

I. CONTEXT

1. My name is Jayakrishnan Nair (39) , a biotech and real estate entrepreneur based in Seattle, WA since 2003 [Ex_WallStBio]. I am the only son of Ms. Omana Thankamma (77), who was born in a poor family in Kerala, India and had worked as an accountant in a public utility company there for 35 years. My father passed away when I was a kid, and my mother brought me (and a girl child had she adopted named Ms. Rajakumari) up as a single mom. My mother had retired in 1995 and her only income (other than my support) is a small pension of about \$300 per month (about INR 20,000) from her retirement. My sister works for a leading newspaper in India.
2. After completing my Bachelors in Electronics Engineering from University of Kerala, I came to the United States to pursue my Masters in Computer Engineering from University of Massachusetts-Amherst in Aug 2001. I also received a research assistant position on NASA space applications, along with a full tuition waiver due to outstanding merit from an invention for use by paralysis patients that I applied a patent for, and a 99 percentile GRE score, and various other academic honors and achievements including the nomination for a coveted President's medal. So I quit my job at IBM in Bangalore, India and accepted the offer to become a research student in USA.
3. As my mother had long retired by then and living by herself in India (step sister was married) I invited her to visit me in the States, as I already had enough income to support her while a student from the scholarship. So she obtained a visitor visa and first came to US in Feb 2002 and lived with me in my student housing. After graduating my Masters with a full 4.0 GPA, I was recruited to Microsoft in 2003, and my mother and I moved to Seattle. I became a permanent resident in 2008 through Microsoft sponsorship, and also became a real estate investor owning five homes in the eastside. I also completed an MBA summa cum laude from University of Washington-Seattle.
4. She has since been staying six months with me in USA EVERY YEAR SINCE 2002 (as the max her I-94 allowed per visit on her 10 year multiple entry visa, which was renewed for another 10 years in 2012) and the other six months living alone by herself in India (my step sister is married and living with her husband's family), waiting out half a year in solitude before returning to be with me. She followed this pattern for EVERY year since 2002 until 2014, when could not return to India any more as she was paralyzed waist down from a massive stroke and needed fulltime care.
5. My mother had needed a triple bypass surgery in New Jersey [Ex_DrAxelrodStmt] while visiting me in 2012, which I defrayed out of pocket as she did not qualify as a visitor for Medicaid benefits [Ex_OmanaStmtMedicare]. My mother and I share a deep bond that is very obvious to everyone that has known us both for any length of time.
6. My mother had learnt in 2007 that a new community of cottage homes optimized for retirement living was opening next to my home in 6706 Quigley Ave SE in Snoqualmie Ridge, and expressed her desire to live in a home close to me when I start a family. As she had no income and no savings to purchase the home, I loaned her the money to buy this dream home through a transfer from a HELOC on the equity in my home in Quigley Ave.
6. She bought this cottage home (6813 SE Gove ST Snoqualmie WA 98065) with the \$208k transferred from my Countrywide Home Equity account to our joint Bank of America account in 2007, and one year she later transferred it back to my name in 2008 for ease of taking care of it along with the rest of my real estate (my real estate business is named Omana Homes LLC) while she spends her six months in India. The reason why we did it this way was only because as a retirement community Cottages at Heights offered a hefty discount for senior buyers over the age of 60 and there was a requirement the original buyer cannot transfer deed for one year.
7. After her disability, as a single man supporting her, I had no other option but to quit my day job and become her full-time caretaker at home while also working from home (being a biotech entrepreneur, investor and software

professional gave me the option to telecommute) and also rely on my income from rentals and investments [Ex_Jay RealAssets in WA]. I have a federally declared net worth of \$4.3 Million as of April 03, 2017. I take pride in being extremely knowledgeable about all aspects of my mother's care, as have been observed by almost all her doctors, as also attested by Dr. Nayak in [Ex_DrNayakReport]. My mother adores me, and I love her more than my life.

8. We wrote to USCIS in May 2014, four weeks before her I-94 expired for her most recent entry to the States on January 2014, that my mother is medically unstable and requested an extension to her return date. Her application was supported by letters from her primary care physician Dr. Palanati [Ex_DrPalanati] and also her neurologist Dr. Hong [Ex_DrHong]. USCIS sent us an acknowledgment. I could not simply put my paralyzed mom on an airplane and say goodbye when she is no longer able to live by herself in her home country.
9. Since then I have been taking care of my beloved mother at home, and she has, as always since my starting to earn, been living under my expense with me under my care as my Tax dependent on my 1040s. Her only source of income as aforementioned is a small pension from the job in Kerala State Electricity Board in India, that she receives in her bank account in India. As she was a visitor without state legal status or eligible for any sort of state medical aid, I have been spending several thousands of dollars a month out of my pocket for her private insurance (which I purchased through Molina) and for all her private therapies and medications and in-home nursing visits. She has received diligent and gold-standard care at home, as ALL her treating physicians in USA in all states we lived in since 2002 (WA, NJ, MA and NV) would certify. Moreover, she has been CONTENTED and AT PEACE to be home.
10. I customized our home heavily [Ex_HomePictures] to make it her happy sanctuary with a wheelchair accessible huge backyard backing to a permanent greenbelt that she can feed bunnies. I purchased a Hoyer lift, custom wheelchair, power hospital bed, and every other equipment to give her a private heaven loved by family and getting the best medical care possible. She has lived with me as happy and as best taken care of as possibly could be, as she is ALWAYS the first to emphasize [Ex_OmanaDeclaration], which also includes a YouTube video plea from her.
11. In July 2016 she suffered a second stroke [Ex_VegasStrokeReport] while we were summer vacationing in Las Vegas, which paralyzed her body completely except for limited motion on her right hand. She also lost her ability to chew, and now required feeding through a PEG tube. Amazingly, she still retains her mental faculties, and is still able to hold deeply meaningful conversations and even do advanced arithmetic by mind, as she keeps demonstrating to everyone around her each day. However, due to her Dysarthria and language barrier of only being able to speak Malayalam and no English, she has trouble communicating with anyone that does NOT speak her language. She is exceptionally close to her daughter and me, and therefore she needs to stay in contact with us to be able to survive, and we are the only two people she trusts and will talk to in this condition. She has had bad experiences of trying to talk to strangers so will withdraw herself when family is not present.
12. Following this she required 24x7 TOTAL care as can be seen from [Ex_StrokeReport], so after returning with her to WA after spending 6 months in a hospital in Nevada, (which again I paid for out of my pocket), I decided to hire an additional experienced and certified live-in caregiver as a RESPITE for me to move into my six bedroom house in Snoqualmie Ridge and to join our household consisting of my mom, myself and our housekeeper Ms.Alexandria Hall.
13. So I found Ms. Ashley Redican, who has extensive experience [Ex_AshleyResume] as a certified caregiver [Ex_AshleyCerts] taking care of stroke victims at several well established nursing homes such as Mary Martha Memory care, Liberty Ridge Rehab Care etc. It was agreed I would be doing both the evening shift as well as night shift from 3pm-9am, while Ms. Redican would do only morning shift from 9am- 3pm. This is in addition to another CNA Karina Conspicion [Ex_KarinaCerts, Ex_KarinaBackground] visiting us three times a week for half a day each for additional help in bathing, pedicure, manicure, skin conditioning and other routines that she enjoys. She also had physical therapy, speech therapy and occupational therapy at home three times a week in addition to all the care and love in the world. She enjoyed watching her favorite shows, speaking with family and spending time with friends. She was on a miraculous path to recovery from the stroke.

II. The ENTIRELY FRIVOLOUS "INCIDENT"

14. On March 12 2018, after I had stepped out of the home to go to Redmond in the morning around 9am, Ms. Redican gave my mom her morning medications and started Ms. Thankamma's PEG tube feeding as usual, and stepped out for a personal errand, leaving her with the maid Ms. Alexandria Hall. She noticed that the tube had got clogged around half way through the feeding, and contacted me by text. I called Ashley and requested her to return home immediately to complete the feeding. I also advised Alexandria through texts [Ex_HallTexts] that both I and Ashley were on the way back home and therefore to divert her attention to housekeeping tasks until Ashley and I returned and took care of completing Omana's feeding.
15. Desirous of helping Omana, Alexandria however still went to a neighbor to borrow a blender, as she thought blending the food might help to get it through the feeding line. This was not necessary or advised, just an idea she thought on her own. After talking with our housekeeper this neighbor apparently felt that it would be a good idea to call for a welfare check for Omana to make sure she is ok and has received adequate care and food that morning. So an officer was dispatched to check on the home and my mother from Snoqualmie Police.
15. While I was driving back home, I was called on my cell by Officer Fischbeck from Snoqualmie Police Department. He advised that he was there to check my mother is doing ok because he got a call from the neighbor her feeding had been interrupted and that he was going to ask her to be taken to Hospital. I advised him that her nurse Ashley and I were on our way back, and that it was unnecessary as she was not in any risk or danger but to no avail.
16. When I reached home, the cop was already talking with Ashley, and I was told my mom was taken to Issaquah Swedish Hospital. Ashley and I rushed there to meet with Dr. Nayak, who wrote on her detailed medical report [Ex_DrNayakReport] that she has been very well taken care of, her skin shows no signs of breakage, she is at her normal baseline and the son is very knowledgeable about her care. Dr. Nayak furthermore outright refused Officer Fischbeck's request to hold her in the hospital until Adult Protection Services (APS) investigated the incident as he determined it was in her best interest to be allowed to return home. Dr. Nayak sent her home with Ashley immediately and we thought that was the end of it. Furthermore, I also sent an email to the officer [Ex_EmailFischbeck] that clearly outlined all the facts of the matter and even thanked him for coming out.
17. However weeks later I got a mail for an arraignment on a criminal charge of Abandonment of a Dependant person in the third degree, from the Issaquah Municipal Court. I was absolutely shocked and so was Ashley, and she gave a statement [Ex_AshleyStmt] showing that she was home (along with Ms. Hall) when I left in the morning. Therefore it is easy to see that to charge someone with a crime of "reckless abandonment", when the facts are clear that when he left her at home that morning there was a licensed and certified caregiver present at home [Ex_AshleyCerts], along with another adult who also had experience working in nursing home facilities around seniors [Ex_HallEssay], is nothing short of blatantly malicious abuse of power.
18. Furthermore, the police report [Ex_PoliceReport] is full of absolutely nonsensical and amateur errors, unbecoming of a professional LEO. The report states my mother is 99 years old, when the fact is she is a young 76 who still has no grey hair [Ex_AmmaPictures], and continues with other baseless and silly "allegations", including one that the cop found my mother's "Colostomy bag" unattached and lying under the bed; laughable nonsense given that she NEVER had a colostomy. Instead what he was referring to was the urine bag that was supposed to be kept under the bed! The police report is nothing more than a scary reflection of the pathetically low hiring standards for small town officers and their frightening power incommensurate with their intellect as not even a child could write such blatant and obvious rubbish. She had been terribly startled by cop's intrusion at her bed while happily watching her favorite show clean in bed and nearly died from the stress. She had literally pleaded with the cop and the paramedics as much as she possibly could in tears to not take her from her home [Ex_OmanaDeclaration].
19. On the basis of this completely and utterly meaningless "police report" and the corresponding open abandonment charge, Adult Protection Services took my mother into custody and kept her in Harborview hospital, while they also

obtained a "Vulnerable Adult Protection Order" against me through which I was prevented from removing her from the hospital [Ex_VAPO] although there are no other restrictions. I did not have any legal representation at the hearing and Hon. Commissioner Judson was deceived with several easily provable lies and misrepresentations in the APS petition [Ex_APSPetition] as can be seen from my Pro Se response [Ex_NairResponse].

20. After this VAPO had my mother in tears desperately wanting to come home from APS custody, I contacted an attorney Mr. Greg McBroom. He told me that to reverse the VAPO and to get back her custodianship will be a very expensive legal battle, and instead offered to negotiate a settlement that would instead actually be helpful to us.

These are the key points my family (my mom, Rajakumari and I) wished to have to agree for an outside guardian:

- a. Her legal status: Once she became legal and qualified for Medicare the huge financial burden of having to pay for a live-in caregiver and private insurance and inhome therapies can be lifted off my shoulders. I could also return to my own fulltime career that has been on hold since her stroke.
 - b. Ability for family to see her anytime, at a place near my home (within 25 miles radius from my home); and
 - c. that all her important care decisions will rest with family (such as her code status)
 - d. she can visit home whenever she wants and son can take her to attend religious and cultural occasions
 - e. Of course, all the above was predicated on the most important condition that her care should be held at the same gold standard as she has always been kept at home, as certified by Dr. Nayak's and other physicians' reports, and she should continue all the therapies and medical care as before.
21. Ms. Jennifer Boharski representing the DSHS and my attorney Mr. McBroom negotiated and agreed on all the above key points, and the settlement was approved by Court [Ex_GuardianshipSettlement]. Therefore the family accepted DSHS to bring in a third party guardian (Ms. Channa Copeland) in exchange for all the above demands, in lieu of spending tens of thousands in legal fees to throw out the APS allegation predicated on a nonsensical police report that alleges the son "abandoned" the mom with two adults he hired to take care of his mother, both experienced with working in nursing home and one of them a certified and experienced CNA [Ex_MotionDismiss].

At this point one has to wonder: How many people can buy private insurance & hire two live-in caregivers to prov

e excellent private medical care for their mother that does not qualify for any state assistance? Since when did it become a crime to do one's best (even sacrificing a promising career leading a team of 26 engineers at Microsoft and holding two masters degrees) to take care of his quadriplegic mother as she herself acknowledges?

22. As is obvious, there was absolutely no legal reason whatsoever for accepting a guardian but for the strong lure of getting her eligible for legal status and Medicaid, thereby saving the exorbitant medical costs for visiting "aliens" and expensive private caregivers, which the son has borne out of his pocket for all Omana's expenses and care for 17 years since her first trip to USA in 2002. She has had a triple bypass heart surgery that I paid completely out of pocket in 2012. The DSHS petition was clearly only hogwash and would not pass muster if we contested.
23. The baseless "abandonment" charge was entered into a Stipulation Of Continuance for dismissal by July 10 2019 [Ex_SOCDdismissal] as the Prosecutor requested my attorney Mr. John Rongerude to avoid a trial. I heavily opposed her request and insisted on a trial [Ex_MotionDismiss], to show the people of the city of Issaquah the dubious prosecutorial standards for harassing a sick old mother who loves her son and desperately wants to stay home she considers her heavenly sanctuary. If I can be prosecuted for this "crime", then ANYONE in society is not safe.
24. This whole Jeremiad my family has been going through for no reason or fault of ours is a totally unacceptable travesty in a civilized society [Ex_MotionUpdate] and can only be equalized by holding those abusing power accountable for contempt of court and misrepresentations in documents filed under penalty of perjury.
25. Furthermore, Ms. Amy P. Swanson, director at Providence Rehabilitation Services (that had been sending therapists to our home since her stroke and have completed over a hundred or so successful sessions of physiotherapy, speech

therapy and occupational therapy at home), was contacted by Mr. Wilson with a weird illegal request to stop sending therapists to our home. Her regular therapy sessions that had been keeping her healthy and on a path to successful rehabilitation (she had already gained almost all of her speech in her native tongue Malayalam back, as the speech therapist that I had engaged Mr. Dinesh Kannada is the ONLY licensed therapist in the area that speaks her language; and due to his yeoman service she could speak again for a while as he can attest) were stopped abruptly for no reason based on this DSHS request. This has led to a terrible regression in her rehabilitation and also caused other medical problems from cramps forming in legs from discontinuing the physical therapy she received at home (covered in her ongoing abuse detailed in Section 3).

26. On the basis of this comically laughable "police report", DSHS/APS applied for a restraining order [Ex_APSPetition] to prevent me from taking my mother back to our home. Ms. Boharski representing APS offered to settle for a 6-month restraining order that will have no other restraints but to take her home [Ex_VAPO], however I denied the offer as there was absolutely no logical reason to keep my mother from the only place she finds peace and happiness in.
27. Therefore the matter was heard before Commissioner Judson, who appears to have been fully deceived from the fraudulent misinformation presented in the Petition as proved to be false in my response [Ex_NairResponse] and Omana's declaration and video testimony in English from Hospital pleading to the Honorable Judge to be allowed to go back home [Ex_OmanaDeclaration] as "I cannot live without my sons" as she says in her own words repeatedly. One such example is the DSHS Petition for the VAPO that alleges that when the police and paramedics arrived to take my mother home, they found her lying in the floor in a pile of excreta and there was a strong stench of urine inside the home. On the contrary, the referenced police report, although childishly silly otherwise, at least does acknowledge that "I found Omana Thankamma laying on a futon...Omana's bedding appeared **FRESH**" [Ex_PoliceReport]. This was brought out in my response [Ex_NairResponse], along with about 10 other factual inaccuracies/ lies in the petition, and on her opening oral brief to Commissioner Judson, Ms. Boharski readily accepted that errors were made and that the above allegation was a lie that Mr. Wilson had misrepresented, and that Omana was indeed found clean and fresh in her bed when the paramedics arrived to take her to the hospital.
27. To put things into perspective, Ms. Boharski has therefore admitted that the Department had MISREPRESENTED THE CASE AGAINST MR. NAIR. Such a lot of pivotal falsifications is not an error, but obviously DELIBERATE AND WILFUL. Her statement **ON RECORD** should be held as proof that Mr. Randy Wilson has committed the crime of perjury by maliciously using **FABRICATED** allegations from some templates. It is still a huge mystery to me how or why Hon. Commissioner Judson inexplicably failed to bring sanctions against Mr. Wilson and DSHS for knowingly submitting false evidence. How is it possible to "mistakenly" copy paste **SEVERAL** wrong allegations from the wrong file (as claimed) and present it to a venerable court KNOWINGLY accusing an innocent man of neglecting his mother when he has done his total best to keep his mother clean and safe? How can such a deliberate action any conceivably be only an error? Although Ms. Boharski "apologized" to the court, it is afraid Commissioner has unfortunately failed to take the appropriate legal action, as a simple apology does nothing to correct Mr. Wilson's obvious pattern of devious corruption for framing an innocent man that loves his mother more than his own life. Mr. Wilson and rest of DSHS's legal team (specifically one Ms. Christine Glenn's diabolical lies) have made this case into a total circus.
28. The unfortunately prevailing sense of a complete lack of respect among legal professionals practicing in King County Superior Court for Hon. Commissioner Judson's competence is not only painfully obvious from Mr. Wilson and Ms. Boharski's gall to make these criminally fraudulent statements (in pathetic contrast to their referenced police report, which they impudently assumed the Commissioner will not be bothered enough to check) but also from the other lawyers like Mr. Greg McBroom openly referring to him as a "piece of work" [Ex_EmailJudsonMcBroom] in writing.
28. The truly sadistic motivations for Mr. Wilson and Ms. Glenn for their criminal actions of most contemptuously misrepresenting facts to a venerable Court, for savagely harassing a paralyzed lady that just wants to be left alone at her home (that she calls her lovely sanctuary in video [Video_Home]) and to take her away from her family lovingly trying to take the best possible care of her (paying astronomical medical and qualified private caregiving costs out of pocket), are quite unclear. It could be racial discrimination, xenophobia, "power tripping" or quite simply, the

pathetic need to "justify" their fat paychecks when they have absolutely nothing productive to do but to warm chairs at taxpayer expense, have too much time to kill and reports to fill on their job activity. They need to show to their bosses the "stats" that they helped "n number" of "vulnerable adults" when the reality is the said adults see these DSHS agents as monsters prying them from family and their "efforts to protect them" as evil persecution.

29. However Mr. Rongerude persuaded me that as the Prosecutor was "playing games to keep the case open for as long as Mr. Wilson wanted, without any legal merit" and not willing to schedule a trial for at least 3 months, it made absolutely NO logical sense to NOT accept a Stipulation of Continuance (SOC) for dismissal after three months. Clearly it would only be a Pyrrhic Victory to return to court for a mock trial that the prosecutor acknowledges she has no chance to win, as she also is willing to dismiss the case after the SAME length of time (3 months) before when it would have gone to trial anyway. In other words, the only reason to NOT accept the SOC would be if I had to be foolhardy enough to insist to spend the time and expense, for my lawyer and I to come back after three months to do a mock trial, to prove my innocence to 12 random strangers and for absolutely no other reason whatsoever. By the same logical reasoning, she could have charged me with the assassination of JFK and I would have still been forced to accept the same SOC, which I did as I had no other choice despite repeatedly asking for a quick trial. There was absolutely no legal or logical reason for this obviously facetious case to have remained open for 17 months other than the pressure from Mr. Wilson on Ms. Moberly. She kept an utterly frivolous case open as NOTHING more than a BLUFF for facilitating DSHS in getting Omana a guardianship, by using circular logic to deceive the courts.
30. No reasonable person can have any doubt that if this absolutely frivolous "case" went to a trial with this trumped up "evidence", the cop and the prosecutor is fully aware they would only manage to embarrass themselves as bozos for maliciously and deliberately abusing power to harass a quadriplegic and her innocent loving family, to destroy the life of a high standing erudite executive and to tarnish his social and professional reputation, and above all to keep a quadriplegic from the happiness and contentment of being with her family at home that is her only motivation to live in her locked-in pitiful condition. It is simply beyond absurd that any "Prosecutor" would fail to dismiss a case for "abandonment" when there is a signed statement from a qualified caregiver that she and another adult were present at home when Mr. Nair left in the morning [Ex_AshleyStmt] of the non-incident. Knowing this, the Prosecutor purposely delayed the trial for more than a year on the request of Mr. Wilson, as the incident was on March 12 2018 and the three months SOC was ONLY entered in April 10 2019. All this while they were just waiting for Omana to die so the guardianship would be moot and unnecessarily dragging this matter while she and I suffered for no reason.

III. ONGOING SEXUAL ABUSE & EXTREME NEGLECT AT PARAMOUNT SHELTER HOME

III a) "OFFICIAL STATUS" : "ALIEN LESS THAN A DOG"

31. At our first meeting with the newly appointed Guardian (with my attorney also present), she initially appeared to be a genuine and caring person and I was beginning to have hopes that the whole fiasco can turn out positive if my mother can get citizenship and Medicaid coverage, and we can still also keep our bond strong by visiting her every day for at least three hours (as I have done diligently for every single day that I have been allowed to). I handed over to her all of Omana's legal documents and passports and told her I don't have any more left. Ms. Copeland mentioned that my mother has to be released from Harborview soon as she cannot be held in the hospital any longer, and needs to go to a nursing home. However, as her status is a visiting alien that did not qualify for Medicaid or any state assistance, she did not have any placement in any facility and therefore she did not know what to do with her until she got the citizenship as she has nowhere to go and no insurance (I stopped paying her Molina private insurance after the court order relieving me of all her responsibilities and appointing a guardian).
32. She said the only place she could put Omana in until she got the citizenship application approved from USCIS on the basis of the court order, and thereby qualifying her for any insurance or benefits and placing at a facility trained to

take care of her, would be at a shelter for the homeless where she would be bunched with the discards and desolates in all stages of illness and infectious diseases. Her only choice other than to take her home with her was a short-term respite that Harborview operates [Ex_ShelterAdmissionCriteria] where the patients with no insurance and too weak to be thrown to the streets are sent, and it is called Paramount Shelter Home. This place has no arrangements or facilities to take in someone like my mother who needs total care and PEG tube feeding etc, and there is not a single other patient in her state of total care with PEG and Catheter admitted there. Ms. Copeland cautioned that she has been there in the past and was terribly shocked at how poorly run down the place was and total lack of hygiene. Furthermore, she met none of the admission criteria and was in need of care they can't provide per their own website. Omana is a long term stable patient needing ongoing therapies, and not a homeless.

33. She then declared, in the presence of Mr. McBroom VERBATIM these words: " This is not a place I would keep any one of my dogs in even for a day. It is so terribly filthy it is traumatic to even visit". I had never heard of this place but based on this caution from her guardian I pleaded with her to expedite the citizenship application so she can return home with the benefits or go to a proper nursing facility qualified to treat a patient like her, and to keep her at Harborview until the Medicaid will allow her to have the proper care at a facility or can restart visits at home. I pleaded with her to not have her sent to a shelter for homeless when her son owns 5 homes in the area.
34. She said the issue was that DSHS had no funding for her though they had jumped the gun to take ownership of Omana's care in the settlement. They apparently never had any other situation like this in history and assumed Omana was a citizen and would have the same state benefits as any other sick old woman in her situation. So now Omana was in limbo and no funding and no qualified care and nowhere to go to, but ALSO not allowed to return to her family and home where she has been getting qualified care for several years since her strokes. They apparently did not realize that I was the branch supporting her, and cutting me off was same as letting her die.
35. A few days later when I visited her at Harborview I was advised she had already been shifted to Paramount Shelter home. Ms. Copeland had never communicated with me about the move and despite her own caution she moved her to this homeless shelter; as apparently she had no other option other than to take her own home in Pierce (where she had no place for Omana) or to put her in a homeless shelter (which she chose to do) despite knowing what the conditions are there first hand and she cannot survive there. She knew very well that Paramount as a homeless shelter is not equipped to take care of my mother and she would be at serious risk.
36. From the first visit it became apparent Paramount was a hell hole shelter that would put even a horror prison cell to shame and that Ms. Copeland was NOT exaggerating one bit in her statements about the place - anyone taking a tour can be convinced themselves. Patients with no insurance and no money are regularly dumped there to die, in the filthiest conditions imaginable as can be seen from some of the pictures and videos I have taken care of her: ALWAYS BATHING IN HER OWN VOMIT AND STOOL AND NEGLECTED FOR HOURS. She clings on to my hand every time I visit and begs to take her back home with me every time I visit, and she is in terrible trauma and nobody answers her calls for hours until I request the staff for helping me in cleaning her up. She has given several detailed video testimonies of her neglect and abuse in Malayalam [Video_Testimony], and have been continuously pleading to be allowed to go home. The fact she is at a homeless place the Guardian would not put her dogs in, shows Ms. Copeland is a terribly evil hypocrite that does not consider my mother as even worthy of being considered a human being, in other words she is less than a dog to her.
37. I communicated my mother's desire to meet with her guardian and speak with her, but the guardian ignored all our requests to date. Unfortunately Ms. Copeland has no time or interest in my mother's welfare or safety and has declined all our efforts to have Omana speak to her through an interpreter. To this date my mother and I have not been granted a single face to face meeting with her guardian so she can communicate her abuse and neglect with her in my presence, the only person she trusts. Ms. Copeland is utterly clueless about Omana's medical needs and refuses to speak with her or to listen to her complaints and problems she is facing at Paramount as she is "helpless and she has nowhere else to go".

38. My mother has been on an expensive Botox injection regimen every six months at Harborview to keep her legs from stiffening and avoid the severe pains from the contractures. This also helps with her legs massage that she gets at home every day and her stretching exercises to prevent muscle atrophy. Omana was taken to Dr. Julie Hodapp MD, her neurologist, for a regularly scheduled Botox injection on March 21, but her Guardian was not available to answer the call when Dr. Hodapp's office called her for legal consent for the procedure. Therefore she had to be taken back without getting this critical injection that numbs her pain. Thus Omana has stopped getting the Botox injections, the physical therapy sessions (of which she used to get regular three sessions every week at home from Providence Home Health), stretching exercises and sitting in the wheelchair as she is now 24x7 lying in bed. Naturally she has developed incredible pain in her legs and developed severe skin breakage and constantly weeping in intolerable pain. Despite multiple requests, the staff always keeps her legs in a contracted, fetal position without keeping several pillows in between her feet and lower back for keeping them stretched as we always did at home [Ex_AbusePictures]. She never receives oral care at Paramount and her mouth always smells like rotten tuna.
39. At home Omana had been on a carefully controlled diet of specially ordered organic Liquid Hope (R), that controlled her sugar naturally so she did not need insulin injections regularly. At the shelter, she is being force fed regular store bought Glucerna (R) meal replacement shakes that are heavy on sugar and injected with huge volumes of insulin to compensate for the abnormal sugar spikes. She has developed severe side effects on her body and skin due to this and her a1c has gone up. Medically, she went from thriving after stroke to a near mortal state from severe neglect.
40. To compensate for her crying loudly and screaming from leg pain, due to not receiving her scheduled Botox injections and lack of stretching exercises that kept her cramps at check, the charge Doctor Dr. Tran in the facility prescribed a dangerous Muscle Relaxant named Dantrolene Sodium, that introduced severe vomiting in her as a side effect. Upon reviewing her changed medical chart it was obvious the reason for her nausea and vomiting was this drug, as another drug from the same class of muscle relaxants, named Baclofen, had been tried on her immediately after the stroke in 2016 to alleviate her leg pain from cramps from the stroke. However it had to be replaced with the Botox injections in her thighs every six months for a localized anesthetic solution due to similar side effects. I informed this to the charge nurse at Paramount and to Channa [Ex_EmailChanna1] but to no avail and she had continued to get this drug DESPITE ALWAYS BEING COVERED IN HER VOMIT NEARLY 24X7 as in [Ex_AbusePictures].

III b) Incident with Mr. Roger, administrator at Paramount Shelter

41. On Feb 16 2019, I visited Omana at Paramount to find as usual that she was covered in her vomit and neglected for hours. I had had enough of trying to get help from the staff as this was a systemic problem and my mother was steadily declining in front of my eyes each day. So I took a picture of my mother and reported it to her guardian Ms. Copeland on the same day as soon as I got home [Ex_EmailChanna1]. In the same email I also explained to her about Dantrolene and why it must be replaced with Botox injections as she had been on previously and had worked for her. Ms Copeland responded [Ex_EmailChanna2] saying that she had forwarded the message to somebody at Paramount, although I worried it would be indiscreet to do so and expose me as a whistleblower.
42. On the very next day, as I visited the facility in the morning and was cuddling with my mother, with two of her nursing staff also in the room, a black male in his 50s, identifying as administrator Roger, approached me and asked me to hand over my phone. I remonstrated that I could not hand over my device with personal information, and he said I was in violation of HIPAA for taking photos inside the facility. I told him that I had a right to take the pictures of my mother's abuse and neglect. He threatened that I will "not be there for long". As I continued my visit, a couple of Seattle PD officers came to the room in about half an hour and asked me to leave as Roger had trespassed me from the premises. I was flabbergasted, my mother was in total shock and trying to plead with the cops to leave me and that she cannot survive without seeing me, as I was getting escorted out of the facility. I sent an update to Ms. Copeland [Ex_EmailChanna3].

43. My mother's family and friends had organized a large birthday party for her at home, and this was an event she has been looking forward to as we were afraid this could be her final one. So we had made elaborate arrangements and got a large crowd of everyone of her friends, as we had done also in the previous years. But due to this incident, we were forced to cancel her birthday party much to our extreme chagrin, disappointment and embarrassment and her friends could not meet her or give her birthday gifts. The guardian was able to negotiate to allow me to re-enter after about a week but the facility would not allow me to take any recording devices or give phones to my mother to make calls to the outside world. She has less rights than a prisoner.
44. My mother had two Motorola Moto mobile phones that I had given her, that she can use to call me or sister anytime and to keep in touch with her friends and family. There were two so one could be charging while other is with her. Both of them were confiscated from her, and her Chai tea pot was confiscated also. She was denied all means of communicating with family. She was also denied use of a laptop and one day I left a youtube video playing for her, only to find out the laptop was confiscated also. She has been turned into a vegetable though she is a living, talking human being with aspirations, hopes and dreams to live with family and to love and be loved.

III c) Missing Bank Account with \$12,000

45. As Ms. Copeland was "negotiating" my terms for returning to see my mother, I noticed that my primary account with Bank of America, (that I had opened 17 years ago and used for my salary from Microsoft, rental income, businesses and all other personal transactions and had nothing to do with Omana other than that I had added her as a joint account holder to facilitate the payment of the expenses on her behalf that I was taking care of), was wiped out on Feb 21,2019 along with the balance of about \$12,000. I had just credited that account with a wire for about \$10,000 from another account I owned individually, to pay for the legal fees for a critical matter on my real estate portfolio. I checked with Ms. Copeland who admitted that she stole the money from my account using her mandate to act on my mother's behalf and closed MY account [Ex_EmailChanna4] that contained all my bill pays for my businesses and rentals. Although I sent her proof of the wire that credited the money [Ex_Wire] and explained in excellent detail why Omana is 100% my 1040 dependant and how I am her power of attorney, and that all the money she stole from my account totally belonged to me as my mother has absolutely no income other than a paltry pension in India that is less than her copay for insurance [Ex_EmailChanna5], she refused to return MY money (despite all proof) and used the cash as a bargaining chip to let me have access to my mother.
46. As part of her speech therapy, Mr. Dinesh Kannada would regularly massage her neck during his three visits per week, and speak to her in Malayalam about her history. He also gives her tea by mouth as that is a custom she has grown up with every day as a child, and she is addicted to having Chai every day twice all her life. After the stroke she has a Modified Barium Swallow Test, which evaluated her risk of aspiration when given thin liquids by mouth. Much to her relief her swallowing of liquids was not affected which meant she could still have her chai every day, as she has been getting at home everyday at home from me as well as from Dinesh. After transferring to Paramount, I met with an in-house speech therapist who evaluated her and said that although she does not speak Malayalam and will not be continuing her speech therapy sessions at Paramount, she agreed it is important to continue giving her chai tea by mouth. Accordingly she showed me the refrigerator to keep milk, and the microwave to make the chai in. During my regular visits for three hours I have been giving her the chair tea every day at Paramount, but other than the Chai she lost all the other services from Dinesh and her speech declined. She is in extreme pain from lack of care.
47. On May 6, 2019, yet once again I found my mother bathed in her feces and had been left for hours when I visited [Ex_AbusePictures: first picture]. She had been calling for help for hours and no one responded, the call light had been on for hours. I went to the nursing station and asked for help, and patiently waited in the room for about two FURTHER hours. At this point I lost my patience at my mother's plight, who has been lying in a large pool of stool for over FIVE hours so much so it had soaked through the bed and become dry. So I went back to the nursing station, asked her charge nurse Ms. Pauline to come over and bear witness to her plight, and took a picture in FRONT of Ms. Pauline and asked her to acknowledge the neglect and bear witness to her state. She admitted the severe neglect

and said she will talk with her aides to clean her soon and to be more responsible in answering the call light. Five hours is not acceptable to change soiled diapers. My mother's skin has torn off from the severe neglect of being left in fecal matter for hours. She has developed very painful pressure sores and severe bed sores in a short time since going to Paramount, due to not being turned often and repositioned. She is often left in a dreaded cramped fetal posture with legs folded to her butt causing her to scream incessantly in agony and keep calling my name asking for help [Ex_AbusePictures]. Her abuse and neglect is beyond traumatically evil. Her diapers are changed by mostly black male nurses recently immigrated from African nations (a peculiar demographic for the staff at this facility), which is beyond traumatic for her. All she is pleading if for a voice - to be heard through an interpreter where she can narrate all her abuse in Malayalam to anyone caring to ask directly from her in front of her children she trusts.

III d) Incident with Mr. Tedlaw, "nurse" at Paramount

48. On the next day, May 7 2019, I visited her later than usual (normally I visit from 5pm-8pm) around 7:55pm, and I had just walked in the room with her daily chai when I was accosted by another black male (coincidentally many if not most of the so called "nursing staff" in this "homeless facility" are young males recently immigrated from Ethiopia, for some odd reason) named Tedlaw and identified as her charge nurse for that night. He seemed to be on a guided mission to rile me and confront me for no reason as he appeared hostile from the get go though I was most warm, friendly and polite.
49. He told me that I am not allowed to give her anything by mouth after noticing I had chai with me. I responded that I was just following her speech therapist's instructions and assured that I would not give her the chai until I checked with the in-house speech therapist at Paramount (that had evaluated her upon admission and also recommended to continue giving her Chai as Dinesh had been doing for years) the next day in the morning. He then told me I was not allowed to touch her or kiss her. I was exasperated, but not wanting to create a friction I told him I will obey everything he said.
50. My mother had told me she was running a fever and felt nauseous and so I told Tedlaw that I feared she might have a slight temperature. I expected him to check her temperature with a thermometer. He instead put his hand underneath her gown over her breast and started fondling her over the nipple with an evil grin looking at me. I realized what he was doing, he was trying to rile me up as they did not want me visiting her everyday and documenting her constant neglect. No other patient there had regular visitors that spent three hours a day there and took pictures, and no other patient there needed total care with PEG and Catheter. Because the facility was not trained in how to handle her catheter, they removed her urinary catheter altogether and put her on diapers, while her incontinence means that the appropriate medical solution to keep her dry is to use a catheter. Due to this change (the only reason for which is lack of qualified care at Paramount) she has been regularly getting infected since admission to Paramount and needed 4 intensive care admissions in a coma state for infections that could have been completely avoided with proper hygiene and a Catheter as she had at home.
51. I protested and told him that his way of "checking her temperature" is inappropriate as nobody but a pervert checks a lady's temperature by fondling her breasts. My mother looked at me helplessly in agony and I firmly asked him to take off his hand, upon which he told me that the time was five minutes past 8pm, and the visiting hours was only until 8pm. He asked me to leave immediately before he calls police.
52. I told him that according to Federal law, I had the right to visit my mother anytime if she wanted my presence. I then took out my phone camera and asked my mother to say whether or not she wanted me to stay, to which she said "yes" on video. Then I requested Tedlaw to either give me a notice in writing to leave, or to allow me to record his command to leave my mom when she wanted me to remain, which was against our rights. I also said I intended to record a victim statement from my mother of her sexual abuse that I had just witnessed, in Malayalam and in her own words.

53. Mr. Tedlaw suddenly turned violent and tried to grab the phone from my hands. He physically assaulted me and pinned me to the wall, burying his elbow into my chest. My face and arms were bruised. Several other staff and patients including my mother witnessed this and my mother started yelling in panic asking someone to save me. Being paralyzed she was helpless. One of the other staff members intervened and asked Tedlaw if he was insane, as he pulled him away from me. He replied that he was holding me under arrest for recording within the facility and for asking to record his voice. He held me hostage and asked to call the cops to arrest me for illegal audio recording of his voice.
54. I told Peter (the receptionist at Paramount that witnessed Tedlaw's vicious attack and my bruises) and other staff members and all the inmates watching that I had not started any recording of his voice or video until he started threatening me and even so only after showing him the phone and advising that I was starting to record for my own safety, and that of my mother, as is my right. Therefore there was no legal reason to hold me hostage and it was a false arrest. The real criminal to be arrested was Tedlaw, who had just sexually assaulted my mother in front of my eyes and then physically attacked me in front of about 8 people and injured me, and held me hostage.
55. The staff then contacted somebody (apparently the head of the legal department) at Paramount and narrated the incident, and asked what to do with me who was being held a hostage. This legal counsel apparently told them that they were the ones violating the law by holding me illegally and to let me go immediately. I was released from custody. On the next day, I received an email from Channa that I had been trespassed again from Paramount.
56. My birthday was on the next day (May 09) and of course May 12 was mothers day, the two most important days in a year we pamper each other with love, but we were not allowed to even contact each other, for no legal reason. In the last 12 days, I have not been able to visit my mother, and our family in India is most extremely worried about her so my step sister has booked tickets to visit USA [Ex_RajakumariTicket]. My mother has no contact with anyone that can communicate with her in nearly two weeks and she would be extremely worried about me as she has no update till now about what happened to me after she last saw me being viciously attacked and dragged across the floor by Tedlaw out of her room.
57. She suffers from anxiety and depression and panic attacks, and she has never spent even a single day in her life in solitary confinement as has she been for the last 12 days. The Guardian appears to be happy to hide behind some nonsensical excuses by Paramount to stop my visits and documenting of her vicious abuse and terrible neglect as can be seen from her emails [Ex_EmailChanna6,7,]. At the present time the Guardian is simply waiting to let her die from neglect and isolation and despite multiple requests from family in India she has not moved her to a real nursing facility that she can get proper care. Instead her current offer is to allow her to go back home if I reinstate her insurance and hire new caregivers, i.e. to take her back to where she was before this unbelievable farce started on March 12 2018 for no reason other than our silly maid asking to borrow a blender from a neighbor without our consent, a non-incident which had nothing to do with Omana or me as any rational and sane person with at least a couple of brain cells can easily see.
58. The guardian has failed to comply with the Court order to apply for her citizenship. Despite me having given her all her documents and Indian passport in my possession, Ms. Copeland has not even started her citizenship application that could have made her legal and eligible for care at a proper nursing home instead of being left to die at a shelter not capable or interested in letting her survive. She has been at mortal risk since going to Paramonut and her health has steadily declined, and all the progress from years of rehab therapy at home is lost.

IV. THE NAIR FAMILY'S SHOCKING JEREMIAD

59. Omana was very happily and contentedly staying at home with excellent care and must return home expediently. She has suffered a disastrous decline in health, from being hale and healthy at a loving home to being repeatedly infected and held in isolation at a shelter for the homeless where she has nobody to communicate with and has been left to die. She has already been diagnosed with depression from stroke, and these last five months in Paramount has made her further lose all interest to live. She has not had any therapy sessions or Botox injections or qualified care, and is forced to lay helplessly in her excreta and vomit for five to six hours every day until her son comes, and in the last 12 days even that too has been taken from her. It is hard to imagine any worse evil possible to a human that what has been done to my mom. Her skin has been torn severely from pressure sores and diaper rashes from not being cleaned up for hours after a bowel movement.
60. She was already found unresponsive three times when I visited, and each time I had to go through a lot of hoops just to get her into hospital (even while she is unconscious) as the staff was not sure if she should be left to die. So they would wait till they get approval from her Guardian to take her to a hospital, even when she is palpitating with a 104 degrees fever and unresponsive and literally in a coma. Each of these occasions she was diagnosed with advanced Urinary Tract Infection that are typical of severe neglect in nursing home facilities. She is running a continuous drug resistance infection from Extended Spectrum Beta Lactamase infection, also called the Nursing Home infection due to its heavy recurrence rate at poorly maintained nursing homes with terrible hygiene.
61. Omana is a HUMAN BEING, and although she has overstayed her I-94 due to disability it does not make her worse than a dog as her so-called Guardian considers her to be (and she is continuing to keep her at a place she would not let her dog stay for a day). Only reason she is at a shelter is because she is neither eligible for proper care as a citizen who would be placed at a proper nursing facility equipped with trained staff with knowledge of Catheter, PEG tube etc, nor allowed to return home. She is an "alien", so she does not qualify for medicaid, but the laws apply to her in the same way to citizens. So she can neither go home nor qualify to get proper care, which is the very definition of a pathetically failed legal system. The Homeless Shelter has removed her catheter forcing her to be soaked in urine all the time 24x7. She is currently being kept in solitary confinement and allowed NO contact with family or outside world, and left to die in her vomit and excreta. Family is not allowed to visit in the fear of documenting her pathetic condition and murder. The guardian is passively playing along as all that she wants to do is to wash Omana off her hands like a stain now that she looted all the money she can from MY bank account.
62. As a matter of fact it is not clear if she is even alive or not at this point. She cannot speak English and cannot communicate without me or my sister or her speech therapist Dinesh, the only three people who can understand her slurred speech in Malayalam (affected by her Dysarthria) well. I am more essential for her existence than even pills or Oxygen, as my love, kisses and cuddling is what keeps her going. As my phone rings each time I expect the worst as I am actually surprised if she has not been murdered by them already. She is incredibly dependant on our emotional support and currently in deep distress and agony. The only reason for being trespassed from the facility was the whistleblowing of her abuse and neglect, due to which they do not like me visiting my mother every day.
63. Paramount is not a nursing home but, simply for a lack of a better apposite term, only a ghetto shithole that is an embarrassment to all the civilized people not only in Seattle but all of America. Even third world countries like India does not have such human dumps and Omana is better off being returned to Indian government. She is a Indian Citizen and the Indian consulate can arrange better care and repatriation than this torture at Paramount. This is the place the homeless, the desolate and the unwanted are discarded to die (i.e. killed off through abject neglect). There is not even a pretense of any care, as everyone knows what is happening inside. The nasty hoodlums like Roger and Tedlaw managing this place are only interested in making sure the outside world does not get to see what is happening inside or the abuse going on, and cover up the atrocities.
64. They will immediately trespass anyone that dares to make any complaints on behalf of their loved family member who is being inhumanly neglected and/or abused. They see anyone who documents the victims' condition with

irrefutable evidence and victim statements (my mother has dozens of videos of her stories of abuse and neglect) as a threat to how they run it like a Nazi concentration camp. The unthinkable cruel nightmare that my mother and her loving family have been enduring in the last 5 months at Paramount, not to mention in complete isolation in the last 12 days, where a paralyzed woman is left to the mercy of her abusers, is beyond my verbal expression.

65. By every conceivable metric, I have been an IDEAL son who did everything humanly possible to take the best care of my beloved *Amma* at my home with TWO live-ins to assist with her caregiving and the very best gold standard of medical care with regular home visits from speech, physio and occupational therapists three times. Her full time care team included two CNAs (Ashley and Karina) and two maids (Alexandria Hall and Jennifer Gallagos) in addition to myself working from home as primary caregiver, all in the luxury of a huge six bedroom mansion in the Snoqualmie Ridge golf course community. From there she has been forcibly taken into solitary incarceration with no one to talk to that understands her language, no contact with family, denied all her simple pleasures like her favorite shows or even a cup of tea, neglected to die in pile of her own feces and vomit, and sexually abused by perverted intimidating African men that she is scared out of her life of and she wants to escape so badly. She repeatedly calls this place as hell on videos and pleads to be returned home in every way she possibly can despite her language barrier and Dysarthria. as can be seen from her declaration to court [Ex_OmanaDeclaration] and video plea. The amount of pain and losses our family have had to go through due to the incompetence of DSHS is sheer insanity.
66. This is in addition to more laughable allegations from DSHS, as they sent me a letter stating that they wanted to put my name in some stupid registry (though I am not a caregiver but a computer engineer by profession) for the crime of taking the best care of my mom at home as an IDEAL son [Ex_APSLetter]. I had always hired experienced caregivers from the same regulated CNA hiring boards that large nursing homes hire their staff from, such as care.com, and my proof of paid membership is in [Ex_Caremem]. Yet I am baselessly accused of hiring unqualified caregivers from Craigslist, a website that I have only used for hiring housekeepers for my rental business that has nothing to do with Omana's care. The fact that I as an employer used two different hiring boards is simply a testimony to my success, not a proof that I did not use adequate due diligence in hiring caregivers (which I did).
67. I promptly appealed for a hearing, and DSHS then moved for a summary judgment motion. I responded to it thought my lawyer Mr. Greg McBroom [Ex_SummaryResponse] and made a declaration [Ex_JayDeclaration]. The Honorable Administrative Law Judge Michael Hovey decided in my favor and tossed out the DSHS' Summary Judgment motion [Ex_DenySummary]. Ms Christine Glenn, representing DSHS, had tried to obtain a backdoor summary judgment by piggybacking on the VAPO finding of neglect, which itself was obtained by Ms. Boharski by piggybacking on the nonsensical criminal case of "abandonment" [that has since been SOC'ed for dismissal as in Ex_SOCDismissal] that in turn piggybacked on a "brainfade" from a policeman that cannot unfortunately tell a 99 year old from a 76 old stroke victim, or a Colostomy bag from an urine bag. Inadvertently, Ms. Glenn has shown light on how pathetically broken the APS function is and how inherently meaningless & infuriatingly egregious her pleadings are. If these shameless liars are still allowed to practice law, what iota of credibility does the State's Bar Association have left?
68. Not yet satisfied with this stupid farce, Ms. Glenn then submitted an interlocutory appeal to the Board of Appeals, in which she made up even more new baseless allegations, this time about financial exploitation. As can be seen from [Ex_GlennAppeal], she is indirectly alleging that I was spending \$6000 per month taking care of her at home, paying for her private insurance and two live-in caregivers, and sacrificing my income I could have otherwise had from a regular top executive job at Microsoft or another corporation for an annual salary north of \$250,000, all for the purpose of financially exploiting my mother's paltry \$300 per month pension from India. The fact this clown is qualified and allowed to practice law in the Bar of the State of Washington can only be seen as an incredibly terrible embarrassment for all legal professionals in the state. At least, she successfully manages to undermine all credibility for all her pleadings and prove she is an absolute joke, just like the "Adult Protection Services" she is representing. One should ask Omana how well she likes their "protection"! She sees them as monsters! If this is not the very quintessential definition of evil state tyranny and sadistic xenophobic abuse of power, it is hard to say what is.

V. EMERGENCY PLEA TO ACLU FROM OMANA'S FAMILY TO SAVE HER LIFE

V.a) So-called "Guardian" has embezzled my money and neglected Omana; is threatening family to FINISH her off.

69. My mother has no state assistance so Paramount has no desire or interest in keeping her alive. The Guardian has already taken the liberty to send an email to my niece Sukanya in India (the original email and her response is in [Ex_EmailSukanya]) to change her from full code to no resuscitation as she has unilaterally decided that my mother, who she officially already made clear to us means less than a dog, does not even deserve to live any more. Note her arrogance displayed in the email, trying her evil best to justify killing off my mother, (after she shamelessly stole my money and does not want Omana to live any longer as it no longer suits her purposes), to my family in India:

" I did a ton of research on Hinduism.... In my research all I can find is that everything we are doing right now goes completely against her beliefs. Which concerns me greatly. Please correct me if I am wrong, being Hindu, life should not be prolonged artificially. We are doing that because we feed her through a feeding tube. , I know per Hinduism Jay has the final say, but that is no longer the case. I have the final say. His opinions are just his opinions. I worry that he has kept her in this condition for so long because it some how serves a purpose for him, whether he can get money from family claiming to be caring for her, or getting money from you to save "her" I don't know what his reasons are, but they are not based on what is in her best interest or what aligns with her faith..... Please note my court orders allow me to make this decision on my own. I don't technically need to have anyone else's permission." She continues in another email to me "You cannot speak for your family in this matter. I need THEM to tell me what THEIR decision is. That is all I need. Nothing else you have to say matters"

70. In the original negotiations [Ex_EmailMcBroom] and the court settlement, it was made very clear that the decision to change her code status will lie with the family. Ms. Copeland unilaterally determined that my mother's life is not worth prolonging, and filed a POLST changing her from full code to NO RESUSCITATION [Ex_POLST] despite staunch and vehement opposition from son and family in India [Ex_EmailSukanya] and a direct video plea for MERCY from Omana herself humbly pleading with Channa to kindly let her live [Video1]. Channa has decided that the guardianship give her right to play God. She treats our family as if she if were our Parole officer and we're parolees.

71. These words and actions including criminal theft prove Ms. Copeland is absolutely NOTHING more than a psychopath using the veil of guardianship for stealing her wards' assets and for other nefarious purposes such as gloating on social media using this as a publicity stunt. She has never met with Omana with her family even once in five months [Ex_Email6] since being appointed as her Guardian despite multiple repeated requests from my family (as Omana can confirm through me or any interpreter that is familiar with her Dysarthria, such as her speech therapist Dinesh Kannada or my sister Rajakumari or any one of her friends that she knows and trusts) or heard her requests and issues; which is ample proof she does not take guardianship seriously or as anything more than a way to inflate her ego and to steal money from her wards and their families as seen from [Ex_Email5] and [Ex_Wire].

72. As is clear from [Ex_EmailMcBroom], the only reason for the settlement where the family accepted the Guardianship was the lure of citizenship status and Medicaid for Omana, so the son can offload the huge financial burden of private insurance (Molina that I paid out of pocket, \$1100/ month) and private live-in CNA caregivers [Ex_KarinaCerts]. Not even Adult Protection Services had any other allegations against Mr. Nair other than failure to ensure qualified caregivers (though it is false as I used a regulated site [Ex_CareMem]) and also Hon. Judge that approved the settlement order had appreciated Mr. Nair's love and caring for his mother on record, and getting Medicaid through Citizenship was a perfect solution to keep her happy at home while maintaining highest quality care. Therefore I immediately delivered all my mother's legal documents to Ms. Copeland. However, Ms. Copeland did not even initiate the N400 citizenship application even after 6 months, and has been evading it asking for irrelevant documents while also maintaining that she has not even started to look for an immigration attorney [Ex_EmailChanna7]. This is in total CONTEMPT of the court order and the settlement, and thus the Nair family and Omana feel TERRIBLY BETRAYED.

73. Ms. Copeland is unfortunately either completely apathetic to guardianship responsibilities (considering it only as a joke) or simply "acting dumb" to evade performing her legal duties, as some of her emails belie incomprehension beyond human imagination [Ex_EmailChanna6]. For example, she claims to believe (from speaking with Roger) that my mother's Urinary Tract Infections, medically diagnosed as repeatedly caused due to the Extended Spectrum Beta Lactamase infection that she contracted at Paramount (this infection is common among nursing patients where hygiene is lacking, and has turned drug resistant due to recurring infections from a complete lack of hygiene), is due to me adjusting her bed when I visit (which I have never done: also I am a noted inventor for paralyzed patients, and I bought Hoyer lift and hospital bed at home for her) and giving her daily Chai (!!) and even has the gall to tell me to stop giving her Chai (the only daily pleasure she still had left from her life previous to stroke) to control her UTIs ??? (I assure you she was not trying to make a joke). She has no interest in getting Omana proper care or applying for her citizenship (the only reason Omana and her children accepted the guardianship settlement offer from DSHS).
74. She has made my mother miss CRITICAL Doctor appointments for her pain management from severe leg cramps, such as the trip on March 21 to Dr. Julie Hodapp for her regularly scheduled Botox injection, without which she has since been in constant excruciating pain and moaning throughout night unable to sleep from very painful leg cramps - she has been in constant agony simply only due to Ms. Copeland's irresponsibility in not being available at her appointment time to provide consent to the Doctor (and I was no longer eligible).
75. Ms. Copeland did not even bother to reschedule the appointment either and ignores any questions on her medical care. To date her only medical related messages to our family have all been requests for our cooperation to "let Omana die" at the earliest. [Medically, Omana is stable and with proper care she is able to live several years happily and contentedly at home.] She even changed the POLST to No Resuscitation ordering to us "I am now the head of household, I decide her fate" in emails. She even ignored Omana's own mercy plea to let her stay alive [Video17].

V.b) Urgent, immediate action needed to move her to safe place that she can get proper medical care

76. My mother's life is in grave danger as she has not had any contact with family in over 12 days, whereas she is dependent on us for emotional support. She was running a fever and we have not had any updates since then. We don't know if she is alive or what her condition is. She must be incessantly calling for her son and in extreme agony and helplessness as she is a completely paralyzed quadriplegic yet articulate in Malayalam to detail her misery. She is unable to communicate with anyone at Paramount and completely isolated. She was just discharged after having been admitted to Harborview medical center after I found her in a coma when I visited and asked the nurse to call ambulance. But for my visits and efforts, she would have already been dead on at least five separate occasions where I found her unresponsive and bathed in her own excrements. She does not deserve this fate one bit.
77. My mother is neither an alien from another planet, nor worth less than a dog. She is a sick human lady with basic rights that her so called "Guardian" has absolutely no interest whatsoever to preserve or even want to know about. Her only involvement in this matter to-date has been stealing our \$12,000 cash from bank, putting mom in a God Forsaken shelter for homeless, asking to put her on no resuscitation, and then making her miss the most critical Doctor's appointments for pain management as she was too busy looking good. It did not matter to her ONE BIT that Omana would be writhing for months in unimaginably crucifying pain if she didn't get the Botox injection. Surely though she would have made herself available had it been an injection at the Vet for her dog?
78. My mother is highly intelligent, coherent, articulate and STILL able to do math faster than the idiots accusing her of being a vegetable, a fact she has proved again and again to anyone who cares to ask. She has made it clear to Dr. Janice Edwards, a psychologist that evaluated her [Ex_DrEdwardsReport], that she is totally cogent and alert. She quickly answered multiplication qns (50 x 11?), a general knowledge quiz, and also gave a lot of intricate details about her past, her passion to live at home, her love for family and son, and proved she can hold a conversation.

79. To any reasonable human being reading this narrative and examining facts, it is clear that Omana should be immediately moved back to home, and those responsible for her plight, being taken from a happy loving home to die in a homeless shelter isolated and always completely covered in poop and vomit, should be held **CRIMINALLY** accountable by RCW 74.34.053. If officers employed by the State and its lawyers are allowed to wantonly commit perjury with impunity, how can it even be possible for the public to have any trust on the integrity and credibility of the court system? What crime did Omana do to be devoid of all her happiness and peace of home in her final days?
80. Therefore the NAIR family is unanimously requesting the expedient action of your esteemed office to investigate the gross criminal neglect of NOT ONLY OMANA but also the filthy and inhumane conditions in which helpless, poor vulnerable inhabitants (especially women) that have nowhere to go are housed at Paramount and SYSTEMATICALLY abused and neglected to die by perverts like Tedlaw and Roger. This report is praying for your prompt action to stop the torturous murder happening to Omana and others like her; to uncover the MOST EXTREME & HEINOUS human rights violations going on at Paramount Shelter into public conscience and to immediately save her and other inhabitants from this most disgustingly hideous fate possibly conceivable for an human being (this place is flying under the radar by silencing or trespassing any whistleblowers, and the management runs it like a prison)
81. My mother is paralyzed and locked in with her abusers and tormenters she is absolutely most terrified of and cannot speak her language, with no access to family (or anything she loves, even a laptop to play some music was taken away, it seems Paramount is on a mission to torture Omana) and in most harrowing leg pain (a gift from Ms. Copeland through DENYING her Botox or regular physical therapy to relax muscles, as confirmed by Dr. Junn and Dr. Hodapp - all agreed it was irresponsible to make her miss her pain injections she needs to live) and covered in her own excrements. As [Ex_AbusePictures] show, she also shows signs of sexual abuse like broken lips, and is most incredibly desperate to escape from this unbelievable trauma she repeatedly calls hell in the videos [Video_Hell]. All this when she has a loving home and family waiting for her (but not allowed to make contact).
82. This evil farcical charade from APS is beyond the most cruel travesty humanly imaginable, and she is begging for her life !! Please help us save Omana's life by moving her home from this hell as she calls it repeatedly on video. She has not met with us for 12 days and we are most afraid about how she is doing at this time, or if she is even alive as the guardian is completely apathetic to the family and simply waiting for her to die though she is medically stable and can have several good years at home if she is taken care of. In the two years since her stroke she has made a near miraculous recovery at home of her speech and was well on course for a long meaningful life she loved. But these evil monsters have put her through an incredible regression and are threatening to finish her off after emptying our bank account and stealing our \$12k money. Her skin has broken through in several places in severe neglect.
83. The lessons from Omana's experience should be used to revamp and restructure DSHS/APS, and to immediately trim useless, dishonorable, parasitic "fat" such as Mr. Wilson, Ms. Glenn and others who are responsible for her plight. It has become blindingly obvious that the overfunded DSHS/APS has not simply overextended but actually 180 degrees reversed its mandate; and become a "white elephant" posing a huge risk to the life and safety of innocent elderly and their loving families, most ironically at the expense of the very same said families' tax payments. Their incompetence and overzealousness do exponentially more harm than good to innocent victims like our family, since under pressure to "find and rescue vulnerable adults" and too much resources and time allotted that must be spent to stalk and harass them (and their innocent loving families already working incredibly hard to take their best care.)
84. The State owes an explanation to its people for Omana's tearful story and the lawmakers must take expedient steps to ensure that the disabled seniors and their families are protected from such Draconian harassment: through new legislature that makes it a felony for state representatives to deliberately make false allegations against innocent people. The abuse of the legal system that has resulted in an innocent old woman who was making a great recovery from stroke at home and loving life, to currently being tortured in the most dreadful way possible, is a dreadful and unforgivable failure. Omana did not do any crime to deserve to have everything she loves taken away when she

already was in a very sad situation and suffering from depression from stroke. She has lost all will to live from this evil. This matter requires international attention and outcry to save her and to obviate such travesties in future.

85. Omana is in the USA to be with her son, out of love as a devoted mother. Otherwise, she has no reason to even be in this country in the first place?! We feel like "bait-n-switched" into accepting an unnecessary "guardian", who has treated our family like dirt and has done everything possible to make all of our lives including Omana's foremost as miserable as possible for no fault of ours. Her unbelievably steep decline in health since the takeover is ample proof!

Affidavit

The foregoing is a true copy of the complaint I submitted on behalf of my mother, who is being held in illegal confinement and disallowed all family contact and neglected in her excrements (attached pictures, we also have dozens of her testimonies) to accelerate her death, to American Civil Liberties Union via their website on May 20, 2019. A packet containing a set of 59 attachments have been mailed via certified USPS to Ms. Michele Storms, Executive Director of ACLU's Seattle Chapter. Roger, the administrator at Paramount Shelter has trespassed ALL visitors for Omana for documenting her negligence and taking photos, citing HIPAA as a lame and incorrect excuse.

Specifically, the family of Omana is requesting the following:

1. A thorough Inquiry into this malicious abuse of the Draconian APS setup that has most severely harmed all of us, not only Omana. She had no reason to go to a homeless shelter while staying at a 6 bed luxury home with family.
2. Ensuring Omana is provided adequate medical care; so her therapies and critical pain injections are ASAP resumed.
3. Ending the systematic abuse, rape and neglect being perpetrated on the completely helpless, vulnerable, poor and homeless residents at Paramount Shelter by perverted hooligans like the administrator Roger and Tedlaw. It is not a coincidence this place looks and is managed like an abominably filthy hood hole. No human deserve such conditions.
4. Criminal charges per RCW 74.34.053 to be brought against those responsible for hurting my family, destroying my reputation as the Chief Operating Officer of a valuable biotech company with exclusive tie-up with Johns Hopkins University, and Omana's crucifying agony in being denied Botox injections, visits from family, or even a cup of tea.
5. A discreet way for Omana to provide a live testimony in presence of her children about her abuse and neglect to the investigators, but such a testimony should only happen after her safety has been ensured first as the suspects have every reason and ability to terminate Omana and make it look natural if they do not want her to talk again. She is terrified and 100% under their mercy at present and so she and her family are literally scared for her life.

Update on 06/03/2019: The guardian has arranged a video call to confirm my mother is alive to my family in India, so my sister Ms. Rajakumari Susheelkumar will be flying to Seattle this week to bring our mother back to our home. The guardian has fortunately agreed to release Omana from Paramount with Rajakumari once she reaches Seattle. Therefore we hereby request a complete enquiry into this Fiasco by taking Omana's testimony after her safety has been ensured by meeting with Ms. Rajakumari, myself and 4 other members of our family; all of us are here only to take care of Omana most lovingly at our home; and to make sure her pain and tears from her inhuman isolation and torture is alleviated. Though our first priority is to save Omana's life, bringing accountability for our losses and suffering is also germane to obviate repeat of such travesties of APS' Jeddart justice again to more innocent lives. Please help my mother's return home so she can be happy and loved for her remaining days as she is pleading here:

https://www.youtube.com/watch?v=H2bRE_ZSItU&t=27s

Omana's completely unnecessary nightmare situation from State Tyranny is a **SHAME** to all civilized Americans. Kindly spare a thought to fathom helpless Omana's state of mind at this present moment?!. Thanks and God Bless.



Jayakrishnan Nair MS, MBA

Original : May 20, 2019

Update: June 03, 2019

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