
9/12/2022 5:04	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 11:22	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
9/12/2022 11:28	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 12:14	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/12/2022 12:41	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 12:42	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 13:17	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	9
9/12/2022 13:34	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	13
9/12/2022 14:29	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
9/12/2022 15:16	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 15:55	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 17:22	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/12/2022 20:11	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	12
9/13/2022 10:07	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	10
9/13/2022 11:02	SHARON HAROLD TO/FROM	ESQ Aleksander Shcilbach CELL	206.436.9909	Seattle, WA	SDDV	1
9/13/2022 14:14	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	8
9/13/2022 14:22	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	1
9/13/2022 14:27	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Call Wait	SDDV	1
9/13/2022 14:28	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	20

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

9/13/2022 16:10	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	SDDV	1
9/13/2022 19:55	SHARON HAROLD TO/FROM	ESQ Aleksander Schilbach CELL	206.436.9909		Text / instant messaging	
9/13/2022 20:24	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/14/2022 3:22	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/14/2022 4:37	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/15/2022 0:00	"As also discussed during our call, Mr. Paice wants to move forward with this matter. We have prepared releases regarding the Accountings for the remainder beneficiaries to sign. If your client (or any other remainder beneficiaries of the Trust) is disinclined to execute a release, then please let us know at your earliest convenience so that we can determine whether it will be necessary to petition the court to approve the Accountings."					
9/15/2022 9:06	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	5
9/15/2022 10:02	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
9/15/2022 10:46	SHARON HAROLD TO/FROM	ESQ Aleksander Schilbach OFFICE	206.223.7094	Incoming, CL	SDDV	20
9/15/2022 11:06	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
9/15/2022 17:17	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	SDDV	9
9/16/2022 14:30	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	3
9/16/2022 15:13	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	SDDV	1
9/17/2022 14:42	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	SDDV	1

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/18/2022 8:37	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	19
9/18/2022 11:02	Sharon Harold visits the AT&T store in Coos Bay for one hour as evidenced by her Google Map history					
9/18/2022 12:00	After leaving the AT&T store, Sharon Harold drives 57 minutes and a distance of 1.7 miles to arrive at The Pancake Mill Restaurant in Coos Bay as shown on her Google Map History					
9/18/2022 12:57	Sharon Harold arrives at the Pancake Mill Restaurant in Coos Bay at 12:57 PM and leaves at 1:43 PM as evidenced by her Google Maps history					
9/18/2022 13:45	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	13
9/18/2022 20:47	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	WIFI	1
9/21/2022 8:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
9/21/2022 8:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
9/21/2022 14:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
9/21/2022 16:35	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	20
9/21/2022 17:58	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	32
9/22/2022 10:36	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541	Seattle, WA	WIFI	1
9/22/2022 15:08	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Multimedi a messaging	
9/22/2022 19:04	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		WIFI	2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/22/2022 19:08	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/22/2022 19:59	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	2
9/22/2022 20:00	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
9/22/2022 20:07	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
9/22/2022 20:09	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
9/22/2022 20:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
9/23/2022 0:00	Sharon M. Harold signs the Lane Powell's Relase for David Paice's AOT.					
9/23/2022 0:00	Sharon M. Harold mails her signed waiver to Lane Powell					
9/23/2022 17:32	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
9/23/2022 18:53	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	1
9/23/2022 19:02	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	2
9/24/2022 7:29	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
9/24/2022 7:29	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/24/2022 7:29	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	14
9/24/2022 7:43	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

9/24/2022 7:43	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/24/2022 7:45	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
9/24/2022 7:45	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	8
9/25/2022 13:40	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	8
9/29/2022 8:45	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
9/29/2022 8:56	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	5
9/29/2022 9:01	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	SDDV	1
9/29/2022 9:02	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	6
9/30/2022 11:47	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Multimedi a messaging	
9/30/2022 11:47	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Multimedi a messaging	
9/30/2022 15:47	SHARON HAROLD TO/FROM	Briana (Harold) Paice	206.660.3541		Text / instant messaging	
10/3/2022 0:00	Paul Ohainle of Lane Powell sent a letter to all beneficiaries stating in part; "Ms. Sharon M. Harold, the primary lifetime beneficiary of the Trust, has already released the Trustee for actions as disclosed in the accountings, and we have enclosed a copy of Ms. Harold's executed Release and Discharge for your information." The alternative to obtaining a Release from each of you by October 28 is for the Trustee to file a petition seeking court approval of the accountings. All costs associated with such a filing will be paid from the assets of the Trust. While the Trustee would strongly prefer not to incur these additional legal and administrative expense, we reserve the right to do so if we do not receive the fully executed Releases from all beneficiaries. We look forward to receiving your executed Releases no later than October 28, 2022.					

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

10/3/2022 11:09	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Call Wait	WIFI	8
10/3/2022 21:52	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
10/3/2022 21:53	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
10/3/2022 21:54	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
10/3/2022 21:55	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
10/3/2022 21:55	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
10/3/2022 21:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
10/3/2022 21:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
10/3/2022 21:57	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
10/3/2022 21:58	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
10/3/2022 21:59	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	1
10/4/2022 11:17	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	7
10/4/2022 11:50	SHARON HAROLD TO/FROM	ESQ Aleksander Shcilbach CELL	206.436.9909	Seattle, WA	WIFI	2

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

10/4/2022 14:18	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	6
10/5/2022 11:43	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
10/5/2022 14:01	SHARON HAROLD TO/FROM	ESQ Aleksander Shcilbach CELL	206.436.9909	Seattle, WA	WIFI	2
10/5/2022 14:29	Sharon Harold send an email to Lane Powell revoking her "Release" "Since I signed the Release letter a couple of days ago I have come upon some discrepancies in the accounting. I wish to revoke the release immediately and I am looking to employ a new trustee as soon as I am able. Respectfully, Sharon M. Harold					
10/5/2022 14:31	SHARON HAROLD TO/FROM	ESQ Aleksander Shcilbach CELL	206.436.9909	Incoming, CL	WIFI	5
10/5/2022 16:34	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Incoming, CL	WIFI	9
10/6/2022 8:47	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	1
10/6/2022 8:48	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	SDDV	2
10/6/2022 14:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
10/7/2022 9:54	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	2

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, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

10/7/2022 19:12	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	3
10/7/2022 21:16	SHARON HAROLD TO/FROM	Brieana (Harold) Paice	206.660.3541		Text / instant messaging	
10/8/2022 18:08	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
10/8/2022 21:15	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
10/9/2022 14:17	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150	Seattle, WA	WIFI	1
10/9/2022 19:35	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Tacoma, WA	WIFI	2
10/10/2022 9:26	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	4
10/10/2022 9:49	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	6
10/10/2022 14:24	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
10/10/2022 14:30	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264	Incoming, CL	WIFI	7

Phone call and text records between Protected Party (Grantor) Sharon M. Harold and Respondent (Trustee) David A. Paice, his wife Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These serious of calls and texts that coorespond with major manipulated events in this case.

10/12/2022 14:19	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
10/13/2022 18:02	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264		Text / instant messaging	
10/14/2022 16:35	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	2
10/19/2022 7:10	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
11/1/2022 8:44	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	
11/1/2022 8:44	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Multimedi a messaging	
11/1/2022 12:44	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
11/1/2022 12:46	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
11/1/2022 12:46	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150		Text / instant messaging	
11/1/2022 15:03	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 Briana Paice, his mother-in-law Jenifer (Harold) Sawyer, Joie Harold-Ramirez (Sharon's daughter) and David Paice's attorneys Lane Powell, Aleksander Schilbach and attorney Roger Gould who wrote the paperwork to have Sharon Harold remove Amy Jane Small (Sharon's daughter) from Power of Attorney. These records demonstrate the undo influence respondent David Paice and others have exercised over Protected Party. These series of calls and texts that correspond with major manipulated events in this case.

11/1/2022 15:05	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150			Text / instant messaging
11/1/2022 15:06	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150			Text / instant messaging
11/1/2022 16:50	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150			Text / instant messaging
11/1/2022 17:04	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150			Text / instant messaging
11/8/2022 8:17	SHARON HAROLD TO/FROM	RESPONDENT David Paice	206.331.2150			Text / instant messaging
11/24/2022 18:03	SHARON HAROLD TO/FROM	Jenifer (Harold) Sawyer	253.228.9264			Text / instant messaging
12/1/2022 18:02	SHARON HAROLD TO/FROM	Microsoft Security Code Text	51789			Text / instant messaging
12/9/2022 12:42	SHARON HAROLD TO/FROM	ESQ Roger Gould	541.269.5566	Coos Bay, OR	WIFI	2

EXHIBIT 3

22-4-08326-1 KNT

IN RE SHARON M HAROLD

Trust/Estate Dispute Resolution - Active

[Request Access to Sealed Documents](#)[Request Fee Waiver](#)[Purchase/View Court records](#)[Summary](#)[Participants](#)[Document List](#)[Events](#)[Judgments](#)**Participants**

▼ Participants

Type	Name	Represented By
- filed on 12/05/2022		
Respondent	HAROLD, SHARON M	
Respondent	HAROLD, CHARLES ANTHONY Jr	
Respondent	HAROLD, JOHN JOSEPH	
Respondent	SAWYER, JENNIFER	
Respondent	SMALL, AMY	
Respondent	HAROLD RAMIREZ, JOSETTE MARIE	
Respondent	LOOMIS, NICOLE	
Respondent	RAMIREZ, JOSETTE	
Respondent	HAROLD, JOHN	
Petitioner / Trustee	PAICE, DAVID A	Schilbach, Aleksander Richard Mautner, Gail Eileen
Petition - filed on 02/03/2023		
Deceased	HAROLD, SHARON M	

[Go Back](#)

EXHIBIT 4



September 1, 2022

By Mail and E-mail: Schilbacha@Lanepowell.com

Aleksander Schilbach, Esq.
LanePowell
1420 Fifth Avenue, Suite 4200
Seattle, WA 98101-2375

Re: Sharon M. Harold Irrevocable Trust; Request for Information

Dear Mr. Schilbach:

I represent Chuck Harold, a beneficiary under the Sharon M. Harold Irrevocable Trust and son of the settlor, Sharon Harold. This requests information from the trustee relating to the administration of the trust.

We thank you for providing eight trust accountings covering the period from January 2010 to December 2021. The accountings, provided to my client on or about August 9, 2022, were prepared by the Llewellyn Accountancy Corporation at the behest of the trustee following written requests made by beneficiary Amy Jane Small.

Llewellyn's cover letters, dated June 8, 2022, to each of account contains the following explicit warning:

The Trustee has elected to omit substantially all of the disclosures required by accounting principles generally accepted in the United States of America. If the omitted disclosures were included in the financial statements, they might influence the user's conclusions about the trust's financial statements. Accordingly, the financial statements are not designed for those who are not informed about such matters.

The disclaimer is unprecedented in my experience. The accountant's disclaimer gives us concern regarding the accuracy of the accounts. "*The financial statements are not designed for those who are not informed about such matters.*" My client is among "those who are not informed about such matters." But he would like to be thus informed.

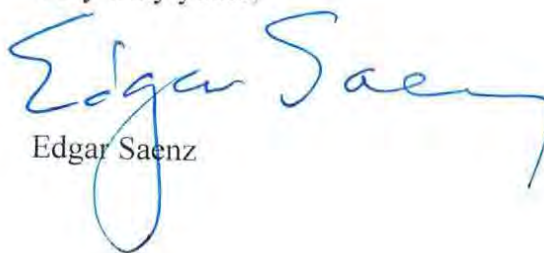
Accordingly, this requests, pursuant to California Probate Code section 16061, that the trustee provide my client with the relevant "disclosures" and information, including but not limited to:

- statements for LPL Trust account nos. 2602-4662 and 2601-4662 from 2010 through December 31, 2021;
- an answer to the question whether the trustee transferred funds from trust accounts to his personal accounts at any time;
- supporting documents evidencing the alleged "wire" distributions to Sharon Harold during the period;
- supporting documents evidencing the source of the wires; and
- supporting documents evidencing dividends and interest earned by LPL Financial accounts.

Note that Mr. Harold is a "beneficiary," as defined under California law. (See Prob. Code § 24(c) ("As it relates to a trust, means a person who has any present or *future interest, vested or contingent.*")) As such, he has standing to request administration information. (See Prob. Code § 16061; Esslinger v Cummins (2006) 144 CA4th 517 (future beneficiary entitled to obtain trust account under general duty of trustee to provide information on reasonable request).)

We look forward to your cooperation. Please do not hesitate to call if you believe that would help bring this matter to a mutually amicable conclusion.

Very truly yours,


Edgar Saenz

Cc: Mr. Chuck Harold



PAUL OHAINLE
206.225.8383
OHAINLEP@LANEPOWELL.COM
ALEKSANDER SCHILBACH
206.436.9909
SCHILBACHA@LANEPOWELL.COM

September 8, 2022

VIA U.S. MAIL & ELECTRONIC MAIL – smharold7@gmail.com

Ms. Sharon Harold
100 River Bend Road, #103
Reedsport, OR 97467

RE: *The Sharon M. Harold Irrevocable Trust dated November 12, 2004*
Release and Discharge of David Paice, as Trustee

Dear Ms. Harold,

We are writing on behalf of our client, Mr. David Paice (“David”), as trustee of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 (“Trust”). We recently sent you a copy of the Trust’s accountings for 2010 through 2021 and asked you to contact our office with any questions related to the Trust or the Trust’s accountings. We understand that you have reviewed and approved the accountings. Accordingly, we ask that you review and sign the enclosed Release and Discharge of Trustee (“Release”) to approve the actions taken by David as disclosed in the accountings and release him for the actions as disclosed in the accountings. We recommend that you seek counsel to review the Release for you before you sign it. Once you have signed it, please send the executed original Release to our office in the enclosed self-addressed stamped envelope at your earliest convenience.

Once we have received the Release we will ask the Trust’s residual beneficiaries (your children and grandchild) to execute a release. If we do not obtain executed releases from **all** of the residual beneficiaries, then David will need to file a petition to approve the Trust’s accountings with the court. David would strongly prefer not to incur these additional legal and administrative expenses, but he reserves the right to do so if we do not receive an executed release from each beneficiary.

As you know, David, as trustee, retained our office to assist him after you daughter, Amy, demanded an accounting and threatened to contact David’s employer. Now, after receiving the accounting, your son Chuck Harold has retained an attorney, and Chuck’s attorney has demanded to see the underlying financial documentation that the accountant prepared the accountings from. Given’s Chuck’s request and the family dynamics toward David’s trusteeship generally, we must now incur additional time and expense to respond to Chuck’s

Ms. Sharon Harold
September 8, 2022
Page 2

attorney regarding his request for additional documentation. Please understand that the fees and costs David incurs in responding to Chuck's attorney and other requests from other residual beneficiaries, as well as all costs associated with obtaining court approval of the accountings, will be paid out of the Trust.

As we wrote before, if you are represented by an attorney, then please forward this letter to your attorney and ask your attorney to contact us so that we may direct any future communications to him or her.

Please contact us with any questions regarding the Trust accountings or this letter.

Very truly yours,

LANE POWELL PC



Paul Ohainle

Aleksander Schilbach

Enclosures: Release and Discharge of Successor Trustee
Letter from Edgar

134455.0001/9119229.2

**RELEASE AND DISCHARGE OF SUCCESSOR TRUSTEE OF
THE SHARON M. HAROLD IRREVOCABLE TRUST
DATED NOVEMBER 12, 2004**

I am the grantor and current beneficiary of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust").

David Paice ("David") is the current trustee of the Trust. David has served as trustee of the Trust from on or around March 1, 2010 to the present.

David provided me with full and complete accountings for the Trust for the period from January 2010 to December 2021 ("Accountings").

I have had the opportunity to review the Accountings and to seek additional information from David regarding the administration of the Trust.

I, on behalf of my marital community, heirs, and as virtual representative, as applicable, hereby (a) waive any and all objections related to the Accountings; (b) approve the administration, acts, and accounts of David as trustee of the Trust; and (c) release, discharge, and forever acquit David, both individually and as trustee of the Trust, and his successors, employees, employers, spouse, heirs, directors, agents, attorneys, affiliates, and assigns, from any and all claims, demands, actions, causes of actions, judgments, rights, fees, damages, debts, obligations, liabilities, and expenses of any kind whatsoever, whether known or unknown, arising from, or in any way related to the Trust, the Trust's assets, and David's actions as Trustee of the Trust as reflected in the Accountings.

I have been advised to have this Release reviewed and explained to me by counsel of my own choosing prior to my signing, and I have had a sufficient and reasonable amount of time to do so.

SHARON M. HAROLD, individually and as grantor-
beneficiary of the Sharon M. Harold Irrevocable Trust
dated November 12, 2004

DATE:



THE UNIVERSITY OF CHICAGO



First-Class - IMI
ZIP 98101

Received 10/14/2022
Ameyme

[illegible]



PAUL OHAINLE
206.225.8383
OHAINLEP@LANEPOWELL.COM
ALEKSANDER SCHILBACH
206.223.7094
SCHILBACHA@LANEPOWELL.COM

October 3, 2022

VIA U.S. MAIL & ELECTRONIC MAIL – Edgar@EdgarSaenz.com

Edgar Saenz, Esq.
Law Office of Edgar Saenz
8921 S. Sepulveda Blvd., Suite 101
Los Angeles, CA 90045

John Harold
230 Westmont Dr
Reedsport, OR 97467

Josette Harold Ramirez
11319 Playa St.
Culver City, CA 90230

Angel Harold
27411 Anthony Lane, #101
Canyon Country, CA 91387

Nicole Loomis
31688D U.S. 97
Tonasket, WA 98855

Jenifer Sawyer
1819 74th St E
Tacoma, WA 98404

Amy Jane Small
P.O. Box 352
Gracagle, CA 96103

RE: Sharon M. Harold Irrevocable Trust: Release and Discharge of David Paice, as Trustee

Dear Mr. Edgar Saenz, Mr. John Harold, Ms. Angel Harold, Ms. Josette Harold Ramirez, Ms. Jenifer Sawyer, Ms. Nicole Loomis and Ms. Amy Jane Small:

We are writing on behalf of our client, Mr. David Paice ("Trustee"), as trustee of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust"). To follow up on our letter of September 20, 2022, enclosed please find a Release and Discharge of Successor Trustee of The Sharon M. Harold Irrevocable Trust Dated November 12, 2004 ("Release").

Ms. Sharon M. Harold, the primary lifetime beneficiary of the Trust, has already released the Trustee for actions as disclosed in the accountings, and we have enclosed a copy of Ms. Harold's executed Release and Discharge for your information.

We respectfully request that each of you review and sign the enclosed Release to approve the actions taken by the Trustee as disclosed in the accountings, which have previously been provided to you. Please send the executed original of the Release to our office by October 28,

Edgar Saenz, Esq. et al
October 3, 2022
Page 2

2022. For your convenience, we have enclosed a self-addressed stamped envelope to return the signed Release.

The alternative to obtaining a Release from each of you by October 28 is for the Trustee to file a petition seeking court approval of the accountings. All costs associated with such a filing will be paid from the assets of the Trust. While the Trustee would strongly prefer not to incur these additional legal and administrative expense, we reserve the right to do so if we do not receive the fully executed Releases from all beneficiaries. We look forward to receiving your executed Releases no later than October 28, 2022.

Your immediate attention to this matter would be appreciated. please let us know if you have any questions or concerns.

Very truly yours,

LANE POWELL PC

A handwritten signature in black ink, appearing to read 'P. Ohainle', written over the printed name.

Paul Ohainle
Aleksander Schilbach

PO/AS/scw
Enclosures as stated

cc: Sharon Harold (via e-mail, w/o encl.)
134455.0001/9135399.1

**RELEASE AND DISCHARGE OF SUCCESSOR TRUSTEE OF
THE SHARON M. HAROLD IRREVOCABLE TRUST
DATED NOVEMBER 12, 2004**

I am the grantor and current beneficiary of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust").

David Paice ("David") is the current trustee of the Trust. David has served as trustee of the Trust from on or around March 1, 2010 to the present.

David provided me with full and complete accountings for the Trust for the period from January 2010 to December 2021 ("Accountings").

I have had the opportunity to review the Accountings and to seek additional information from David regarding the administration of the Trust.

I, on behalf of my marital community, heirs, and as virtual representative, as applicable, hereby (a) waive any and all objections related to the Accountings; (b) approve the administration, acts, and accounts of David as trustee of the Trust; and (c) release, discharge, and forever acquit David, both individually and as trustee of the Trust, and his successors, employees, employers, spouse, heirs, directors, agents, attorneys, affiliates, and assigns, from any and all claims, demands, actions, causes of actions, judgments, rights, fees, damages, debts, obligations, liabilities, and expenses of any kind whatsoever, whether known or unknown, arising from, or in any way related to the Trust, the Trust's assets, and David's actions as Trustee of the Trust as reflected in the Accountings.

I have been advised to have this Release reviewed and explained to me by counsel of my own choosing prior to my signing, and I have had a sufficient and reasonable amount of time to do so.

Sharon M. Harold (Sh Harold)
SHARON M. HAROLD, individually and as grantor-
beneficiary of the Sharon M. Harold Irrevocable Trust
dated November 12, 2004

24 September 2022
DATE:

**RELEASE AND DISCHARGE OF SUCCESSOR TRUSTEE OF
THE SHARON M. HAROLD IRREVOCABLE TRUST
DATED NOVEMBER 12, 2004**

I am a residual beneficiary under the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust").

David Paice ("David") is the current trustee of the Trust. David has served as trustee of the Trust from on or around March 1, 2010 to the present.

David provided me with full and complete accountings for the Trust for the period from January 2010 to December 2021 ("Accountings").

I have had the opportunity to review the Accountings and to seek additional information from David regarding the administration of the Trust.

I, on behalf of my marital community, heirs, and as virtual representative, as applicable, hereby (a) waive any and all objections related to the Accountings; (b) approve the administration, acts, and accounts of David as trustee of the Trust; and (c) release, discharge, and forever acquit David, both individually and as trustee of the Trust, and his successors, employees, employers, spouse, heirs, directors, agents, attorneys, affiliates, and assigns, from any and all claims, demands, actions, causes of actions, judgments, rights, fees, damages, debts, obligations, liabilities, and expenses of any kind whatsoever, whether known or unknown, arising from, or in any way related to the Trust, the Trust's assets, and David's actions as Trustee of the Trust as reflected in the Accountings.

I have been advised to have this Release reviewed and explained to me by counsel of my own choosing prior to my signing, and I have had a sufficient and reasonable amount of time to do so.

Printed Name

Signature

Date:

EXHIBIT 5

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, Aleksander, 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.

10/9/22

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.

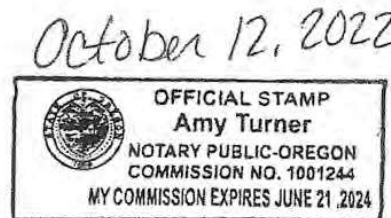
A hard copy of this letter shall be sent to you via U.S mail.

Regards,

Sharon M. Harold 10-12-2022

Sharon M. Harold

Douglas County, Oregon
Amy Turner
exp June 21, 2024



1 of 2

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 retain an attorney.

Respectfully,

Sharon Harold OCT 12, 2022
Sharon M. Harold

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


From: Sharon Harold <smharold7@gmail.com>

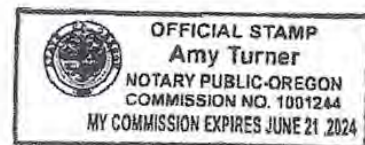
Date: Sun, Oct 9, 2022 at 6:54 PM

Subject: cease and desist

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

Please confirm receipt via email

 Cease and Desist from Sharon M.pdf
72K



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

7020 0640 0002 0911 7580

Domestic Mail Only	
For delivery information, visit our website at www.usps.com	
Seattle, WA 98101	
Certified Mail Fee	\$4.00
Extra Services & Fees (check box, add fee \$)	\$2.25
<input type="checkbox"/> Return Receipt (hardcopy)	\$0.00
<input type="checkbox"/> Return Receipt (electronic)	\$0.00
<input type="checkbox"/> Certified Mail Restricted Delivery	\$0.00
<input type="checkbox"/> Adult Signature Required	\$0.00
<input type="checkbox"/> Adult Signature Restricted Delivery	\$0.00
Postage	\$0.60
Total Postage and Fees	\$7.85
Sent To Lane Powell - Aleksander Schilbach Street and Apt. No., or PO Box No. 1420 FIFTH AVE - SUITE 4200 City, State, ZIP+4 Seattle, WA 98101-2375	
PS Form 3800, April 2015 PSN 7530-02-000-9001 See Reverse for Instructions	

0467
03
Postmark
Here
10/11/2022

aron M. Harold
Bend Road, Spc #103
sport, OR. 97467
541) 664-1937
tharold7@gmail.com

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, Aleksander, 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



Sharon Harold <smharold7@gmail.com>

Disbursement

David Paice
to reiterate

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 & Briana 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,

Sharon Harold

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

2/22/23, 5:56 PM

Gmail - RE: Disbursement

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

CONFIDENTIALITY NOTICE: DO NOT read, copy, or disseminate this communication unless you are the intended recipient(s). This email is confidential, privileged and is solely for the intended recipient(s). If you received this communication in error, please call us immediately at (541) 345-8800 and ask to speak to the sender of the communication. Also, please reply to this email, notify the sender that you have received the communication in error and permanently delete all copies of this email from your records. This communication, along with any attachments, is not tax advice intended to be used to avoid tax penalties. Thank you.

From: Schilbach, Aleksander <SchilbachA@LanePowell.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

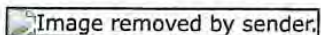
Removing Ms. Sharon Harold and Mr. David Paice from the E-mail

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

2/22/23, 5:56 PM

Gmail - RE: Disbursement

(He/Him)
schilbach@lanepowell.com
D 206.223.7094 C 206.436.9909
LANEPOWELL.COM

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...> 3/5

Schilbach, Aleksander <SchilbachA@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 <SchilbachA@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,

2/22/23, 5:56 PM

Gmail - RE: Disbursement

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 **C** 206.436.9909

LANEPOWELL.COM

[Quoted text hidden]

[Quoted text hidden]

EXHIBIT 6

**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,

a Trust.

**SUR-OPPOSITION OF RESPONDENTS
TO MOTION OF PETITIONER FOR
APPOINTMENT OF A LITIGATION
GUARDIAN AD LITEM FOR SHARON
M. HAROLD**

I. INTRODUCTION

Grantor Sharon M. Harold ("Grantor") and Residual Beneficiaries Charles A. Harold, Jr., John J. Harold, Angel Harold, Amy Jane Small, and Josette Harold Ramirez (hereinafter collectively referred to as "Respondents") hereby submit this Sur-Opposition to Petitioner's Reply in Support of the Motion for Appointment of a Litigation Guardian Ad Litem ("LGAL") for Sharon M. Harold. The inaccuracy of these statements will be shown herein. Respondents reiterate their request that this motion be denied outright or at a minimum, held over until after the Temporary Protection Order and Hearing scheduled for March 20, 2023.

To put the case in layperson's terms, a Grandson (Trustee) is suing his Grandmother (Grantor) and using her money to do so simply because Grandma asked Grandson for an accounting of her Trust (which Grandson had not done in 12, now 13 years). Grandma disagreed with how her Grandson accounted for HER trust funds. When Grandma found out that Grandson's Accounting of Trust (AOT) was actually a

1 mis-accounting of Trust (MAOT), Grandson then used this TEDRA proceeding to
2 bombard the court with attacks on his Grandmother in an attempt to confuse the Court
3 and hide his malfeasance.

4 Petitioner and his attorneys continue to grandstand, file frivolous and litigious
5 motions to churn their attorney fees against Grantor's Trust, misuse their IOLTA
6 deposits and commit perjury before this Court, all in an attempt to distract the Court
7 and further diminish Grantor's Trust funds. When Petitioner first started threatening
8 Respondents with litigation if they did not sign a release (a violation of RCW
9 9A.56.130), the balance of the Trust was approximately \$700,000, now it is
10 approximately \$500,000.

11 Each time Petitioner files any motion of any kind, Respondents are required by
12 this Court to respond or risk an adverse ruling of the Court. Each time Respondents
13 respond, as in this present opposition, double dipping occurs. Petitioner's attorney's
14 take money from Grantor's trust to pay for the original motion, then take money from
15 Grantor's trust to pay to reply to the opposition to that frivolous motion they generated
16 in the first place. This is the definition of litigious. This churning of attorney fees is a
17 perpetual motion machine that will eventually result in Grantor's trust fund being
18 completely depleted, leaving her no money for her end-of-life planning.

19 As an offer of proof to Lane Powell's perpetual attorney fee machine,
20 Respondents will now reply to their perjury laced comments in the latest round of this
21 frivolous litigation.

22 **A. Notice Was Given to All Parties Regarding the Filing of The Petition for**
23 **Protective Order.**

24 At the February 3 hearing before Commissioner Henry Judson, Respondent
25 Charles A. Harold, Jr. stated, "We would be filing a protection order against Mr. Paice
26 to allow us to get an oversight on what's going on with this case so we can put
27 [Grantor] into an assisted living facility." (Schilbach Dec., Ex. A, p. 5. [Dkt. #52])
28 Furthermore, Respondents believe there is no duty to give notice to a Respondent

(Paice) by a Protected Party (Sharon M. Harold) because that would forward Respondent and could cause retribution by a Respondent harming a Protected Part. Instructions from the Protection Court only call for service by various processes.

B. The \$20,740.50 Disbursement Was Received by Grantor and Deposited Into Her Account.

On March 13, 2023, Grantor's USAA account showed a deposit of \$20,740.50. As of this writing, it appears that the deposit has been withdrawn. After speaking with USAA, Respondents were told that there were several reasons for this occurrence, one of them being that a stop payment was put on the check. Respondents have no further information regarding this deposit but do know that Grantor's account is NOT frozen as alleged by Petitioner.

C. The Petition for Protection Order Is Not Meritless.

A Temporary Protection Order was granted by the Protection Court. The Court ordered financial accounts related to Petitioner frozen in part because of his self-reported "inadvertent" commingling of Trust money between various accounts related to Grantor. If the Petition for Protection Order is meritless or baseless, that is for the Protection Court to decide, not Lane Powell. If this is "judge-shopping" as alleged, then Petitioner went "venue shopping" when he brought this Petition before this Court. Clearly this matter belongs either in California or in Federal District Court because of: (1) the four different states Respondents reside in, (2) the common defense of Grantor position Respondents hold as Joint Respondents in common, (3) the violations of various federal laws, and (4) the conflicts of authority and jurisdiction. Respondents have not exercised their right to move this matter to a federal court because they are united in one cause and one cause only: to stop Petitioner's spending of Grantor's Trust funds on meritless, frivolous and litigious litigation and use her Trust funds to place her into an assisted living facility

D. The Freezing of Petitioner's "Family Personal Bank Account."

The bank account numbers listed in the Protective Order were taken from the

1 BECU's financial statements of the alleged "Trust" account for Sharon M. Harold,
2 managed by Petitioner and provided to Grantor and Respondent's by the family
3 accountant David Llewellyn. Several of those statements list a transfer from the "Trust"
4 account to another BECU account listing the receiving BECU account number. That
5 account number is NOT an account stated as one of Grantor's alleged "Trust"
6 accounts. At various times, as stated by Petitioner himself in documents filed before
7 this Court, Petitioner transferred alleged "Trust" assets to this non-trust account. Since
8 Petitioner's MAOT is clear as mud, Respondents and the Protection Court correctly
9 froze this account because at this point the Court and Respondents have no idea what
10 is happening with Grantor's Trust funds. The Protection Court has ordered Petitioner
11 (named Respondent in the Protection Hearing) to appear with an actual AOT as
12 required by California Probate Code § 1060 *et seq.*

13 Additionally, as stated in the recent Supplemental Brief to the Protection Court,
14 Respondents believe Petitioner's "Family Personal Bank Account" is not in fact frozen
15 at all because Respondent was able to deposit funds into Petitioner's account using
16 Zelle and verify the deposits.

17 **E. The Interests of Grantor are Completely Aligned with Attorneys in Fact**
18 **Charles A. Harold, Jr. and Amy Jane Small; A LGAL Is Unwarranted,**
19 **Unnecessary and Unwanted.**

20 Respondents reiterate that the goal of Grantor as well as Respondents is to
21 place her in an appropriate assisted living facility. In order to accomplish this,
22 Respondents want to ensure that there are and will be sufficient funds. It is Petitioner
23 who has consistently and repeatedly claimed there were not enough funds to move
24 Grantor into assisted living. It is Petitioner whose interests are not aligned with Grantor
25 because he would not release funds for an assisted living facility and because he
26 continues to spend her money in an attempt to ratify his breaches of duty as a trustee.
27 The ratification of Petitioner's breaches is not the business of the trust, or respectfully
28 this Court and therefore Grantor's trust funds should not be paying for Petitioner to

1 defend himself. Since Grantor and Respondents are united, a LGAL is unwarranted.

2 Since Petitioner is spending Grantor's trust at an alarming rate, which will result
3 in there not being enough funds to take care of Grantor for the rest of her life,
4 Respondents see that as a "serious immediate harm or irreparable injury," justifying
5 the Protective Order. Paying for a LGAL would add to the exponential depletion of
6 Grantor's trust fund. Petitioner and his counsel are of course aware of this and do not
7 seem to care. Another example of churning attorney fees. For this reason, an LGAL is
8 unwarranted and unwanted by Grantor.

9 **F. Petitioner Conflates "Incapacity" with "Vulnerable Adult".**

10 Grantor is a properly defined as a "Vulnerable Adult" per RCW
11 74.34.020(21)(a)(f), which is unrelated to incapacity. Petitioner tries to conflate
12 "Vulnerable Adult" with incapacity with zero proof, even though Petitioner is personally
13 aware this proof exists.

14 Petitioner has not seen or spoken to Grantor since mid-2022. It seems
15 Petitioner and his attorney's purport to have personal knowledge of Grantor's
16 incapacity simply because she disagreed with Petitioner's MAOT, made up her own
17 mind that Petitioner has discrepancies in his MAOT math, and decided the personal
18 actions Petitioner took were against the interests of Grantor.

19 Again, Petitioner and his attorney's offer zero proof and continue to churn their
20 attorney fees in an attempt to use up her Trust funds and discourage Respondents
21 from fighting this litigious litigation. The Court will recall this is exactly what Petitioner's
22 attorneys stated in several pre-litigation letters to Respondents, threatening litigation
23 unless a "release" of Petitioner was signed.

24 In the Opposition to this motion, Grantor stated she possessed doctor's reports
25 proving her mental capacity and offered them to the court for private viewing. Grantor
26 has since changed her mind in order to prove that she is not incapacitated. See Exhibit
27 1 attached hereto.

28 Petitioner has personal knowledge that Dr. Lottman's report submitted herein

1 exists because it was requested by Petitioner's and Grantor's previous attorney,
2 Jeanne Kvale, as part of her duty to verify that Grantor had the capacity to understand
3 the conflict of interest between Petitioner and Grantor. Petitioner and Grantor were
4 eventually let go by Ms. Kvale for the inherent conflict of interest between Petitioner
5 and Grantor discuss herein. Therefore, for Petitioner to allege Grantor has a capacity
6 issued when he had personal knowledge that was not true is perjury before this Court.

7 **G. Respondents Charles A. Harold and Amy Jane Small Act in the Very**
8 **Best Interest of Grantor as Her Attorneys-in-Fact In All Aspects of this**
9 **Matter, but Especially Regarding Her \$20,740.50 Disbursement Check.**

10 After stating in open court that Respondents would be seeking a protection
11 order, Charles A. Harold, Grantor and Amy Jane Small discussed at length the
12 implications of such actions. All parties were fully aware that the promise of a check
13 from Petitioner and his attorney to reimburse Grantor for previous attorney fees could
14 be stopped when accounts were frozen.

15 Based upon previous unfulfilled statements from Petitioner to send Grantor
16 money, attorneys-in-fact and Grantor did not believe this latest offer of a check would
17 be fulfilled. This was based upon a simple fact: Grantor asked for money. Petitioner
18 then replied through his attorney that a check would be issued, but it would arrive in
19 several weeks, not overnight via courier or overnight via Zelle as was Petitioner's
20 previous practice. This resulted in the letter sent by Grantor to this Court and received
21 by the Court's clerk Mr. Luiken wherein Grantor ask Petitioner to send her money
22 immediately.

23 Because Grantor was fully aware that her \$20,740.50 disbursement check
24 could be frozen, contingency plans were made and all Respondents, as they have
25 done for the past six months, are contributing to Grantor's needs. She is in fact better
26 off than she has been in the past under Petitioner's now exposed fiduciary breaches.

27 **CONCLUSION**

28 Every argument made by Petitioner in his Reply is easily disproved. The

1 accusation of not providing notice (which is not required in the first place), the
2 baseless and actionable charge she is incapacitated, the accusation that the
3 Protection Order is meritless, have all resulted in the churning of more and more
4 attorney fees.

5 Grantor and all Respondents are in agreement with respect to what they are
6 trying to accomplish. There is no conflict between them. Petitioner has manufactured
7 illusory issues to justify a LGAL. Petitioner has created an uneven playing field by
8 paying for his own counsel with Grantor's money but not paying for counsel for
9 Grantor, and now wishes to further tip the scales in his favor because he obviously
10 believes that a LGAL will benefit him in this case and any related matter.

11 Respondents once again shall let the facts, not speculation, speak in this
12 matter.

13 DATED: March 16, 2023

s/Charles A. Harold, Jr.

14 Charles A. Harold, Jr., Residual Beneficiary and
15 Respondent in pro se
16 1455 N. Tomahawk Rd.
17 Apache Junction, AZ 85119
18 Tel: 818-652-6400
19 E-mail: chuckharold@gmail.com

18 DATED: March 16, 2023

s/Sharon M. Harold

19 Sharon M. Harold, Grantor and
20 Respondent in pro se
21 100 River Bend Rd. #103
22 Reedsport, OR 97467
23 Tel: (541) 662-1937
24 Email: smharold7@gmail.com

24 DATED: March 16, 2023

s/John Harold

25 John Harold, Residual Beneficiary and
26 Respondent in pro se
27 230 Westmont Dr.
28 Reedsport, OR 97467
Tel: (541) 662-6262
Email: john6231@live.com

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DATED: March 16, 2023

s/Angel Harold
Angel Harold, Residual Beneficiary and
Respondent in pro se
9317 Balcom Ave.
Northridge, CA 91325
Tel: (661) 289-4238
Email: angelharold25@gmail.com

DATED: March 16, 2023

s/Amy Jane Small
Amy Jane Small, Residual Beneficiary and
Respondent in pro se
P.O. Box 352
Graeagle, CA 96103
Tel: (805) 827-0051
Email: aj.harold9@gmail.com

DATED: March 16, 2023

s/Josette Harold Ramirez
Josette Harold Ramirez, Residual Beneficiary and
Respondent in pro se
11319 Playa St.
Culver City, CA 90230
Tel: (310) 280-6229
Email: jobabe007@gmail.com

We certify that this memorandum contains 2,157
words, in compliance with the Local Civil Rules.