

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
PROBATE DIVISION

IN RE: GUARDIANSHIP OF

PATRICIA A. SAHM,

File

No.: 502023GA000245XXXXMB

Division: IZ

Ward.

_____ /

CHARLES J. REVARD, as
Guardian of Patricia A. Sahn,

Petitioner,

v.

PATRICIA ANNE SAHM JR.,

Respondent.

_____ /

**PETITION FOR INJUNCTION FOR PROTECTION AGAINST EXPLOITATION OF
VULNERABLE ADULT**

COMES NOW Petitioner, CHARLES J. REVARD, as guardian of the person and property
of PATRICIA A. SAHM, who has been sworn and says that the following statements are true:

SECTION I. VULNERABLE ADULT

1. The Vulnerable Adult's name is: PATRICIA A. SAHM
2. Aliases of the Vulnerable Adult are: ANNE A. SAHM
3. The date of birth of the Vulnerable Adult is: August 2, 1941
4. The Vulnerable Adult resides at: 21843 Town Place Drive, Boca Raton, FL 33433
5. Does the Vulnerable Adult have one or more impairments(s) that impact his/her ability to perform normal activities of daily living or provide for his/her own care or protection?

YES NO

If so, what are this person's impairments? (check all that apply)

- Long-term physical disability
- Sensory disability
- Cognitive disability
- Mental or emotional disability
- Developmental disability
- Infirmary of aging
- Other (explain):

6. Is there an active guardianship case involving the Vulnerable Adult?

YES ___ NO

SECTION II. RESPONDENT

1. The Respondent's name is: PATRICIA ANNE SAHM JR. (daughter)
2. Aliases of the Respondent are: Patty Sahm
3. The Respondent's last known address is: 21843 Town Place Drive, Boca Raton, FL 33433
4. The Respondents' last known places of employment are: N/A
5. The physical description of the Respondent is:

RACE: WHITE

GENDER: FEMALE

DATE OF BIRTH: JANUARY 31, 1969

HEIGHT: 5'7"

WEIGHT: 235 LBS.

EYE COLOR: BROWN

HAIR COLOR: BLONDE

DISTINGUISHING MARKS OR SCARS: UNKNOWN

SECTION III. REASON FOR SEEKING INJUNCTION

1. The Respondent is associated with the Vulnerable Adult as follows: The Respondent is the adult daughter of the Vulnerable Adult and is currently residing with the Vulnerable Adult.

The Respondent resides in North Carolina¹ but claims that she presently does not have the funds to return to her state of residence.

2. Describe, if known: (a) Any other cause of action currently pending between the Petitioner and the Respondent, any proceeding under Chapter 744 (Guardianship) concerning the Vulnerable Adult, and any previous or pending attempts by the Petitioners to obtain an injunction for protection against exploitation of the Vulnerable Adult in this or any other circuit; (b) the related case numbers, if available; and (c) the results of any such attempts: (a) This Petition is being filed as part of active guardianship case no. 50-2023-GA-000245-XXXX-MB, in and for Palm Beach County, Florida (the "Guardianship Proceedings"). The Petitioner is the court-appointed limited guardian of the person and property for the Vulnerable Adult, pursuant to Letters of Limited Guardianship of Person and Property issued on July 13, 2023 [D.E. #28]. No injunctions were sought by the Petitioner against Respondent prior to this one. (b) See (a). (c) Not applicable.

3. The following describes the Petitioner's knowledge of any reports made to (1) a government agency, including but not limited to the Department of Elder Affairs, the Department of Children and Families, and the adult protective services program relating to abuse, neglect, or exploitation of the Vulnerable Adult; (2) any investigations performed by a government agency relating to abuse, neglect, or exploitation of the Vulnerable Adult, and (3) the result of any such reports or investigations: (1) Petitioner does not believe any such reports have been filed; (2) Petitioner has no knowledge of any such investigations; (3) NA.

¹ The North Carolina residence is owned by the Walter E. Sahn, Jr. and Patricia A. Sahn Revocable Family Living Trust dated August 31, 1999.

4. The Petitioner knows the Vulnerable Adult is either a victim of exploitation, or the Petitioner has reasonable cause to believe the Vulnerable Adult is, or is in imminent danger of becoming, a victim of exploitation because the Respondent has (describe any incidents or threats of exploitation): as set forth in detail below, the Respondent recently facilitated the removal of funds and closure of the Vulnerable Adult's account at Wells Fargo Bank, N.A. ("Wells Fargo"), a change in the mailing address of the Vulnerable Adult's Wells Fargo account to the Respondent, and the creation of a new account in the Vulnerable Adult's name at Bank of America, and has been attempting to access the Vulnerable Adult's pension account. The Respondent has taken these actions despite knowledge of the Guardianship Proceedings, the Vulnerable Adult's adjudication of incapacity, and Petitioner's appointment as Limited Guardian. Moreover, based upon the pattern of conduct exhibited by Respondent, discussed *infra*, Respondent's lack of income and financial resources, and the nature of the Vulnerable Adult's incapacity, Petitioner believes that Respondent opened a credit card with the Vulnerable Adult during the pendency of the Guardianship Proceedings.

- a. **Respondent Facilitated the Removal of Funds from and Closure of the Vulnerable Adult's Account at Wells Fargo:** On July 13, 2023, Petitioner was notified by the Vulnerable Adult's other daughter, Joanna Sahn ("Joanna"), who serves as Trustee of the Patricia A. Sahn Revocable Trust (the "Trust") and who is a joint owner on the Vulnerable Adult's Wells Fargo account, that an appointment had been scheduled with Wells Fargo for July 18, 2023 at 11 a.m. See Exhibit A. Neither Joanna nor Petitioner, who has the right to make decisions about the Vulnerable Adult's property, made the appointment with Wells Fargo nor were they

informed by the Respondent that an appointment had been made. It is believed that Respondent made and drove the Vulnerable Adult to the appointment as she left the residence with the Vulnerable Adult for at least a couple of hours on the morning of July 18, 2023. Petitioner, through counsel, immediately sought to prevent the appointment from occurring on the grounds that the Vulnerable Adult was judicially determined incapacitated and was no longer able to manage her property; however, Wells Fargo permitted the appointment to proceed, and the Vulnerable Adult's Wells Fargo account was drained of the remaining funds and closed. See Exhibit B, Exhibit C, and Exhibit D. While the assets removed from the Vulnerable Adult's Wells Fargo account via cashier's check were relatively nominal (\$215.80), Petitioner has grave concern that Respondent's efforts to obtain the Vulnerable Adult's funds will continue and that she may ultimately be successful in withdrawing or facilitating the withdrawal of a substantial sum of money from the Vulnerable Adult's assets.

b. **Respondent Changed the Mailing Address for the Vulnerable Adult's Wells Fargo Account:** After facilitating the removal of funds from and closure of the Wells Fargo account, Respondent also changed the mailing address of the Vulnerable Adult's Wells Fargo account from Joanna to the Respondent. See Exhibit E.

c. **The Creation of a New Account at Bank of America:** Immediately thereafter, Respondent facilitated the creation and opening of a new account in the Vulnerable Adult's name at Bank of America. See Exhibit F and Exhibit G. The Respondent

also facilitated the order of 40 checks for the new Bank of America account. See Exhibit H. Respondent's conduct is particularly alarming because the Vulnerable Adult has or is the beneficiary of significant assets held by Bank of America and the accounts holding those assets have not yet been changed to reflect Joanna as the sole trustee². What's more, Bank of America has recently refused to acknowledge the Vulnerable Adult's incapacity and the Guardianship Proceedings. As a result, the Vulnerable Adult remains a signer on all accounts at Bank of America, can access her accounts online, request withdrawals and transact business related to her accounts. Petitioner fears that Respondent, now armed with the knowledge of and ability to access these accounts through the Vulnerable Adult with whom she resides, will unduly influence the Vulnerable Adult to remove funds from the Bank of America accounts for Respondent's sole benefit.

- d. **Respondent's Attempt to Access the Vulnerable Adult's Pension Account:** On or about July 18, 2023, Petitioner learned from Joanna, that Respondent was attempting to update the Vulnerable Adult's account with the Florida Retirement System with her own email address. See Exhibit I. Upon information and belief, this online account was established by Joanna per the Vulnerable Adult's husband's request and Joanna is the only person with the username and password. At present, the Vulnerable Adult's pension benefits are directly deposited into an account for the Vulnerable Adult's benefit, but Petitioner fears that Respondent may be trying

² The account retitling is under review with the Bank of America legal team.

to gain control of the Vulnerable Adult's pension and/or divert the pension benefits to herself.

- e. **Respondent Involved in Opening a Credit Card in the AIP's Name:** Based on the above-described conduct and the nature of the Vulnerable Adult's incapacity at the time, Petitioner believes that Respondent was involved in the opening of a credit card with the Vulnerable Adult in the Vulnerable Adult's name on May 26, 2023, and the removal of Joanna's online access for the Vulnerable Adult's Chase Freedom credit card. See Exhibit J and Exhibit K. The Guardianship Proceedings were initiated on April 17, 2023, and Respondent had notice of those proceedings. Upon information and belief, both the Respondent and the Vulnerable Adult can use the credit card and Petitioner has a reasonable fear that Respondent, who is unemployed and receives disability benefits of less than \$1,000.00 per month, is using the credit card to make purchases for her own personal gain.
- f. **Other Examples:** Although the above conduct alone warrants the issuance of an injunction for the Vulnerable Adult's protection, this is not the first time that Petitioner (and others) have been alarmed by the Respondent's behavior and concerned for the Vulnerable Adult's safety. The following are non-exhaustive examples offered for the Court's consideration of the pattern of conduct exhibited by Respondent, which further supports the issuance of injunction to provide for the Vulnerable Adult's physical and financial safety under Section 825.1035(5)(a)(1.)(f):

- i. Respondent is unemployed and receives disability benefits in a sum estimated to be less than \$1,000.00 per month. On or around December 21, 2022, Respondent moved into the Vulnerable Adult's home where she has resided ever since. Since that date, and upon information and belief, Respondent has used or is using the Vulnerable Adult's credit card or cards to make purchases for her own benefit and supplement her disability benefits. Moreover, since residing with the Vulnerable Adult, the Respondent has isolated the Vulnerable Adult, and prevented the Vulnerable Adult from engaging in activities she enjoys such as walking, exercising³ and socializing, including, but not limited to, with her own daughter Joanna. See Exhibit K.
- ii. As relates to the latter, on or about January 24, 2023, there was a verbal altercation between Joanna and the Respondent, which resulted in Respondent obtaining a gun from the Vulnerable Adult's residence, pointing the gun at Joanna and her partner, and threatening to kill them both. This altercation resulted in Respondent being charged with assault with a deadly weapon, and the issuance of an injunction and final judgment against the Respondent in Palm Beach County Circuit Court. See case numbers 502023CF000747AXXXMB, 50-2023-DR-000716-XXXX-NB [D.E. #13] and 50-2023-DR-000717-XXXX-NB [D.E. #13]. The operative effect of

³ Prior to retirement, the Vulnerable Adult was a physical education instructor. She continues to enjoy physical activity, which Petitioner believes has been limited by Respondent.

injunction in case number 2023-DR-000716-XXXX-NB is that there are barriers to visitation between the Vulnerable Adult and her daughter, Joanna. All the while, Respondent remains in the home with the Vulnerable Adult and exerts influence over the Vulnerable Adult's life by her mere presence. While Petitioner does not necessarily fear that Respondent will be violent with the Vulnerable Adult, Petitioner fears that Respondent has violent tendencies and suffers from mental illness that will influence the way she acts with the Vulnerable Adult.

- iii. This influence has manifested in Respondent blocking Joanna's number from the Vulnerable Adult's phone and otherwise preventing or inhibiting communication between the Vulnerable Adult and Joanna. See Exhibit K.
- iv. Furthermore, Petitioner placed caregivers in the home to provide care for the Vulnerable Adult and believes that Respondent is interfering with that care. Petitioner believes that Respondent influenced the Vulnerable Adult to call Petitioner and say that she did not need any assistance in the home because she "has Patty" and to voice displeasure with the caregivers in their presence. This belief is based on a conversation Petitioner has with the Vulnerable Adult the day prior wherein the Vulnerable Adult expressed gratitude to Petitioner for placing the caregiver in the home. Additionally, Respondent attempted to turn a caregiver away and represented to the caregiver that the Vulnerable Adult didn't need help because Patty was

there. Petitioner has concerns about what other actions Respondent may take toward the caregivers to further isolate the Vulnerable Adult.

- v. Respondent has also neglected the Vulnerable Adult's care by failing to fill various necessary medications for the Vulnerable Adult for months during the time after the health care surrogate designation in favor of Joanna was revoked (discussed *infra*) and Petitioner was appointed as guardian and while Respondent lived with the Vulnerable Adult and should have been aware of the Vulnerable Adult's medications.
- vi. Additionally, the Respondent has expressed an intent to move the Vulnerable Adult to her home in North Carolina as recently as July 22, 2023. Petitioner has been to the North Carolina residence and does not believe that it is an appropriate residential setting for the Vulnerable Adult and that such a move would result in further isolation of the Vulnerable Adult and contribute to the Vulnerable Adult's physical and mental decline.
- vii. Finally, upon information and belief, Respondent was responsible for the Vulnerable Adult's revocation of her advanced directives and power of attorney designations on or around March 28, 2023, and April 13, 2023, which advanced directives were executed in favor of her now deceased husband, Walter E. Sahn, Jr., Joanna and/or Petitioner.

5. The Petitioner knows that the Vulnerable Adult maintains assets, accounts, or line items of credit at the following financial institutions (provide name, address, title holders and account number of each):

In re Guardianship of Patricia A. Sahn

Revard v. Sahn Jr.

Petition for Injunction for Protection against Exploitation of Vulnerable Adult

Page 11 of 16

NATURE OF PROPERTY	VALUE
Real property located at: 21843 Town Place Drive, Boca Raton, FL 33433	\$511,545.00 per the Palm Beach County Property Appraiser; \$634,000.00 per Zillow.com
Bank of America Account ending in [REDACTED] 21060 St Andrews Blvd, Boca Raton, FL 33433	Unknown
Bank of America, Walter E. Sahn Jr Agency Account ending in [REDACTED] 21060 St Andrews Blvd, Boca Raton, FL 33433	\$112,904.00
Bank of America, Walter E. Sahn & Patricia A. Sahn Revocable Family Living Trust ending in [REDACTED] 21060 St Andrews Blvd, Boca Raton, FL 33433	\$48,943.02
Bank of America, Walter E. Sahn & Patricia A. Sahn Revocable Family Living Trust ending in [REDACTED] 21060 St Andrews Blvd, Boca Raton, FL 33433	\$15,226.20
Wells Fargo Walter E. Sahn Jr & Patricia A. Sahn Revocable Trust ending in [REDACTED] 7009 Beracasa Way, Boca Raton, FL 33433	\$24,792.87
Allianz Index Advantage IRA account ending in [REDACTED] PO Box 59060, Minneapolis, MN 55459- 0060	\$253,042.44
Investment Edge 21 VA IRA account ending in [REDACTED] Equitable Financial PO Box 1016, Charlotte, NC 28201-1016	\$260,804.77
JWC Financial IRA JW account ending [REDACTED] National Financial Services/JW Cole	\$105,537.27

In re Guardianship of Patricia A. Sahn

Revard v. Sahn Jr.

Petition for Injunction for Protection against Exploitation of Vulnerable Adult

Page 12 of 16

4301 Anchor Plaza, Suite 450 Tampa, FL 33614	
JWCA AUM IRA DZN account ending in [REDACTED] National Financial Services/JW Cole 4301 Anchor Plaza, Suite 450, Tampa, FL 33614	\$189,684.37
IRA-SEP JW account ending in [REDACTED] National Financial Services/JW Cole 4301 Anchor Plaza, Suite 450, Tampa, FL 33614	\$34,707.82
Patricia A. Sahn Revocable Trust AXA Annuity account ending in [REDACTED] Equitable Financial PO Box 1016, Charlotte, NC 28201-1016	\$329,157.03
Patricia A. Sahn Revocable Trust Midland Annuity account ending in [REDACTED] Midland Financial 8300 Mills Civic Parkway West Des Moines, IA50266	\$962,364.56
Patricia A. Sahn Revocable Trust Prudential Annuity account ending in [REDACTED] Prudential Securities PO Box 14533, Cincinnati, OH 45250-5433	\$225,015.53
Patricia A. Sahn Revocable Trust 1031 Exchange account ending in [REDACTED] JW Cole Financial 4301 Anchor Plaza, Suite 450 Tampa, FL 33614	\$50,564.17
Walter E. Sahn Irrevocable Life Insurance Trust JW Cole Financial 4301 Anchor Plaza, Suite 450 Tampa, FL 33614	\$218,371.96

6. Petitioners believe that the Vulnerable Adult's assets to be frozen are (check one):

worth less than \$1,500

worth between \$1,500 and \$5,000

worth more than \$5,000

7. Petitioners request that the following funds be frozen:

ACCOUNT	VALUE
Bank of America Account ending in [REDACTED] 21060 St Andrews Blvd, Boca Raton, FL 33433	Unknown
Allianz Index Advantage IRA account ending in [REDACTED] PO Box 59060, Minneapolis, MN 55459- 0060	\$253,042.44
Investment Edge 21 VA IRA account ending in [REDACTED] Equitable Financial, PO Box 1016, Charlotte, NC 28201-1016	\$260,804.77
JWC Financial IRA JW account ending [REDACTED] National Financial Services/JW Cole 4301 Anchor Plaza, Suite 450, Tampa, FL 33614	\$105,537.27
JWCA AUM IRA DZN account ending in [REDACTED] National Financial Services/JW Cole 4301 Anchor Plaza, Suite 450, Tampa, FL 33614	\$189,684.37
JW Cole Financial IRA-SEP JW account ending in [REDACTED] National Financial Services./ JW Cole 4301 Anchor Plaza, Suite 450 Tampa, FL 33614	\$34,707.82

8. Petitioner genuinely believes that the Vulnerable Adult is the victim of exploitation by the Respondent and genuinely fears further exploitation by the Respondent.

SECTION IV. INJUNCTIVE RELIEF REQUESTED

1. The Petitioner asks the Court to enter a temporary injunction for the protection of the Vulnerable Adult to be in place from now until the scheduled final hearing, at which point Petitioner requests a final judgment for protection against exploitation.
2. The Petitioner seeks an injunction to (mark appropriate section or sections):
- X **Prohibiting the Respondent from having any direct or indirect contact with the Vulnerable Adult;**
 - X **Immediately restraining the Respondent from committing any acts of exploitation against the Vulnerable Adult;**
 - X **Restraining the Respondent from any attempts to access the Vulnerable Adult's funds including, but not limited to, any assets held in trust for the Vulnerable Adult's benefit;**
 - X **Directing the Respondent to disclose the nature and location of any new accounts opened in the Vulnerable Adult's and/or Respondent's names;**
 - X **Directing the Respondent to surrender all credit cards held in the name of (i) the Vulnerable Adult (ii) held jointly in the name of the Vulnerable Adult and any other individual or entity (iii) held in the name of the Respondent but tied to an account in the name of the Vulnerable Adult to the Petitioner; and**
 - X **Freezing the assets of the Vulnerable Adult held at Bank Of America ending in [REDACTED] Allianz Index ending in [REDACTED] Investment Edge 21 VA IRA ending in [REDACTED] JWC Financial IRA ending in [REDACTED] JWCA AUM IRA DZN ending in [REDACTED] and JW COLE IRA-SEP account ending in [REDACTED]**
 - X **Directing law enforcement to remove the Respondent from 21843 Town Place Drive, Boca Raton FL 33433 if she is found there at the time of service of the temporary ex-parte injunction or any time thereafter in violation of the provisions set forth above.**

3. If the Court issues an injunction freezing assets and/or credit lines, Petitioners believe that the critical expenses of the Vulnerable Adult will be paid for or provided by the following persons or entities: Joanna Sahn, as trustee of the Vulnerable Adult's Trust.
4. The Petitioner requests that the following expenses be paid notwithstanding the freeze (for each expense, list the name of the payee, address, account number if known, amount to be paid, and a brief explanation of why payment is critical): Not applicable because Joanna Sahn, as trustee of the Vulnerable Adult's Trust, has ample funds in trust to provide for the Vulnerable Adult's necessary expenses.

I ACKNOWLEDGE THAT PURSUANT TO SECTION 415.1034, FLORIDA STATUTES, ANY PERSON WHO KNOWS OR HAS A REASONABLE CAUSE TO SUSPECT THAT A VULNERABLE ADULT HAS BEEN OR IS BEING ABUSED, NEGLECTED, OR EXPLOITED HAS A DUTY TO IMMEDIATELY REPORT SUCH KNOWLEDGE OR SUSPICION TO THE CENTRAL ABUSE HOTLINE. I HAVE REPORTED THE ALLEGATIONS IN THIS PETITION TO THE CENTRAL ABUSE HOTLINE.

I HAVE READ EACH STATEMENT MADE IN THIS PETITION AND EACH SUCH STATEMENT IS TRUE AND CORRECT. I UNDERSTAND THAT THE STATEMENTS MADE IN THIS PETITION ARE BEING MADE UNDER PENALTY OF PERJURY PUNISHABLE AS PROVIDED IN SECTION 837.02, FLORIDA STATUTES.

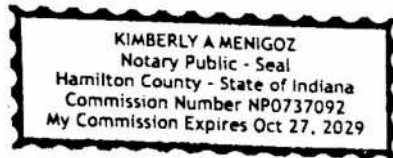
I HAVE READ EACH STATEMENT MADE IN THIS PETITION AND EACH SUCH STATEMENT IS TRUE AND CORRECT. I UNDERSTAND THAT THE STATEMENTS MADE IN THIS PETITION ARE BEING MADE UNDER PENALTY OF PERJURY PUNISHABLE AS PROVIDED IN SECTION 837.02, FLORIDA STATUTES.

Signed on 7-25, 2023.


CHARLES J. REVARD

COUNTY OF Hamilton)
STATE OF Indiana)

Sworn to and subscribed to before me on 25th July, 2023, by Charles J. Revard Affiant, who appeared by [] physical presence or [] online notarization and who is personally known to me or who produced drivers license as identification.



Kimberly A. Menigoz
Notary Public, State of INDIANA
My commission expires: 10-27-2029

Signed this 25th day of July, 2023.

Clara Ciadella

KITROSER LEWIS & MIGHDOLL, LLC
Mitchell I. Kitroser, Esq., Fla. Bar #995134
Preston Mighdoll, Esq., Fla. Bar #220124
Kathryn N. Lewis Esq., Fla. Bar #59182
Clara Crabtree Ciadella, Esq., Fla. Bar #106323

Palm Beach Office:

√ **Filed by & respond to this office:**

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paula@kitroserlaw.com, and

mikadmin@kitroserlaw.com

Attorneys for Petitioner

Paula Albright

Subject: Personal: Assist with my accounts - Other services
Location: BOCA DEL MAR

Start: Tue 7/18/2023 11:00 AM
End: Tue 7/18/2023 11:30 AM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Wells Fargo and Company

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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

From: Joanna Sahm <joanna_sahm@yahoo.com>
Date: Sat, Jul 15, 2023 at 7:52 PM
Subject: Your Wells Fargo Appointment is Confirmed
To: Charlie Revard <charlie@thebikeline.com>

Hi There,

My email is the notification email for the Trust Account and the joint account I have with my mother at Wells. I did not set this appointment, but I was notified about this. I thought you should know as I am not sure why my mom is going or who is taking her there.

The branch where the appointment is scheduled is the branch in Boca where my mother goes to bank.

From: Wells Fargo and Company <appointments@wellsfargo.com>
Date: July 13, 2023 at 3:10:24 PM EDT
To: vivien.dangelo-rice@wellsfargo.com, joanna_sahm@yahoo.com
Subject: Your Wells Fargo Appointment is Confirmed

WELLS FARGO

Appointment confirmation

Dear JOANNA SAHM,

Thank you for scheduling an appointment with us.

When:

Tuesday, July 18, 2023 at 11:00 AM EDT
30 minutes

Where:

BOCA DEL MAR
7009 BERACASA WAY
BOCA RATON, Florida 33433
United States
(561) 338-6000
Map it

We'll discuss:

Personal: Assist with my accounts - Other services

Confirmation number:

12BVW80EUE

You can change or cancel your appointment using this link. For other questions prior to your visit with a banker, please read our FAQs.

Sincerely,
Wells Fargo

Please do not reply to this automated email. To contact us, go to Wells Fargo Online Customer Service call us anytime at 1-800-956-4442 for technical or banking issues.

wellsfargo.com | Privacy, Security, and Legal

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KITROSER LEWIS & MIGHDOLL

Mitchell I. Kitroser, Esquire, Managing Partner - Admitted in FL, NY & CO • Kathryn N. Lewis, Esquire, Partner - Admitted in Florida
Preston Mighdoll, Esquire, Partner - Admitted in Florida • Clara Crabtree Ciadella, Esquire, Associate Attorney - Admitted in Florida

July 17, 2023

By Hand Delivery

Wells Fargo Bank, N.A.
Attn: Branch Manager
7009 Beracasa Way
Boca Raton, Florida 33433

RE: Patricia A. Sahn

Dear Sir or Madam,

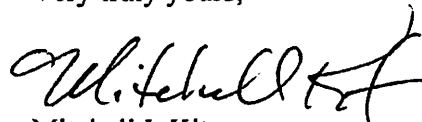
Our firm represents Charles Revard in his capacity as Limited Guardian of the Person and Property of Patricia A. Sahn. Enclosed herewith please find a copy of the *Order Determining Limited Incapacity, Order Appointing Limited Guardian and Letters of Limited Guardian of Person and Property* issued by Judge Charles Burton, Circuit Judge, Palm Beach County, Florida. Attorney Eileen O'Malley, who is copied on this correspondence, represents Mrs. Sahn's daughter, Joanna Sahn, in her capacity as Trustee of the *Patricia A. Sahn Revocable Trust uad July 1, 2020*.

We are aware of an appointment having been scheduled by Mrs. Sahn's daughter, Patricia ("Patty") Sahn for tomorrow, July 18, 2023, at 11:00 a.m. Please be advised that following the Court's determination as to Mrs. Sahn's incapacity, she is no longer able to manage her property. Such duties have been delegated to Mr. Revard and Ms. (Joanna) Sahn.

Kindly confirm receipt of this correspondence to Senior Paralegal, Paula Albright, via e-mail at paula@kitroserlaw.com. Should you wish to discuss the matter further, please contact me at (561) 614-6740.

Thanking you in advance for your attention to this matter.

Very truly yours,



Mitchell I. Kitroser

MIK:pma

Enclosures

Cc: Eileen O'Malley, Esquire (via email with enclosures)

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE:

File No. 502023GA000245XXXXMB

PATRICIA A. SAHM,
an alleged incapacitated person.

_____ /

ORDER APPOINTING LIMITED GUARDIAN OF PERSON AND PROPERTY

On the Petition of for the Appointment of a Guardian of the person and property of Patricia A. Sahn ("Ward"), the Court makes the following findings:

1. The Ward was adjudicated to be incapacitated by Order of this Court entered on June ____, 2023, and the Court, having considered alternatives to guardianship, found that no alternatives to guardianship sufficiently address the needs of the Ward, and that the restrictions imposed upon the Ward's rights and liberties are consistent with the Ward's welfare and safety, and are the least restrictive appropriate alternatives, reserving to the Ward the right to make decisions in all matters commensurate with the Ward's ability to do so.

2. The Order Determining Limited Incapacity established the incapacity of the Ward to exercise the following delegable rights:

- () to determine his or her residence,
- (X) to consent to medical and mental health treatment,
- () to make decisions about his or her social environment or other social aspects of his or her life,
- (X) to contract,
- (X) to sue and defend lawsuits,
- (X) to personally apply for government benefits,
- (X) to manage property or to make any gift or disposition of property.

3. The nature of the guardianship is limited and it is necessary to appoint a limited guardian of the person and property of the Ward.

4. The Court finds no evidence that the Ward, prior to incapacity, executed any valid advance directive pursuant to Florida Statutes Chapter 765.

The Court having jurisdiction and being fully advised, it is

ADJUDGED as follows:

1. Charles Revard is qualified to serve and is hereby appointed limited guardian of the person and property of Patricia A. Sahm ("Ward").

2. The following rights of the Ward are delegated to the guardian appointed by this Order:

(X) to contract,

(X) to sue and defend lawsuits,

(X) to apply for government benefits,

(X) to manage the property of the Ward,

() to determine the Ward's residence,

(X) to consent to medical and mental health treatment,

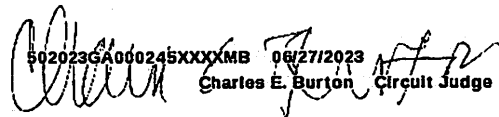
() to make decisions about the Ward's social environment or other social aspects of the Ward's life.

Note: If the right of the Ward to contract has been delegated to the guardian but the right to marry is retained, then the right to marry is subject to court approval.

3. Upon taking the prescribed oath, filing a designation of resident agent and acceptance, and posting a bond in the amount of \$____ payable to the Governor of the State of Florida and to all successors in office, conditioned on the faithful performance of all duties by the guardian, letters of guardianship shall be issued.

4. The Ward retains the rights specified in Florida Statutes Section 744.3215(1) and the right to make decisions in all matters commensurate with Ward's abilities.

DONE and ORDERED in Delray Beach, Palm Beach County, Florida.


502023GA000245XXXMB 06/27/2023
Charles E. Burton Circuit Judge

502023GA000245XXXMB 06/27/2023
Charles E. Burton
Circuit Judge

Copies furnished to:

Amber Patwell, Esq., apatwell@wblaws.com, Whitbeck Bennett, 136 4th St. N., Suite 201, Office 356, St. Petersburg, FL 33701

Eileen T. O'Malley, Esq., eileen.omalley@nelsonmullins.com, Nelson Mullins Riley & Scarborough, LLP, 360 South Rosemary Ave., Suite 1410, West Palm Beach, FL 33401

Inger Garcia, Esq., attorney@ingergarcia.com, 7040 Seminole Pratt Whitney Rd., #25-43, Loxahatchee, FL 33470

Kevin R. Hall, kh.itconsultingslesoffices@gmail.com, P.O. Box 756, Kinderhook, NY 12106

NOT A CERTIFIED COPY

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE:

File No. 502023MH001072XXXXMB

PATRICIA A. SAHM,
an alleged incapacitated person.

ORDER DETERMINING LIMITED INCAPACITY

On the Petition to Determine Incapacity filed herein with respect to Patricia A. Sahm (the Ward), the Court having reviewed file, having considered the reports of the Examining Committee, having considered all alternatives to guardianship, having been informed of the agreement of Patricia A. Sahm and all other interested persons, and being fully advised in the premises, finds based on the clear and convincing evidence presented, as follows:

1. The Ward suffers from incapacities of the following nature and scope: unspecified dementia, impaired memory and cognition. .

2. The Ward lacks capacity to make informed decisions about care and treatment services or to meet the essential requirements for the Ward's physical or mental health or safety. More particularly, the specific legal disabilities to which the Ward is subject (the rights the Ward is incapable of exercising) are:

- | | |
|---|---|
| <input type="checkbox"/> to marry | <input type="checkbox"/> to vote |
| <input checked="" type="checkbox"/> to contract | <input type="checkbox"/> to travel |
| <input checked="" type="checkbox"/> to sue and defend lawsuits | <input type="checkbox"/> to have a driver's license |
| <input type="checkbox"/> to determine his or her residence | <input type="checkbox"/> to seek or retain employment |
| <input checked="" type="checkbox"/> to personally apply for government benefits | |
| <input checked="" type="checkbox"/> to manage property or to make any gift or disposition of property | |
| <input type="checkbox"/> to make decisions about his or her social environment or other social aspects of his or her life | |
| <input checked="" type="checkbox"/> to consent to medical and mental health treatment | |

3. After consideration of reasonable alternatives to guardianship, the Court finds that no alternative will sufficiently address the problems and needs of the Ward.

4. It is in the best interests of the Ward that a limited guardian of the person and property of the Ward be appointed; accordingly, it is

ADJUDGED as follows:

1. Patricia A. Sahn is hereby determined to be incapacitated and a limited guardian should be appointed to provide for the welfare and safety of the Ward.

2. The Ward is incapable of exercising the rights specified in paragraph 3.

3. The Ward shall retain those rights set forth in Florida Statutes Section 744.3215(1), and all other rights except those the Court has hereinabove adjudged that the Ward is incapable of exercising.

4. A copy of this Order shall be served on the Ward and the Ward's attorney by the clerk and a certificate attesting to such service promptly filed in this proceeding.

DONE and ORDERED in Delray Beach, Palm Beach County, Florida.


502023MH001072000XMB 06/27/2023
Charles E. Burton Circuit Judge

502023MH001072XXXXMB 06/27/2023
Charles E. Burton
Circuit Judge

Copies furnished to:

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Inger Garcia, Esq., attorney@ingergarcia.com, 7040 Seminole Pratt Whitney Rd., #25-43, Loxahatchee, FL 33470

Kevin R. Hall, kh.itconsultingslesoffices@gmail.com, P.O. Box 756, Kinderhook, NY 12106

IN THE CIRCUIT COURT FOR PALM BEACH COUNTY, FLORIDA
PROBATE DIVISION

IN RE: THE GUARDIANSHIP OF

PATRICIA A. SAHM,

Case No. 502023GA000245XXXXMB

Division: IZ

The Ward.
_____ /

**LETTERS OF LIMITED GUARDIANSHIP
OF PERSON AND PROPERTY**

TO ALL WHOM IT MAY CONCERN:

WHEREAS, CHARLES J. REVARD has been appointed as the limited guardian of the person and property of PATRICIA A. SAHM (the "Ward"), pursuant to this Court's *Order Appointing Limited Guardian of Person and Property* [D.E. #21], and taken the prescribed oath and performed all other acts prerequisite to issuance of limited letters of guardianship of the person and property of the Ward,

NOW, THEREFORE, I, the undersigned circuit court judge, declare CHARLES J. REVARD (hereinafter, the "Guardian") duly qualified under the laws of the State of Florida to act as limited guardian of the person and property of PATRICIA A. SAHM. The Guardian shall have the power to exercise the following powers and duties pertaining to the Ward's person and property:

- to contract;
- to sue and defend lawsuits;
- to apply for government benefits;
- to manage property or to make any gift or disposition of property; and
- to consent to medical and mental health treatment.

Any financial institution, credit union, company or individual holding assets of the Ward is directed to cooperate with the Guardian and attorney for the Guardian, including providing said attorney/Guardian with information or copies of records on any accounts in which the Ward is a beneficiary of a trust, is the account holder, or joint account holder and complying with the

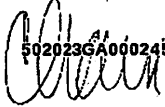
In re Guardianship of Patricia A. Sahn
Case No. 502023GA000245XXXXMB
Letters of Limited Guardianship – Charles J. Revard

instructions of the attorney in the transfer, withdrawal or release of funds authorized by order of this Court, whether the account is held in the Ward's individual name or held jointly, until further direction from the Guardian.

The Guardian is authorized to communicate with and act on behalf of the Ward with government services including the Internal Revenue Services.

The Court finds no evidence that the Ward, prior to incapacity, executed any valid advance directive pursuant to Florida Statutes Chapter 765.

DONE and ORDERED in Palm Beach County, Florida.


502023GA000245XXXXMB 07/13/2023
Charles E. Burton, Circuit Judge

502023GA000245XXXXMB 07/13/2023
Charles E. Burton
Circuit Judge

Copies furnished to:

Mitchell I. Kitroser, Esq. and Clara Crabtree Ciadella, Esq., Kitroser, Lewis & Mighdoll, LLC, 631 U.S. Highway One, Suite 406, North Palm Beach, FL 33408 (mitch@kitroserlaw.com, clara@kitroserlaw.com, kate@kitroserlaw.com, and mikadmin@kitroserlaw.com)

Amber Patwell, Esq., Whitbeck Bennett, 136 4th St. N., Suite 201, Office 356, St. Petersburg, FL 33701 (apatwell@wblaws.com)

Eileen T. O'Malley, Esq., Nelson Mullins Riley & Scarborough, LLP, 360 South Rosemary Ave., Suite 1410, West Palm Beach, FL 33401 (eileen.omalley@nelsonmullins.com)

Inger Garcia, Esq., 7040 Seminole Pratt Whitney Rd., #25-43, Loxahatchee, FL 33470 (attorney@ingergarcia.com)

Kevin R. Hall, P.O. Box 756, Kinderhook, NY 12106 (kh.itconsultingslesoffices@gmail.com)

VERIFIED RETURN OF SERVICE

State of Florida

County of Palm Beach

CIRCUIT Court

Case Number: 502023GA000245XXXXMB

IN RE: PATRICIA A. SAHM, an alleged incapacitated person,

For:

MITCHELL I. KITROSER, ESQ.
KITROSER & ASSOCIATES
631 U.S. HIGHWAY ONE, SUITE 406
NORTH PALM BEACH, FL 33408

Received by Tenacious Process Servers of Florida, LLC on the 17th day of July, 2023 at 11:00 am to be served on WELLS FARGO BANK, N.A. ATTN.: BRANCH MANAGER, 7009 BERACASA WAY, BOCA RATON, FL 33433.

I, MARSHALL A. BISHOP, do hereby affirm that on the 17th day of July, 2023 at 3:50 pm, I:

served an AUTHORIZED entity by delivering a true copy of the LETTER / ORDER APPOINTING LIMITED GUARDIAN OF PERSON AND PROPERTY / ORDER DETERMINING LIMITED INCAPACITY / LETTERS OF LIMITED GUARDIANSHIP OF PERSON AND PROPERTY with the date and hour of service endorsed thereon by me, to: VIVIEN D'ANGELO RICE as CSR / APB at the address of: 7009 BERACASA WAY, BOCA RATON, FL 33433, who stated they are authorized to accept service for WELLS FARGO BANK, N.A., and informed said person of the contents therein, in compliance with state statutes.

Additional Information pertaining to this Service:

PROCESS SERVER CLEARLY EXPLAINED TO RECEIVER TO CAREFULLY READ LETTER AS IT REFERS TO A PENDING MEETING TO OCCUR THE NEXT DAY. NOTE: BRANCH MANAGER WAS NOT AVAILABLE AT TIME OF SERVICE.

I certify that I am over the age of 18, have no interest in the above action, and have proper authority in the jurisdiction in which this service was effected. Under the penalty of perjury, I declare I have read the foregoing documents and the facts stated in it are true to the best of my knowledge. I am a Certified Process Server / Special Appointed Process Server, in good standing, in the judicial circuit in which the process was served and no Notary is required under F.S.S. 92.525 (2).

NOT A CERTIFIED COPY



MARSHALL A. BISHOP
Certified Process Server #785

Tenacious Process Servers of Florida, LLC
P.O. Box 210443
Royal Palm Beach, FL 33421
(561) 798-5518

Our Job Serial Number: TEN-2023001178
Ref: SAHM

KITROSER LEWIS & MIGHDOLL

Mitchell I. Kitroser, Esquire, Managing Partner - Admitted in FL, NY & CO • Kathryn N. Lewis, Esquire, Partner - Admitted in Florida
Preston Mighdoll, Esquire, Partner - Admitted in Florida • Clara Crabtree Ciadella, Esquire, Associate Attorney - Admitted in Florida

July 17, 2023

A.P.B.

Served Vivien D'Angelo Rice

Date 7/17/23 Time 1:50

P.S. MAB # 0785

By Hand Delivery
Wells Fargo Bank, N.A.
Attn: Branch Manager
7009 Beracasa Way
Boca Raton, Florida 33433

RE: Patricia A. Sahn

Dear Sir or Madam,

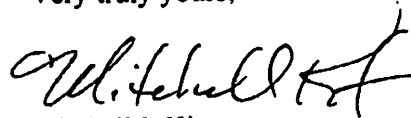
Our firm represents Charles Revard in his capacity as Limited Guardian of the Person and Property of Patricia A. Sahn. Enclosed herewith please find a copy of the *Order Determining Limited Incapacity*, *Order Appointing Limited Guardian* and *Letters of Limited Guardian of Person and Property* issued by Judge Charles Burton, Circuit Judge, Palm Beach County, Florida. Attorney Eileen O'Malley, who is copied on this correspondence, represents Mrs. Sahn's daughter, Joanna Sahn, in her capacity as Trustee of the *Patricia A. Sahn Revocable Trust uad July 1, 2020*.

We are aware of an appointment having been scheduled by Mrs. Sahn's daughter, Patricia ("Patty") Sahn for tomorrow, July 18, 2023, at 11:00 a.m. Please be advised that following the Court's determination as to Mrs. Sahn's incapacity, she is no longer able to manage her property. Such duties have been delegated to Mr. Revard and Ms. (Joanna) Sahn.

Kindly confirm receipt of this correspondence to Senior Paralegal, Paula Albright, via e-mail at Paula@kitroserlaw.com. Should you wish to discuss the matter further, please contact me at (561) 614-6740.

Thanking you in advance for your attention to this matter.

Very truly yours,



Mitchell I. Kitroser

MIK:pma

Enclosures

Cc: Eileen O'Malley, Esquire (via email with enclosures)

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE:

File No. 502023GA000245XXXXMB

PATRICIA A. SAHM,
an alleged incapacitated person.

ORDER APPOINTING LIMITED GUARDIAN OF PERSON AND PROPERTY

On the Petition of for the Appointment of a Guardian of the person and property of Patricia A. Sahn ("Ward"), the Court makes the following findings:

1. The Ward was adjudicated to be incapacitated by Order of this Court entered on June ____, 2023, and the Court, having considered alternatives to guardianship, found that no alternatives to guardianship sufficiently address the needs of the Ward, and that the restrictions imposed upon the Ward's rights and liberties are consistent with the Ward's welfare and safety, and are the least restrictive appropriate alternatives, reserving to the Ward the right to make decisions in all matters commensurate with the Ward's ability to do so.

2. The Order Determining Limited Incapacity established the incapacity of the Ward to exercise the following delegable rights:

- () to determine his or her residence,
- (X) to consent to medical and mental health treatment,
- () to make decisions about his or her social environment or other social aspects of his or her life,
- (X) to contract,
- (X) to sue and defend lawsuits,
- (X) to personally apply for government benefits,
- (X) to manage property or to make any gift or disposition of property.

3. The nature of the guardianship is limited and it is necessary to appoint a limited guardian of the person and property of the Ward.

4. The Court finds no evidence that the Ward, prior to incapacity, executed any valid advance directive pursuant to Florida Statutes Chapter 765.

The Court having jurisdiction and being fully advised, it is

ADJUDGED as follows:

1. Charles Revard is qualified to serve and is hereby appointed limited guardian of the person and property of Patricia A. Sahn ("Ward").

2. The following rights of the Ward are delegated to the guardian appointed by this Order:

(X) to contract,

(X) to sue and defend lawsuits,

(X) to apply for government benefits,

(X) to manage the property of the Ward,

() to determine the Ward's residence,

(X) to consent to medical and mental health treatment,

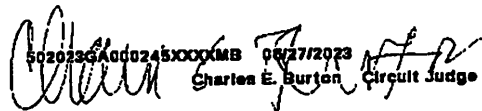
() to make decisions about the Ward's social environment or other social aspects of the Ward's life.

Note: If the right of the Ward to contract has been delegated to the guardian but the right to marry is retained, then the right to marry is subject to court approval.

3. Upon taking the prescribed oath, filing a designation of resident agent and acceptance, and posting a bond in the amount of \$____ payable to the Governor of the State of Florida and to all successors in office, conditioned on the faithful performance of all duties by the guardian, letters of guardianship shall be issued.

4. The Ward retains the rights specified in Florida Statutes Section 744.3215(1) and the right to make decisions in all matters commensurate with Ward's abilities.

DONE and ORDERED in Delray Beach, Palm Beach County, Florida.


502023GA000245XXXXMB 06/27/2023
Charles E. Burton, Circuit Judge

502023GA000245XXXXMB 06/27/2023
Charles E. Burton
Circuit Judge

Copies furnished to:

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Inger Garcia, Esq., attorney@ingergarcia.com, 7040 Seminole Pratt Whitney Rd., #25-43, Loxahatchee, FL 33470

Kevin R. Hall, kh.itconsultingslesoffices@gmail.com, P.O. Box 756, Kinderhook, NY 12106

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

IN RE:

File No. 502023MH001072XXXXMB

PATRICIA A. SAHM,
an alleged incapacitated person.

ORDER DETERMINING LIMITED INCAPACITY

On the Petition to Determine Incapacity filed herein with respect to Patricia A. Sahn (the Ward), the Court having reviewed file, having considered the reports of the Examining Committee, having considered all alternatives to guardianship, having been informed of the agreement of Patricia A. Sahn and all other interested persons, and being fully advised in the premises, finds, based on the clear and convincing evidence presented, as follows:

1. The Ward suffers from incapacities of the following nature and scope: unspecified dementia, impaired memory and cognition. .

2. The Ward lacks capacity to make informed decisions about care and treatment services or to meet the essential requirements for the Ward's physical or mental health or safety. More particularly, the specific legal disabilities to which the Ward is subject (the rights the Ward is incapable of exercising) are:

- to marry
- to contract
- to sue and defend lawsuits
- to determine his or her residence
- to personally apply for government benefits
- to manage property or to make any gift or disposition of property
- to make decisions about his or her social environment or other social aspects of his or her life
- to consent to medical and mental health treatment
- to vote
- to travel
- to have a driver's license
- to seek or retain employment

3. After consideration of reasonable alternatives to guardianship, the Court finds that no alternative will sufficiently address the problems and needs of the Ward.

4. It is in the best interests of the Ward that a limited guardian of the person and property of the Ward be appointed; accordingly, it is

ADJUDGED as follows:

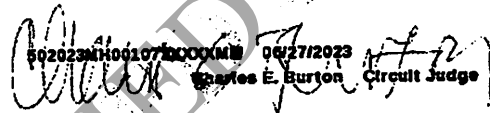
1. Patricia A. Sahn is hereby determined to be incapacitated and a limited guardian should be appointed to provide for the welfare and safety of the Ward.

2. The Ward is incapable of exercising the rights specified in paragraph 3.

3. The Ward shall retain those rights set forth in Florida Statutes Section 744.3215(1), and all other rights except those the Court has hereinabove adjudged that the Ward is incapable of exercising.

4. A copy of this Order shall be served on the Ward and the Ward's attorney by the clerk and a certificate attesting to such service promptly filed in this proceeding.

DONE and ORDERED in Delray Beach, Palm Beach County, Florida.


502023MH001071000XMB 06/27/2023
Charles E. Burton, Circuit Judge

502023MH001072XXXMB 06/27/2023
Charles E. Burton
Circuit Judge

Copies furnished to:

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IN THE CIRCUIT COURT FOR PALM BEACH COUNTY, FLORIDA
PROBATE DIVISION

IN RE: THE GUARDIANSHIP OF

PATRICIA A. SAHM,

Case No. 502023GA000245XXXXMB

Division: IZ

The Ward.

**LETTERS OF LIMITED GUARDIANSHIP
OF PERSON AND PROPERTY**

TO ALL WHOM IT MAY CONCERN:

WHEREAS, CHARLES J. REVARD has been appointed as the limited guardian of the person and property of PATRICIA A. SAHM (the "Ward"), pursuant to this Court's *Order Appointing Limited Guardian of Person and Property* [D.E. #21], and taken the prescribed oath and performed all other acts prerequisite to issuance of limited letters of guardianship of the person and property of the Ward,

NOW, THEREFORE, I, the undersigned circuit court judge, declare CHARLES J. REVARD (hereinafter, the "Guardian") duly qualified under the laws of the State of Florida to act as limited guardian of the person and property of PATRICIA A. SAHM. The Guardian shall have the power to exercise the following powers and duties pertaining to the Ward's person and property:

to contract;

to sue and defend lawsuits;

to apply for government benefits;

to manage property or to make any gift or disposition of property; and

to consent to medical and mental health treatment.

Any financial institution, credit union, company or individual holding assets of the Ward is directed to cooperate with the Guardian and attorney for the Guardian, including providing said attorney/Guardian with information or copies of records on any accounts in which the Ward is a beneficiary of a trust, is the account holder, or joint account holder and complying with the

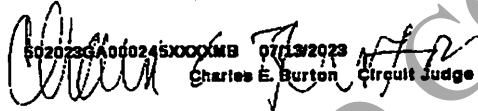
In re Guardianship of Patricia A. Sahn
Case No. 502023GA000245XXXXMB
Letters of Limited Guardianship – Charles J. Revard

instructions of the attorney in the transfer, withdrawal or release of funds authorized by order of this Court, whether the account is held in the Ward's individual name or held jointly, until further direction from the Guardian.

The Guardian is authorized to communicate with and act on behalf of the Ward with government services including the Internal Revenue Services.

The Court finds no evidence that the Ward, prior to incapacity, executed any valid advance directive pursuant to Florida Statutes Chapter 765.

DONE and ORDERED in Palm Beach County, Florida.


502023GA000245XXXXMB 07/13/2023
Charles E. Burton Circuit Judge

502023GA000245XXXXMB 07/13/2023
Charles E. Burton
Circuit Judge

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Kevin R. Hall, P.O. Box 756, Kinderhook, NY 12106 (kh.itconsultingslesoffices@gmail.com)

**WELLS
FARGO**

VIVIEN D'ANGELO RICE
Associate Personal Banker
NMLS ID: 479878

Wells Fargo Bank, N.A.

Boca Del Mar
MAC Z6009-010
7009 Beracasa Way
Boca Raton, FL 33433
Tel: 561 338 6000 Fax: 561 338 6002
24 Hour Cust. Svc: 800 869 3557
vivien.dangelo-rice@wellsfargo.com



PATRICIA CHECKING

\$0.00

Available balance ⓘ



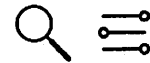
This account is closed. You can view your account information for approximately 90 days after the date of closure.

Overview

Manage account

Routing & balance info

Transactions ⓘ



07/18/2023

\$215.80

ACCOUNT CLOSE
CASHIER'S CHECK



07/18/2023

OUTSTANDING ITEMS CLOSE,
NON-INT W/O FEE



07/10/2023

\$10.00



Accounts



Deposit



Pay & Transfer
EXHIBIT D



Explore

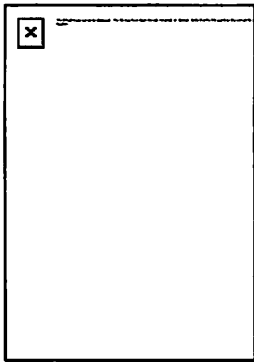
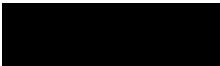


Menu

Paula Albright

From: Mitchell Kitroser
Sent: Tuesday, July 18, 2023 12:52 PM
To: Joanna Sahn
Cc: Charlie Revard; eileen.omalley@nelsonmullins.com; Kathryn Lewis; Clara Ciadella; Paula Albright; Kate Salfi; Susan Stutz
Subject: RE: Your Wells Fargo contact information has been updated

Categories: 10am
FilingIndicator: -1



Mitchell I. Kitroser, Esquire

Managing Partner

Kitroser Lewis & Mighdoll

Main 561.721.0600 Direct 561.614.6740

Web www.kitroserlaw.com Email Mitch@kitroserlaw.com

631 US Highway 1, Suite 406 North Palm Beach, FL 33408

890 NE Jensen Beach Boulevard Jensen Beach, FL 34957



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IRS Circular 230 Notice Requirement. This communication is not given in the form of a covered opinion, within the meaning of Circular 230 issued by the United States Treasury. Thus, we are required to inform you that you cannot rely upon any tax advice contained in this communication for the purpose of avoiding United States federal tax penalties. In addition, any tax advice contained in this communication may not be used to promote, market, or recommend a transaction to another party.

E-mail viruses. This e-mail transmission and any attachments are believed to have been sent free of any viruses or other defect that might affect any computer system into which it is received and opened. It is, however, the recipient's responsibility to ensure that the e-mail transmission and any attachments are virus free, and Mitchell I. Kitroser, P.A. and Kitroser Lewis & Mighdoll accepts no responsibility for any damage that may in any way arise from their use.

From: Joanna Sahn <joanna_sahm@yahoo.com>
Sent: Tuesday, July 18, 2023 11:40 AM
To: Mitchell Kitroser <mitch@kitroserlaw.com>
Cc: Charlie Revard <charlie@thebikeline.com>
Subject: Fwd: Your Wells Fargo contact information has been updated

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

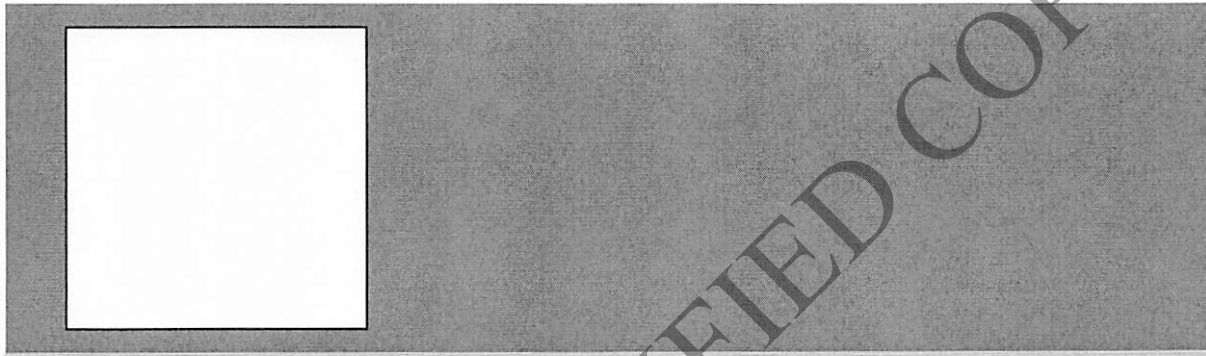
FYI, She also changed the mailing address to her home address. I used to receive it via email, but she changed it to a paper bill to be sent to her home.

Thanks,

Sent from my iPhone

Begin forwarded message:

From: Wells Fargo Online <alerts@notify.wellsfargo.com>
Date: July 18, 2023 at 11:37:09 AM EDT
To: joanna_sahm@yahoo.com
Subject: Your Wells Fargo contact information has been updated



We've updated your contact information

- Mailing Address: (Account ending [REDACTED] 21843 TOWN PLACE DR

To view your current information, go to [update contact information](#).

If you didn't make this request, please call us immediately at 1-800-869-3557 (for personal banking) or 1-800-225-5935 (for small business). We're available 24 hours a day, 7 days a week.

Thank you for banking with Wells Fargo.

Wells Fargo Online Customer Service

[wellsfargo.com](#) | [Security Center](#) | [Contact Us](#)

Note: You may also receive this alert if you are a "Guest User" with view-only access on another customer's account. The Administrator on those accounts may have recently updated your email address. Please contact the Administrator for assistance.

Please do not reply to this automated email.

ca71f2b2-7b39-4b73-9145-d3f3d28a8ecb

▪

Paula Albright

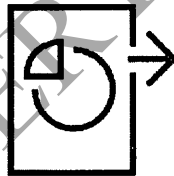
From: Charlie Revard <charlie@thebikeline.com>
Sent: Tuesday, July 18, 2023 2:47 PM
To: Clara Ciadella; Eileen OMalley; Joanna Sahm; Kate Salfi; Mitchell Kitroser; Paula Albright
Subject: Fwd: Welcome to Bank of America

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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

From: Bank of America <onlinebanking@ealerts.bankofamerica.com>
Date: Tue, Jul 18, 2023 at 2:31 PM
Subject: Welcome to Bank of America
To: <charlie@thebikeline.com>

BANK OF AMERICA 



Thanks for opening an account with us

Dear PATRICIA SAHM:

Here are the terms and conditions you reviewed and agreed to when you opened your Deposit account.

You can view, save or print these PDFs for your records.

Deposit Account Opening eDocument Disclosure

Deposit Agreement & Disclosures

Personal Schedule of Fees

Non-English Language Disclosure

Consumer Privacy Notice

Affiliate Marketing Notice

Check your balances, transfer money, set payments and more with the BofA app.

[Download the app](#)

We'll never ask for your personal information such as SSN or ATM PIN in email messages. If you get an email that looks suspicious or you are not the intended recipient of this email, don't click on any links. Instead, forward to abuse@bankofamerica.com then delete it.

Please don't reply to this automatically generated service email.

[Privacy Notice](#)

[Equal Housing Lender](#) 

Bank of America, N.A. Member FDIC

© 2023 Bank of America Corporation

Thank you for allowing us to assist you with your banking needs. Here is a summary of the accounts and services we set up for you or which you applied for today. If any of this information is incorrect, please let us know. We appreciate the opportunity to serve you.

Gracias por permitirnos ayudarle con sus necesidades bancarias. Este es un resumen de las cuentas y los servicios que configuramos para usted o que usted solicitó hoy. Si alguna información es incorrecta, infórmenos. Le agradecemos la oportunidad de servirle.

PATRICIA A SAHM

CHECKING ACCOUNT

Account Number
ACH Routing Number
Title on Account

Advantage Plus



PATRICIA A SAHM

Address

21843 TOWN PLACE DR

BOCA RATON, FL 33433

NOT A CERTIFIED COPY

Bank Information	
Date	07/18/2023
Banking Center Name	ST. ANDREWS
Associate's Name	Loudjina Bell
Associate's Phone Number	954-935-5500

Non-Federal Direct Deposit Enrollment Request Form
 Authorization agreement for automatic deposits (ACH credits)

Directions for Customer Use:

- 1) **Ensure entire form is complete, then sign and date**
 - Use the ABA routing number from the state where your account was opened
- 2) **Ensure appropriate Employer / Company address is used when mailing completed form**
- 3) **Employer / Company should review this form for completeness and suitability.** If Employer / Company prefers or requires their own form, use account type, number and ABA routing number below to help complete their form
- 4) **Mail form directly to Employer / Company** (Note: It is not necessary for employer or company to return the form to the bank once direct deposit is set up into the payroll system)

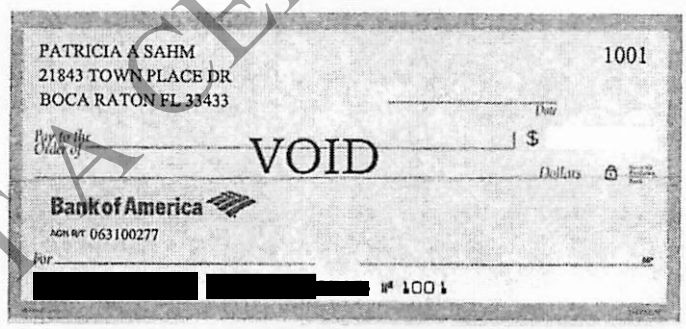
Employer / Company Name: _____

Employer Address _____ City _____ State _____ Zip _____

I (we) authorize the above named Employer / Company to initiate credit entries to my Bank of America Checking and/or Savings accounts indicated below and to credit the same to such account. I (we) acknowledge that the origination of the ACH transactions to my (our) account must comply with the provisions of U.S. law.

Note: Funds can be deposited into one account or split between accounts as a set percent or dollar amount.

Account Type	<input checked="" type="checkbox"/> Checking <input type="checkbox"/> Savings	State Acct Opened	FL
Account Number	██████████		
ABA Routing Number	██████████		
Deposit Amount	_____ % OR \$ _____	(Flat Amount)	



If monies to which I am not entitled are deposited to my account, I authorize the Employer / Company (issuer) to direct the financial institution to return said funds and I authorize the financial institution to act on the Employer / Company direction and to return said funds. This authority will remain in effect until Employer / Company has received written notification from me of its termination in such time and in such manner as to afford Employer / Company and financial institution a reasonable opportunity to act on it.

PATRICIA A SAHM
 Name
 21843 TOWN PLACE DR BOCA RATON FL 33433
 Address City/State/Zip
 07/18/2023
 Signature (required) Date Telephone Number

Non-Federal Direct Deposit Enrollment Request Form
 Authorization agreement for automatic deposits (ACH credits)

Directions for Customer Use:

- 1) *Ensure entire form is complete, then sign and date*
 - Use the ABA routing number from the state where your account was opened
- 2) *Ensure appropriate Employer / Company address is used when mailing completed form*
- 3) *Employer / Company should review this form for completeness and suitability. If Employer / Company prefers or requires their own form, use account type, number and ABA routing number below to help complete their form*
- 4) *Mail form directly to Employer / Company* (Note: It is not necessary for employer or company to return the form to the bank once direct deposit is set up into the payroll system)

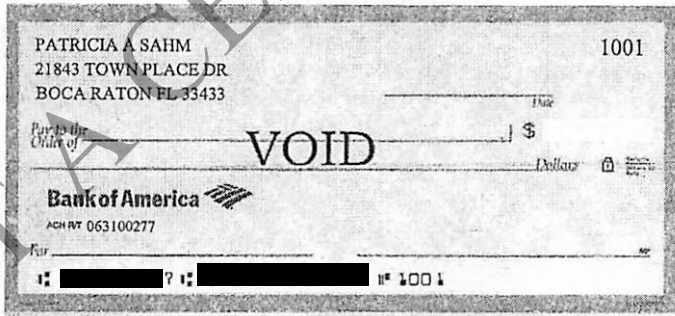
Employer / Company Name: _____

Employer Address _____ **City** _____ **State** _____ **Zip** _____

I (we) authorize the above named **Employer / Company** to initiate credit entries to my **Bank of America** Checking and/or Savings accounts indicated below and to credit the same to such account. I (we) acknowledge that the origination of the ACH transactions to my (our) account must comply with the provisions of U.S. law.

Note: Funds can be deposited into one account or split between accounts as a set percent or dollar amount.

Account Type	<input checked="" type="checkbox"/> Checking <input type="checkbox"/> Savings	State Acct Opened <u>FL</u>
Account Number	_____	
ABA Routing Number	_____	
Deposit Amount	_____ % OR \$ _____	(Flat Amount)



If monies to which I am not entitled are deposited to my account, I authorize the Employer / Company (issuer) to direct the financial institution to return said funds and I authorize the financial institution to act on the Employer / Company direction and to return said funds. This authority will remain in effect until Employer / Company has received written notification from me of its termination in such time and in such manner as to afford Employer / Company and financial institution a reasonable opportunity to act on it.

PATRICIA A SAHM
 Name

21843 TOWN PLACE DR BOCA RATON FL 33433
 Address City/State/Zip

07/18/2023
 Date

Signature (required) _____ Telephone Number _____

Clarity Statement® — Overview of key policies and fees

Account information

Opening Deposit	\$100 or more
Monthly Maintenance Fee	\$12.00 each month. You can avoid the Monthly Maintenance Fee when you do ONE of the following each statement cycle: <ul style="list-style-type: none"> • Make at least one qualifying Direct Deposit of \$250 or more, OR • Maintain a minimum daily balance of \$1,500 or more, OR • Enroll in the Preferred Rewards program. Learn more at bankofamerica.com/preferred-rewards.

ATM fees

Bank of America ATMs	No ATM fee	For deposits, withdrawals, transfers or balance inquiries
Non-Bank of America ATMs	\$2.50	In the U.S., plus any fee charged by the ATM's operator
	\$5.00	Outside the U.S., plus any fee charged by the ATM's operator

Overdraft policy

- To help you avoid fees, we won't authorize ATM withdrawals or everyday debit card purchases when you don't have enough money in your account at the time of the transaction.
- When we determine you don't have enough money in your account to cover other items such as checks or scheduled payments, we'll either authorize and pay the item and overdraw your account (an overdraft item),¹ or decline or return the item unpaid (a returned item). When this happens, you may be charged a fee. See details below.
- We offer two overdraft setting options for how you want us to process your other transactions.

Overdraft settings and fees

Option 1: Standard - This setting will be automatically applied to your account.

- Your checks and scheduled payments may be paid, causing an overdraft.
- You may be charged an Overdraft Item Fee if you overdraw your account.
- If we return an item unpaid, we won't charge a fee, but the payee may.

Overdraft Item Fee	\$10.00	We won't charge this fee:
(We won't charge you more than 2 of these fees per day.)	per item	<ul style="list-style-type: none"> • If your account is overdrawn by \$1 or less OR • For items that are \$1 or less OR • On ACH resubmissions labeled by the merchant as "RETRY PYMT" or "REDEPCHECK"

Option 2: Decline All - You can choose this setting if you would like to have your transactions declined or returned unpaid when you don't have enough money. With this setting you can avoid Overdraft Item Fees.

- Checks or scheduled payments will be returned unpaid if you don't have enough money in your account.
- If your account becomes overdrawn for any reason, we won't charge you an Overdraft Item Fee.
- When we decline or return a transaction, we won't charge a fee, but the payee may.

Keep in mind, regardless of your overdraft setting, if you set up Balance Connect® for overdraft protection,² we'll automatically transfer available funds from one or more of your linked backup accounts if you're about to overdraw your account.

Please see the Personal Schedule of Fees and Deposit Agreement and Disclosures for your account terms.

1. Our overdraft fee of \$10 may apply for overdrafts created by check, recurring debit card transactions, or other electronic means. If your account is overdrawn, you must immediately bring your account to a positive balance. We pay overdrafts at our discretion and we reserve the right not to pay. For example, we typically do not pay overdrafts if your account is not in good standing.

2. Balance Connect® for overdraft protection is also available from your Bank of America credit card. Overdraft protection transfers from your credit card are Bank Cash Advances and will accrue interest at the Bank Cash Advance APR. Please refer to your Credit Card Agreement for additional details. Overdraft protection transfers from a linked savings account count towards the six transactions you're allowed each month from your savings account and may lead to a Withdrawal Limit Fee.



Here are the details of your Check Deposit

A Check Deposit was made on July 18, 2023 at 2:44 PM at our 21060 Saint Andrews Blvd Boca Raton, FL 33433-2402 location

DETAILS

Transaction amount: \$215.80
Check amount: \$215.80
To: ADV PLUS BANKING DDA [REDACTED]
Number of checks: 1
Checks included: \$215.80
Transaction ID: [REDACTED]

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Important Information:

- Keep this receipt until you see the transaction completed on your statement.
- Depending on your account's terms and conditions, it might not be finalized right away since some transactions may need to be verified or have a payment collected.
- Keep in mind, transactions made in a financial center on non-business days (Saturday, Sunday and bank holidays) aren't processed until the next business day we're open.

Using our mobile app?

Make deposits, check account balances, and much more.



Ask Erica
"Has my Check Deposit posted?"



Scan this code using your smartphone or QR reader to learn more

Clara Ciadella

From: Charlie Revard <charlie@thebikeline.com>
Sent: Tuesday, July 18, 2023 9:15 PM
To: [REDACTED]; [REDACTED]; Joanna Sahm; Kate Salfi; Mitchell Kitroser; Paula Albright
Subject: Fwd: Patty docs
Attachments: 20230718 Patty Jr_Docs.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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

From: Patricia Sahm <patty.sahm@gmail.com>
Date: Tue, Jul 18, 2023 at 8:24 PM
Subject: Fwd: Patty docs
To: Charlie Revard <charlie@thebikeline.com>

Just so you know, I told my lawyer! I thought She should be at the Bank of America on the corner where she goes to Publix, 2 drug stores(1 where her prescriptions are),2 restaurants, etc.3-5 mins. from the house,depending on lights and traffic.

I have no ulterior motives except her safety,etc. And, David Kubilian, my lawyer, knew everything I was doing,Amber Patwell, as well, every step of the way.
My lawyer thought it was a great idea. My name isn't on anything,I know better! Again, never my intention. I actually, told the bank your email and cell phone number.
If you want, it is ready for you to be "joint" if you want. They know.

Also, The H.O. A. letter is on this email too.
Mom did say, She may not remember the roads, and on more than 1 occasion said something about the B.O.A., she banked there years ago. 40 checks are on the way. She is very happy it's down the street!
Loujina(Lou) Bell-Relationship Banker St. Andrew's Financial Center
21060 St. Andrews Blvd.
Boca Raton, Fl.
33433
561-447-4076 X-4
loudjina.bell@bofa.com

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

From: Eliot Bernstein <iviewit@gmail.com>
Date: Tue, Jul 18, 2023 at 7:15 PM
Subject: Patty docs
To: Patty Sahm <patty.sahm@gmail.com>

EXHIBIT H

Eliot Ivan Bernstein

YouTube Inventor Scapegoated by Big Law

and Courts for Decades Now Protected by

NY Law Offices of Lalit K. Jain Esq. helping

All Courts to Self-lift the Self-inflicted

Baby Bastard Curse ("BBC")

Iviewit Holdings, Inc. – DE

2753 N.W. 34th St.

Boca Raton, Florida 33434-3459

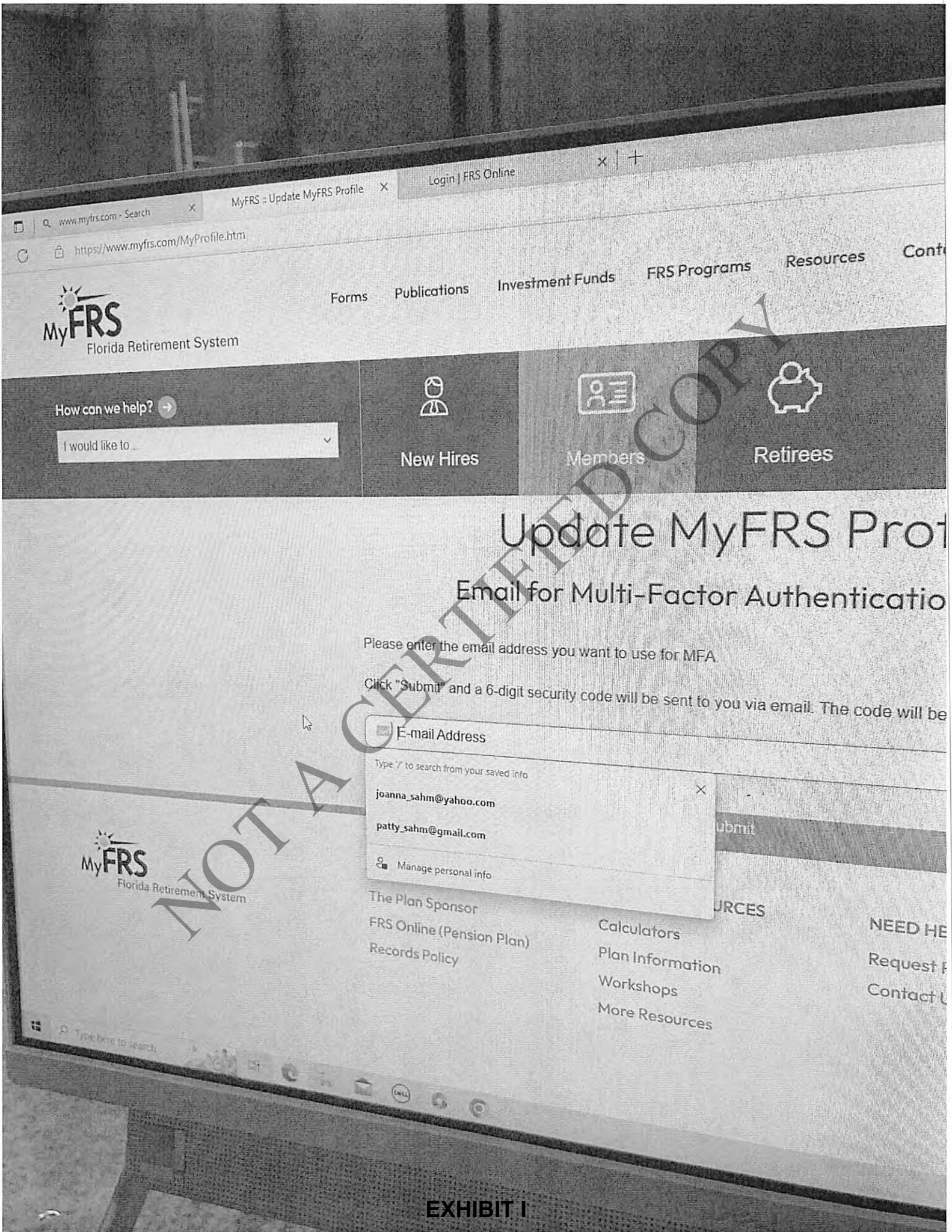
(561) 886.7628 (c)

iviewit@iviewit.tv

<http://www.iviewit.tv>

Please click www.TruthIsPrudence.Com, download, print and use upgraded legal service to help all Courts end the felony crime of scapegoating you and your family.

This e-mail message (and any attachment(s)) is covered by the *Electronic Communications Privacy Act*, 18 U.S.C. §§ 2510-2521, is intended only for the person or entity to whom it is addressed, and is a legally PRIVILEGED and CONFIDENTIAL communication.



Update MyFRS Profile

Email for Multi-Factor Authentication

Please enter the email address you want to use for MFA.

Click "Submit" and a 6-digit security code will be sent to you via email. The code will be...

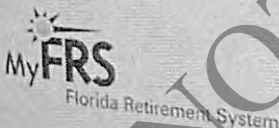
E-mail Address

Type '/' to search from your saved info

- joanna_sahm@yahoo.com
- patty_sahm@gmail.com

Manage personal info

Submit



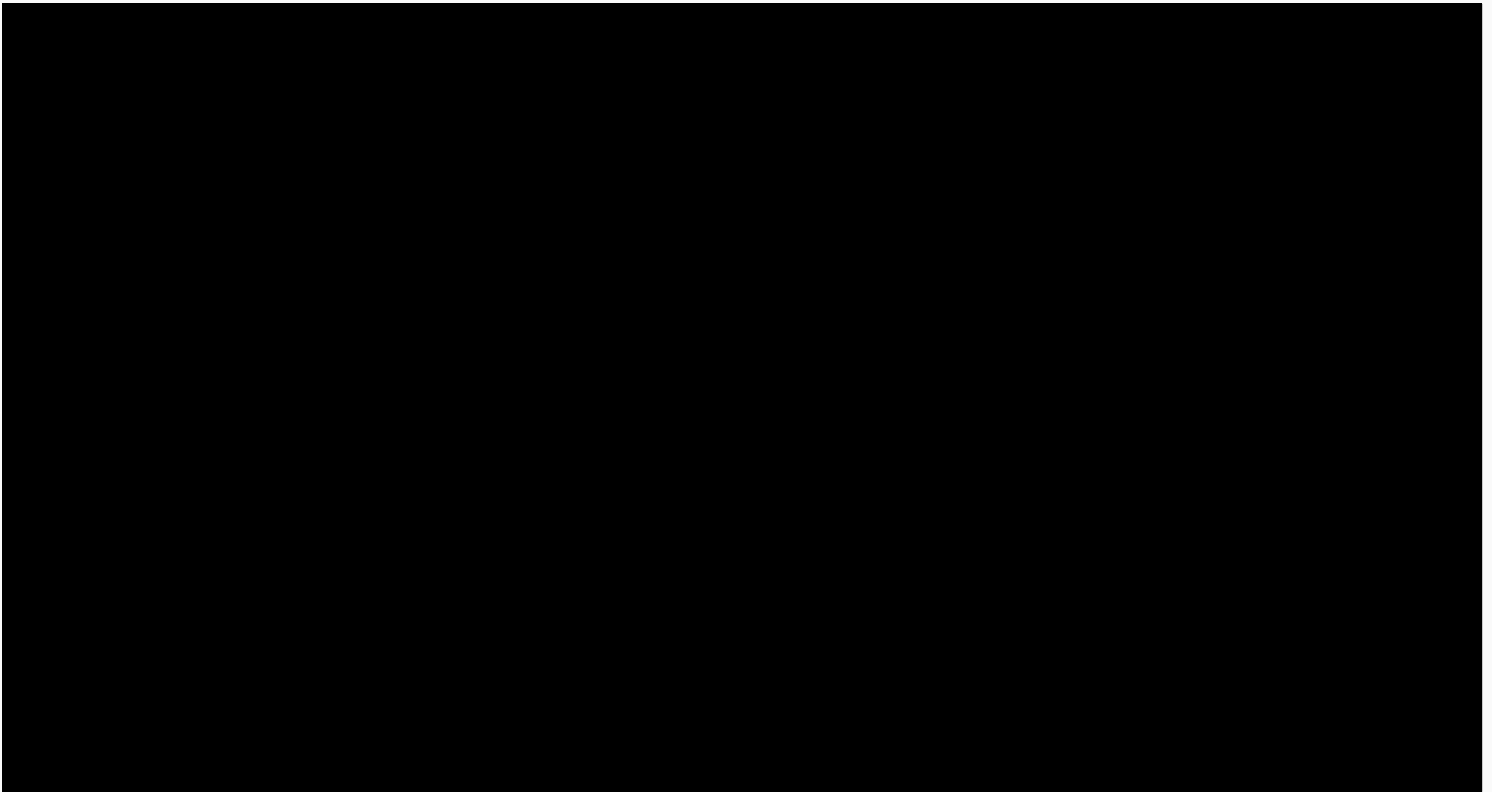
The Plan Sponsor
 FRS Online (Pension Plan)
 Records Policy

Calculators
 Plan Information
 Workshops
 More Resources

NEED HELP
 Request Form
 Contact Us



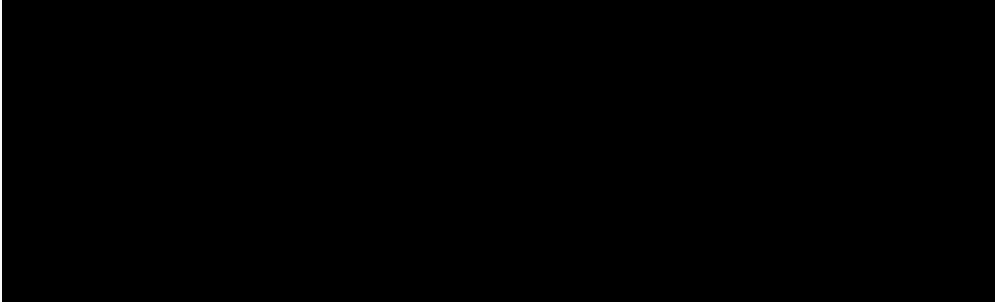
At a glance



NOT A CERTIFICATE



Personal information



Year of birth



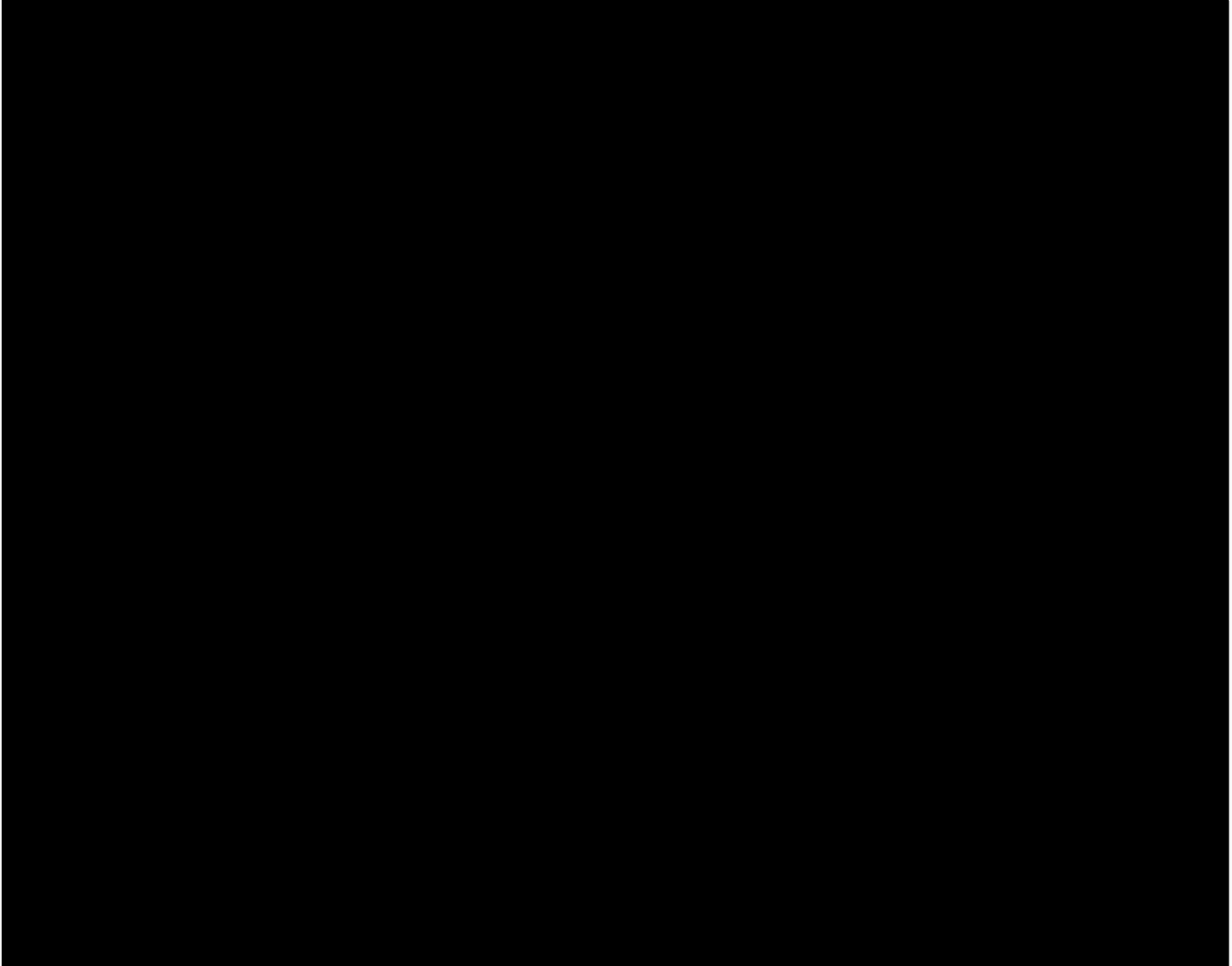
Personal statements

No Statement(s) present at this time

NOT A CERTIFIED COPY

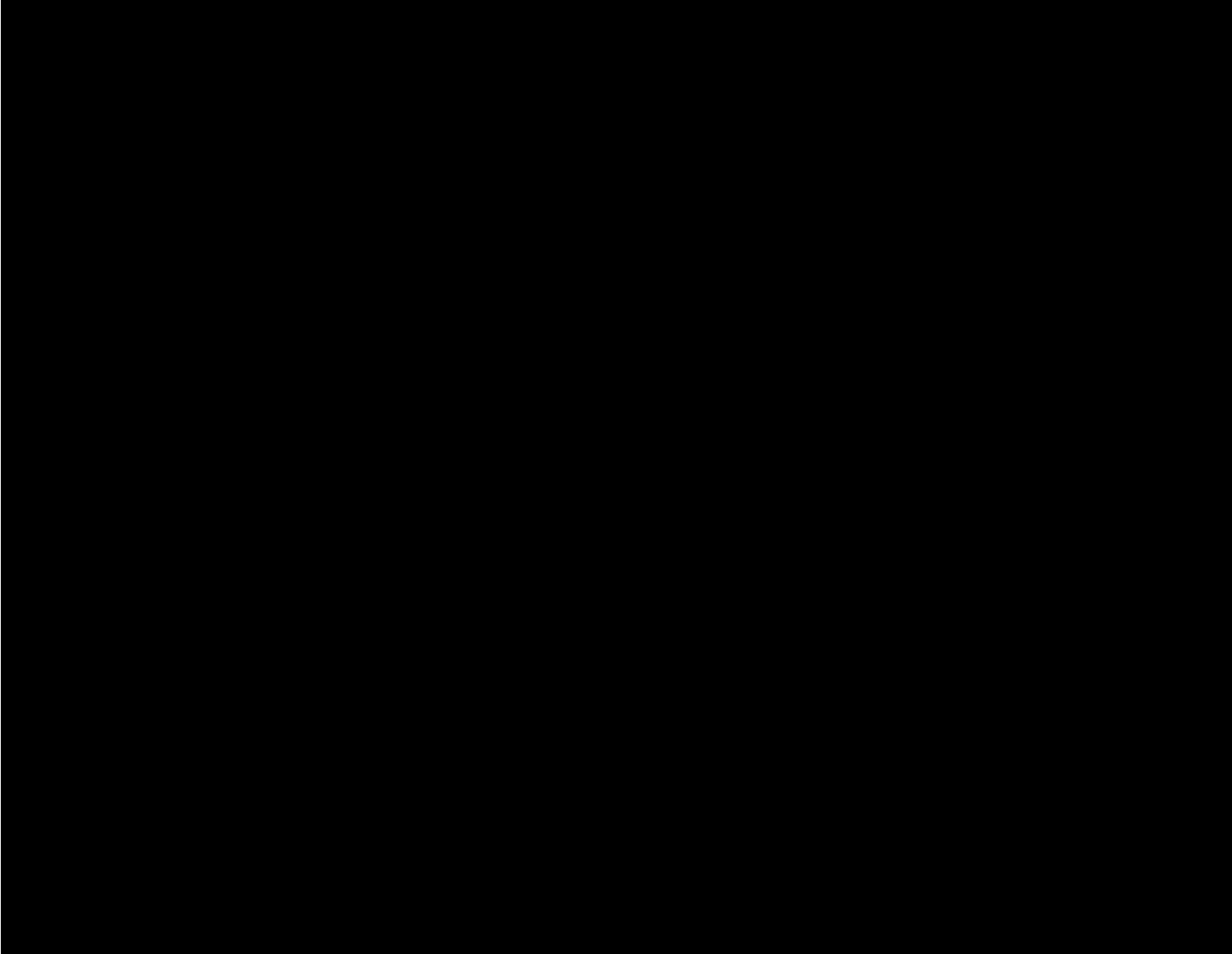


Open accounts

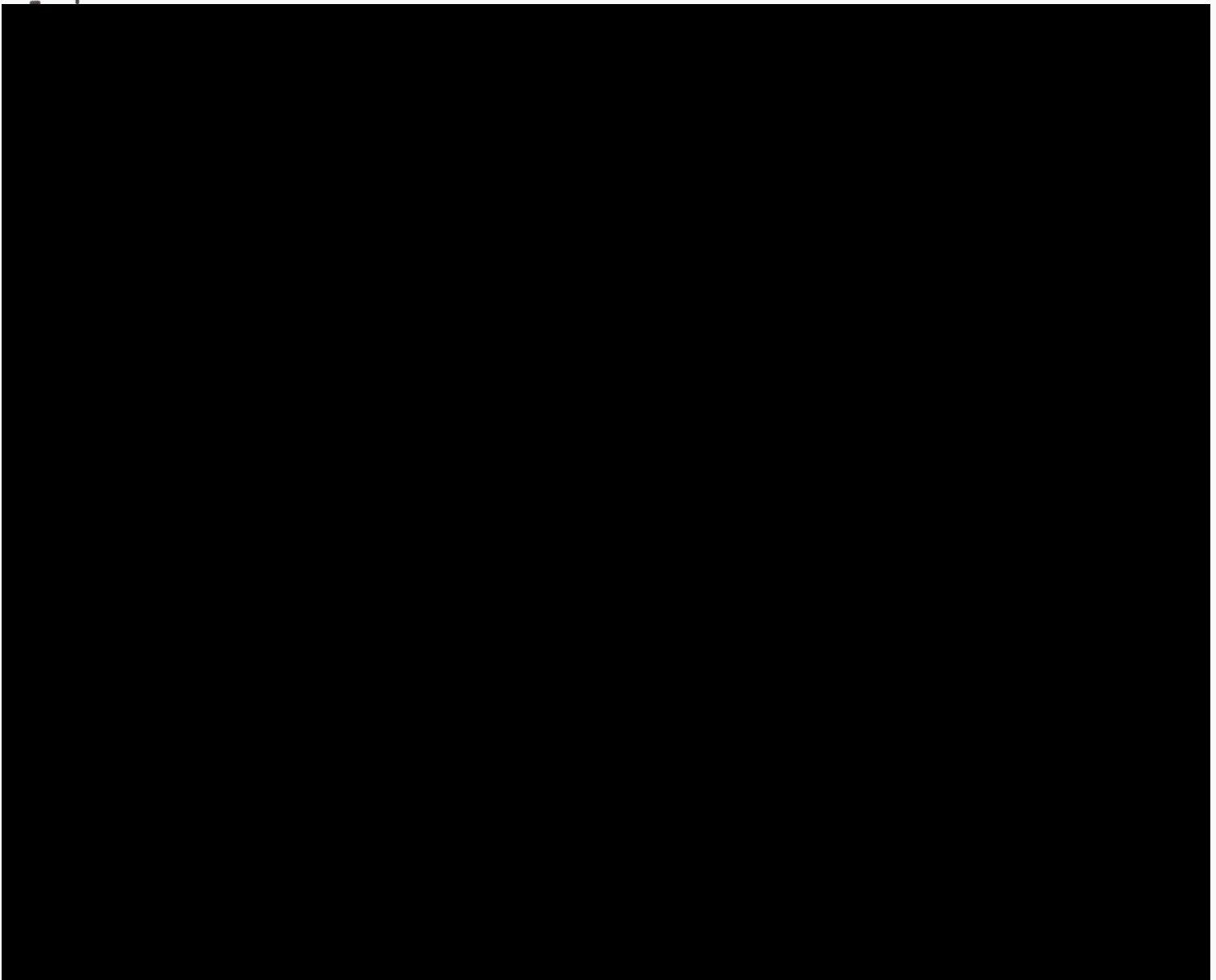


Comments

NOT



NOT A

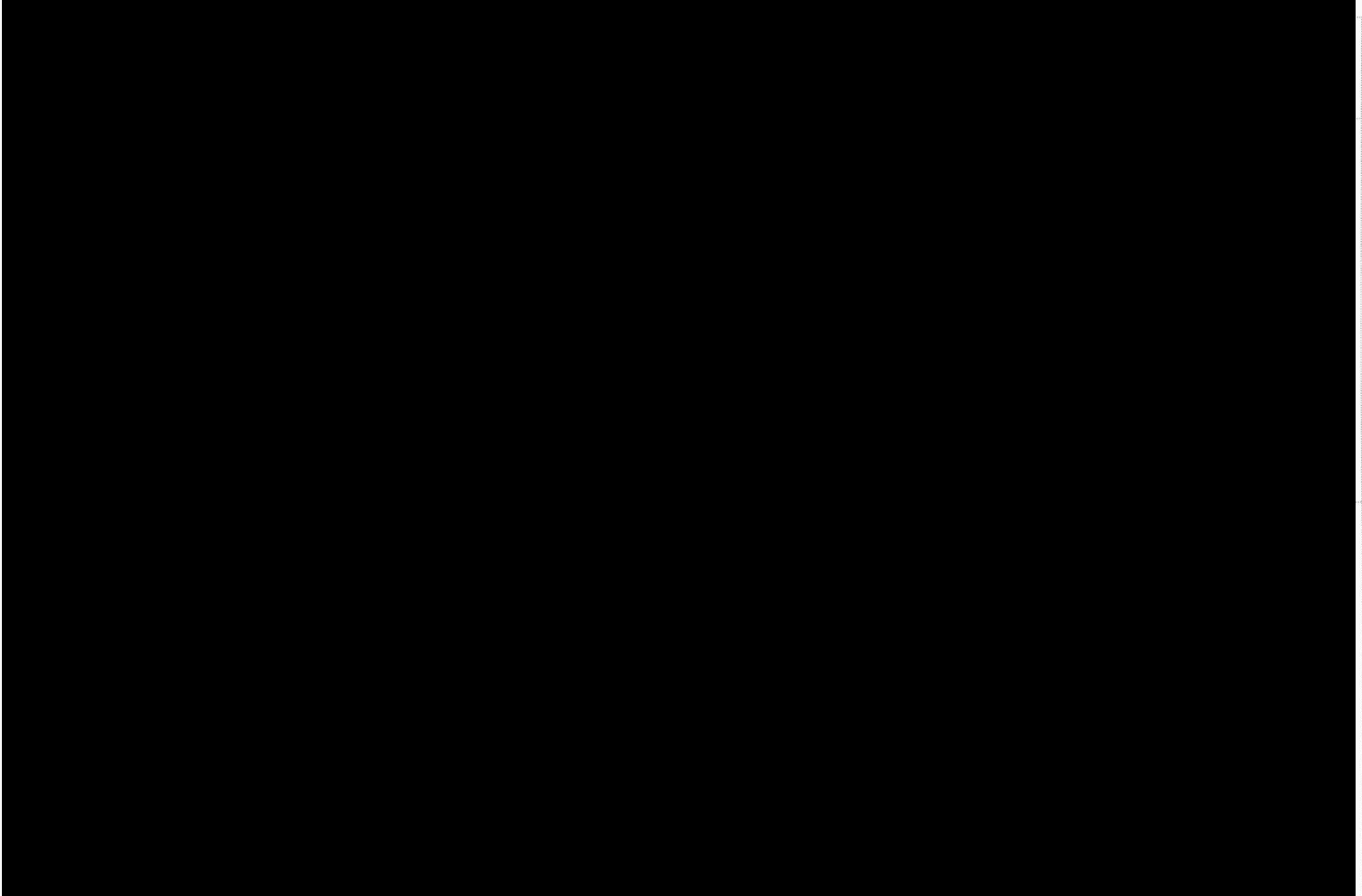


Comments

NOT A



Closed accounts



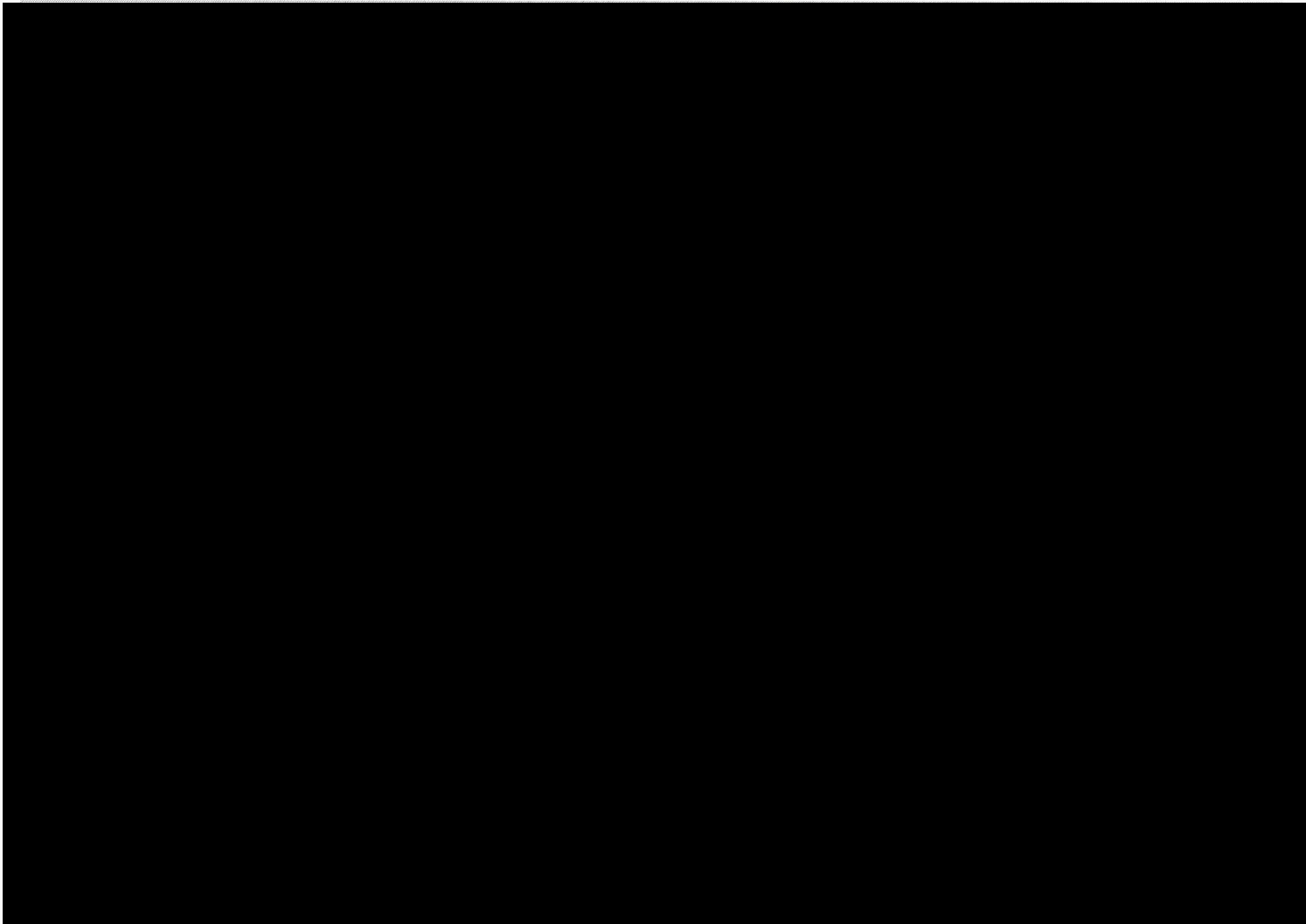
✓ Current / Terms met CLS Closed — Data Unavailable

✉ Contact info



💬 Comments

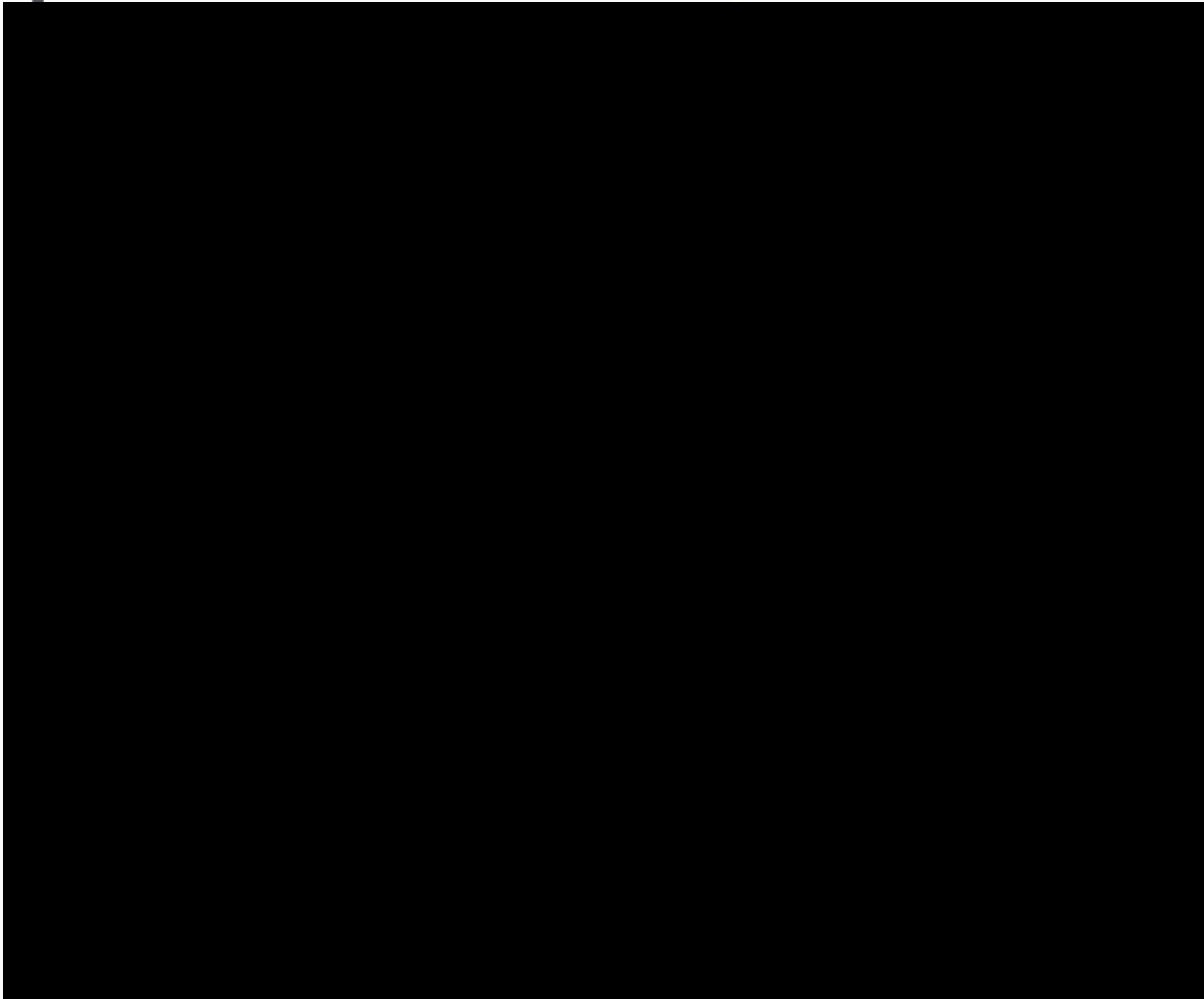
Account closed at credit grantor's request



Comments

Account closed at credit grantor's request

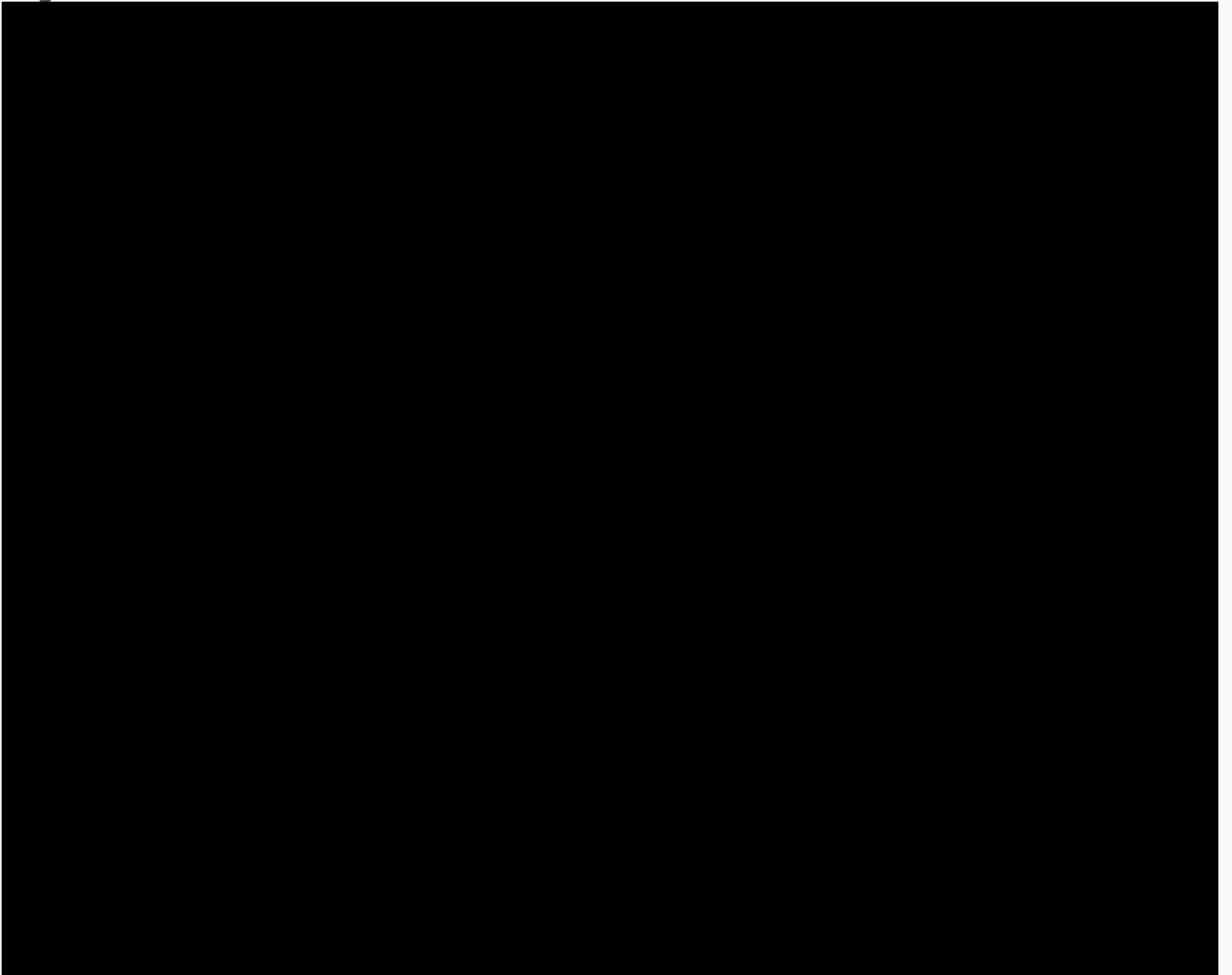
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 Comments

Account closed at credit grantor's request

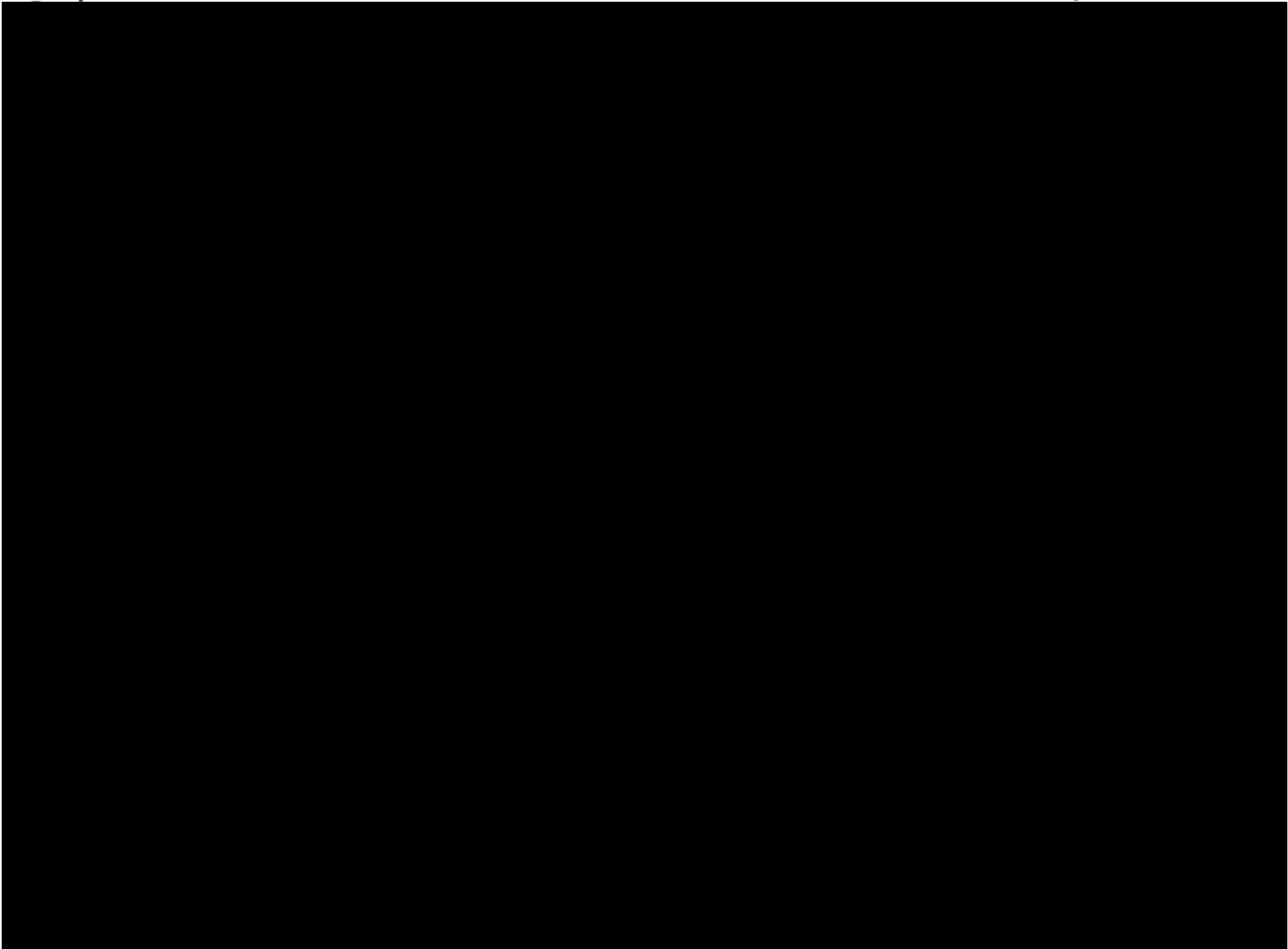
NOTIFIED



 Comments

Account closed at credit grantor's request

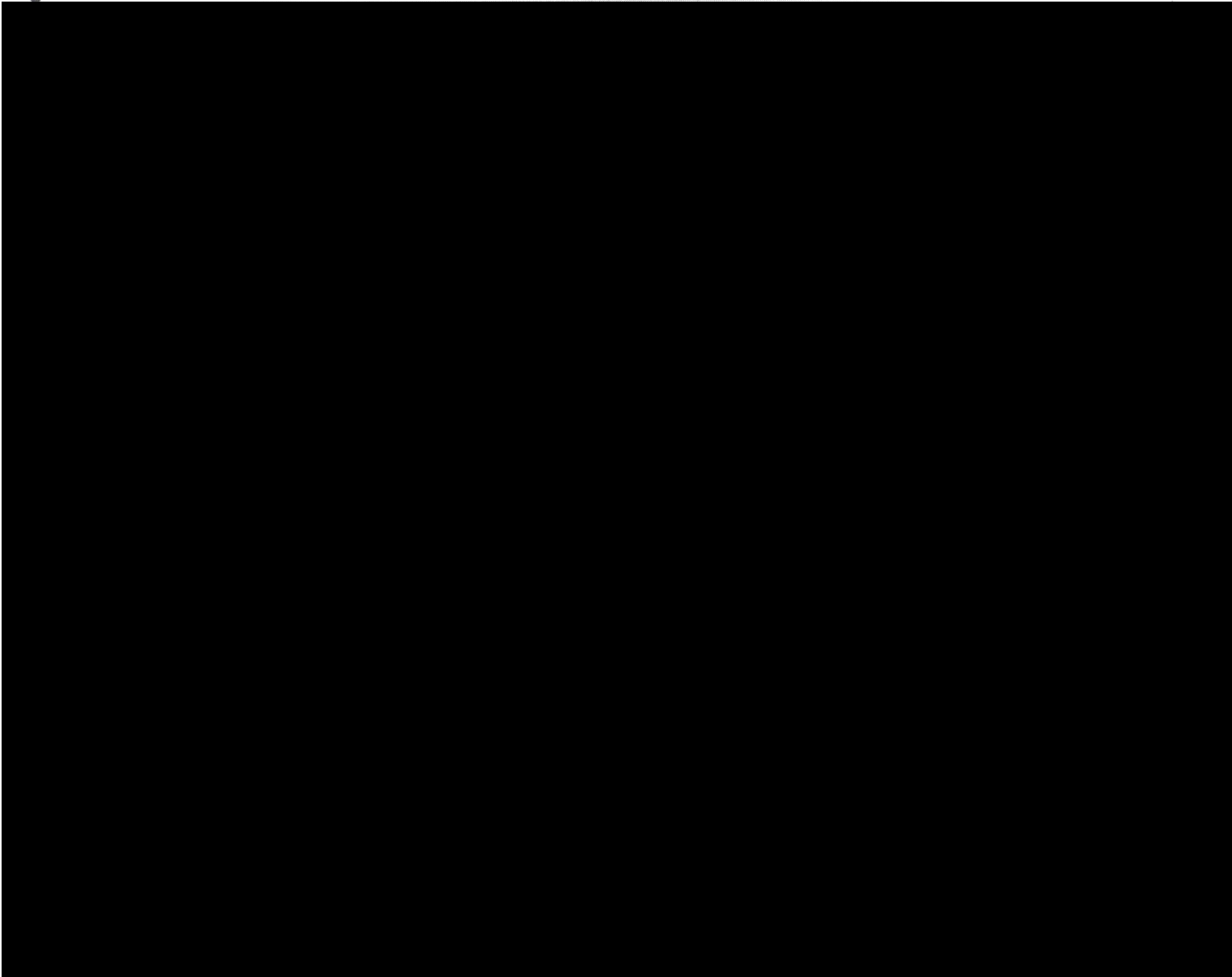
NOT F



 Comments

Account closed at consumer's request

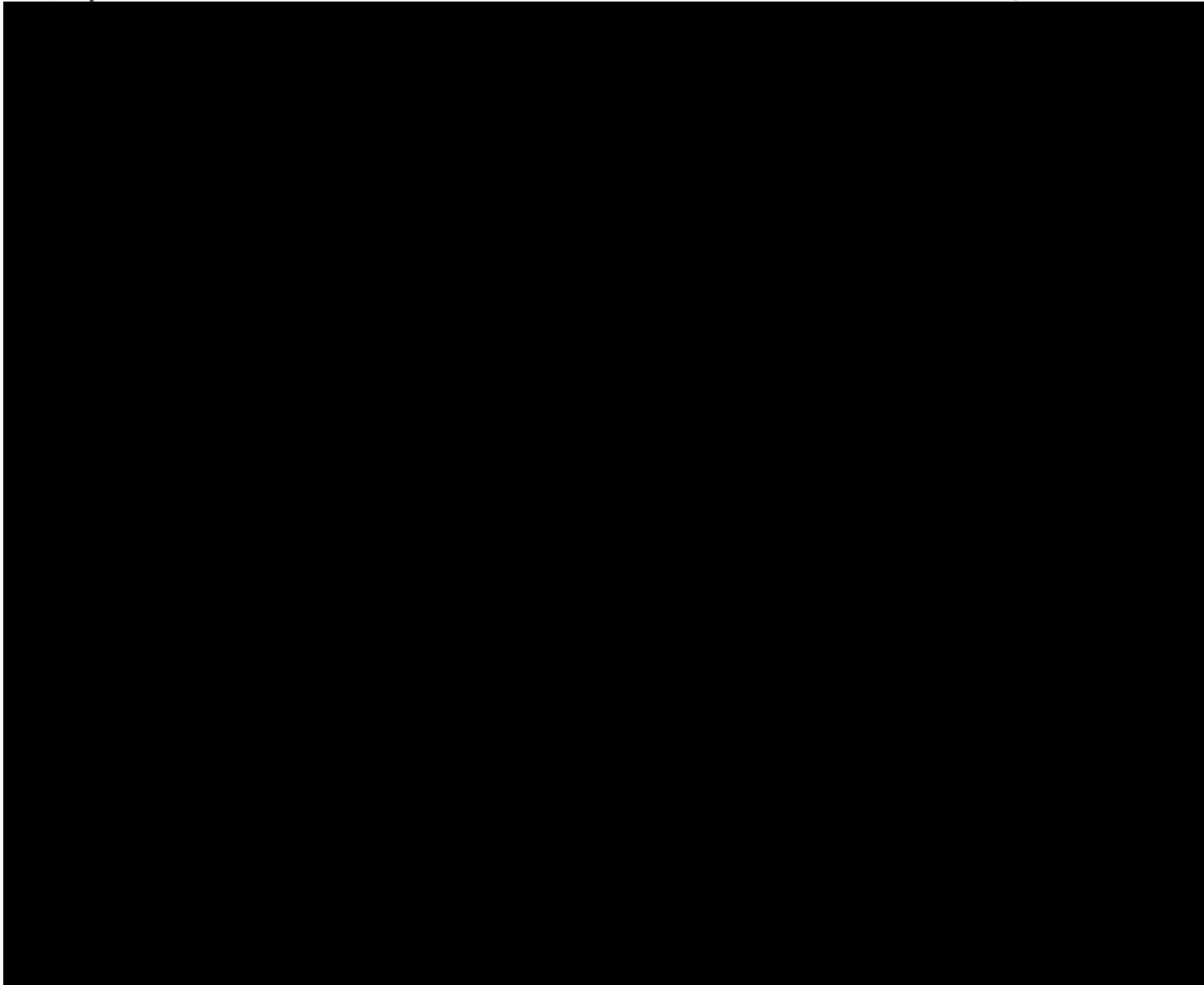
NOT A CREDIT REPORT



Comments

Account closed at consumer's request

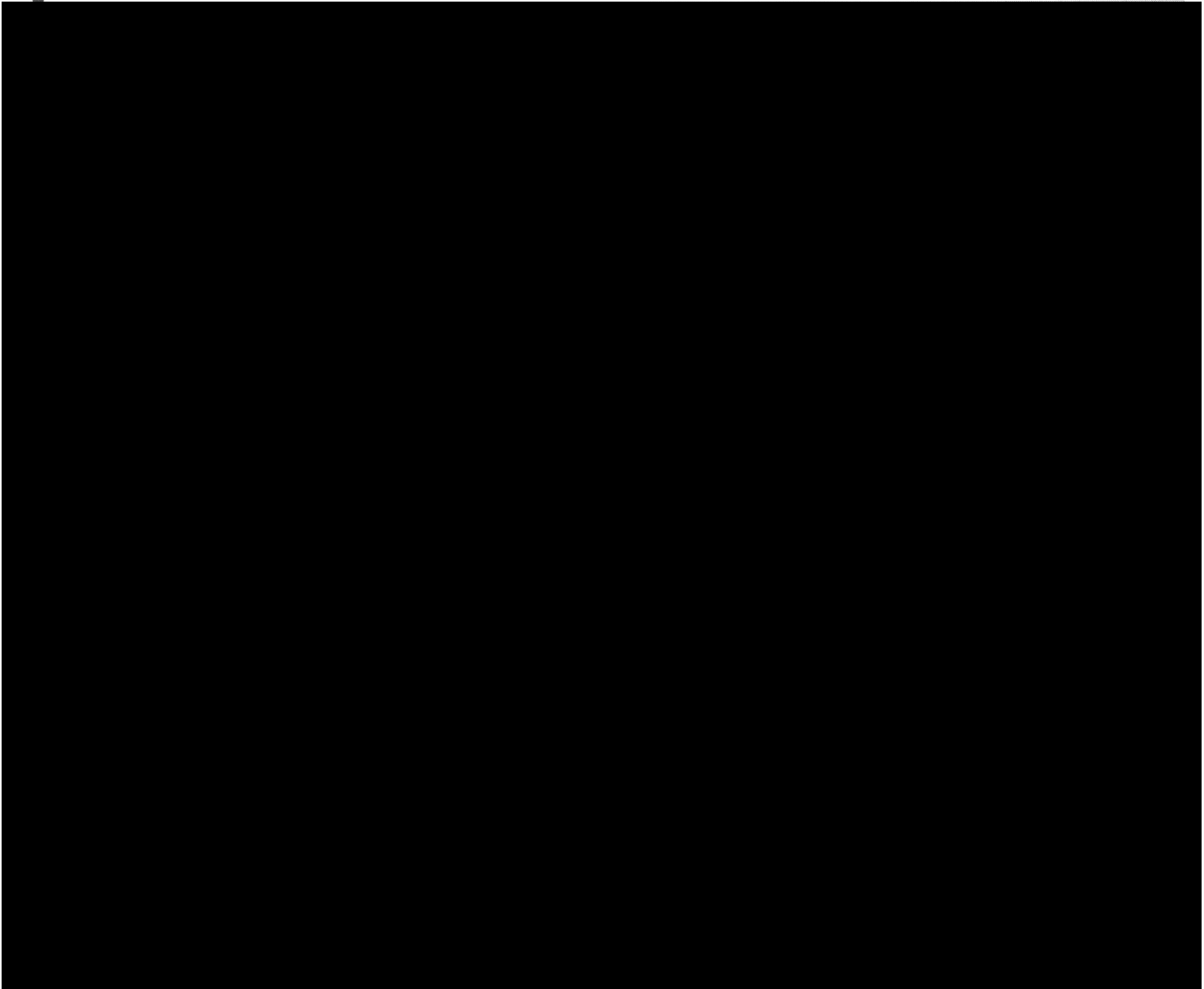
NOT A



Comments

Closed due to inactivity

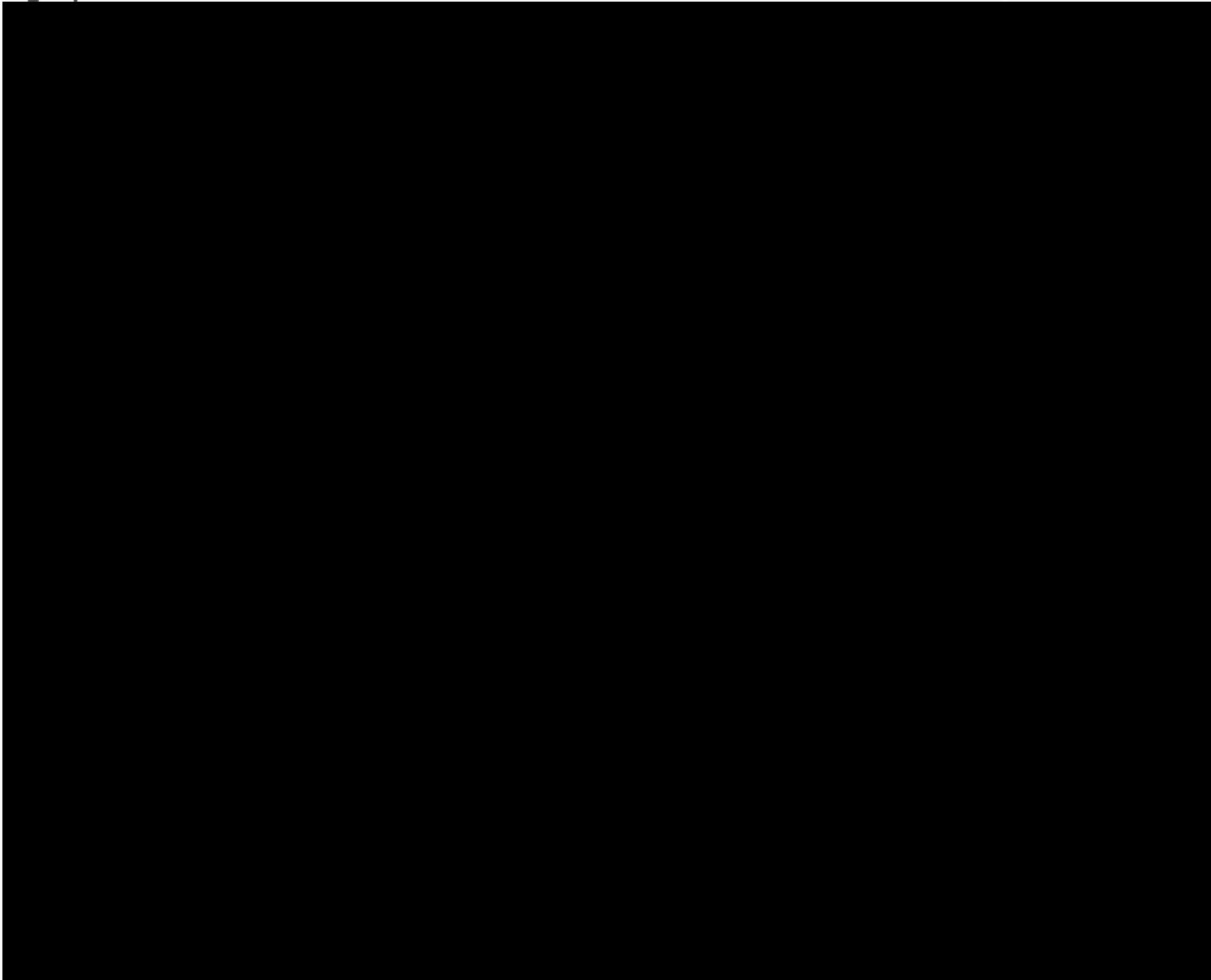
NOT F



Comments

Closed due to inactivity

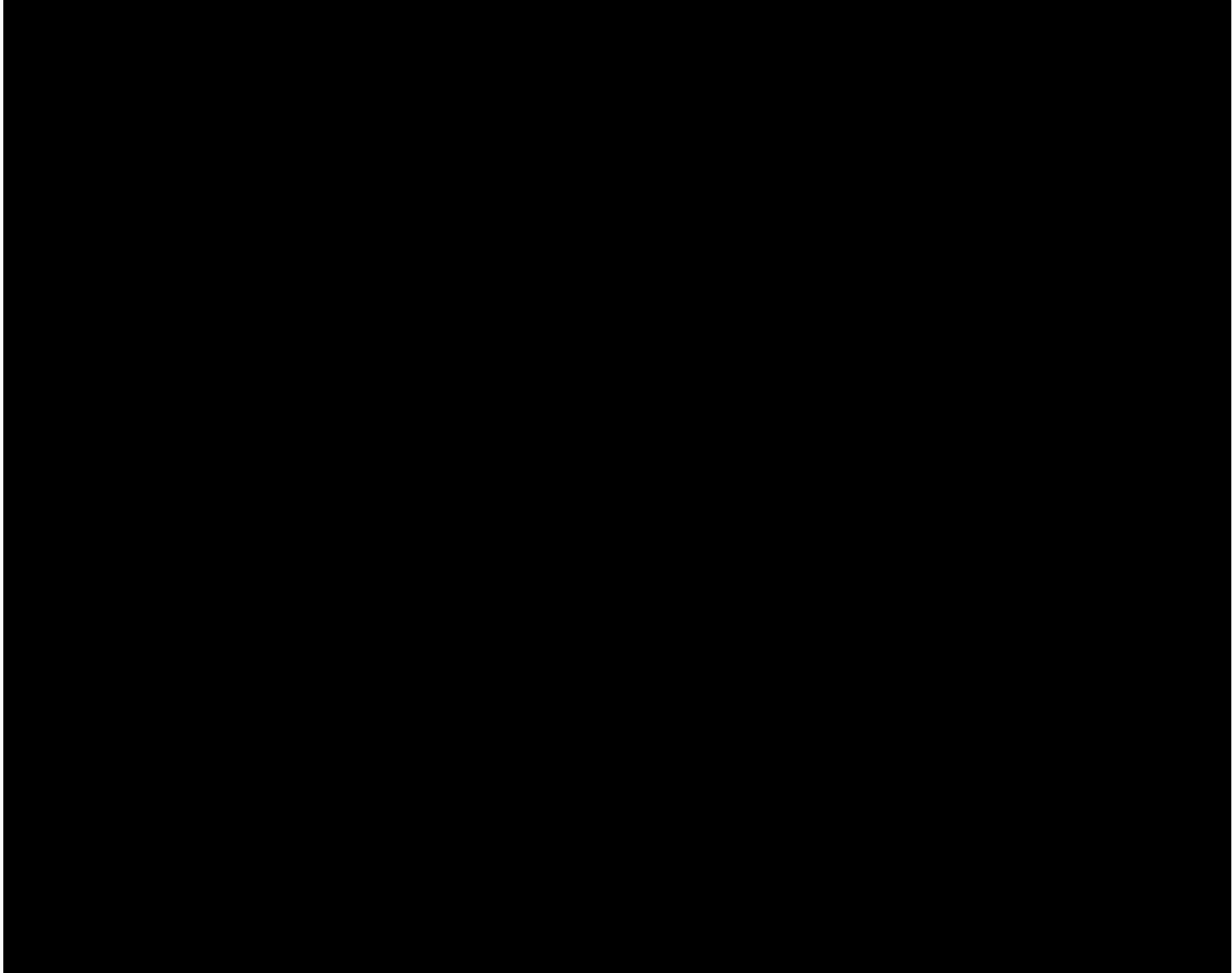
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Comments

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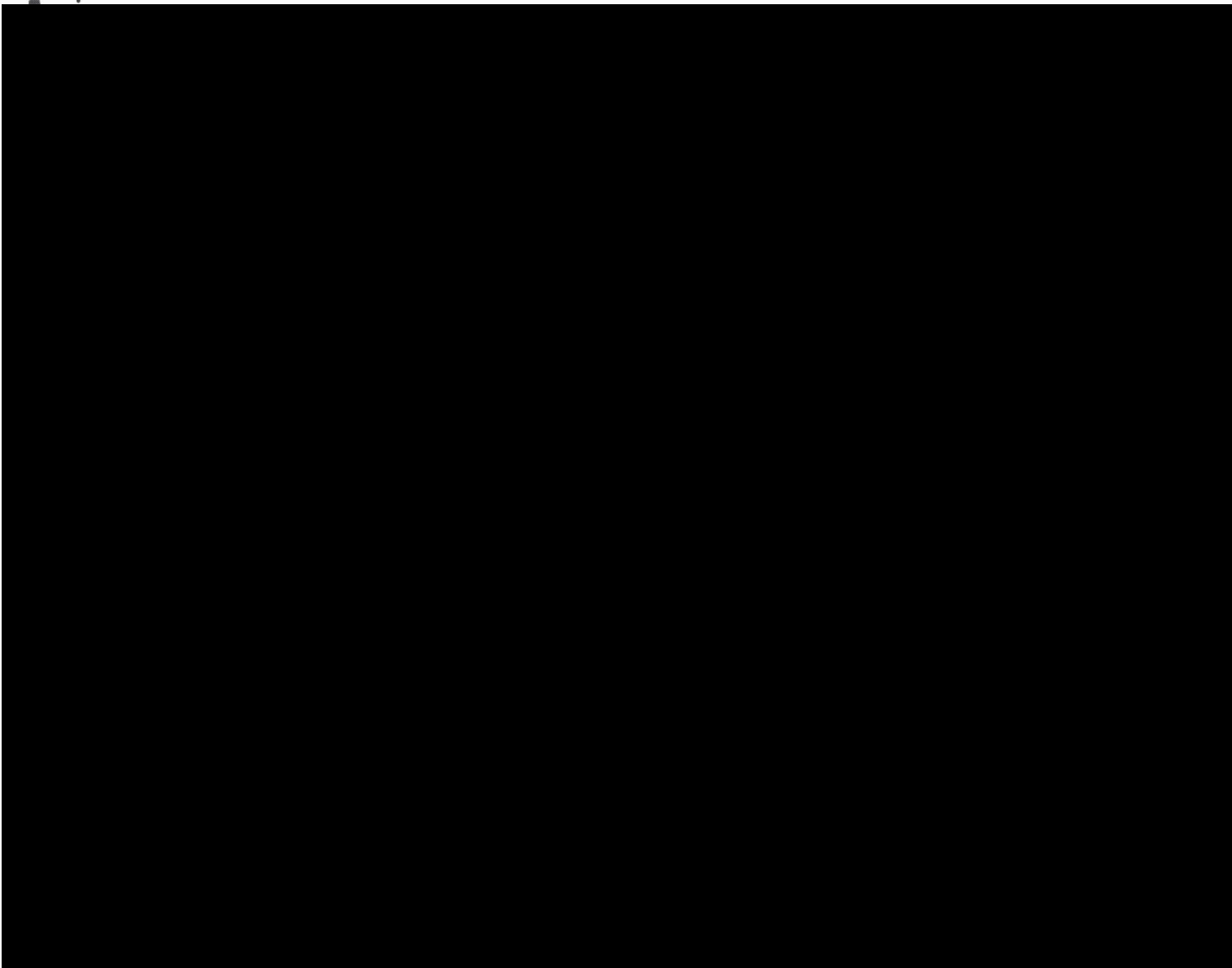
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 Comments

Closed due to inactivity

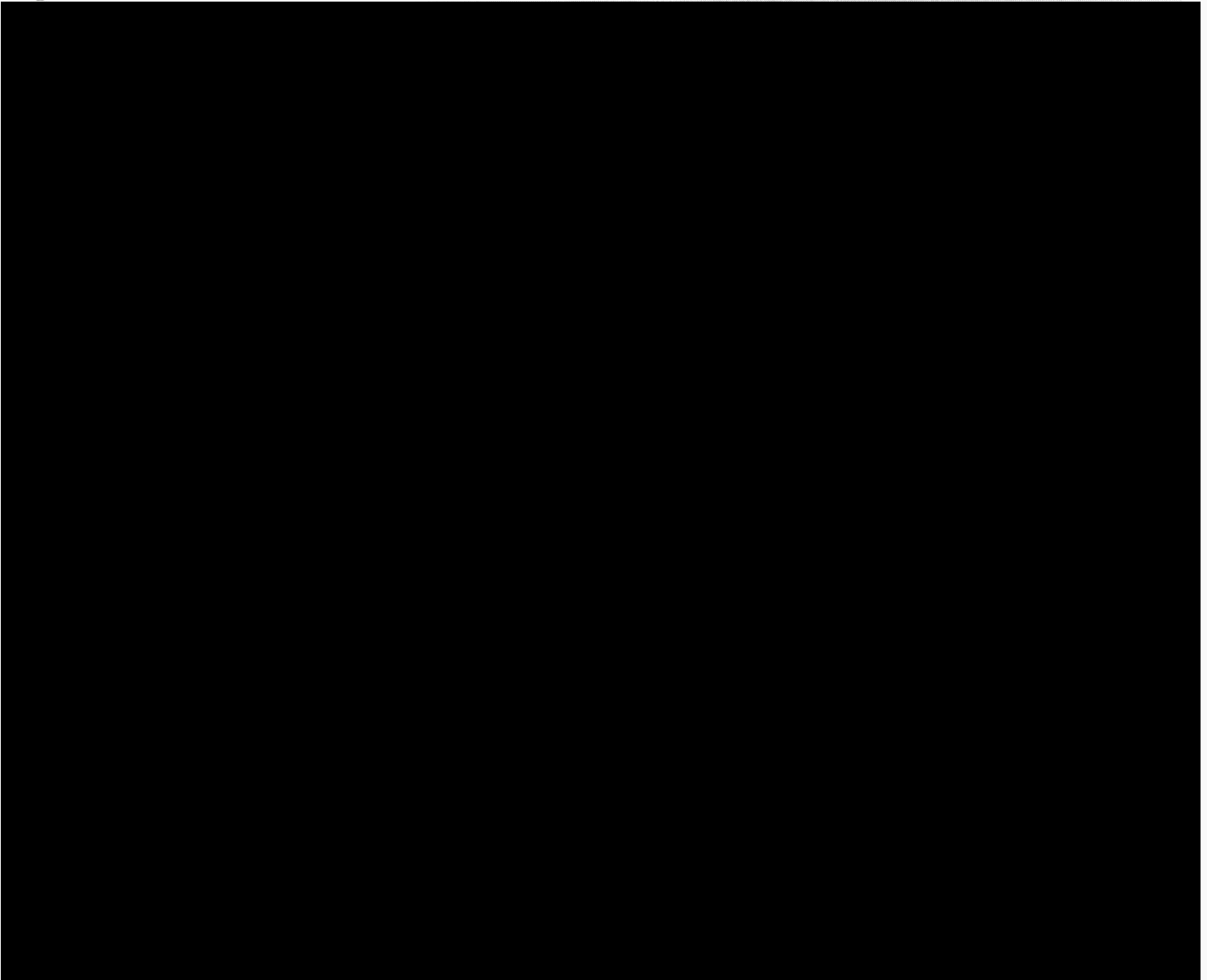
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Comments

Account closed at consumer's request

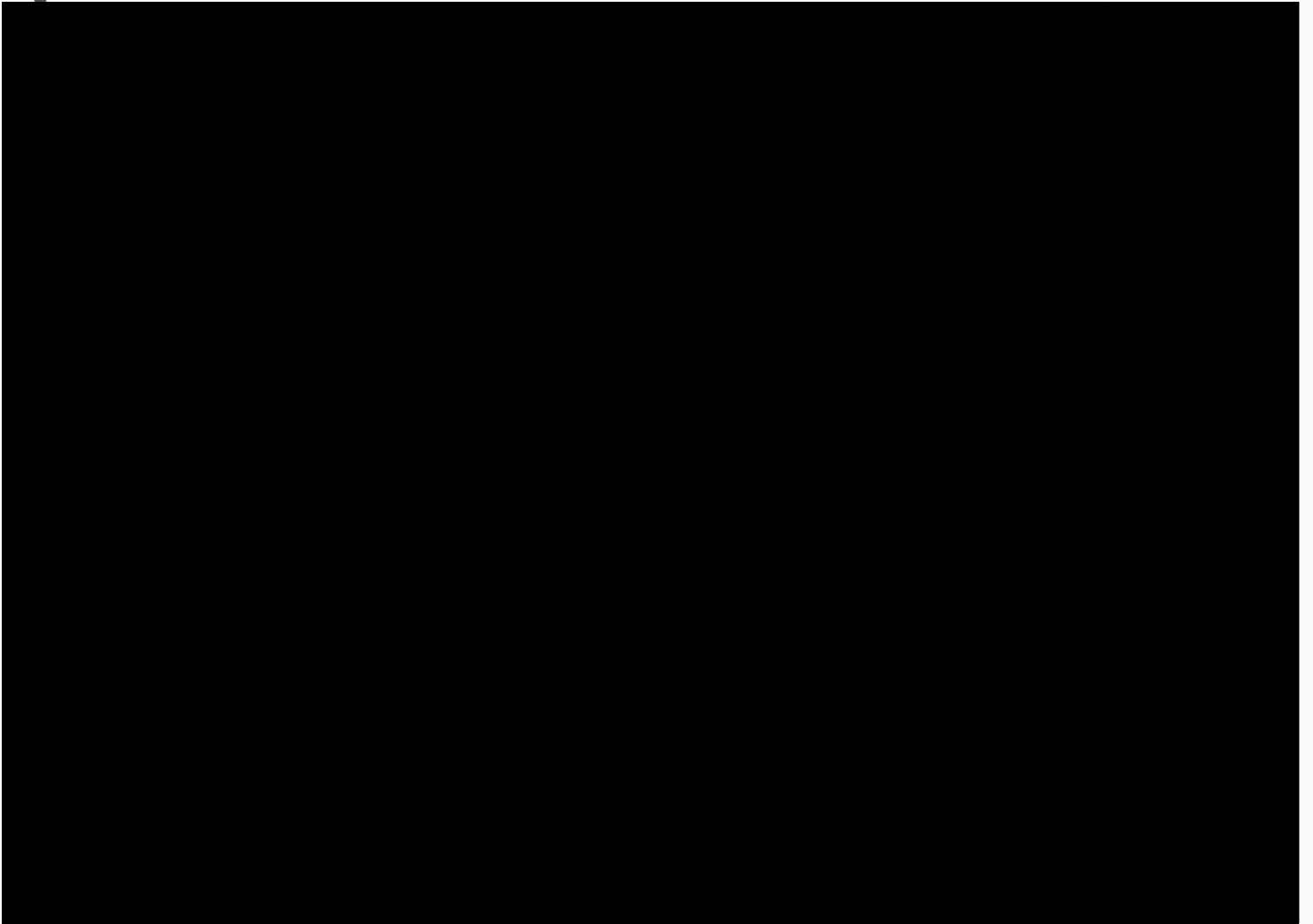
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 **Comments**

Closed due to inactivity

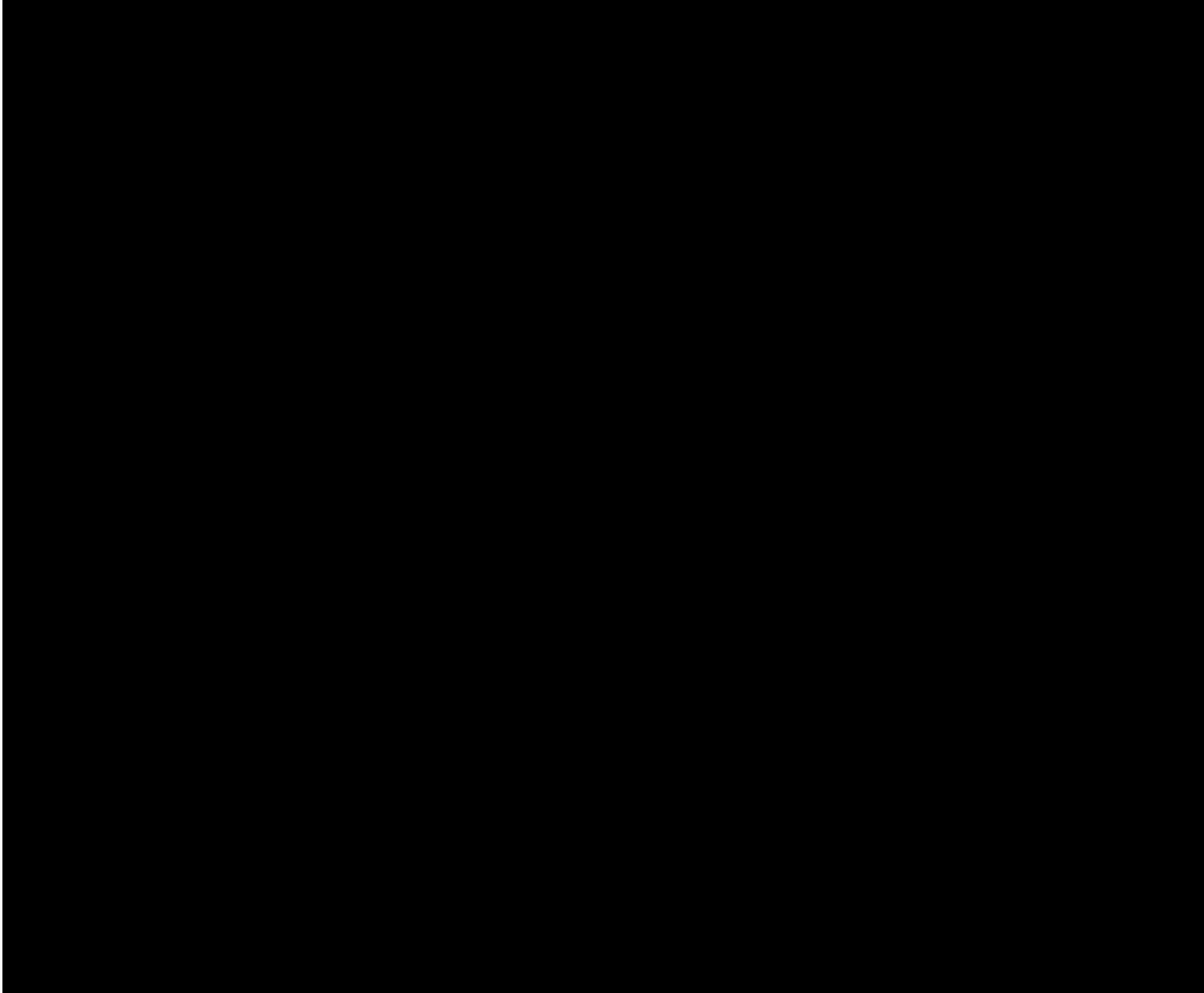
NOT A



 **Comments**

Closed due to inactivity

NOT A CE



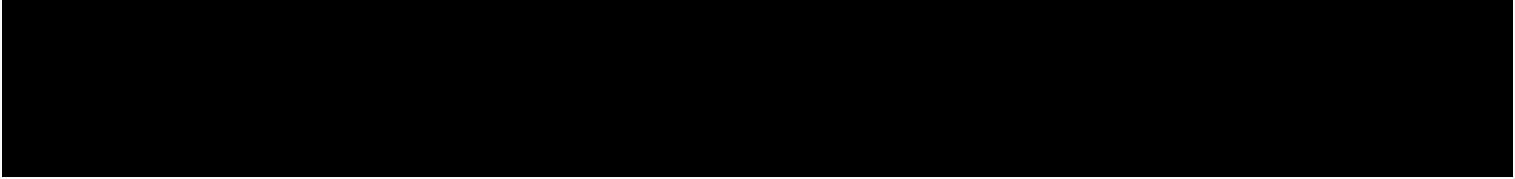
Comments

Account closed at consumer's request

NOT A



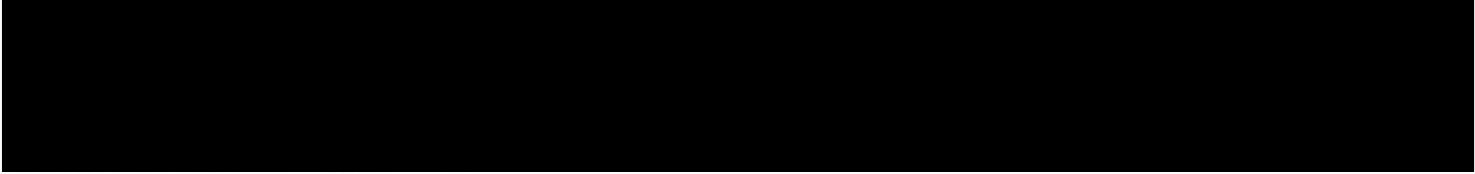
Collection accounts



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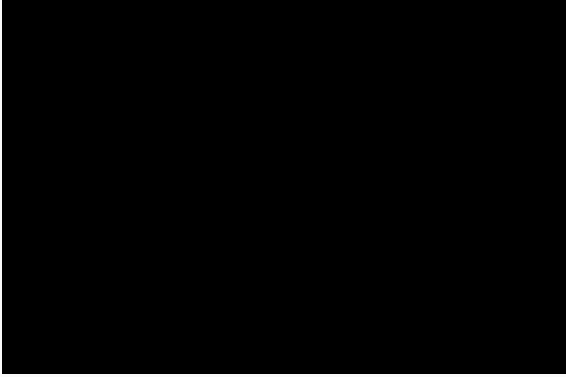
Public records



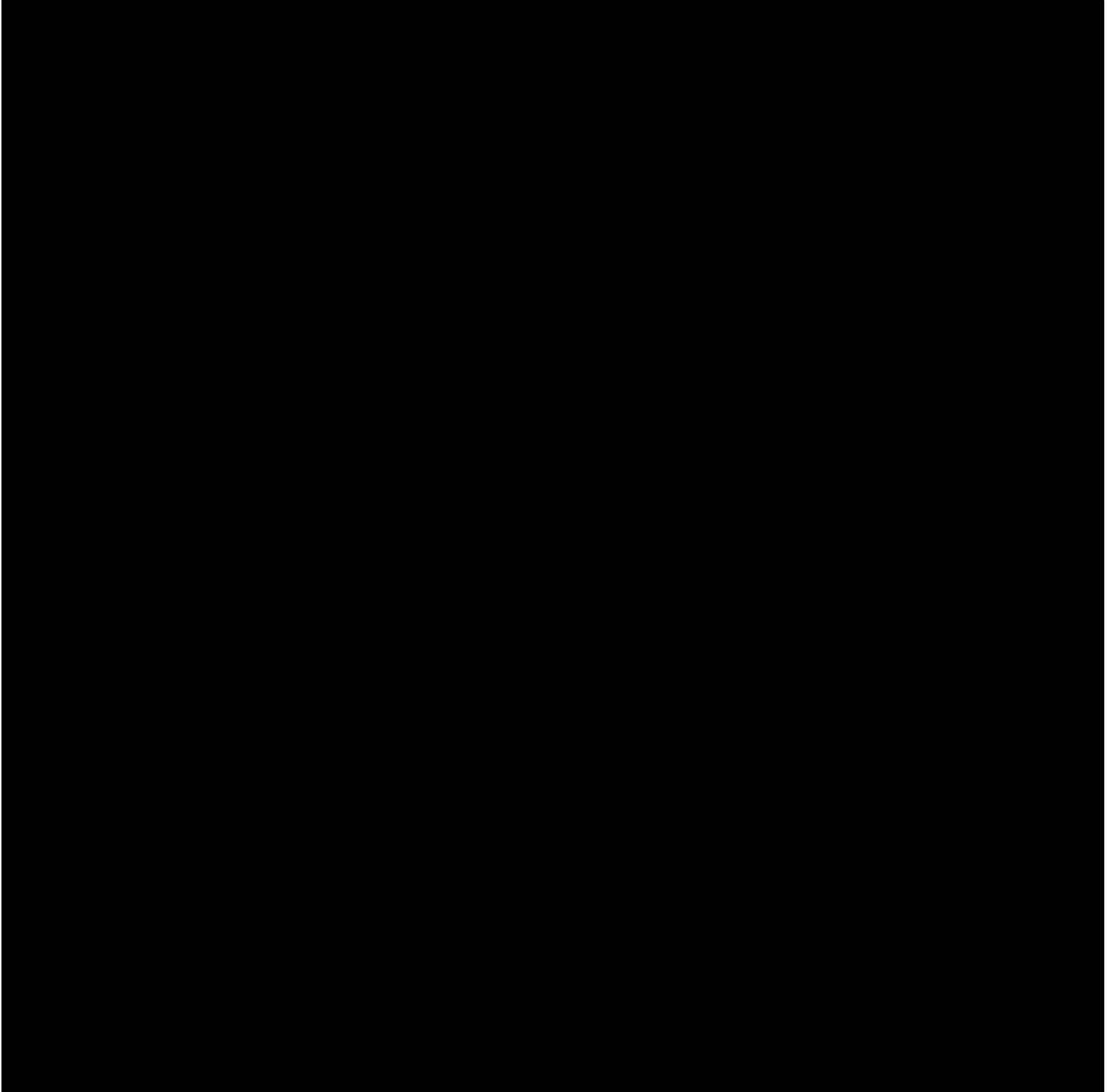
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Inquiries



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**Credit scores****What's hurting****— Lack of recent non-mortgage loan information**

- You have a lack of recent activity from a non-mortgage installment loan.
- Your credit report shows a \$0 balance on your non-mortgage loans (such as auto or student loans) or a lack of sufficient recent information about your loans. Having a non-mortgage installment loan with no missed payments and a low balance along with other types of credit demonstrates that a person is able to manage a variety of credit types. Having a 0% installment loan balance to loan amount ratio is considered slightly more risky than having a low installment loan ratio.



Disclaimer

About your FICO® Score 8 or other FICO® Scores

Your FICO® Score 8 powered by Experian data is formulated using the information in your credit file at the time it is requested. Many but not all lenders use FICO® Score 8. In addition to the FICO® Score 8, we may offer and provide other base or industry-specific FICO® Scores (such as FICO® Auto Scores and FICO® Bankcard Scores). The other FICO® Scores made available are calculated from versions of the base and industry-specific FICO® Score models.

Base FICO® Scores (including the FICO® Score 8) range from 300 to 850. Industry-specific FICO® Scores range from 250-900. Higher scores represent a greater likelihood that you'll pay back your debts so you are viewed as being a lower credit risk to lenders. A lower FICO® Score indicates to lenders that you may be a higher credit risk. There are many scoring models used in the marketplace. The type of score used, and its associated risk levels, may vary from lender to lender. But regardless of what scoring model is used, they all have one purpose: to summarize your creditworthiness. Keep in mind that your score is just one factor used in the application process. Other factors, such as your annual salary and length of employment, may also be considered by lenders when you apply for a loan.

What this means to you:

Credit scoring can help you understand your overall credit rating and help companies better understand how to serve you. Overall benefits of credit scoring have included faster credit approvals, reduction in human error and bias, consistency, and better terms and rates for American consumers through reduced costs and losses for lenders. Your lender or insurer may use a different FICO® Score than FICO® Score 8 or other base or industry-specific FICO® Scores provided by us, or different scoring models to determine how you score.

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IN THE CIRCUIT COURT OF THE FIFTHTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
PROBATE DIVISION

IN RE: GUARDIANSHIP OF

File No. 502023GA000245XXXXMB

PATRICIA A. SAHM,
Ward.

_____ /

CHARLES J. REVARD, as Guardian
of Patricia A. Sahm,
Petitioner,

v.

PATRICIA ANNE SAHM, JR.
Respondent.

_____ /

**AFFIDAVIT OF JOANNA E. SAHM IN SUPPORT OF PETITION FOR INJUNCTION
FOR PROTECTION AGAINST EXPLOITATION OF VULNERABLE ADULT**

BEFORE ME, the undersigned authority, personally appeared, JOANNA E. SAHM, who being first duly sworn, deposes and says:

1. I make this Affidavit with the understanding that it is to be used in the above-styled action. All statements contained herein are within my personal knowledge. I am *sui juris*, over the age of 18, and fully competent to testify to the facts recited herein.

2. Patricia A. Sahm, my mother (“**Patricia**” or “**Mom**”), was married to Walter E. Sahm, my father (“**Walt**” or “**Dad**”) until his death on January 5, 2021.

3. Within their estate planning documents, after first designating one another, each of my parents designated me to act as their attorney-in-fact, health care surrogate and successor Trustee.

4. Following my Dad’s death, pursuant to the various capacities in which my parents had designated me to act, I had to gradually take over my mother’s household finances as well as her medication administration as there was a gradual decline in my Mom’s memory and cognition.

5. As a result, I routinely spoke to my Mom several times a day by phone and would frequently visit with her, in addition to taking her to her medical appointments and to handle her errands.

6. In September 2022, my Mom determined that she wished to relocate, from The Villages, Florida, where she and my Dad had retired in, or about April 2008, to Boca Raton, Florida, where she and my Dad had raised their family, me and my sister, Patricia A. Sahm, Jr. (“Patty”).

7. In anticipation of the move, and in light of her decline, my Mom’s long term care insurance provider, Transamerica, had approved her for round-the-clock, in home care. A true and correct copy of correspondence from Transamerica dated November 22, 2022, approving said plan of care, is attached hereto and marked as **Exhibit A**.

8. In December 2022, Patty, who resides in my Mom’s house in North Carolina, determined she would, for the first time, be visiting my Mom for the winter¹. Accordingly, the initiation of the in home care was put on hold.

9. On January 24, 2023, after having lunch with my Mom at her home, Patty initiated an argument with me over the dogs in the house as I was leaving, which culminated with Patty pulling a gun on my partner and I, threatening to kill us both, before being arrested and charged with assault with a deadly weapon. Case No. 502023CF000747AXXXMB is currently pending before the Felony Division of this Court.

10. Pending the resolution of that proceeding, the Court entered its Agreed Final Judgement for Protection Against Repeat Violence and Agreed Final Judgement for Protection Against Repeat Violence against Patty for my partner and me. Case Nos. 502023DR000716XXXXNB and 502023DR000717XXXXNB.

11. Prior to my Dad’s death, he and my Mom had been involved in a contentious, protracted foreclosure proceeding that had become the bane of his existence. Walter E. Sahm and Patricia A. Sahm v. Bernstein Family Realty, LLC, Case No. 502018CA002317XXXXMB (“Bernstein Foreclosure”). One of the things he asked that I do for my Mom was to see the Bernstein Foreclosure through to the end as he felt that they had taken too much advantage of he and my Mom.

12. On April 13, 2023, at a hearing to discharge the second bankruptcy proceeding initiated² following the final judgment within the Bernstein Foreclosure to delay the judicial sale, the Defendants filed an emergency Motion which included allegations that I was taking advantage of my Mom and presented the Court with a form Florida Power of Attorney Revocation signed by

¹ Historically, Patty would only stop by my to see my parents in The Villages on her way to/from Boca Raton, Florida, where she would visit friends for several weeks or months each year.

² In Re Bernstein Family Realty, LLC, Case No. 22-13009-EPK and In Re Eliot Ivan Bernstein, Case No. 23-12630-PDR.

my Mom on March 28, 2023. A true and correct copy of such Revocation is attached hereto and marked as **Exhibit B**.

13. As my Mom had not been previously acquainted with the Defendants nor personally participated within the Bernstein Foreclosure, this was shocking to me.

14. In speaking to my Mom afterwards, she had no recollection of having signed any such document nor did she indicate that she no longer wanted me to act on her behalf.

15. From that date forward, has been a complete nightmare, with my sister, Patty at the helm.

16. On April 14, 2023, I had plans to meet my Mom outside of her home (due to the Injunctions, I cannot go to my Mom's home and was required to make arrangements through a third party, Julia Jones, to do so. See Exhibit B.

a. After I met my Mom, I noted we were being followed by a car containing Michele Wepner, the wife of one of my cousins. As the only person other than my Mom and I who knew of our plans was my sister, Patty; I presumed that Patty had sent Michele to follow us.

b. After I spoke to Officer Gary Desir, of the Boca Raton Police Department, who happened to be in the parking lot, Michele Wepner drove off; returning shortly thereafter, joined by a second car containing Eliot Bernstein and Candace Bernstein, the judgment debtors within the Bernstein Foreclosure.

c. Michele Wepner and the Bernsteins' also spoke to Officer Desir and my Mom and I then left, without anyone following us, to find someplace to have lunch.

17. On April 15, 2023, I contacted Tammy Rivera, a Victim Advocate with the Office of the State Attorney, advising her that the intermediary within the Injunction refused to coordinate a time for me to see my mother and to request assistance. No action was taken.

18. On April 17, 2023, when I called my Mom to remind her of her medications, my calls could not go through; by chance, I was able to speak to my Mom as she had called me to go out to lunch later that day.

a. At lunch, we tested the phones and I still could not call. As my Mom has an older flip phone that neither of us could figure out, we went to the AT&T store, who advised that my number had been blocked on my Mom's phone before removing the block.

b. There was an issue with the A/C at my Mom's house³ and I scheduled a service call for same. As my sister was in the home, I had to call the Boca

³ I am Trustee of Patricia A. Sahm Revocable Trust, which owns the house.

Police Department to meet me at the house so that I speak to the serviceperson and pay them for the call. The responding officers noted that they cannot keep coming to my Mom's house because of the injunction as it diverts their time from serious emergencies.

- c. Concerned for my Mom, in light of the Revocation and feeling I had no alternative, I initiated these guardianship proceedings.

19. On April 19, 2023, I was contacted by Robert Sweetapple, Esq., who had been representing my parents in the Bernstein Foreclosure. Mr. Sweetapple advised that he had just received a strange written statement from my Mom, that he was concerned as to her competency and had an obligation to advise the Court of the same.

20. On April 20, 2023, I emailed Chloe Leedom, Assistant State Attorney for the State in Patty's felony proceeding, to express my concerns about my Mom's safety, particularly given that Patty was actively isolating me from my Mom. A true and correct copy of my email is attached hereto and marked as **Exhibit C**. I received a message advising me to file a notice of violation of the restraining order, which I did.

21. On April 24, 2023, I contacted both the Victim Advocate and Assistant State Attorney to advise:

- a. that my Mom had called me that day, distressed, asking her to come take her away from her house as she was confused and unsure of what people were telling her.
- b. My efforts to coordinate a visit to my Mom through Julia Jones was rebuffed;
- c. That I had tried 21 times to call my Mom back and could not get through.
- d. I shared that I was deeply worried about my Mom and that Patty appeared to be exploiting her with regard to the Bernstein Foreclosure.

A true and correct copy of said email is attached hereto as **Exhibit D**. No action was taken.

22. On April 24, 2023, I spoke to my Mom by telephone

- a. She was asking questions about her Will, stating that she did not remember if she had one.
- b. She was also angry with me for having taken the guns from her house;
- c. She was missing a check for \$569 and asked if I had seen it. I reminded her that I had not been able to see her in over two weeks because of the restraining order. In reviewing my Mom's account, the check was never deposited and I believe it was likely cashed by Patty, as they have the same name.

23. On April 27, 2023, after being unable to contact my Mom for several days, I had to resort to asking Laura Burkhalter, the Court Appointed Attorney for my Mom, to enlist her assistance in finding out if my Mom recalled/would be attending upcoming medical appointments.

24. On May 5, 2023, the Examining Committee conducted their examinations of my mom; their reports unanimously found that my Mom required a limited guardianship.

25. On, or about, May 14, 2023, I spoke to my Mom who had received a number of papers from the Court and didn't understand what it was or why my name was on it. She was concerned that I was trying to "put her away in an institution."

26. At the hearing before the Court on May 23, 2023, my Mom appeared by Zoom and was seated next to my sister; the Court had to repeatedly stop the proceedings to instruct Patty not to pass notes to or whisper answers to our Mom.

- a. That incapacity hearing was further attended by the judgment debtors within the Bernstein Foreclosure, Bernstein Family Realty, LLC, and Kevin C. Hall, who claims to be a mediator within the Bernstein Foreclosure.
- b. At the hearing, my Mom was asked about what medications she takes and she couldn't say, but implied that Patty was helping her.

27. On May 24, 2023:

- a. I was contacted by Robert Sweetapple, Esq., who advised that there was now a purported settlement of the Bernstein Foreclosure, for less than half of what is owed,
- b. I asked my Mom about the settlement; she had no idea what I was talking about and asked why I did not help her.

28. On May 25, 2023, I received a series of disturbing texts from Kevin Hall:

- a. "the details of what Amber, Inger, Eliot and Candice pulled on your mom the night before the hearing was very disturbing."
- b. "if you use my name on this, Patty will pounce."
- c. Confessing to having initiated contact with Patty; and
- d. Noting that on more than a few occasions, Patty wasn't letting my Mom speak for herself.

A true and correct copy of the text messages are attached hereto and marked as **Exhibit E**.

29. On May 26, 2023, I discovered that the online access for my Mom's Chase Freedom credit card, to which she had added me so that I might monitor her account and pay the bill, had been changed; the credit card company confirmed that same were now in Patty's name.

30. On May 27, 2023, I spoke to my Mom by phone and she asked to make plans with me as I had not seen her, at this point, in over six weeks.

- a. We planned to take a walk on May 30, 2023 and my mom wrote the date/place where we would meet down so as not to forget.
- b. During our call, she commented that moving to Boca had been a mistake, that it had been a strange few month.
- c. She randomly apologized for hurting me and thanked me for my help after Dad died.

31. On May 28, 2023, all calls to my Mom went to voicemail and it appeared her phone was turned off.

32. On May 29, 2023

- a. at 7:05 p.m., I received an unsolicited text from my cousin, Michael Wepner, advising that my Mom wouldn't be able to see me as planned, stating she wasn't feeling well and her phone wasn't working. A true and correct copy of such text is attached hereto as **Exhibit F**.
- b. I took a chance and tried my Mom's cell at 8:45 p.m. and she answered. When we spoke, she had no knowledge of being sick or having asked my cousin to cancel are plans and rescheduled our walk.

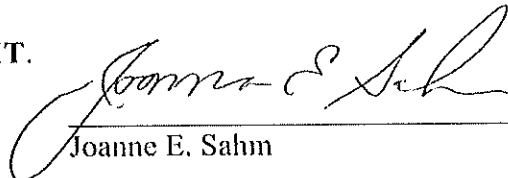
33. On May 30, 2023, I received a voicemail from my Mom, cancelling our plans, stating she is sick, that her attorney said she cannot see me and accused me of stealing from her. This was devastating as I've never done anything but try to help my Mom and honor the plans she and my father made.

34. On June 30, 2023, I discovered that my Mom's Chase Freedom credit card, that she has had since 1997 and which my Mom used for groceries, gas and daily expenses, had been closed.

35. I would not be able to see my Mom again until July 14, 2023, when Charlie came to visit her following his appointment as her limited guardian.

36. In providing information to facilitate the preparation of the Petition for Injunction for Protection Against Exploitation of Vulnerable Adult, I determined that my Mom's medications were not filled during the months of April, May and June 2023.

FURTHER AFFIANT SAYETH NAUGHT.



Joanne E. Sahn

SWORN TO AND SUBSCRIBED before me, by means of physical presence or online notarization this 24 day of July , 2023 by Joanna E. Sahm who is () personally known to me or () has produced _____ as identification.

Eileen T. O'Malley

(Signature of notary public)

(Typed name of notary public)
State of Florida
My Commission Expires: _____
Commission Number: _____



NOT A CERTIFIED COPY



Home Office: Cedar Rapids, Iowa
Long Term Care Division
P.O. Box 159
Cedar Rapids, IA 52406
Telephone: (866) 745-3545 Fax: (866) 630-7502

Anne P Sahn
1502 Wresh Way
The Villages, FL 321627172

November 10, 2022

Re: Policy/Certificate Number: [REDACTED]
Claim Number: [REDACTED]
Claimant: Anne P Sahn

Dear Anne P Sahn:

We're pleased to inform you that you and Boca Home Care Services meet the eligibility requirements of this long term care policy. The Home Health Care Benefit available under the policy has been approved based on the inability to perform the minimum required number of Activities of Daily Living as specified in the policy. Please refer to the policy for any applicable elimination period.

Plan of Care

We've enclosed the approved Plan of Care for this claim. Please review the plan carefully and let us know right away if you have questions or concerns. Keep in mind that this claim is only approved for providers and services specified in the Summary of Covered Services, as shown in the Plan of Care. Providers and services that aren't specified in the summary won't be covered and won't apply to any elimination period. If your care needs change, please let us know as soon as possible so that we can update the Plan of Care.

Claim Approval Period

The approval period for this claim begins on October 12, 2022 and will end on May 10, 2023, or earlier, if eligibility requirements are no longer satisfied. During the approval period, we may evaluate your care needs again to determine ongoing eligibility and to update the Plan of Care. We'll let you know if we need to re-evaluate care needs. If at any time the policy's eligibility requirements are no longer met, the claim will be closed as of that date and benefits will cease.

Itemized Billing Statements

To prevent delays in receiving benefits, be sure to send a complete itemized billing statement to our office. The itemized billing statement must include the policy number, your name, the dates of care, the type of care, the charges for the care, and the provider information. **Each itemized billing statement should be sent to us after care has been received as benefit payments cannot be made before services have been rendered.**

For example, if home care is received from October 31 to November 7, the itemized billing statement cannot be sent until November 8.

Summary of Covered Services

Applicable to Episode of Benefit from 10-12-2022 to 05-10-2023

Any services or care expenses not listed as covered on this Plan of Care cannot be considered for coverage under your plan of benefits.

Care Information Provider #1

Dates From: 10-12-2022 To: 05-10-2023

Provider Name Boca Home Care Services

Address 4700 Nw 2nd Ave Suite 400
Boca Raton, FL 33431

Phone (561) 989-0611

Benefit Approved & Service to be Provided Home Health Care Benefit & assistance with Bathing, Dressing and Transferring

Approved Frequency of Service 24/7

Amount eligible for coverage under your plan: Any amount considered for reimbursement cannot exceed Approved Frequency of Service as noted above, nor can it exceed your maximum benefit amount. You must also have met the Elimination Period before any request for reimbursement can be considered.

Amount not eligible for coverage under your plan: Any amount during your Elimination Period, any amount exceeding your daily or monthly benefit amount limit, and any amount exceeding the Approved Frequency of Service as noted above.

NOT A CERTIFIED COPY



0825-02-03-00000-1-0000-00000000

FLORIDA POWER OF ATTORNEY REVOCATION

Use of this form is for the power of attorney of:

- Health Care Powers

- Financial Powers

- Other:

any and all Powers of Attorney

I, Patricia A. Sahm, hereby immediately revoke those portions covering decisions of the document titled Power of Attorney, that I previously executed on the 28 of December, 2021 which appointed Joanna E. Sahm as my agent and Joanna E. Sahm as my alternate successor agent. I hereby notify said agent(s) and any other interested persons and institutions that all portions of said document are revoked.

This revocation takes effect immediately. A photocopy has the same effect as an original.

This revocation was signed this 28 of MARCH, 2023.

Signature of Principal

Patricia Sahm

Print Name

Patricia A. Sahm

NOTE: Provide copies to anyone who may have copies of the Power of Attorney that is being revoked. Retain the original of this form in your personal papers.



We, the witnesses, each do hereby declare in the presence of the principal that the principal signed and executed this instrument in the presence of each of us, that the principal signed it willingly, that each of us hereby signs this power of attorney revocation as witness at the request of the principal and in the principal's presence, and that, to the best of our knowledge, the principal is eighteen years of age or over, of sound mind, and under no constraint or undue influence.

Aracely Abraham
Witness's Signature

10108 County brook rd Boca Raton 33428
Address

Marie M. Laplante
Witness's Signature

MARIE M. LAPLANTE
1600 NW 2ND AVE Suite 20
BOCA RATON, FL 33432

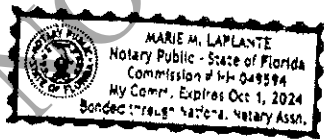
NOTARY ACKNOWLEDGMENT

[State of Florida

County of PALM BEACH]

The foregoing instrument was acknowledged before me by means of physical presence or online notarization, this 28TH (numeric date) day of MARCH (month), 2023 (year), by PATRICIA SAHM (name of person acknowledging).

(Seal)



Marie M. Laplante

Signature of Notary Public

Print, Type/Stamp Name of Notary

Personally known: _____

OR Produced Identification: Florida DL

Type of Identification Produced: _____



Eileen OMalley

From: Joanna Sahn <joanna_sahm@yahoo.com>
Sent: Thursday, April 20, 2023 9:52 AM
To: cleedom@sa15.org
Cc: Tammy Rivera; John Raymond; Eileen OMalley; Robert Sweetapple; Cynthia Miller; Doug Collier
Subject: Patricia A Sahn Case

◀External Email▶ - From: joanna_sahm@yahoo.com

Dear Chloe,

I hope this finds you well. I understand you will be assuming the position as prosecutor for the State Attorney's Office in my sisters's criminal case.

Below, please see the email thread expressing my concerns about my mothers safety. Since I have sent you these other emails, my sister persists on taking my mother to sign documents that my mother does not remember signing and also does not understand. I received another document last night from the foreclosure attorney where my mother states she doesn't remember speaking to him on Monday. She absolutely did speak with him as I was present for the call, but, sadly, her short term memory is impaired so she does not remember much of anything day to day.

A guardianship has been filed to protect my mother where she is deficient and this is being expressed to my mother in a way that is incorrect. My sister is telling my mother that I am trying to find her incompetent to put her away into a facility. This is absolutely untrue, mean and incorrect. My mothers Last Will And Testament expressly lays out her desire to remain in her home with care in the home if needed.

My sister is perpetrating psychological, elder abuse on my mother. She has medically diagnosed dementia and is on medication for her dementia. While she is able to care for herself in many ways, she is unable to understand business decisions about the family trust, unable to pay her monthly bills, unable to make payments/transfer money between accounts and unable to understand the documents put before her to attempt to get her to settle litigation over a foreclosure that my family has been engaged in for over ten years. My father passed away in January of 2021 and I became my mothers primary care taker at that point.

My sister is attempting to isolate my mother from me but telling her false information, blocking my phone number in my mothers phone so I cannot reach her and monitoring any call my mother makes to me to keep me from seeing my mother.

I am deeply concerned about my mothers health, mental health, stress level, confusion level and psychological abuse being perpetrated by a sibling that pointed a gun at me and threatened to kill me. I am seriously concerned about my mother the longer this continues.

My sister needs to be removed from my mothers house so we can restore peace, proper care and a proper routine for my mother.

Thank you for your time.

Sincerely,

Joanna Sahn

Eileen OMalley

From: Joanna Sahm <joanna_sahm@yahoo.com>
Sent: Monday, April 24, 2023 3:31 PM
To: Tammy Rivera
Cc: cleedom@sa15.org; Eileen OMalley; Doug Collier; John Raymond
Subject: Restraining Order Violation

◀External Email▶ - From: joanna_sahm@yahoo.com

Dear Chloe,

Per the reply from your office, I contacted Jupiter PD as I live in Jupiter. The officer confirmed the violation of the restraining Order and assigned Jupiter PD case # 2300 1706. This report was taken by officer Luis Cedeno.

Jupiter PD is going to reach out to Boca Raton PD to see what they can do for me to get to my mother.

My mother had called me this morning, distressed asking me to please come take her away from her house as she is confused and unsure of everything being told to her. I explained to her that my sister and the people around my sister are lying to her and tricking her into signing documents and that it is not her fault. I told her I would have to make the arrangements to get to her because of the restraining order and I told her I would call her back.

I have called my mother 21 times since that call trying to make contact with her and I have been unable to reach her. I am VERY concerned for my mother mental health, peace and well being as I am unable to get to her with my sister living in her house. Since I am not able to reach her regularly anymore, I am not sure if she is getting her proper medication. My sister blocks my phone number in my mothers phone, she turns the volume down and takes the phone away from my mother so I am unable to contact her. I am deeply worried about my mother and am begging you to please help get my sister out of my mothers home. She has felony charges against her and is psychologically abusing my mother to assist in exploiting her in a pending foreclosure case.

I have reached out to the Domestic Violence advocate at Boca Raton PD and the original investigating detective in Boca to ask for any help they can give.

Sincerely,

Joanna Sahm
954-464-8698

Sent from my iPhone

> On Apr 20, 2023, at 1:24 PM, Tammy Rivera <trivera@sa15.org> wrote:

>

> Good Afternoon,

>

> You can contact the police. Show them the proof of her contacting you. If they find probable cause, she will get a violation of the No Contact Order.

>
>
> OFFICE OF
> STATE ATTORNEY
> DAVE ARONBERG
>
> www.sa15.org
>
>
> Tammy Rivera
> Victim Advocate DOVE
> Office of State Attorney Dave Aronberg
> 401 North Dixie Highway
> West Palm Beach, FL 33401
> (561) 355-7498
> trivera@sa15.org

>
>
>
>
>
>
> -----Original Message-----

> From: Joanna Sahm <joanna_sahm@yahoo.com>
> Sent: Thursday, April 20, 2023 1:15 PM
> To: Chloe Leedom <CLEEDOM@SA15.ORG>
> Cc: Tammy Rivera <trivera@sa15.org>
> Subject: Screenshot 2023-04-20 at 1.13.05 PM

>
> Hi Chloe,

>
> My sister just copied me on a text message. She is not to contact me per the restraining order. What can be done about this?

>
> Joanna Sahm

>
>
> _____
>
> Please note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

7:54



+1 (518) 309-2094 >

Text Message
Yesterday 6:20 PM

Joanna this is Krvin Hall
my alternate number via
Google voice. May be
able to help in certain
ways but can't go near
the Sweetapple issue.
But with conduct of
Amber Patwell Inger
Garcia Eliot Candice
yes. Am about to file my
own papers as BFR
Manager in foreclosure
to deny their settlement
n potentially Conflict
out both Inger n Amber.
Your MH Petition
attorney was very
professional. Am happy



Text Message





+1 (518) 309-2094 >

to get on call with you n
your lawyer or just you if
you consented. No
worries either way

The details of what
Amber Inger Eliot
Candice pulled on your
mom the night before
the hearing was very
disturbing

You know if you use my
name on this with your
mom then Patty will
pounce on her so I
suggest it not be
discussed until your
lawyer you n I speak
first but hey I do have a
very clear self interest
that never should have



Text Message





+1 (518) 309-2094

involved your mom but
that's Inger Eliot n
Amber's fault in KY
book. BFR Eliot n the
boys owe me major
money. It should never
have come in to your
mom's side. Let me
know

So that's my interest.
Getting paid by the
Bernstein's and also
find Inger very
untrustworthy. She has
never represented me
and never will

As an FYI my self
interest in getting paid
by the Bernsteins n
conflict with Inger was



Text Message





+1 (518) 309-2094

conflict with Inger was disclosed in my very first call to Patty although I have seen her other side by now but again never initiated contact with your mother. That was Patty and your Mom after several calls I thought only were with Patty and originally did not know she was living with your Mom. I can say on more than a few occasions when your Mom did get on the call I had to politely back Patty up n let your mom speak for herself



Text Message



10:19



Michael >

and Olha are well

Thank you. We are.

Thank you for taking
time to play tennis with
my mom.

Delivered

We have fun. Yw

Yesterday 7:05 PM

Your Mim asked me to
let you know she can't
make breakfast
tomorrow. She isn't
feeling well and her
phone is not working

Mom

