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Hearing Date: May 22, 2023
Honorable Wyman Yip
Without Oral Argument

**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 CHARLES A.
HAROLD, JR. IN SUPPORT OF
MOTION TO STAY PROCEEDING**

a Trust.

I, Charles A. Harold, Jr., declare as follows:

1. I am a Respondent in this action and a beneficiary of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 (the "Trust"). I am Grantor's son and hold a durable power of attorney, including attorney-in-fact with power to litigate for her.

2. In order to prevent David A. Paice ("Paice"), the acting trustee of the Trust from using my mother's trust fund to pay for his attorney fees, I filed a petition for a protection order on March 3, 2023 in a case entitled, *Harold v. Paice*, Case No. 23-2-03980-7 ("protection order matter"). A temporary restraining order was granted at the March 20, 2023 hearing which froze several accounts belonging to my mother as well as accounts belonging to Paice, among other remedies.

3. The continuation of the protection order was denied at the further hearing held on April 20, 2023. Paice's attorney, who was instructed to prepare the order, and I disagreed with respect to the proposed order. I then requested a presentation of the

1 denial order, and we were instructed to agree on a hearing date and time for the
2 presentation. Despite explaining to Paice's counsel and the court that neither my
3 mother and I were available on the scheduled hearing date, the court went ahead with
4 the presentation hearing without us.

5 4. In my investigation of the incident between my mother and my sister,
6 Jenifer Sawyer, I obtained a copy of an audio tape of the Reedsport Police
7 Department radio call made by the witness. I discovered that there was an error
8 between the dispatcher's log and the actual recording of the witness phone call. What
9 was actually said by my sister Jenifer Sawyer, Grantor's daughter was, "I hate you. I'm
10 going to kill you." Grantor responded by saying, "You want me dead?"

11 5. I also learned from my sister Josette Harold Ramirez that during this
12 same visit by Jenifer to my mother's home, Jenifer told Josette through phone calls
13 and texts that Jenifer was taking and photographing my mother's personal documents
14 relating to the Trust. Attached hereto as Exhibit A is a true and correct copy of the
15 Declaration of Josette Harold Ramirez filed in the protection order matter.

16 6. During the course of my monthly conversations with my sister Harmony
17 Harold, she informed me of an incident involving Briana Paice in which Briana said,
18 "I will tie up every penny of that trust and no one will get anything." Attached hereto as
19 Exhibit B is a true and correct copy of the Declaration of Harmony R. Harold filed in the
20 protection order matter.

21 7. In April, I was reviewing the online information relating to this case on the
22 Superior Court of Washington for King County website. When I selected the
23 "Participants" tab, I noticed that my mother was listed as deceased on this page. I
24 have emailed the clerks in both this case and the protection order case notifying them
25 of this error. I have also notified Paice's counsel of this mistake. It is unclear to me
26 how this designation occurred since my mother was originally listed as a respondent.
27 My mother has told me that she does not believe this is a mistake, and she finds this
28 very disturbing.

1 8. My mother has been actively involved in both this proceeding and the
2 protection order case. She contributes to her defense by providing evidence and
3 pertinent records. In addition, she has attended every hearing, excluding the denial of
4 the protection order presentation. Respondents serve at the direction of and for the
5 benefit of my mother.

6 9. On April 18, 2023, my mother called me to let me know she was at the
7 emergency room because her head “felt full.” This was her third visit to the emergency
8 room this year.

9 10. On April 27, 2023, my mother called me to tell me that she was going to
10 see her personal doctor, Robert Jacques, as a follow-up to her emergency room visit
11 and because she was not feeling better. Based on her symptoms and her medical
12 history, Dr. Jacques wrote a letter requesting a 90-day reprieve from litigation in order
13 to allow low level medical intervention. On April 28, 2023, my mother told me that she
14 was going to pick up the letter from Dr. Jacques’ office and send me a copy. A true
15 and correct copy of Dr. Jacques’ letter is attached hereto as Exhibit C.

16 11. On May 4, 2023, my mother told me that she was having trouble
17 breathing and that my brother was driving her to the emergency room. I spoke with the
18 emergency room doctor treating her. He informed me that my mother’s cardiac
19 enzymes were elevated and would have to be monitored to ensure that they did not
20 continue rising. If they did, that would constitute a heart attack. After treatment, the
21 cardiac enzymes decreased; she was diagnosed with a near heart attack and was
22 discharged. His recommendations were for my mother to take it easy and reduce her
23 stress levels and to follow-up with a cardiologist.

24 12. There is no urgent matter before this Court that would prove detrimental
25 to my mother by waiting a maximum of 90 days for her health to recover. Her living
26 expenses are fully funded for the year, and she has the additional financial support of

27 ///

28 ///

1 her children. Her health and recovery are the actual urgent matters before us
2 presently, and I respectfully request that this Court grant the 90-day medical reprieve.

3
4 DATED: May 9, 2023

s/Charles A. Harold, Jr.
Charles A. Harold, Jr.
Respondent in pro se

EXHIBIT A

FILED
2023 APR 17 03:40 PM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 23-2-03980-7 KNT

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

**DECLARATION OF JOSETTE
RAMIREZ HAROLD IN SUPPORT OF
PETITIONER'S REPLY BRIEF**

I, Josette Ramirez Harold aka Joie Harold, declare as follows:

1. I am the daughter of the Protected Party Sharon M. Harold ("Mom") and a beneficiary of the Sharon M. Harold Irrevocable Trust dated November 12, 2004 (the "Trust"). I am also a party to the TEDRA proceedings involving the Trust, Case No. 22-4-03826-1 KNT. I have personal knowledge of the facts set forth herein. I make this declaration in support of the Petitioner's Reply Brief.

2. On September 4, 2022, my sister, Jenifer (Harold) Sawyer, and I were having a conversation on the phone. She told me she was at our Mom's house looking through some papers.

3. I asked her, "What are you looking at?" Jeni told me that she was going through all of Mom's mail and legal paperwork that had to do with the Trust.

DECLARATION OF JOSETTE RAMIREZ HAROLD IN SUPPORT OF - 1
PETITIONER'S REPLY BRIEF

CHARLES A. HAROLD, JR., IN PRO SE
1455 N. TOMAHAWK ROAD
APACHE JUNCTION, AZ 85119
(818) 652-6400;
EMAIL: CHUCKHAROLD@GMAIL.COM

Doc ID: 5c543c0fa776a4d7f767032b0d93407424d7ee57

1 4. I then asked Jeni, "Why are you doing that? Isn't that illegal or
2 something? "

3 5. Jeni then told me that she was taking pictures of some documents and
4 removing copies of others just in case the "Evil Siblings" (referring to my brothers and
5 sisters Charlie Harold, John Harold, Amy (Harold) Small and Angel Harold) decided to
6 change or hide something."

7 6. I said, "I don't think that's a good idea, Jeni, and it's also an invasion of
8 Mom's privacy. I'm pretty sure it's also a felony to read someone else's mail or legal
9 papers." Jeni then said that she would call me later because John (our brother) was
10 there at Mom's house.

11 7. Jeni called and texted me several other times while she was at Mom's
12 house between September 3 and September 10. One of the texts I remember was a
13 picture of Jeni's desert. She was out to dinner with Mom at the time.

14 8. On or about September 10, 2022, I got a text from Jeni saying she was
15 home. Jeni also called me on September 10 because I remember asking if she was
16 home from the Vortex, that is what I called where my mother lives.

17 9. I have attached hereto as Exhibit A, a true and correct copy of the phone
18 calls and texts between Jeni and me from September 3 to September 10, 2023.

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

21 Executed this 10th day of April, 2023 at Culver City, California.

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JOSETTE RAMIREZ HAROLD

Title	2023-04-10 Joie Dec
File name	2023-04-10 Joie Dec.pdf
Document ID	5c543c0fa776a4d7f767032b0d93407424d7ee57
Audit trail date format	MM / DD / YYYY
Status	● Signed

Document History





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 SIGNED	04 / 11 / 2023 03:01:12 UTC	Signed by Josette Harold Ramirez (jobabe007@gmail.com) IP: 172.58.209.75
 COMPLETED	04 / 11 / 2023 03:01:12 UTC	The document has been completed.

EXHIBIT A

Calls between sisters Jennifer (Harold) Sawyer and Josette Harold-Ramariz during the time Jennifer was staying at Sharon M. Harold's house 2022-09-03 and 2022-09-10. Per Josette Harold, Jennifer Harold was photographing and removing financial and other documents belonging to Sharon M. Harold, without Sharon's knowledge or approval.

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
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 9:32	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing

9/4/2022 14:54	Reedsport Police Department received a call from Sharon Harold's neighbor: "Neighbor in 103 a female possibly a relative came over this morning and they were fighting and heard jeni say, "I hate you. I'm going to kill you!" to which Sharon responded, "You want me dead?" Jennifer (Harold) Sawyer identified as was her car. The call was cleared at 17:33 hours as code-4.					
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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
9/8/2022 16:30	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	to Tacoma WA	T-Mobile to T-Mobile	12 Min

Calls between sisters Jenifer (Harold) Sawyer and Josette Harold-Ramariz during the time Jenifer was staying at Sharon M. Harold's house 2022-09-03 and 2022-09-10. Per Josette Harold, Jenifer Harold was photographing and removing financial and other documents belonging to Sharon M. Harold, without Sharon's knowledge or approval.

9/8/2022 17:02	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Incoming	T-Mobile to T-Mobile	1 Min
9/8/2022 17:03	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Incoming	T-Mobile 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
9/9/2022 17:40	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Incoming	T-Mobile to T-Mobile	1 Min
9/10/2022 8:36	JOIE HAROLD TO/FROM	Jenifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming
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

Calls between sisters Jennifer (Harold) Sawyer and Josette Harold-Ramariz during the time Jennifer was staying at Sharon M. Harold's house 2022-09-03 and 2022-09-10. Per Josette Harold, Jennifer Harold was photographing and removing financial and other documents belonging to Sharon M. Harold, without Sharon's knowledge or approval.

9/10/2022 8:37	JOIE HAROLD TO/FROM	Jennifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jennifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jennifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Outgoing
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jennifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming
9/10/2022 8:37	JOIE HAROLD TO/FROM	Jennifer (Harold) Sawyer	(253) 228-9264	Tacoma WA	Text	Incoming
9/10/2022 9:00	JOIE HAROLD TO/FROM	Jennifer (Harold) Sawyer	(253) 228-9264	Incoming	T-Mobile to T-Mobile	46 Min

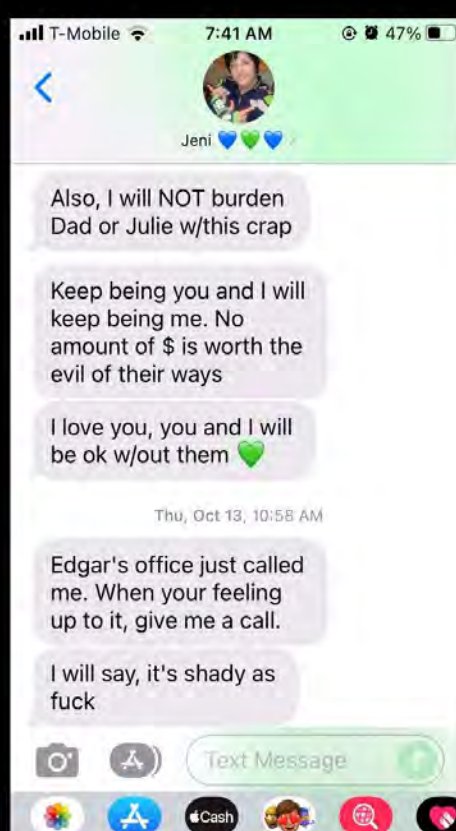
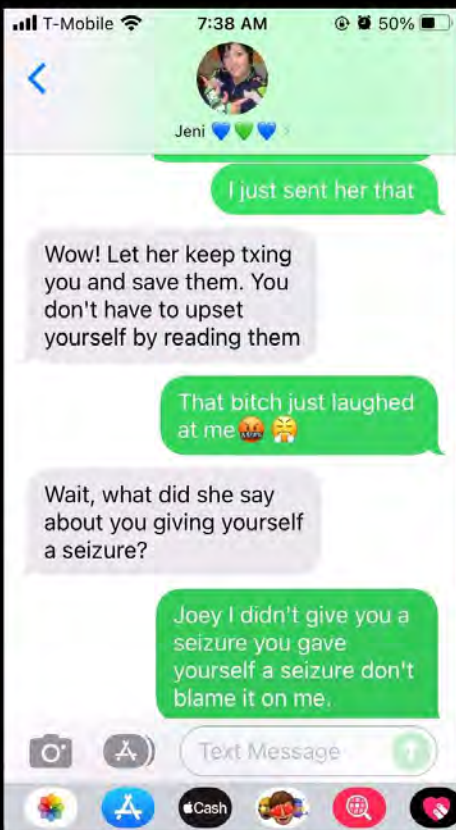


EXHIBIT B

HONORABLE HENRY JUDSON
Hearing Date: April 20, 2023

FILED
2023 APR 17 03:40 PM
KING COUNTY
SUPERIOR COURT CLERK
E-FILED
CASE #: 23-2-03980-7 KNT

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

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

Case No. 23-2-03980-7 KNT

Petitioner,

vs.

**DECLARATION OF HARMONY R.
HAROLD IN SUPPORT OF
PETITIONER'S REPLY BRIEF**

DAVID ALLEN PAICE,

Respondent.

I, Harmony R. Harold, declare as follows:

1. I am Petitioner's half-sister as well as Respondent David's aunt by marriage. Respondent's wife, Briana Paice is my niece, the daughter of my half-sister Jeni (Harold) Sawyer. I have personal knowledge of the facts set forth herein. I make this declaration in support of the Petitioner's Reply Brief.

2. I, along with Petitioner and my other brothers and sisters, attended the funeral for Respondent David's daughter, Katherine ("Kate") Paice on March 10, 2018.

3. There were a lot of family members at Respondent David and Briana's house immediately after the funeral, mostly my brothers and sisters and their families. We were all commiserating about Kate's loss.

DECLARATION OF HARMONY HAROLD IN SUPPORT OF - 1
PETITIONER'S REPLY BRIEF

CHARLES A. HAROLD, JR., IN PRO SE
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APACHE JUNCTION, AZ 85119
(818) 652-6400;
EMAIL: CHUCKHAROLD@GMAIL.COM
Doc ID: c8bf816af2d397b3f08ce94fec713c9e6b55609a

1 4. After the services and family visits were over and all the guests left, I
2 stayed at Respondent David's house to help and show support for Respondent David,
3 Brieana and their daughter Ellie.

4 5. Two days after Kate's funeral, Brieana told me that someone in our
5 family was questioning how she could afford that house on her and her Respondent
6 David's salaries. That was the first time the family member saw the house.

7 6. Brieana was pretty upset about this, and she said to me, "My daughter
8 just died, and they're checking out my fucking house? I will tie up every penny of that
9 trust and no one will get anything."

10 7. I took that to mean that Brieana was referring to the Sharon Harold trust.
11 That is the only trust I know of, the money David manages for Sharon. I don't know of
12 any other trusts.

13 8. Most people at Brieana's house that day were her aunts and uncles, all
14 beneficiaries of the trust Respondent David manages for Sharon.

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

17 Executed this 11th day of April, 2023 at Portland, Oregon.

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21 HARMONY R. HAROLD
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Title	Harmony Dec 4_11_23
File name	Harmony Dec 4_11_23.pdf
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EXHIBIT C

Date April 20 seven 2023

Note origination:

Robert L Jacques MD
OR Med License (MD 19329)
Dunes Family Healthcare Center
1620 Ranch Rd, Reedsport OR 97467

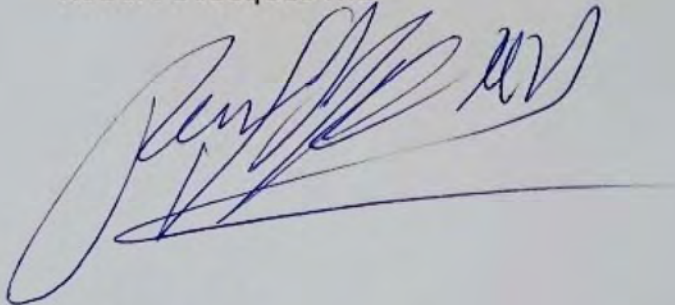
To whom it may concern:

Sharon Harold Was seen in the emergency room setting at Lower Umpqua Hospital on March 24, 2023 complaining of severe global headache described as if her head was about to explode. She very rarely experiences headaches their being absence of any significant neurologic symptoms or sequelae, work up in the emergency room setting failed to demonstrate any evidence of significant pathology. These headaches have persisted on a much severe level. In conjunction with this she's had some issues with memory, anxiety, and difficulty sleeping.

It would appear she has been under significant stress as to how her personal Trust has been managed. As her position is contested it would appear that legal aspects will necessitate several months of involvement and continued stress. Her response given her age at 85 and History of moderately severe hypertension has left her perceiving a high level degree of vulnerability regarding her health. She is requesting a brief reprieve of perhaps 90 days to allow the benefit of a low grade level of medical intervention.

The courts sensitivity to her needs and health at this time in granting her this time is much appreciated.

Robert L Jacques MD

A handwritten signature in blue ink, appearing to read 'Robert L Jacques MD', with a long horizontal flourish extending to the right.