

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

IN RE:

Case Number: 502023GA000245XXXXMB
Division: "IZ"

PATRICIA A. SAHM,
Vulnerable Adult/Ward,

_____ /

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

Petitioner,

v.

PATRICIA ANNE SAHM, JR.,
Respondent.

_____ /

**ORDER GRANTING FINAL INJUNCTION FOR PROTECTION AGAINST
EXPLOITATION OF VULNERABLE ADULT**

THIS CAUSE came before the Court for a final hearing on August 14, 2023 (the "Final Hearing"), upon Petitioner Charles J. Revard's *Petition for Injunction for Protection Against Exploitation of Vulnerable Adult* (the "Petitioner" and "Petition," respectively) pursuant to Section 825.1035, Florida Statutes. Previously, this Court entered an *Order Granting Petitioner's Request for Temporary Ex-Parte Injunction for Protection Against Exploitation of Vulnerable Adult and Order Setting Final Hearing on Injunction for Protection Against Exploitation of Vulnerable Adult* [D.E. #31].

The Court reviewed the *Petition* and received evidence at the Final Hearing, both in the form of documents and live testimony, and is aware of the agreement of counsel on the record at the Final Hearing as relates to supervised visitation between Patricia A. Sahn (the "Vulnerable Adult") and Patricia Anne Sahn, Jr. (the "Respondent").

The Court has jurisdiction over the parties and the subject matter under Florida law. The

Petitioner has standing.

It is therefore intended that this protection order meet the requirements of 18 U.S.C. Section 2265, and therefore intended that it be accorded full faith and credit by the court of another state or Indian tribe and enforced as if it were the order of the enforcing state or Indian tribe.

SECTION I. NOTICE OF HEARING

This cause came before the Court for a Final Hearing on August 14, 2023, to determine whether the injunction for protection against exploitation of vulnerable adult should be:

- Issued.
- Modified.
- Extended.**

The Final Hearing was attended by:

- Petitioner: Charles J. Revard, as limited guardian of the person and property of Patricia A. Sahn
- Petitioner's counsel: Mitchell Ira Kitroser, Esq., Clara Crabtree Ciadella, Esq., and Kathryn N. Lewis, Esq.
- The Vulnerable Adult named in the Petition: Patricia A. Sahn
- Counsel for the Vulnerable Adult: Amber H. Patwell, Esq.¹
- Guardian of the Vulnerable Adult: Charles J. Revard
- Respondent: Patricia Anne Sahn, Jr.
- Respondent's counsel: Inger M. Garcia, Esq.
- Financial institution representative: Dawn D. Hurley, Bank of America, N.A.
- Trustee(s): Joanna Sahn
- Counsel for the Trustee: Eileen T. O'Malley, Esq.
- Other(s): David Kubiliun, Esq., Kevin R. Hall, and numerous self-described "court watchers" including, but not limited to David Manuel, Julia Jones, Louise Esposito, Alee Carrino, Rick Black, Eliot Bernstein, Natasha Coffey, Kathleen Bosse, Candice Bernstein and Luanne Fleming.

SECTION II. FINDINGS

On July 27, 2023, a notice of the Final Hearing was served on the Respondent, together with

¹ The parties dispute whether Amber Patwell, Esq., currently represents the Ward. Petitioner states that he terminated Ms. Patwell, while Ms. Patwell maintained that Petitioner lacks such power. The Court permitted Amber Patwell to attend the hearing on behalf of the Vulnerable Adult and reserves ruling on the status of Ms. Patwell's further representation of the Ward for a future hearing.

a copy of the *Petition* and temporary injunction [D.E. # 35]. Service was within the time required by Florida law, and Respondent was afforded reasonable notice and an opportunity to be heard in a manner that protected Respondent's right to due process.

On July 27, 2023, a notice of the Final Hearing was served on the Vulnerable Adult, together with a copy of the *Petition* and temporary injunction [D.E. #36]. Service was within the time required by Florida law. Both the Vulnerable Adult's limited guardian and the Vulnerable Adult's prior counsel in the incapacity and guardianship proceedings attended the hearing.

After hearing the testimony of each party present and of witnesses, and upon hearing the argument of counsel, the Court finds that, based on the specific facts of this case as further set forth below, that there is competent, substantial evidence to find that the Vulnerable Adult was the victim of exploitation or is in imminent danger of becoming a victim of exploitation by the Respondent. It also appears to the Court that there is a likelihood of irreparable harm and no adequate remedy at law. The Court further finds that the threatened injury to the Vulnerable Adult outweighs the possible harm to the Respondent and that the relief provides for the Vulnerable Adult's physical and financial safety.

Specifically, the evidence reflects that the Respondent has no individual assets and receives disability benefits in the amount of \$952.00 per month. The Respondent testified that between the time she moved into the Vulnerable Adult's home (December 2022) and the day of the Final Hearing, she received no other income. The Vulnerable Adult's daughter and Respondent's sister, Joanna Sahn ("Joanna"), testified that since Respondent has resided with the Vulnerable Adult, charges on the Vulnerable Adult's credit card have increased from roughly between \$700.00 and \$1,200.00 per month to between \$2,000.00 and \$3,000.00 per month.

The Respondent further testified that in March of 2023, a female notary arrived at the residence then occupied by Respondent and the Vulnerable Adult. Although the Respondent suspected that the Bernstein family (with whom the Vulnerable Adult is currently litigating against) or Kevin Hall (an attorney involved in that litigation) sent the notary to the residence, the Respondent claims that she took no action while the notary notarized the Vulnerable Adult's signature on documents that revoked a power of attorney in favor of the Vulnerable Adult's then-acting agent and trustee, Joanna.

Joanna subsequently instituted incapacity and guardianship proceedings for the Vulnerable Adult on April 17, 2023. Respondent testified that she was aware of those proceedings as of April 17, 2023, and that Respondent was involved in retaining, or at least facilitating the Vulnerable Adult retaining, Amber Patwell, Esq., as private counsel for the Vulnerable Adult in the guardianship proceedings. The Respondent further testified that she was aware of the examining committee member reports of Dr. Stanley Bloom, Dr. M. Brennan Cheshire, and Stephanie Cheshire, but chose to ignore those reports (which, among other things, found that the Vulnerable Adult lacks the capacity to independently contract, consent to medical treatment and manage/dispose of property) in favor of a report obtained from Dr. Sam Sugar ("Dr. Sugar"). Although Dr. Sugar is not a member of the examining committee, Respondent testified that Dr. Sugar's report was the only report she wanted to read.

On June 27, 2023, the Vulnerable Adult was adjudicated incapacitated. This Court determined that the Vulnerable Adult lacks capacity to contract, to sue and defend lawsuits, to personally 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 and appointed a limited guardian for the Vulnerable Adult. Joanna testified at the Final Hearing that the Vulnerable Adult lacks the cognitive ability to

independently perform activities of daily living and manage her finances. Joanna further testified that the Vulnerable Adult, at times, cannot recall that she is under guardianship and has previously been a victim of fraudulent bank activity, which resulted in one of her bank accounts being nearly depleted of assets.

During her testimony, the Respondent admitted that she was aware of the incapacity proceedings involving the Vulnerable Adult and the eventual determination of incapacity. Despite that knowledge, Respondent testified that she made an appointment for the Vulnerable Adult at Wells Fargo on July 18, 2023, drove the Vulnerable Adult to and was present at that appointment with Wells Fargo, which resulted in the closure of the Wells Fargo account and the withdrawal of the funds remaining therein by cashier's check. Respondent admitted to subsequently driving the Vulnerable Adult to Bank of America and opening a new account for the Vulnerable Adult at Bank of America where the funds from the Wells Fargo account were deposited and admitted that she failed to notify either the Vulnerable Adult's guardian or the Vulnerable Adult's trustee of her actions.

This Court finds that on or around July 18, 2023, the Respondent knew or should have known that the Vulnerable Adult lacked the capacity to make informed decisions about her finances. The Court further finds that based on Respondent's testimony that she had never served as an agent or healthcare surrogate for the Vulnerable Adult and was aware of the incapacity proceedings and determination, Respondent knew that she had no authority to make financial decisions for the Vulnerable Adult when Respondent facilitated the closure of the Vulnerable Adult's Wells Fargo account and the opening of a new Bank of America account. The Court specifically finds that those actions constitute exploitation of a vulnerable adult. Moreover, the Court finds that there is an imminent risk of future exploitation, as the Respondent's testimony evidences that she is inclined to

ignore the findings of the examining committee, the adjudication of incapacity, and the fiduciary roles occupied by Charles Revard and Joanna Sahn.

SECTION III. INJUNCTION AND TERMS

This injunction will be in full force and effect for a period of **sixty (60) days** from the date of its issuance.

This injunction is valid and enforceable in all counties of Florida. The terms of this injunction may not be changed by either party alone or by both parties together. Only the Court may modify the terms of this injunction. Either party may ask the Court to change or end this injunction at any time.

Any violation of this injunction by the Respondent may result in prosecution under Section 825.1036, Florida Statutes.

In addition, any violation of this injunction, whether or not at the invitation of Petitioner or the Vulnerable Adult or anyone else, may subject Respondent to civil or indirect criminal contempt proceedings, including the imposition of a fine or imprisonment. Certain willful violations of the terms of this injunction include but are not limited to: going to or being within 500 feet of the Vulnerable Adult's residence except as permitted herein; exploiting or unduly influencing the Vulnerable Adult; committing any other violation of the injunction through an intentional unlawful threat, word, or act to do violence to the Vulnerable Adult; telephoning, contacting, or otherwise communicating with the Vulnerable Adult directly or indirectly except as permitted herein and unless the injunction specifically allows indirect contact through a third party; knowing and intentionally coming within 100 feet of the Vulnerable Adult's motor vehicle, regardless of whether that vehicle is occupied; or defacing or destroying the Vulnerable Adult's personal property constitutes a misdemeanor of the first degree punishable by up to one year in jail, as provided in section 775.082

or section 775.083, Florida Statutes. A person who has two or more prior convictions for violation of an injunction or foreign protection order against the same victim, and who subsequently commits a violation of any injunction or foreign protection order against the same victim, commits a felony of the third degree, punishable as provided in Sections 775.082, 775.083, or 775.084, Florida Statutes, pursuant to section 825.1036, Florida Statutes. In addition, it is a federal criminal felony offense, punishable by up to life imprisonment, depending on the nature of the violation, to cross state lines or enter Indian country for the purposes of engaging in conduct that is prohibited by this injunction. 18 U.S.C. section 2262.

It is **ORDERED AND ADJUDGED:**

1. **Exploitation prohibited.** Respondent may not commit, or cause any other person to commit, any acts of exploitation against the Vulnerable Adult. "Exploitation" means: knowingly obtaining or using, or endeavoring to obtain or use, an elderly person's or disabled adult's funds, assets, or property with the intent to temporarily or permanently deprive the elderly person or disabled adult of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than the elderly person or disabled adult, by a person who: (1) stands in a position of trust and confidence with the elderly person or disabled adult; or (2) has a business relationship with the elderly person or disabled adult.

"Exploitation" also means: obtaining or using, endeavoring to obtain or use, or conspiring with another to obtain or use an elderly person's or disabled adult's funds, assets, or property with the intent to temporarily or permanently deprive the elderly person or disabled adult of the use, benefit, or possession of the funds, assets, or property, or to benefit someone other than the elderly person or disabled adult, by a person who knows or reasonably should know that the elderly person or disabled adult lacks the capacity to consent;

"Exploitation" may also mean a breach of a fiduciary duty to an elderly person or disabled adult by the person's guardian, trustee who is an individual, or agent under a power of attorney which results in an unauthorized appropriation, sale, or transfer of property. An unauthorized appropriation occurs when the elderly person or disabled adult does not receive the reasonably equivalent financial value in goods or services, or when the fiduciary violates any of these duties:

1. For agents appointed under chapter 709:
 - a. Committing fraud in obtaining their appointments;
 - b. Abusing their powers;
 - c. Wasting, embezzling, or intentionally mismanaging the assets of the principal

- or beneficiary; or
 - d. Acting contrary to the principal's sole benefit or best interest; or
2. For guardians and trustees who are individuals and who are appointed under chapter 736 or chapter 744, Florida Statutes:
- a. Committing fraud in obtaining their appointments;
 - b. Abusing their powers; or
 - c. Wasting, embezzling, or intentionally mismanaging the assets of the ward or beneficiary of the trust;

“Exploitation” also means misappropriating, misusing, or transferring without authorization money belonging to an elderly person or disabled adult from an account in which the elderly person or disabled adult placed the funds, owned the funds, and was the sole contributor or payee of the funds before the misappropriation, misuse, or unauthorized transfer of (1) personal accounts; (2) joint accounts created with the intent that only the elderly person or disabled adult enjoys all rights, interests, and claims to moneys deposited into such account; or (3) convenience accounts created in accordance with section 655.80, Florida Statutes.

In addition to the above, “exploitation” means intentionally or negligently failing to effectively use an elderly person's or disabled adult's income and assets for the necessities required for that person's support and maintenance, by a caregiver or a person who stands in a position of trust and confidence with the elderly person or disabled adult.

Any *inter vivos* transfer of money or property valued in excess of \$10,000 at the time of the transfer, whether in a single transaction or multiple transactions, by a person age 65 or older to a nonrelative whom the transferor knew for fewer than 2 years before the first transfer and for which the transferor did not receive the reasonable equivalent financial value in goods or services creates a permissive presumption that the transfer was the result of exploitation. This applies regardless of whether the transfer or transfers are denoted by the parties as a gift or loan, except it does not apply to a valid loan evidenced in writing that includes definite repayment dates. However, if any repayment of any such loan is in default, in whole or in part, for more than 65 days, the presumption applies.

2. **No contact.** Respondent may not have any contact with the vulnerable adult unless otherwise provided in this section.
- a. Except as provided in paragraph 2 (c) herein, Respondent may not directly or indirectly contact the Vulnerable Adult in person, by mail, e-mail, telephone, fax, through another person, or in any other manner, and may not contact or have any third-party contact anyone connected with the Vulnerable Adult's employment or school, if applicable, to inquire about the Vulnerable Adult or to send any messages to the Vulnerable Adult. Unless otherwise provided herein, Respondent may not go to, in, or within 500 feet of the vulnerable adult's current residence: 21843 Town Place Drive, Boca Raton, FL. 33433, or any residence to which the Vulnerable Adult may move, or the Vulnerable Adult's place of employment: N/A; or where the vulnerable adult

attends school: N/A; or the following place(s) where the vulnerable adult goes often: N/A.

- b. Except as provided in paragraph 2 (c) herein, Respondent may not knowingly come within 100 feet of the Vulnerable Adult's automobile at any time.
 - c. Other provisions regarding contact: Per the agreement of counsel on the record at the Final Hearing, Respondent may have supervised visits with the Vulnerable Adult provided the following conditions are met: (1) No later than 48 hours prior to the date and time Respondent would like to visit the Vulnerable Adult, Respondent's counsel shall email a written request for visitation to paralegal, Paula Albright, at paula@kitroserlaw.com; and (2) Respondent shall not bring any guests with her to visit the Vulnerable Adult. Although the Court ordered that there shall be no phone calls between the Vulnerable Adult and the Respondent for the next **sixty (60) days**, the Court accepts the Guardian's offer to facilitate recorded Zoom calls between the Respondent and the Vulnerable Adult while the Respondent is out of town, which Zoom calls shall be coordinated in the same manner as the supervised visits. The Guardian's counsel shall provide the Vulnerable Adult's caregivers with a laptop, which shall be used for the Zoom calls. The Guardian's counsel shall be responsible for obtaining and providing the Zoom call information to counsel for Respondent and the Vulnerable Adult's caregivers. The Guardian's agent shall be responsible for hosting and recording the Zoom meeting.
3. **Mailing Address.** Respondent must notify the Clerk of the Circuit Court of any change in his or her mailing address, or designated e-mail address(es), within 10 days of the change. All further papers (excluding pleadings requiring personal service) will be served by mail to Respondent's last known address. Such service by mail will be complete upon mailing. Section 825.1035, Florida Statutes. Service is complete upon mailing.
 4. **Exclusive Use and Possession of the Home/ Permanent Residence**
 - ✓ **Possession of the Home/Permanent Residence.** The Vulnerable Adult has exclusive use and possession over the dwelling located at: 21843 Town Place Drive, Boca Raton, FL 33433.
 - ☐ **Transfer of Possession of the Home.** A law enforcement officer with jurisdiction over the home will accompany Respondent to the home and shall place Petitioner in possession of the home.
 - ☐ **Personal items.** Respondent, in the presence of a law enforcement officer, may return to the premises described above at a time arranged with a law enforcement department having jurisdiction over the home, accompanied by a law enforcement officer only, to obtain his or her clothing and items of personal health and hygiene and tools of the trade. A law enforcement officer with jurisdiction over the premises will go with Respondent to the home and stand by to ensure that he or she vacates the premises with only his or

personal clothing, toiletries, tools of the trade, and any specific items listed below. The law enforcement agency is not responsible for storing or transporting any property.

- ✓ Respondent may not damage or remove any furnishings or fixtures from the premises described above.
- The following other personal possessions may also be removed from the premises at this time: N/A
- If Respondent provided services to the Vulnerable Adult, the following services required for the Vulnerable Adult shall continue to be provided: N/A
- If Respondent was the Vulnerable Adult's caregiver, caregiving services will now be provided to the Vulnerable Adult by: N/A

If the Respondent is not awarded possession of the home and goes to the home without a law enforcement officer, it is a violation of this injunction.

5. **Assets.** The Court finds probable cause that exploitation has occurred.

- ✓ Subject to the terms herein, the following assets of the Vulnerable Adult, including assets held in trust, and/or lines of credit will be frozen subject to the terms set forth below:

Name of Financial Institution	Address	Account Number
Bank of America, N.A.	21060 St Andrews Blvd, Boca Raton, FL 33433	██████
Allianz Index advantage IRA	PO Box 59060, Minneapolis, MN 55459-0060	██████
Investment Edge 21 VA IRA	Equitable Financial, PO Box 1016, Charlotte, NC 28201-1016	██████
JWC Financial IRA JW	National Financial Services/JW Cole 4301 Anchor Plaza, Suite 450, Tampa, FL 33614	██████
JWCA AUM IRA DZN	National Financial Services/JW Cole	██████

	4301 Anchor Plaza, Suite 450, Tampa, FL 33614	
JW Cole Financial IRA-SEP JW	National Financial Services/JW Cole 4301 Anchor Plaza, Suite 450, Tampa, FL 33614	██████████

- ✓ If the Court orders an asset and credit freeze, the Court also orders that living expenses of the Vulnerable Adult will continue to be paid as follows: Joanna Sahn, in her capacity as trustee of the Patricia A. Sahn Revocable Trust and Walter E. Sahn & Patricia A. Sahn Revocable Family Living Trust, shall continue to pay living expenses of the Vulnerable Adult.
- ✓ Additional terms concerning assets: Notwithstanding the asset freeze set forth above, the intent of this asset freeze is to protect the Vulnerable Adult from exploitation. Because the Vulnerable Adult has a court-appointed limited guardian, the above-named financial institutions, companies or individuals holding assets of the Vulnerable Adult are hereby ordered and directed to cooperate with and accept instruction from limited guardian and counsel for the limited guardian as necessary to pay the living expenses of the Vulnerable Adult, and to make deposits or withdrawals or otherwise transact business on the accounts holding such assets.
- ✓ The assets are over \$5000. The following financial institution(s) holding assets belonging to the vulnerable adult is/are ordered to pay to the Clerk of the Circuit Court \$200 from unencumbered assets of the vulnerable adult: Bank of America, N.A.

6. Additional order(s) necessary to protect the vulnerable adult from exploitation.
 N/A

SECTION IV. DIRECTIONS TO LAW ENFORCEMENT OFFICER IN ENFORCING THIS INJUNCTION

{Unless ordered otherwise by the judge, all provisions of this injunction are considered mandatory provisions and should be interpreted as part of this injunction.}

1. The Palm Beach County Sheriff’s Office (“PBSO”), or any other authorized law enforcement officer, is ordered to serve this final injunction upon Respondent as soon as possible after its issuance. Except where the vulnerable adult is the petitioner, PBSO, or any other authorized law enforcement officer, is ordered to serve this final injunction upon the vulnerable adult as soon as possible after its issuance. If any assets are frozen under section 5 of this final injunction, PBSO, or any other authorized law enforcement officer, is ordered to serve this

final injunction upon the financial institution(s) where assets subject to dissipation are held or where a credit line may be exploited as soon as possible after its issuance.

2. **This injunction is valid and enforceable in all counties in Florida.** Violation of this injunction should be reported to the appropriate law enforcement agency. Law enforcement officers of the jurisdiction in which a violation of this injunction occur(s) shall enforce the provisions of this injunction and are authorized to arrest without warrant pursuant to section 901.15, Florida Statutes, for any violation of its provisions.
3. THIS FINAL INJUNCTION IS ENFORCEABLE IN ALL COUNTIES OF FLORIDA, AND LAW ENFORCEMENT OFFICERS MAY EFFECT ARRESTS PURSUANT TO SECTION 901.15(6), FLORIDA STATUTES. The arresting agent will notify the State Attorney's Office immediately after arrest.
4. **Reporting alleged violations.**
 - a. In the event of a violation of an injunction for protection against exploitation of a Vulnerable Adult when the person who violated such injunction has not been arrested, the Petitioner may contact the Clerk of the Circuit Court of the County in which the violation is alleged to have occurred. The Clerk of the Circuit Court shall assist the Petitioner in the preparation of an affidavit in support of the violation or direct the Petitioner to the office operated by the Court within the circuit which has been designated by the chief judge of the judicial circuit as the central intake point for injunction violations and where the Petitioner can receive assistance in the preparation of the affidavit in support of the violation.
 - b. The affidavit shall be immediately forwarded by the Clerk of the Circuit Court or the office assisting the Petitioner to the State Attorney of the circuit and to the court or judge as the chief judge of the circuit determines to be the recipient of affidavits of violation. If the affidavit alleges that a crime has been committed, the Clerk of the Circuit Court or the office assisting the Petitioner shall also forward a copy of the affidavit to the appropriate law enforcement agency for investigation. Within 20 days after receipt of the affidavit, the local law enforcement agency shall complete its investigation and forward the affidavit and a report containing the agency's findings to the state attorney. The State Attorney shall determine within 30 business days whether its office will proceed to file criminal charges, prepare a motion for an order to show cause as to why the respondent should not be held in criminal contempt, prepare both as alternative findings, or file notice that the case remains under investigation or is pending subject to another action.
 - c. If, based on its familiarity with the case, the Court has knowledge that the Vulnerable Adult is in immediate danger if the court fails to act before the decision of the State Attorney to prosecute, it should immediately issue an order of appointment of the State Attorney to file a motion for an order to show cause as to why the Respondent should not be held in contempt. If the Court does not issue an order of appointment of the

State Attorney, it shall immediately notify the State Attorney that the Court is proceeding to enforce the violation through a ruling of criminal contempt.

5. Respondent, upon service of this final injunction, is deemed to have knowledge of and to be bound by all matters occurring at the hearing and on the face of this injunction.

DONE AND ORDERED in Delray Beach, Palm Beach County, Florida, this 22nd day of September 2023 at 10:40 a.m.

Charles E. Burton
502023GA000245XXXXMB 09/22/2023
Charles E. Burton Circuit Judge
502023GA000245XXXXMB 09/22/2023
Charles E. Burton
Circuit Judge

COPIES TO:

- ✓ Palm Beach County Sheriff's Office

Petitioner:

- ✓ Via e-service to Kitroser Lewis & Mighdoll, 631 US Highway 1, Suite 406, North Palm Beach, FL 33407, mitch@kitroserlaw.com, paula@kitroserlaw.com, mikadmin@kitroserlaw.com

Vulnerable adult:

- ✓ Via e-service to Amber H. Patwell, Esq., 136 4th St N Ste 201 Ofc 356, Saint Petersburg, FL 33701-3889, amber@aplpinellas.com
- ✓ Patricia A. Sahn, 21843 Town Place Drive, Boca Raton, FL 33433

Respondent:

- ✓ Forwarded to sheriff for service on Respondent at 126 Sea Island Terrace, Boca Raton, FL 33431
- ✓ Via e-service to Inger Garcia, Esq., 7040 Seminole Pratt Whitney Rd., #25-43, Loxahatchee, FL 33470, attorney@ingergarcia.com

If assets or lines of credit are ordered to be frozen, the depositor(ies) or financial institution(s) were served with this injunction in accordance with section 655.0201, Florida Statutes as follows:

- ✓ Bank of America, N.A.
By servings its Registered Agent:
CT Corporation Service
1200 South Pine Island Road

Plantation, FL 33324

- ✓ Allianz Index Advantage IRA
PO Box 59060
Minneapolis, MN 55459-0060

- ✓ Investment Edge 21 VA IRA
Equitable Financial
PO Box 1016
Charlotte, NC 28201-1016

- ✓ JWC Financial IRA JW
JWCA AUM IRA DZN JW Cole
Financial IRA-SEP JW
By serving:
National Financial Services/JW Cole
4301 Anchor Plaza, Suite 450
Tampa, FL 33614


If assets or lines of credit are held by a trust ordered to be frozen, the depositor(ies) or financial institution(s) were served with this injunction in accordance with section 655.0201, Florida Statutes as follows: N/A

I CERTIFY the foregoing is a true copy of the original as it appears on file in the office of the Clerk of the Circuit Court, and that I have furnished copies of this order as indicated above.

CLERK OF THE CIRCUIT COURT



CLERK OF THE CIRCUIT COURT

By: 
Deputy Clerk