IN THE CIRCUIT COURT OF THE FIFTEENTH

JUDICIAL CIRCUIT OF FLORIDA, IN AND FOR

PALM BEACH COUNTY, FLORIDA

Case No. 502011CP000653XXXXSB

Honorable Judge Martin Colin

IN RE

ESTATE OF SHIRLEY BERNSTEIN,

Deceased. Division: IY

**\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_/**

**OBJECTIONS TO INVENTORY BY TED S. BERNSTEIN, AS**

**SUCCESSOR PERSONAL REPRESENTATIVE**

Objector, ELIOT IVAN BERNSTEIN (“Objector” or “Eliot”), individually and on behalf of his minor children ("Petitioner"), who are alleged qualified beneficiaries[[1]](#footnote-1) of the Estate (the "Estate"), and Trusts of Shirley Bernstein, hereby Objects to the Final Accounting put forth by the Successor Personal Representative, Theodore Stuart Bernstein (“TED”) and his counsel Alan B. Rose, Esq., (“ROSE”) as permitted by Florida Probate Rule 5.401. OBJECTIONS TO PETITION FOR DISCHARGE OR FINAL ACCOUNTING and any other germane statutes and in support thereof, on information and belief, Objector alleges as follows:

**Background**

1. That the Estate of Shirley has been reopened by this Court due to Fraud that was committed upon the Court and the Beneficiaries of the Estate of Shirley Bernstein to close the Estate, including using a deceased Personal Representative, Simon Bernstein, to the close the Estate of Shirley illegally, leading to the Estate being reopened and which remains open as of the date of this filing.
2. That TED was appointed by this Court on October 29, 2013, prior to his attorneys who represented him as PR when he was not officially appointed as there was no PR due to the Estate being closed by his deceased father illegally and thus no Successor was nominated due to this complex fraud on the beneficiaries and FRAUD UPON THIS COURT.
3. That TED’s counsel was later, after TED’s appointment by this Court as PR when the Estate was reopened, removed as Successor Personal Representatives and Successor Trustees of Simon Bernstein’s Estate and Trust and resigned from any involvement in the Estates and Trusts of Simon and Shirley Bernstein and all of their representations of TED, for criminal acts committed by their law firm involving Fraud on the Court and Fraud on the Beneficiaries, including Fraud involving the Estates and Trusts of both Simon and Shirley Bernstein. The crimes all benefited TED and his family who were disinherited and considered predeceased prior to the criminal acts to alter beneficiaries and seize Dominion and Control of the Estates and Trusts through a series of fraudulent acts.
4. That the fraud committed in the Shirley Estate caused this Court to reopen the closed Shirley Estate.
5. That the removed attorneys at law who worked at the law firm Tescher & Spallina PA, Robert Spallina, Esq. (“SPALLINA”) and Donald Tescher, Esq. (“TESCHER”), were not known at the time to have directly been involved in the fraud committed by their law firm, as the criminal acts were alleged to have been committed **only** by their Notary Public, Kimberly Moran (“MORAN”), who was later arrested and prosecuted for fraudulently notarizing six documents in Shirley’s Estate, for six separate parties and admitted additionally to forging the documents, including POST MORTEM fraud and forgery for documents purported to be signed by Simon Bernstein and used to close his deceased wife Shirley’s Estate while Simon was dead for several months.
6. That at that time of TED’S appointment, TED’S close friends TESCHER and SPALLINA were also acting as Counsel for TED as alleged Successor Trustee in the Shirley Trust and SPALLINA stated to the Court in a hearing on September 13, 2013 that he knew of no other problems in the Estates or Trusts of Simon and Shirley than those committed by MORAN.
7. That on or about January 21, 2014 TED’S counsel SPALLINA, admitted to Palm Beach Sheriff Officers that he and his partner TESCHER had conspired together to fraudulently alter a Shirley Bernstein Trust document that added language to include their business associate, friend and client, TED’s family into the Shirley Trust to allow for illegal and fraudulent distributions to TED. TED and his family were considered Predeceased for all purposes of dispositions in the Estates and Trusts of both Shirley and Simon. (See EXHIBIT A – PB SHERIFF REPORT)
8. That SPALLINA then stated after he and his partner TESCHER consulted with each and determined that TED and his family could not be legally be put into the Shirley Trust that he then personally fraudulently altered a Shirley Trust document and the document was then disseminated to various parties to perpetrate a Fraud on Beneficiaries and allow TED to take illegal distributions. Funny part of the story is that SPALLINA claimed to PB Sheriff Investigators that TED took the distributions against the advice of counsel. See EXHIBIT A – PBSO Sheriff Report)
9. That Spallina also stated to Sheriff Investigators that TED was advised by counsel not to make distributions of Shirley’s assets due to both a creditor still being involved in litigation with the Estate and Trust of Shirley and because the beneficiaries could only be Eliot Bernstein, Jill Iantoni and Lisa Friedstein but TED allegedly ignored counsels advice, who had altered the documents to permit the crime and made distributions to members of his family despite knowing they were not legal beneficiaries.
10. That due to the fraud committed by TED’S attorneys at law, TED should have not been appointed by the Court due to his involvement with his attorneys in perpetrating the Fraud on the Court and the Fraud on the Beneficiaries despite any alleged language in the dispositive documents naming him a fiduciary, however the Court and the beneficiaries at the time of the appointment of TED were not aware of TESCHER and SPALLINA’S direct fraudulent acts in addition to MORAN’S, as they concealed this to the Court and in fact concealed this fact that they had also committed perjury in the initial hearing on September 13, 2013, failing to tell the Court of their crime that occurred months before, on or about January 2013.
11. The legal authenticity of the dispositive documents have been challenged on the basis that these documents may also be part of a Pattern and Practice of Fraudulent documents and it is alleged that TED was fraudulently inserted into the dispositive documents of Shirley.
12. That since the Court has appointed TED as PR he has failed to take necessary fiduciary steps to correct the violations of law regarding his former counsel, business associates and friends TESCHER and SPALLINA, who he introduced to Simon and his appointment instead has led to a continued Pattern and Practice of Fraud on this Court, Fraud on the Beneficiaries and Fraud on the Creditors, as will be evidenced in part below in the Specific Objections to the Inventory TED provided to this Court and the To Be Determined Beneficiaries.

**Specific Objections to Inventory**

1. No financial information, physical evidence, tangible things or backup and any account statements or information were provided with the Inventory prepared by TED that evidence or relate to any transactions listed. All items on the Inventory need further investigation, thus the Objector objects as set forth below. In addition, the Objector objects as no substantiating documents were provided, thus the Objector reserves his right to further object to same.
2. That Simon Bernstein is alleged to have completed an inventory of the Estate of Shirley on September 08, 2011, that inventory was recently discovered to have never been sent and verified to the beneficiaries as statutorily required and was only proffered to the Florida Department of Revenue. (See EXHIBIT B - Inventory of Shirley prepared and posited with the Court and Tax Department by TESCHER and SPALLINA acting as Counsel for the PR Simon Bernstein and TED Inventory)
3. That it is alleged that the inventory of Simon of Shirley’s Personal Property was removed from the dispositive documents and replaced with this fraudulent inventory that is the only inventory provided to this Court and the Tax Department and NOT BENEFICIARIES and appears to be yet another fraudulent document inserted into the record as part of the past Fraud on the Court committed by the prior fiduciaries and their counsel to effectuate a change of Beneficiaries illegally and more importantly to seize Dominion and Control of the Estates and Trusts through fraudulent dispositive documents to benefit their business associate, client and close personal friend TED.
4. That the September 08, 2011 Inventory failed to claim any of Shirley’s Personal Property on the Inventory and stated that it totaled $25,000.00 total. Current parole evidence already introduced into the record shows that Personal Properties of Shirley were significantly higher.
5. That Objector Eliot has personal knowledge of far more Personal Property owned by Shirley when she died that totaled far more than $25,000.00.
6. That TED, after being appointed PR to the re-opened Estate of Shirley learned that Shirley’s Personal Property had been transferred to Simon without first being accounted for on the Shirley Inventory sent to the Florida Tax Department and posited with this Court and in violation of Florida Probate Rules and Statutes failed to modify, adjust or amend the alleged initial inventory to reflect Shirley’s property that he had become aware of and yet Ted failed to account on his Inventory filed these items he became aware of.
7. That it appears that the alleged Will of Shirley may be missing Addendums and Schedules and more, which appears to have had specific items Shirley was bequeathing to individuals but that appear at this time to be missing from the dispositive documents tendered.
8. When asked in a hearing before this Court how the amount of $25,000.00 was derived on the Tescher & Spallina, PA Inventory prepared, Simon’s counsel as PR at the time SPALLINA stated he called Simon and asked what Shirley’s properties were worth and Simon allegedly claimed to him only $25,000.00. SPALLINA further stated when asked by the Court how that number was verified claimed that no verification or inventorying was done and he took it on faith or words to that effect.
9. That both TESCHER (the lead attorney on the Bernstein’s accounts when the account transferred from the firm Tescher Gutter Chaves Josepher Rubin Ruffin & Forman PA to Tescher & Spallina, PA and TED’s close personal friend) and his junior Partner SPALLINA knew of far more Personal Properties of Shirley’s as they were counsel who designed their Estate plans of Simon and Shirley and further knew first hand of Shirley and Simon’s net worth’s and extensive Personal Properties and who had visited their home and witnessed Personal Properties far more than they claimed on the Inventory supplied to the Tax Department and this Court and never sent to beneficiaries in violation of Probate Rules and Statutes.
10. That prior to any transfer of Personal Properties to any party, including Simon, the assets of Shirley were required to be inventoried in full and then transferred to Simon and this transfer took place at a time when the transfer was not taxable and thus there would be no reason to fail to properly account to avoid or evade taxes. That Eliot made repeated requests to TED to provide accounting for all missing items from Shirley’s original Inventory, which were ignored.
11. That it was then learned through appraisals submitted regarding Shirley’s assets that there was well over $25,000.00 of furniture, jewelry, art and more that was transferred to Simon but was not listed on her inventory prior to the alleged transfer and many of these items are now missing or stolen.
12. That TED being the Son of Shirley, also had firsthand knowledge of far more art, jewelry, clothing, vehicles and furniture owned by his mother and in statements made to this Court stated falsely that he was unaware of anything she owned worth over $25,000.00 and that the number made sense to him despite his personal knowledge of her assets.
13. That Objector alleges that much of this property has been stolen by the former fiduciaries and prior counsel involved in these matters, along with TED and his siblings, primarily TED and his sister Pamela Simon (“PAM”), both considered predeceased for purposes of the Estates and Trusts of both Simon and Shirley. The crimes committed were with intent and aided by the former fiduciaries in the Simon Estate and Trust and TED’s counsel in the Shirley Estate and Trust, business associates and close personal friends, TESCHER and SPALLINA, who intentionally left the assets stolen off the inventory of Shirley.
14. That it is alleged that the Inventory Simon prepared for Shirley has been replaced with the alleged Inventory submitted only to the Tax Department and this Court by TESCHER and SPALLINA and provides a reason why NO items were accounted for in Shirley’s purported Inventory and only later accounted for, in part, in Simon’s Estate by the former fiduciaries and counsel, TESCHER and SPALLINA.
15. That for example, personal property of Shirley’s included a fully paid for Bentley Automobile with a resale value of approximately several hundred thousand dollars and her wedding ring, worth an appraised value immediately prior to her death of approximately $250,000.00.
16. That additionally Eliot later submitted to the Court an insurance policy that covered and appraised a portion Shirley’s Jewelry (See EXHIBIT C- Insurance Appraisal) shortly before her death where several hundred thousand dollars of Jewelry was insured and none of this was on Shirley’s inventory.
17. That the appraised value of Shirley’s Personal Property in the contents of the Real Estate owned by the Shirley Trust have been questioned by both Eliot and the Creditor William Stansbury as being deficient and low balled with scienter by TED. (See EXHIBIT D – Personal Property Appraisal)
18. That it was claimed that all of Shirley’s assets were transferred to Simon without inventorying but the legal problem is that they were never first put on her inventory according to the TESCHER and SPALLINA on the original Inventory that Simon allegedly produced that they provided to the Tax Department and this Court, prior to the transfer to Simon and thus are not properly accounted for according to Generally Accepted Accounting Principles and Probate Statutes and Rules on Shirley’s original inventory.
19. That Simon, an expert in Estate planning and who ran Trust companies would never have falsified a document sent to a Tax Department or any party, while knowing of far more assets of his wife, especially since there would be no gain from submitting a fraudulent inventory to this Court and a Tax Department.
20. That learning of these missing items not included on Shirley’s inventory, TED as Successor Personal Representative has failed to submit a statutorily required amended inventory and has instead chosen to further conceal this information from both the Court and Beneficiaries, submitting yet another fraudulent and incomplete Inventory to this Court and Beneficiaries, further attempting to cover up the crimes of business associates and former counsel TESCHER and SPALLINA, concealing the items again and breaching his fiduciary duties under law to amend the Inventory. The Court should note that TED is one of the main alleged suspects in ongoing PB Sheriff investigation’s into the stolen Personal Properties.

**733.604 Inventories and accountings; public records exemptions.—**

(1)(a) Unless an inventory has been previously filed a personal representative shall file a verified inventory of property of the estate, listing it with reasonable detail and including for each listed item its estimated fair market value at the date of the decedent’s death.

**(2) If the personal representative learns of any property not included in the original inventory, or learns that the estimated value or description indicated in the original inventory for any item is erroneous or misleading, the personal representative shall file a verified amended or supplementary inventory showing any new items and their estimated value at the date of the decedent’s death, or the revised estimated value or description.**

(The inventory filed by Spallina & Tescher was never docketed, verified and served to the beneficiaries, the copy beneficiaries have is to the tax department only allegedly.)

1. That TED also learned that items that were inventoried on Simon’s Estate Inventory and then appraised had far greater appraisal values than the appraisal he secured and failed to note this on his Inventory or notify beneficiaries of the massive differences of appraised items. Shirley in fact had the items appraised for an insurance policy that specifically dealt with her Personal Properties.
2. That TED has failed to comply with,

RULE 5.340. INVENTORY

(c) Amendments. A supplementary or amended inventory containing the information required by subdivision (a) as to each affected item shall be filed and served by the personal representative if:

**(1) the personal representative learns of property not included in the original inventory; or**

**(2) the personal representative learns that the estimated value or description indicated in the original inventory for any item is erroneous or misleading** [the $25,000.00 stated as her assets in toto]; or

**(3) the personal representative determines the estimated fair market value of an item whose value was described as unknown in the original inventory.**

(e) Information. On request in writing, the personal representative shall provide the following:

 (h) Verification. All inventories shall be verified by the personal representative.

1. That it was recently learned that TESCHER and SPALLINA failed to properly service the beneficiaries of Shirley’s Estate with an Inventory, in violation of Rule

RULE 5.340. INVENTORY

(d) Service. The personal representative shall serve a copy of the inventory and all supplemental and amended inventories on the surviving spouse, each heir at law in an intestate estate, each residuary beneficiary in a testate estate, and any other interested person who may request it in writing.

(See EXHIBIT B - Inventory of Shirley filed to Tax Dept)

Statute 773.604

The personal representative must notify each beneficiary of that beneficiary’s rights under this subsection. Neither a request nor the failure to request information under this subsection affects any rights of a beneficiary in subsequent proceedings concerning any accounting of the personal representative or the propriety of any action of the personal representative.

1. That the footnote one on the Inventory provided by the Successor PR Ted is erroneous, false and perjured. “1This Inventory reports all assets which have come into the possession and knowledge of the undersigned as Successor Personal Representative as of the date of his Appointment. The undersigned did not receive possession of any property disclosed in the initial Personal Representative's Inventory dated August 29, 2011 (attached as Exhibit "A").”
2. That TED however came into possession of all of Shirley’s Personal Properties that were transferred to Simon without accounting for them first, including assets secured of hers in two homes that were part of the Shirley Trust that TED controlled although had no rights to them as they were assets of Simon’s at the time of his death and he failed to add these items to an Amended Inventory.
3. The homes were in the Shirley Trust but the contents were all part of Simon’s estate once she passed away and TED was made fully aware of this and was advised by TESCHER and SPALLINA that he was not in custody of these items as he was not the PR of Simon’s Estate, who initially were TESCHER and SPALLINA and then after their removal the PR was Brian O’Connell. (See EXHIBIT E - Spallina Letter to Ted re Custody of Simon Estate Personal Properties.)
4. That TESCHER and SPALLINA failed to take custody and possession of the Personal Properties of Simon’s they claimed were transferred from Shirley to Simon and allowed TED to take possession and custody of the properties instead, which has led to loss of the properties and no accounting of them in Shirley’s Estate.
5. That TED and his counsel ROSE told this Court that when they improperly sold a multimillion dollar condominium that the Personal Properties of Simon’s were transferred, boxed and stored for safe keeping to the Primary Residence at Saint Andrews Country Club in Boca Raton, FL in the four garages. This Court, based on that claim and knowing the Personal Properties were moved by TED who had no legal custody of the items, then issued an Order on March 30, 2015 for the new PR O’Connell to re-inspect and take possession of these Personal Properties. Therefore, TED’s sworn statements in the Inventory he prepared are knowingly false, as he knew that these were assets of Shirley’s initially that should have been properly accounted for on her inventory prior to any transfers to any parties.
6. The Original Order to take possession and re-inspect the Personal Properties was ordered on June 19, 2014 by this Court and was failed to be complied with as the Trustee TED and his Counsel ROSE who then claimed to the PR and others that there was so much to inventory and unboxing it all in the Primary Residences four garages would take far more money than the Court had allocated in funds to complete such RE-inventorying.
7. It was then told to the PR O’Connell and former Curator Benjamin Brown, Esq. that it would cost a considerable amount over the $500.00 apportioned by the Court in its Order to now unbox all the furniture and items stored in the garages, claiming this as the reason to hold up the Court Ordered Inspection and when over six months later the Court Ordered the immediate inspection due to learning of an undisclosed sale of the Primary Residence where the items were alleged stored, there appeared to be only three or four very small boxes and no furniture and none of Shirley’s Personal Properties from her Condominium were there. (SEE EXHIBIT F - Pictures of Garages) All of these items TED was in possession of he failed to add to the Inventory he prepared in violation of Probate Statutes and Rules and Law.
8. On or about March 27, 2015 at 10:30am Joielle "Joy" A. Foglietta, Esquire representing the PR met Eliot at the Primary Residence as Court Ordered and all four garage doors were open and three were wholly empty and one had a few trinkets such as salt shakers and napkin holders.
9. That TED and ROSE now have stated that the Personal Properties may have been sold by TED, more accurately stolen by TED and then sold stolen goods and further there are no accountings or receipts for any of the items stolen and possibly sold.
10. That Ted had NO legal rights to these Personal Properties to sell or otherwise dispose of them and was not a beneficiary of them either, having been disinherited entirely with his lineal descendants from the Estate and Trust of Shirley.
11. That Palm Beach County Sheriff investigators have an ongoing criminal complaint investigating the alleged stolen properties, none of these items appear on the Shirley or Simon accountings and inventories as being properly accounted for as sold or otherwise transferred.

**SPECIFIC ACCOUNTING INVENTORY OBJECTIONS**

**INVENTORY BY TED S. BERNSTEIN, AS SUCCESSOR PERSONAL REPRESENTATIVE**

1. That TED has come into possession and control of property not listed in the inventory and has failed to put those items on the inventory and thus the following statement is false and perjured.

The undersigned Successor Personal Representative of the estate of Shirley Bernstein, deceased, who died December 8, 2010, submits this inventory of all the property of the estate, that has come into the hands, possession, control, or knowledge of this Personal Representative: 1

1. That TED is now claiming the Homestead exemption was not properly done and hearings will have to be had to determine if the Homestead applies.

REAL ESTATE IN FLORIDA - Exempt (Protected) Homestead: NONE

REAL ESTATE IN FLORIDA- Non Exempt Homestead: NONE

*(Whether or not homestead property is exempt from the claims of creditors, is properly devised and is a probate asset may have to be determined by appropriate proceedings.)*

1. That due to the alleged Successor Trustee TED’s failure to account for the Shirley Trust, it is unknown if there is other Florida real estate that was held by the decedent.

OTHER REAL ESTATE IN FLORIDA: NONE

Total Real Estate in Florida - Except Exempt (Protected) Homestead $ 0.00

1. That TED has knowledge and possession of Personal Properties that he has failed to amend the Inventory produced to reflect and violated Florida Probate Rules and Statutes in so doing.
2. That it is alleged that TED has sold or otherwise disposed of Personal Properties in self-dealing transactions.
3. That it is alleged that TED’s sisters Pamela Simon, Jill Iantoni and Lisa Friedstein also have taken Personal Property of Shirley Bernstein that was taken from the primary residence at Saint Andrews Country Club and the Aragon Condominium and was not inventoried, including jewelry, art, clothing and other items of Shirley Bernstein that were part of her Personal Property and were not inventoried on either Shirley Bernstein’s inventory or Simon Bernstein’s inventory.
4. That Eliot has personal knowledge of far more personal property than the stated “NONE”, including a Bentley Automobile, Jewelry and more that were the Personal Property of Shirley at the time of her death.

PERSONAL PROPERTY WHEREVER LOCATED:

Description: NONE

TOTAL OF ALL PERSONAL PROPERTY AND FLORIDA REAL ESTATE

(Except exempt (protected) homestead) $ 0.00

1. That TED has failed to account for un-inventoried, unidentified items on former Inventory of TESCHER and SPALLINA for $25,000.00 and TED has provided no backup or support as to where the $25,000.00 of items went.

From TESCHER and SPALLINA INVENTORY:

PERSONAL PROPERTY WHEREVER LOCATED:

Description Estimated Fair Market Value

Furniture, furnishings, household goods and personal effects $ 25,000.00 (est.)

TOTAL OF ALL PERSONAL PROPERTY AND FLORIDA

REAL ESTATE$ $ 25,000.00

1. That the footnote below is false and perjured as TED has knowledge of additional Personal Properties and has failed to properly report those items as required and further perjured his statement to this Court as part of an ongoing Pattern and Practice of Fraud on this Court, Fraud on the Beneficiaries and Creditors to benefit himself and others directly at the expense of the True and Proper beneficiaries.

1 This Inventory reports all assets which have come into the possession and knowledge of the undersigned as Successor Personal Representative as of the date of his Appointment. The undersigned did not receive possession of any property disclosed in the initial Personal Representative's Inventory dated August 29, 2011 (attached as Exhibit "A").

1. That it is unclear why the alleged Successor Personal Representative would not at this time know of other real estate outside the State of Florida owned by the decedent and beneficiaries and interested parties have not been provided accounting information regarding the true value of the Shirley Estate and Trusts.

All real estate located outside the State of Florida owned by the decedent of which the Personal Representative is aware, if any, is described on a schedule attached hereto, [if none, so indicate].

NONE KNOWN AT THIS TIME.

1. That appraisals done by TED on assets under the control of Simon’s Estate Personal Representatives is believed and reported to authorities and this Court to have been done with criminal intent to lower the value of items presented and create a false appraisal of assets with substantially discounted items or replaced items with lower values. (SEE DOCKET # - RE THEFT OF ASSETS)
2. That upon repeated requests for new appraisals and explanations of the inventories done by TED, who had no authority to them as the items were claimed to be Simon’s Personal Properties under the Custody of TESCHER and SPALLINA and despite repeated requests to TED, TESCHER and SPALLINA, all have failed to provide information regarding the questioned and missing assets.
3. That Shirley’s Will, (See EXHIBIT G – SHIRLEY WILL) is missing addendums and attachments that bequeathed items are alleged to have been listed on that appear to have been removed from the Will submitted to this Court. Upon repeated requests for examination of the entire Will and all attachments, addendums, etc. beneficiaries have been denied this right.

NOTICE: Each residuary beneficiary in a testate estate or heir in an intestate estate has the right to request a written explanation of how the inventory value of any asset was determined, including whether the Personal Representative obtained an independent appraisal for that asset and, if so, a copy of the appraisal. Any other beneficiary may request this information regarding all assets distributed to or proposed to be distributed to that beneficiary.

1. That TED has perjured his statements on the Inventory with scienter.

Under penalties of perjury, I declare that I have read the foregoing, and the facts alleged are true to the best of my knowledge and belief.

WHEREFORE, Eliot requests that this Court enter an order;

* 1. notifying the appropriate state and federal authorities of the misconduct of TED and ROSE as required under Attorney Conduct Codes, Judicial Cannon and law,
	2. order an independent forensic accounting of the Shirley Bernstein Inventory and all records submitted to the Court by TESCHER, SPALLINA and TED to validate if the Officers of this Court who have perjured themselves before the Court and committed felony misconduct in altering dispositive documents admittedly, have committed further fraudulent accountings,
	3. award Pro Se legal fees and costs of Eliot Bernstein,
	4. any other remedies, relief, damages and sanctions this Court finds appropriate under law.

Filed on Wednesday, February 18, 2015

Eliot Bernstein, Pro Se, Individually; as Beneficiary and as Legal Guardian on behalf of his three minor children.

 X\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**CERTIFICATE OF SERVICE**

I, ELIOT IVAN BERNSTEIN, HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by email to all parties on the following Service List, Wednesday, February 18, 2015.

Eliot Bernstein, Pro Se, Individually; as Beneficiary and as Legal Guardian on behalf of his three minor children

 X\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**SERVICE LIST**

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| --- | --- | --- |
| Alan B. Rose, Esq.PAGE, MRACHEK, FITZGERALD, ROSE, KONOPKA, THOMAS & WEISS, P.A.505 South Flagler Drive, Suite 600West Palm Beach, Florida 33401arose@pm-law.com andarose@mrachek-law.com | John P Morrissey. Esq. John P. Morrissey, P.A.330 Clematis StreetSuite 213West Palm Beach, FL 33401john@jmorrisseylaw.com | Carley & Max Friedstein, Minors c/o Jeffrey and Lisa Friedstein Parents and Natural Guardians2142 Churchill LaneHighland Park, IL 6003Lisa@friedsteins.com lisa.friedstein@gmail.com |
| Julia Iantoni, a Minor c/o Guy and Jill Iantoni, Her Parents and Natural Guardians210 I Magnolia LaneHighland Park, IL 60035jilliantoni@gmail.com |  |  |

EXHIBIT A

PB SHERIFF REPORT

EXHIBIT B

Inventory of Shirley prepared and posited with the Court and Tax Department by TESCHER and SPALLINA acting as Counsel for the PR Simon Bernstein and ted bernstein inventory

EXHIBIT C

Insurance Appraisal

EXHIBIT D

Personal Property Appraisal

EXHIBIT E

Spallina Letter to Ted re Custody of Simon Estate Personal Properties

EXHIBIT F

Pictures of Garages

EXHIBIT G

SHIRLEY WILL

1. [↑](#footnote-ref-1)