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

In re the Matter of

Case No. 22-4-08326-1 KNT

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

**DECLARATION OF AMY JANE SMALL
IN SUPPORT OF SECOND
SUPPLEMENTAL BRIEF**

a Trust.

I, Amy Jane Small, declare as follows:

1. I am a Residual Beneficiary of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 ("Trust"). I have personal knowledge of the facts set forth herein. I make this declaration in support of the Second Supplemental Brief in Support of Respondents' Verified Joint Objection.

2. At all relevant times herein, the documents attached hereto were obtained by me either under Power of Attorney ("POA") or express permission granted by Sharon Harold, my mother and Grantor.

3. On April 27, 2022, I, under my POA, wrote and mailed a letter to acting Trustee David A. Paice ("Paice") requesting an accounting of the Trust. Attached hereto as Exhibit 1 is a true and correct copy of the April 27 letter.

4. On May 23, 2022, I received a letter from attorney Jeanne Kvale ("Kvale") stating she represented Paice and Grantor and that there were adequate trust assets for Grantor's healthcare. Attached hereto as Exhibit 2 is a true and correct

1 copy of the May 23 letter.

2 5. I sent an email dated June 1, 2022, attaching my May 31, 2022 letter, to
3 Kvale stating that Paice called Grantor to discuss my POA paperwork. This telephone
4 conversation was witnessed by Respondent John Harold who was having dinner with
5 Grantor at the time of Paice's call. Attached hereto as Exhibit 3 is a true and correct
6 copy of the June 1 email with attachments.

7 6. On June 7, 2022, Kvale sent me a letter stating that she was no longer
8 representing Paice or Grantor and that they had both been advised to seek
9 independent counsel. Attached hereto as Exhibit 4 is a true and correct copy of the
10 June 7 letter.

11 7. I then received a letter from Mr. Schilbach dated June 10, 2022, stating
12 that he was representing Paice. The letter stated, "Please be aware that we may also
13 seek court approval of the accountings, trustee's fees, and attorneys' fees, all of which
14 will be expenses borne by the Trust." Attached hereto as Exhibit 5 is a true and correct
15 copy of the June 10 letter.

16 8. Roger Gould, an attorney in Coos Bay, Oregon, wrote me a letter dated
17 June 22, 2022 stating that Grantor had revoked my POA. However, I did not receive
18 the letter until approximately a month later. Attached hereto as Exhibit 6 is a true and
19 correct copy of the June 22 letter.

20 9. On August 9, 2022, Mr. Schilbach sent a letter to beneficiaries with a
21 copy of the "Accounting of Trust" ("AOT"), which excluded financial documents
22 verifying the authenticity of the AOT. Attached hereto as Exhibit 7 is a true and correct
23 copy of the August 9 letter (without attachments).

24 10. On September 24, 2022, Grantor signed the release of liability for Paice,
25 his wife Briana and their minor daughter in order to receive the backup financial
26 documents to the AOT. This release was attached to the October 3, 2022 letter (see ¶
27 11). Attached hereto as Exhibit 8 is a true and correct copy of the release.

11. On October 3, 2022, Mr. Schilbach sent a letter to beneficiaries notifying them that Grantor had signed the release (see ¶ 10, Ex. 8) and also threatened to spend trust funds on future attorney fees. The letter stated, “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 expenses, 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.” Attached hereto as Exhibit 9 is a true and correct copy of the October 3 letter.

12. Under my POA, I reviewed emails from Grantor to Mr. Schilbach within her email account and located the attached email string dated from October 5 to October 7, 2022, in which Grantor revoked her release. Attached hereto as Exhibit 10 are true and correct copies of the email string.

13. I refused to sign the release.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Executed this 30th day of October, 2023, at Graegle, California.

s/Amy Jane Small
AMY JANE SMALL

EXHIBIT 1

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



April 27, 2022

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

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

Dear David,

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

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

I. CALIFORNIA LAW

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

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



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

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

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

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

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

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

Regards,



Amy Jane Small

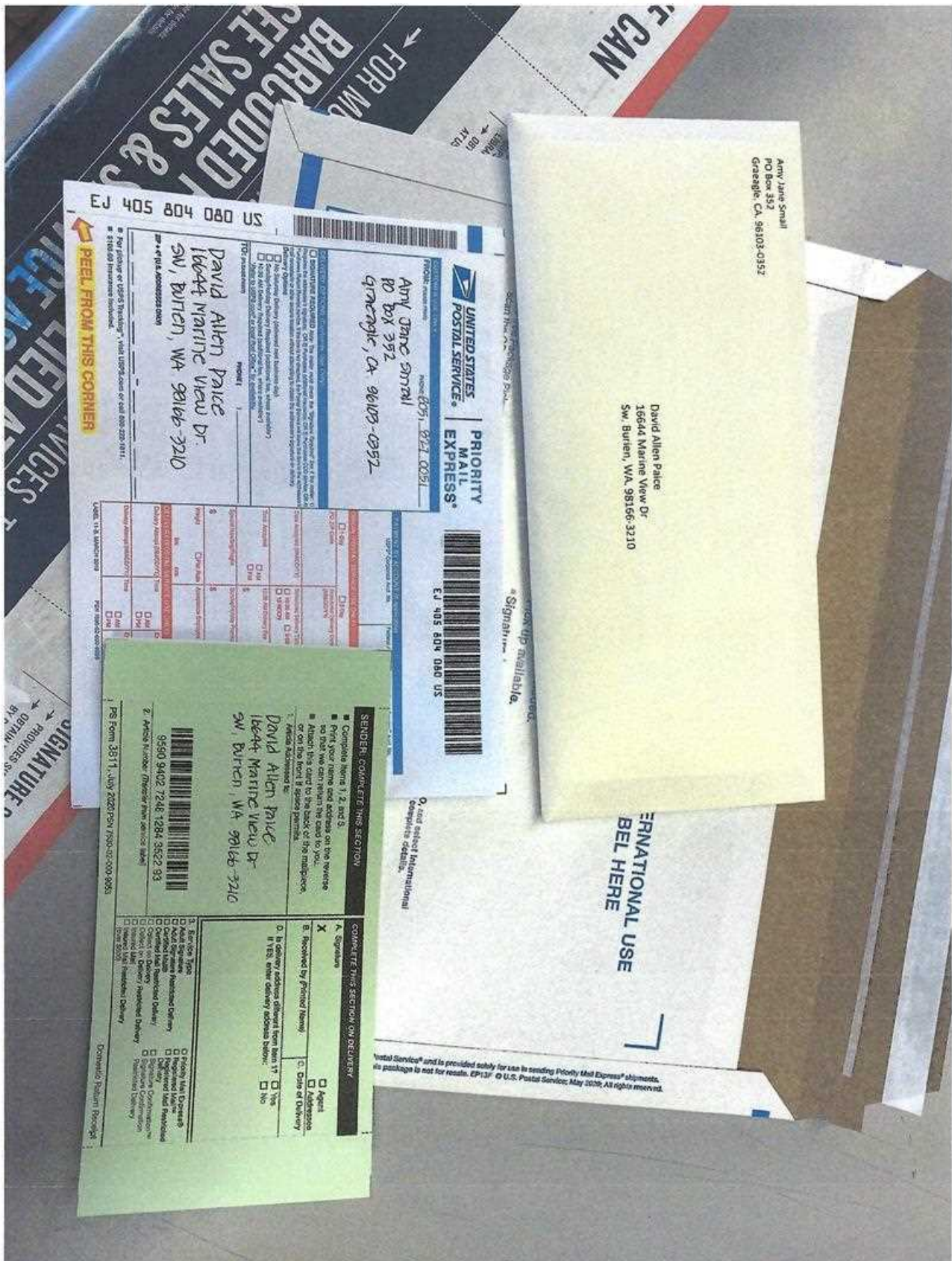
CC: Charles A. Harold, Jr.

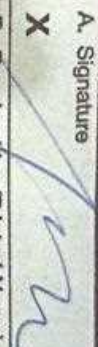
John J. Harold

Jennifer F. Sawyer

Angel M. Harold

Josette M. Ramirez



SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<p>■ Complete items 1, 2, and 3.</p> <p>■ Print your name and address on the reverse so that we can return the card to you.</p> <p>■ Attach this card to the back of the mailpiece, or on the front if space permits.</p> <p>1. Article Addressed to:</p> <p>David Allen Paice 1644 Marine View Dr. SW, Burien, WA. 98146-3210</p>		<p>A. Signature</p> <p><input checked="" type="checkbox"/> X </p>	
<p>2. Article Number (Transfer from service label)</p> <p>9590 9402 7248 1284 3522 93</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Insured Mail Restricted Delivery (over \$500)</p>		<p>D. Is delivery address different from item 1? If YES, enter delivery address below:</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	

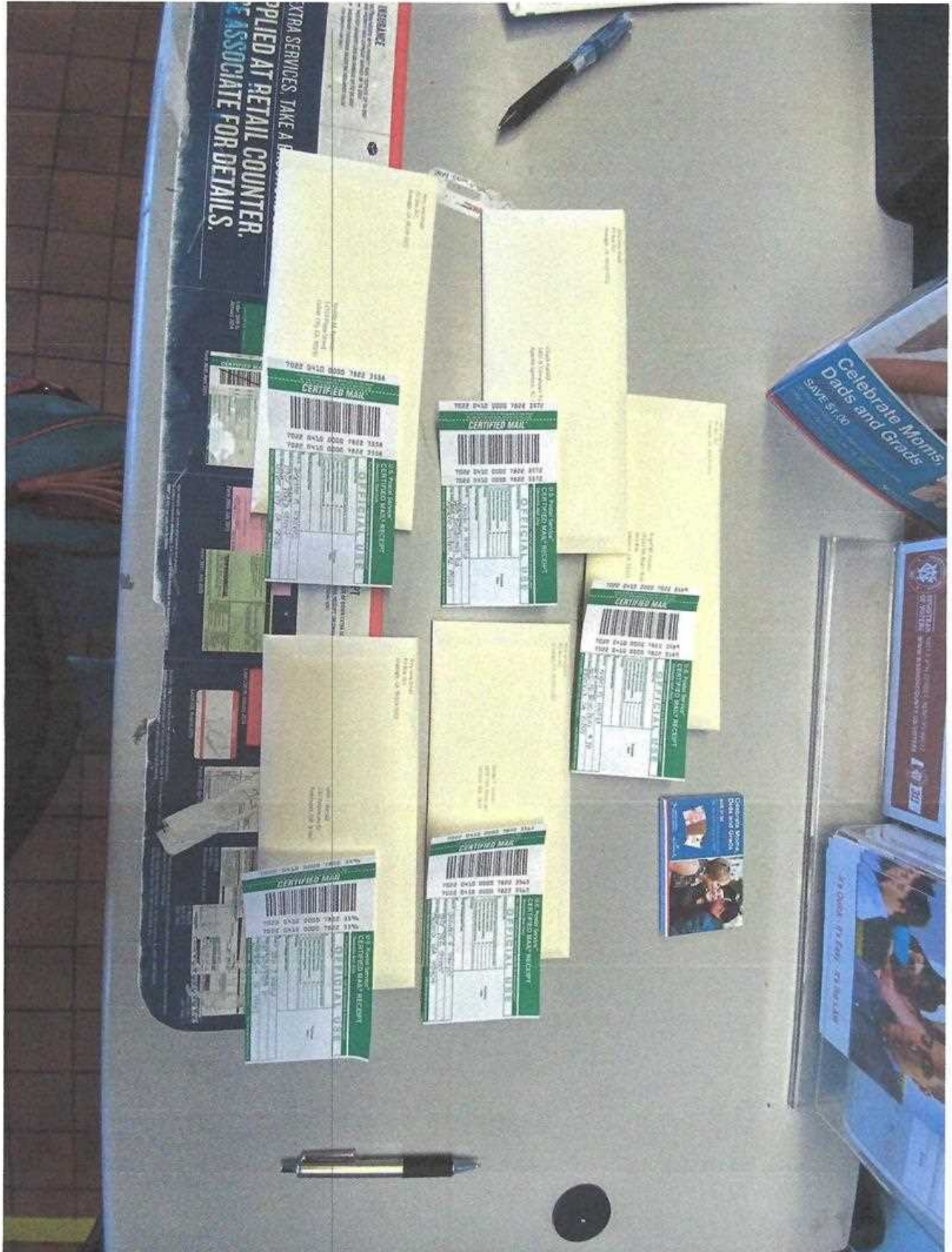


EXHIBIT 2

STEVEN S. FEDER*
DANIEL A. HIGSON**
GREG W. JONES
JEANNE MACCALTEN KVALE
SETH P. SHAPIRO
*CERTIFIED SPECIALIST
ESTATE PLANNING, TRUST & PROBATE LAW
**CERTIFIED SPECIALIST
BANKRUPTCY LAW

THE HATHAWAY LAW FIRM, LLP
A LIMITED LIABILITY PARTNERSHIP
200 HATHAWAY BUILDING
5450 TELEGRAPH ROAD
POST OFFICE BOX 3577
VENTURA, CALIFORNIA 93006
(ESTABLISHED 1961)
TELEPHONE (805) 644-7111
FACSIMILE (805) 644-8296
www.hathawaylawfirm.com

JULIEN G. HATHAWAY
(1897-1985)
JOHN R. WEBSTER
(1938-2017)
PAUL D. POWERS
(RETIRED)
JOSEPH C. CHRISMAN
ALEJANDRO P. GUTIERREZ
MICHAEL F. PERRETT
OF COUNSEL
MARY E. GAGNE
OFFICE MANAGER
DEBRA D. ACEVEDO
COLEEN DE LEON
JENNIFER A. ROLLAG
BONNIE P. RYAN
CERTIFIED PARALEGALS

May 23, 2022

Via Email - ajharold9@gmail.com
Amy Jane Small
P. O. Box 352
Gracagle, CA 96103

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

Dear Ms. Small:

This office represents David Allen Paice, the Successor Trustee of the above-referenced trust.

Mr. Paice has provided our office with a copy of your letter dated April 27, 2022 requesting a full accounting of the above trust.

The Sharon M. Harold Irrevocable Trust Dated November 12, 2004 provides that during the lifetime of Sharon M. Harold, she is the sole beneficiary. Therefore, as the sole beneficiary, Sharon M. Harold is the only person entitled to the trust accountings.

However, at this time, David Allen Paice, the Trustee, and Sharon M. Harold, the Settlor/sole beneficiary, have authorized us to let you know that the Trustee and the accountant have met with Sharon periodically to review the trust's financial statements, investments and accounting information, and that there are adequate current trust assets to provide for her health and support needs for the foreseeable future.

Very truly yours,



JEANNE M. KVALE

THE HATHAWAY LAW FIRM, LLP
A LIMITED LIABILITY PARTNERSHIP
200 HATHAWAY BUILDING
8450 TELEGRAPH ROAD
POST OFFICE BOX 3577
VENTURA, CALIFORNIA 93006



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

96103-035252

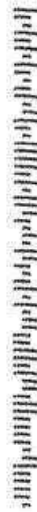


EXHIBIT 3

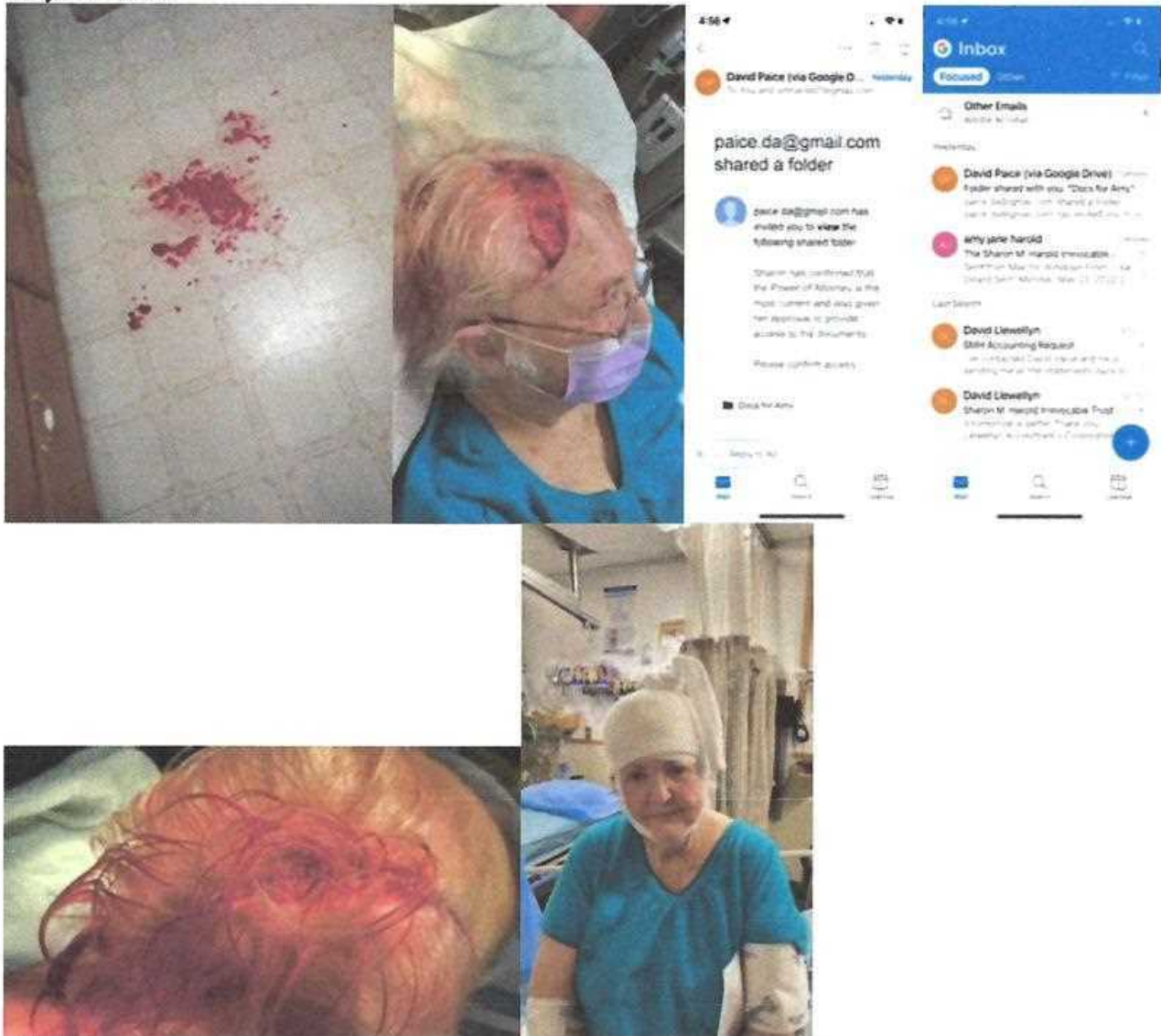
Subject: Sharon M. Harold Irrevocable Trust
From: Amy Jane Small <aj.harold9@gmail.com>
To: Lisa Dillard <ldillard@hathawaylawfirm.com>, Jeanne Kvale <jkvale@hathawaylawfirm.com>
Cc: Amy Jane Small <ajharold9@gmail.com>
Date Sent: Wednesday, June 1, 2022 7:14:42 AM GMT-07:00
Date Received: Wednesday, June 1, 2022 7:14:42 AM GMT-07:00
Attachments: Amy Jane Small to Jeanne M. Kvale_05.31.2022.pdf

Dear Ms. Kvale,

Please see attached letter and photos. My apologies for putting the photos in the body of the email rather than as attachments. For some reason my computer was not cooperating during that process.

Sincerely,

Amy Jane Small



e Small

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

May 31, 2022

Jeanne M. Kvale
The Hathaway Law Firm, LLP
5450 Telegraph Road
Ventura, CA. 93006
Via Email – ldillard@hathawaylawfirm.com (Secretary to Jeanne M. Kvale)

Subject: **The Sharon M. Harold Irrevocable Trust dated November 12, 2004**

Dear Ms. Kvale,

My plan was to write to you today and confirm that you received my email and documents that I sent of Friday May 27th, 2022 if I had not received confirmation, of which I have not. However, that confirmation will not be necessary as I found out from other parties that my email was received by your office.

I know that because I emailed you ONLY (via idillard) and cc'd myself. However on Friday May 27th, 2022 my brother, John, witnessed my mother's cell phone ring while they were eating Chinese food at a restaurant together sometime around 4:00pm – 5:00pm. This was an invitation from my mother to John earlier in the day sometime after Noon while he was at her house so she could address an envelope for him, as he is disabled and unable to write nor speak due to his condition (M.S.A Multiple Symptom Atrophy). Upon the phone ringing during their dinner, my mother looked at her caller id and announced to John that it was David calling. She then answered the phone while at the table with my brother sitting there. She asked David 'what's up?' and informed him that she was sitting down eating Chinese food for dinner. My brother stated that he could hear David tell Sharon that he felt sick and then his voice became very, very quiet after that. After David's voice became quiet my brother could only hear my mother's replies to whatever David was saying on the other end of the line which was, "What letter? From who? Read it! ...Who has Power of Attorney!? Amy?! ...No, no, no that's not true ...Jeni has POA for my healthcare and Amy has to distribute my property in my house after I die ...What is wrong with Amy? Why is she doing this? No, no David I know you're not



stealing from me...I know, I'm sorry this is making you so sick...Please don't worry about it. I promise you it will all work out in the end ...You take care of yourself ...goodbye."

- I find this information concerning for the following reasons.
 1. In your initial letter to me, it stated that you are representing David Allen Paice. The letter made no mention that you are representing Sharon M. Harold. Are you also representing my mother? If not, should David be discussing his case with Sharon or was David in violation of Attorney/Client privilege on Friday May 27th, 2021 when he called my mother to discuss this?
 2. My mother claims to not recall appointing me Power of Attorney in June of 2018. In fact, she called me and told me that she was going to change her POA and put me on it and remove my sister Jeni which is who was POA, according to my mother, at that time. I never once called or asked to be her POA, she solicited me because she became upset with Jeni and had gotten into an argument with her so decided to remove her. My phone was on speaker phone that day my mother called and my husband was with me and witnessed the entire phone call with my mom telling me what she was going to do. If my mother does not recall any of this, then her mental state has severely declined which means she is also not of sound mind to make decisions in retaining an attorney. If she claims to be of sound mind with no limits to her mental state then the only other answer would be that she is not being honest in her claims of not knowing.
 3. Why were David and my mother discussing 'stealing'? I have never mentioned or suggested in any of my communication via mail, email or otherwise the act of stealing or anything close. I have simply requested a full accounting of The Sharon M. Harold Irrevocable Trust dated November 12, 2004 based on a statement David made to me over the phone on November 1, 2021 which was that my mother's Trust did not have enough money in it to support a care facility payment of \$5,500 per month.

Earlier in the day on Friday May 27th, 2021 when sometime around or after 12:30pm, my brother John showed up at my mom's house to have him address an envelope for him (as stated above). Upon his entry my mother said, "What's up? Are you here about the Trust?" My brother grunted/motioned 'No'. While he was taking a look at my mom's phone, per her request regarding an issue she was having with the ringer, he noticed her walk over to and begin shuffling through a pile of papers she has. As he attempted to get her attention again so she could address his envelope for him, he watched as she pulled out a paper and began to read it. She appeared to be speaking to herself

out loud in a quiet whisper like voice and said "Why is Angel's name on my house title? That means she can sell my home. I need to change that. I'm going to need that money to take care of me."

- I find this information concerning for the following reasons;
 1. My mother claims to not recall putting my sister's name on her house. In fact, she mentioned she had done this prior at the time she called and informed me that she was going to change her POA to me. This happened during the same conversation. Again, my phone was on speaker phone that day my mother called and my husband was with me and witnessed the entire phone call. If my mother does not recall any of this, then her mental state has severely declined which means she is also not of sound mind to make decisions in retaining an attorney. If she claims to be of sound mind with no limits to her mental state, then the only other answer would be that she is not being honest in her claims of not knowing.
 2. Most concerning was my mother's comment that she is going to need any monies from the house for her future care. If the Trust has plenty of money to support my mother's care of which her and David are now claiming (which is in direct contrast to what David told me over the phone on November 1, 2021) why is she concerned about needing that money(ies) to take care of herself?

My brother John reached out to me on Friday evening with this information as a concern for my mother's well-being. As she made comments that claimed she had no idea of changes she herself made and my brother also was aware of those changes, because she had told him previously. His concern is that our moms memory is continuing to decline.

I believe it is important for you to know that though my mother is very aware of my brother's condition and that it will continually get worse and he will eventually die from it, she still calls him when she has an emergency. Not sure how familiar you are with his condition (M.S.A) but if you know anything about Parkinson's, it is similar. The main difference is that where Parkinson's has to do with ones nerves, M.S.A has to do with ones muscles (ALL muscles such as legs, arms, tongue, swallowing, etc.). The point being that he already has trouble swallowing, walking, writing, standing, bending over and can no longer play the piano, talk, write, etc, and will only continue to worsen he is already disabled and barely able to care for himself yet she calls him in an emergency rather than 911.

On Sunday March 6, 2022 @ 4:36pm I received a text message from my brother, John, with a picture of a lot of blood on what appeared to be a floor. When I asked what happened, John stated that he received a call from my mother stating that she has fallen and could not get up and asked him to come over and help her. Upon arrival my brother found my mother on the kitchen floor covered in blood with a 4" to 5" gash on her skull. Being disabled and barely having enough muscles to sustain

himself, he could be of absolutely no help to getting her off of the floor. The best he could do was stand there and watch her figure out how to struggle to get off the floor and drive her to the hospital once she got up. This was a horrible accident and had it been any worse my mother may not have survived because my brother cannot be of any physical assistance to her nor can he really explain what was happening had he needed to call 911 due to his difficulty of speech because of his condition. The point to this is that my mother had taken a very bad fall, was laying in a pool of her own blood, knew that my brother is disabled and can be of no assistance yet chooses to call him rather than 911 as she lay surrounded by blood with her skull exposed and blood running down her face. She had no forethought that this was a real emergency. No person in their right mind would have made the decision my mother did. This is highly concerning. I have attached photos of her injury to this email so you have a better understanding of the severity of the situation at this time the accident happened.

Another example of how I know your office received my letter received my letter on Friday May 27, 2022 is because on my drive home from work today, I reached out to my sister, Angel, via phone because I had a missed call from her on Saturday and was able to get back to her over the weekend due to being busy so was just returning her call. She stated that she was just calling to ask me if I sent another letter because my mother was complaining via phone and text to her that, "...half the shit Amy said in that letter was inaccurate"... "Do you realize that this crap with Amy has 3 Attorneys and an accountant involved and it is wasting money I don't have." My sister stated that she received a copy of the letter that I sent dated April 27, 2022 and did not recall seeing anything as inaccurate. My mom stated that she was not referring to the original request letter but rather the '5-page letter' I sent. I only sent 1 letter that was 5-pages and it was sent to you (via idillard) ONLY and cc'd myself. I never sent a copy of that email to my mother. After disclosing to my sister that there are three Attorneys and one Accountant working on this, she then tells her that she cannot discuss this with anyone. She just did discuss it with my sister!

- If you represent David only and David is honoring his Attorney/Client privilege and not discussing this with anyone how then did my mother get a copy of the letter?
- Are you also representing my mother and is that why she received a copy of the letter? If yes, could you please notify my mother that you are representing her so I have documentation?
- Could you please advise who the other 2 Attorneys are that are working on this and who they are representing? I have only been notified by you that you are representing David Allen Paice.
- I am assuming that the Account working on this case is David Llewellyn.

- If my mother and David state that the trust has plenty of money, why did my mother state this was costing her money she did not have?

As an update to this letter that I wrote yesterday May 31, 2022; something happened since that I thought you should be aware of.

- Upon waking up and checking my emails (work and personal), I received an email from David Paice that was sent via Google docs stating Sharon has verified her Power of Attorney as current and approved providing access to documents (my mother is also copied on the email) which I find to be curious being that you are representing him and I would assume any communication would come from you. Based on this, I have not accepted the invitation to the docs as of yet and will not until I hear from you formerly confirming you are aware of this.
- I will include screenshots of the email I am referring to, for reference.

Regardless of my mother's opinion or anger towards me about this situation I will continue to take my Power of Attorney assignment seriously and in the best interest of my mother and her well-being now and in the future which is why she appointed me in the first place. I have never borrowed or asked to borrow any monies from my mother and my only interest in the Trust account balance is so that I can work on getting her exactly what she wants, which is to be in a care facility or her choice and the absolute best one that the Trust monies can afford her. The main reason for the Trust is for my mother and her care and now that she has retained an attorney and is paying for David's representation she will not be afforded the end of life care that she so rightfully deserves because it will all be sucked up on legal fees. Once again, my goal is the same as it has always been which is to get a full accounting of the Trust so that decisions can be made for my mother's care. That is all this has ever been about.

Regards,

Amy Jane Small

Amy Jane Small

EXHIBIT 4

Subject: HAROLD: Correspondence re Harold Irrevocable Trust Representation
From: Jeanne Kvale <jkvalelaw@hotmail.com>
To: "ajharold9@gmail.com" <ajharold9@gmail.com>
Cc: "smharold7@gmail.com" <smharold7@gmail.com>, David Paice <paice@outlook.com>, Joseph Chrisman <jchrisman@hathawaylawfirm.com>
Date Sent: Tuesday, June 7, 2022 3:15:04 PM GMT-07:00
Date Received: Tuesday, June 7, 2022 3:15:07 PM GMT-07:00
Attachments: HAROLD Correspondence Dated 06072022.pdf

Hi Amy,

See attached correspondence.

Best regards,
Jeanne Kvale

The Hathaway Law Firm, LLP
5450 Telegraph Road
Suite 200
Ventura, CA 93003
Ph: 805.644.7111, Ext. 321 Fax: 805.644.8296

Visit our Web Site at www.hathawaylawfirm.com

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STEVEN S. FEDER*
DANIEL A. HIGSON**
GREG W. JONES
JEANNE MACCADDEN KVALE
SETH P. SHAPIRO
*CERTIFIED SPECIALIST
ESTATE PLANNING, TRUST & PROBATE LAW
**CERTIFIED SPECIALIST
BANKRUPTCY LAW

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JENNIFER A. ROLLAG
BONNIE P. RYAN
CERTIFIED PARALEGALS

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

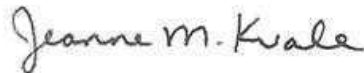
June 7, 2022

Dear Ms. Small,

Thank you for your correspondence relating to the Sharon M. Harold Irrevocable Trust. As you may know, our office, primarily Joe Chrisman, represented Sharon Harold many years ago. David Paice contacted our office after receiving your correspondence dated April 27, 2022 and our office agreed to represent him as the successor trustee of Sharon's Irrevocable Trust.

Our office has now advised both Sharon and David that they should retain independent counsel. Our office will not be representing either Sharon or David with respect to The Sharon M. Harold Irrevocable Trust.

Best regards,



Jeanne M. Kvale

Subject: Re: HAROLD: Correspondence re Harold Irrevocable Trust Representation
From: Amy Jane Small <aj.harold9@gmail.com>
To: Jeanne Kvale <jkvalelaw@hotmail.com>; "ajharold9@gmail.com" <ajharold9@gmail.com>
Cc: "smharold7@gmail.com" <smharold7@gmail.com>; David Paice <paice@outlook.com>; Joseph Chrisman <jchrisman@hathawaylawfirm.com>
Date Sent: Wednesday, June 8, 2022 10:06:22 AM GMT-07:00
Date Received: Wednesday, June 8, 2022 10:06:23 AM GMT-07:00

Received. Thank you.

Get [Outlook for iOS](#)

From: Jeanne Kvale <jkvalelaw@hotmail.com>
Sent: Tuesday, June 7, 2022 3:15:04 PM
To: ajharold9@gmail.com <ajharold9@gmail.com>
Cc: smharold7@gmail.com <smharold7@gmail.com>; David Paice <paice@outlook.com>; Joseph Chrisman <jchrisman@hathawaylawfirm.com>
Subject: HAROLD: Correspondence re Harold Irrevocable Trust Representation

Hi Amy,

See attached correspondence.

Best regards,
Jeanne Kvale

The Hathaway Law Firm, LLP
5450 Telegraph Road
Suite 200
Ventura, CA 93003
Ph: 805.644.7111, Ext. 321 **Fax:** 805.644.8296

Visit our Web Site at www.hathawaylawfirm.com

The information contained in this e-mail is intended only for use of the individual or entity named above. This e-mail, and any documents, files, previous e-mails or other information attached to it, may contain confidential information that is legally privileged. If you are not the intended recipient of this e-mail, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, dissemination, distribution, copying or other use of this e-mail or any of the information contained in or attached to it is strictly prohibited. If you have received this e-mail in error, please immediately notify us by return e-mail or by telephone at (805) 644-7111, and destroy the original e-mail and its attachments without reading or saving it in any manner. Thank you

EXHIBIT 5

Subject: Sharon M. Harold Irrevocable Trust [LPPC-LP.FID719121]
From: "Webb, Silvia" <WebbS@LanePowell.com>
To: "aj.harold9@gmail.com" <aj.harold9@gmail.com>
Cc: "Kirk, Gary" <KirkG@LanePowell.com>, "Ohainle, Paul" <OhainleP@LanePowell.com>, "Schilbach, Aleksander" <SchilbachA@LanePowell.com>
Date Sent: Friday, June 10, 2022 3:03:02 PM GMT-07:00
Date Received: Friday, June 10, 2022 3:03:15 PM GMT-07:00
Attachments: David Paice - Letter to Amy J. Small - 6.10.2022.pdf

Good afternoon Ms. Small,

Attached please find a courtesy copy of correspondence from Mr. Schilbach in the above matter. A hard copy shall go out in today's mail.

Regards,

Silvia



SILVIA WEBB
Private Client Lead
webbs@lanepowell.com
D 206.223.6117 C 206.909.2444
LANEPOWELL.COM

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.



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

June 10, 2022

VIA ELECTRONIC MAIL – AJ.HAROLD9@GMAIL.COM

Ms. Amy Jane Small
P.O. Box 352
Graegle, CA 96103

Dear Amy,

We are reaching out in response to your recent e-mails to our client, David Allen Paice, successor trustee (“Trustee”) of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 (“Trust”). As you are aware, the Trustee was previously represented by Ms. Kvale. Our office now represents the Trustee.

We understand that you have requested that all communications related to the Trust come through the Trustee’s attorneys. Accordingly, please direct all communications regarding the Trust to us going forward. If you are represented by counsel, then please forward this letter to your attorney for a response.

First, please immediately stop threatening to contact the Trustee’s employer. That is unnecessary, harassing, and unproductive. Please be aware that if you proceed with contacting the Trustee’s employer, the Trustee will seek recourse and may hold you personally responsible for any adverse consequences that may result.

Second, we are working with our client and the accountant to finalize the Trust’s accountings. The accountings will be provided to those individuals who are authorized to receive them under California law, and the Trustee may decide to send them to all beneficiaries. Please be aware that we may also seek court approval of the accountings, trustee’s fees, and attorneys’ fees, all of which will be expenses borne by the Trust.

Third, we are working with our client to gather and provide any additional information that has been requested by the residual beneficiaries of the Trust. This information will be provided in due course.

Finally, we have enclosed a copy of the Trust instrument for your information.

Ms. Amy Jane Small
June 10, 2022
Page 2

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.

Very truly yours,

LANE POWELL PC



Paul Ohainle
Aleksander Schilbach

cc: Sharon Harold, Trustor of the Sharon M. Harold Irrevocable Trust dated November 12, 2004

PO/AS/scw
Enclosure

134455.0001/8999335.1

EXHIBIT 6

GOULD LAW FIRM, P.C.

ATTORNEYS AT LAW
243 W. COMMERCIAL
P.O. BOX 29
COOS BAY, OREGON
97420

Roger Gould, OSB# 721040

Pam Cardwell, Legal Asst.

Phone: (541) 269-5566
Fax: (541) 269-0670
E-mail: rogerg@epuerto.org

June 22, 2022

Amy Jane Small
PO Box 352
Graegle, CA 96103

RE: Sharon Margaret Daley Harold

Dear Ms. Small,

I represent your mother, Sharon Margaret Daley Harold.

This is to inform you that your mother has instructed me to notify you that she has revoked the General Power Of Attorney granted to you June 21, 2018. She has also revoked the Power Of Attorney With Disability Planning granted to you June 21, 2018. She has also revoked the Durable Power Of Attorney granted to you June 21, 2018.

You no long may exercise any of the powers and authorities granted to you by the above referenced documents.

Very truly yours,

A handwritten signature in black ink that reads "Roger Gould". The signature is written in a cursive, flowing style with a large initial 'R'.

c: Sharon Harold

GOULD LAW FIRM, P.C.
ATTORNEYS AT LAW
293 WEST COMMERCIAL
P.O. BOX 29
COOS BAY, OREGON 97420

CERTIFIED MAIL



7015 1520 0000 1016 4454

EUGENE OR 974

25 JUN 2022 PM 4 L

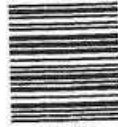


Amy Jane Small
PO Box 352
Graegle, CA 96103

6/27 ✓
7/2 ✓
7/12



1021



96103

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COOS BAY, OR
97420
JUN 23, 22
AMOUNT
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96103-0355252



EXHIBIT 7

Subject: Sharon M. Harold Irrevocable Trust - Letter and Mailings dated August 9, 2022
From: "Schilbach, Aleksander" <SchilbachA@LanePowell.com>
To: amy jane harold <aj.harold9@gmail.com>
Cc: "Webb, Silvia" <WebbS@LanePowell.com>, "Ohainle, Paul" <OhainleP@LanePowell.com>, "Kirk, Gary" <KirkG@LanePowell.com>
Date Sent: Tuesday, August 9, 2022 5:03:21 PM GMT-07:00
Date Received: Tuesday, August 9, 2022 5:07:45 PM GMT-07:00
Attachments: Harold Trust - Letter, Accountings, and Mailings dated Aug. 9, 2022.pdf

Dear Ms. Small,

I am writing in regards to the Sharon M. Harold Irrevocable Trust dated November 12, 2004. This afternoon our office, on behalf of Mr. Paice as trustee, and with Ms. Sharon Harold's consent, mailed out a letter, the Trust's accountings, a Notification by Trustee, and a copy of the Trust to you and the other residual beneficiaries of the Trust. Although you will receive the mailings via the U.S. Mail in the coming days, I am sending the documents to you now via e-mail as a courtesy.

Thank you for your patience and continued cooperation. Please let our office know of any questions.

Best regards,
Sascha



ALEKSANDER "Sascha" SCHILBACH
Associate [Bio](#) | [vCard](#)
(He/Him)
schilbacha@lanepowell.com
D 206.223.7094 C 206.436.9909
LANEPOWELL.COM

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.



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

August 9, 2022

VIA FIRST CLASS MAIL

Charles Harold
5301 S Superstition Mt. Dr. #103-350
Gold Canyon, AZ 85118

John Harold
230 Westmont Dr
Reedsport, OR 97467

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

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

Jenifer Sawyer
1819 74th St E
Tacoma, WA 98404

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

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

RE: The Sharon M. Harold Irrevocable Trust dated November 12, 2004
Trust Accountings & Notification of Trustee

Dear Mr. Charles Harold, 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"). 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.

As residual beneficiaries of the Trust, you are not entitled to the Trust's accountings under California law or the Trust itself. Nevertheless, the Trustee, with Ms. Sharon Harold's consent, is providing the Trust's accountings for 2010 through 2021.

In addition to the Trust's accountings, please find enclosed a Notification By Trustee ("Notification"). Although such a notification may have already been provided to you either after Robert G. Hatch resigned as trustee of the Trust, when David Llewellyn resigned as

Mr. Charles Harold, *et al.*
August 9, 2022
Page 2

trustee, or when our client consented to act as Trustee, we are providing this Notification in any event. The Notification indicates that you are entitled to a copy of the Trust agreement upon reasonable request. We are enclosing a copy of the Trust as a courtesy.

Please contact our office with any questions related to the Trust or the Trust's accountings.

Very truly yours,

LANE POWELL PC



Paul Ohainle
Aleksander Schilbach

PO/AS/scw

Enclosures: Notification By Trustee
Trust Accountings (2010-2021)
Copy of the Sharon M. Harold Irrevocable Trust dated November 12, 2004

Cc: Sharon M. Harold

134455.0001/9092907.1

EXHIBIT 8

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

24 September 2022
DATE:

EXHIBIT 9



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
Graeagle, 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,

STREET ADDRESS: 1420 FIFTH AVENUE SUITE 4200 | SEATTLE WA 98101-2375 P 206.223.7000 F 206.223.7107 LANEPOWELL.COM
MAILING ADDRESS: P.O. BOX 91302 | SEATTLE WA 98111-9402
A PROFESSIONAL CORPORATION

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



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:

134455.0001/9051364.3

EXHIBIT 10



Sharon Harold <smharold7@gmail.com>

RE: Sharon M. Harold Irrevocable Trust

3 messages

Sharon Harold <smharold7@gmail.com>

Wed, Oct 5, 2022 at 2:29 PM

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

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

Sharon Harold <smharold7@gmail.com>

Thu, Oct 6, 2022 at 7:24 PM

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

Please confirm receipt of this email.

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

From: Sharon Harold <smharold7@gmail.com>

Date: Wed, Oct 5, 2022 at 2:29 PM

Subject: RE: Sharon M. Harold Irrevocable Trust

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

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

Sharon Harold <smharold7@gmail.com>

Fri, Oct 7, 2022 at 6:47 PM

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

Paul, Alexsander & Silvia,

This is my second request asking for confirmation, via email, that you have received the email below dated October 5, 2022 @ 2:29pm (2 days ago) stating that I wish to revoke the release immediately.

Please confirm.

Respectfully,

Sharon M. Harold

[Get Outlook for iOS](#)

1/16/23, 7:47 AM

Gmail - RE: Sharon M. Harold Irrevocable Trust

From: Sharon Harold <smharold7@gmail.com>

Sent: Thursday, October 6, 2022 7:24 PM

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

Subject: Fwd: Sharon M. Harold Irrevocable Trust

Please confirm receipt of this email.

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

From: Sharon Harold <smharold7@gmail.com>

Date: Wed, Oct 5, 2022 at 2:29 PM

Subject: RE: Sharon M. Harold Irrevocable Trust

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

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