

From
Jayakrishnan K. Nair
11031 Elliston Way NE
Redmond WA 98053

To
Channa Copeland, nee Carsey
1602 Riddell Ave
Orting WA 98360

Date: 7/26/2019

VIA U.S. CERTIFIED MAIL

Sub: Demand for preservation of evidence and to cease and desist from further infliction of emotional distress.

Ref: Guardianship Case# 18-4-05231-6 SEA;
Attempted Murder Criminal Case # 19-243177

THIS IS A LEGAL DEMAND LETTER AND MAY AFFECT YOUR LEGAL RIGHTS AND/OR THE RIGHTS OF THE OFFICERS/ DIRECTORS OF THE COMPANY ALLEGED HEREIN. PLEASE FORWARD TO THE APPROPRIATE PARTY FOR IMMEDIATE RESPONSE. THIS LETTER IS FOR PURPOSES OF CONTAINING THE DAMAGES OF YOUR ILLEGAL ACTIONS BY INSTRUCTING YOU TO CEASE AND DESIST, AND IS NOT ADMISSIBLE IN COURT FOR ANY PURPOSE(S).

Dear Ms. Copeland:

This is to inform you that a lawsuit has been commenced against you in US District Court of Western Washington by the children and immediate family of Mrs. Omana Thankamma (hereinafter, the "Family"), as you have ignored all our pleas to stop the most atrociously evil treatment of our mother who is being held in isolation, after we saved her from the certain impending murder on June 12 that you had condemned her for.

General Background Information:

- 1) Mrs. Omana Thankamma is a citizen of India that holds 10-year multiple entry visa to the United States, which she originally received in 2/2002 and renewed in 2/2010 to be valid until 2/2022. Her only connection to USA and reason to visit the country has been the desire to visit and spend time with her only son, Jayakrishnan Nair (*a.k.a. Jay*), a permanent resident of USA, and a biotech and real estate entrepreneur. He had immigrated to USA under the EB-2 merit based category through completing two masters degrees in computer science and business administration from University of Massachusetts and University of Washington, and then getting his green card sponsored through Microsoft Corporation where he worked for over 7 years in senior roles.
- 2) Ms. Thankamma had completed 11 successful trips to the USA, all under 6 months each, in the period from 2002-2014 when on the 12th visit she was unable to return due to a stroke that paralyzed her body

waist down. She however retained all mental faculties and her advanced mathematical competence (she had retired after working for 35 years in India as an accountant in a public services company).

- 3) Ms. Thankamma also has a step-daughter Ms. Rajakumari Susheelkumar (*a.k.a. Raji*), an officer in a leading Daily newspaper in India (www.mathrubhumi.com) who has been visiting her since 2012 and helping Jay in taking care of her. In addition to himself as the primary caregiver staying at home (he left his corporate job to be able to take care of her at home), and the occasional help of his sister visiting from India, Jay also hired a CERTIFIED CNA named Ashley Redican. The household was also inhabited by a live-in maid/housekeeper named Alexandra Hall hired for helping the Nair Family.
- 4) On March 12 2018, an incident occurred wherein Ms. Hall went to a neighbor to borrow a blender on her own volition, which had nothing to do with either Mr. Nair or Ms. Thankamma. When Mr. Nair left his home that morning both Ms. Redican and Ms. Hall were present at home as they have declared in their statements. However, on the basis of this completely insignificant and trivial "incident", Mr. Nair was charged with a misdemeanor charge of "abandonment of a vulnerable person in the fourth degree".
- 5) DSHS officials abused this non-incident and pending case to deceive Commissioner Judson with several baseless and fabricated allegations to get a VAPO against Mr. Nair and take custody of Ms. Thankamma and to force Mr. Nair to accept a settlement that introduced a third party Guardian, Ms. Copeland.
- 6) The case against Mr. Nair was dismissed on July 11, 2019. The only reason the frivolous case remained open thitherto was due to the unethical and illegal pressure from DSHS on the prosecutor Ms. Maberly.
- 7) Ms. Copeland had placed Ms. Thankamma in a homeless facility that is not equipped to take care of Mrs. Omana. The staff removed her urinary catheter as they were not trained on how to use it, despite the fact that Ms. Thankamma had safely used the catheter for over two years at home.
- 8) Ms. Thankamma was making a miraculous recovery from stroke and had been enjoying a life where she interacted with friends and Family, had three or more visits from therapists (speech therapist, occupational therapist, physical therapist) at home per week. She was able to speak to her Family in India on a daily basis, visit Temples and places of interest with her son, and was happy and peaceful.
- 9) After being taken to Paramount Shelter home, all her therapies were stopped. She was no longer receiving pain medication, botox injections, stretching exercises for her legs or massages, as she had been at home. This led to her constantly moaning and crying in pain, and requesting Ms. Copeland to meet with her so she can discuss her concerns. Ms. Thankamma only can communicate in her native tongue Malayalam, and due to Dysarthria from stroke she needs one of only three people who can understand her slurred speech from her medical condition - her speech therapist Mr. Dinesh Kannada or either of her children - to be able to communicate and understand her.
- 10) Ms. Thankamma had a psychologist evaluation by Dr. Edwards in which she made it clear that she considered the ONLY purpose of her existence was to love and be loved by her Family, and that she wanted to spend every second of her remaining life with her son as she loved him so much. Dr. Edwards wrote in her report that Ms. Thankamma is a cogent individual fully capable of holding a conversation.

- 11) She even answered general knowledge questions (who was the previous president of USA? how much is 50x11?) and questions to test her knowledge of the legal proceedings, to which she categorically responded that she did not want or trust anybody other than her son as her Guardian.
- 12) Despite being aware of all the above, Ms. Copeland never tried to meet with Omana even once so she can communicate and appraise her life threatening issues and her desires to her new "Guardian". Instead she has stubbornly resisted all efforts from Family for an initial meeting in presence of someone who is familiar with Ms. Thankamma's Dysarthria. On one occasion Ms. Thankamma reported that Ms. Copeland had made a comical effort to use a Malay interpreter to communicate with her, being clueless to the fact that Malayalam and Malay were two entirely different languages like chalk and cheese.
- 13) Mr. Nair visited his mother everyday at Paramount and was shocked to find that almost everyday she was left in a pool of vomit and stool and in tears. She constantly pleaded with him to take her back home and that she was dying there. All her vitals were declining and she was sinking like a stone since being moved to the "facility", and all the years of progress from diligent therapies were getting lost.
- 14) On multiple occasions, Mr. Nair apprised Ms. Copeland of the terrible difficulties his mother was suffering at Paramount and sent her several emails with photos of abuse and gross neglect, and also direct pleas from Ms. Thankamma to save her life. Ms. Copeland was not only apathetic, but also did the unthinkable - she forwarded this information to one Roger, an administrator at the facility, to trespass Mr. Nair from visiting his mother for taking photos of her neglect (by incorrectly alleging HIPAA violations as a NAKED attempt to stop Mr. Nair from documenting his mother's slow murder).
- 15) To top it off, Mr. Nair also found to his petrified chagrin that Ms. Copeland had abused the court order to steal about \$12,000 from HIS Bank of America account that he had used for 17 years for handling personal finances and had nothing to do with Mrs. Thankamma other than having added her as a joint account holder to facilitate transactions. Mr. Nair showed conclusive proof that all the money in the account belonged to him and was wired from another account he owned 100%, and that he would stand to lose over \$400,000 in his real estate portfolio as this amount was earmarked for critical legal expenses that cannot wait. However, Ms. Copeland's theft caused exponential losses and mental anguish to Mr. Nair, in addition to finding out that she has also irretrievably maligned and destroyed his reputation with lies to the bank employees at Redmond Ridge bank where the account as closed.
- 16) As an entrepreneur managing assets in hundreds of millions of dollars, reputation is more valuable than his own life to Mr. Jay Nair, and Defendants' actions have destroyed his most valuable asset on which his success centers on.
- 17) Ms. Rajakumari returned to USA on June 12 2019, and upon visiting her mother at Paramount, she was absolutely horrified beyond words to see that her mother had been abandoned to die, completely covered in vomit and excreta, and was in a coma and not responding. Her hand was covered with cloth and upon removing, Ms. Raji nearly fainted at the sight - her mother's hand was completely scalded from what looked like some psychopath had poured boiling water on her paralyzed hand.
- 18) Ms. Raji screamed in agony and asked the staff to call ambulance, but was told the Guardian had changed her code and instructed her to be on NO RESUSCITATION, and therefore they were waiting for

her to die as the Guardian did not want her to receive any medical attention. Ms. Raji's efforts to get medical attention for her dying mother, with a burnt hand and in coma, were ignored for nearly an hour, until she contacted her brother and together they were able to get her to ER at Harborview.

- 19) At the ER, the doctors advised that she was very close to death and it was a miracle if she survived. Her blood glucose has always been around 400, whenever the paramedics checked her at the facility. Showing she never received insulin or any critical medication at this shelter home.
- 20) She was stabilized with insulin at Harborview and her blood glucose has returned to normal. She was saved from certain death by her daughter, after her son was stopped from visiting and saving his mother from murder as conspired by the same criminals that was put on charge of looking after her.
- 21) However, on July 5th, as she was visiting Omana, Ms. Raji was told by her charge nurse that the Guardian had once again asked the staff to stop all visits from her family, including both children, on the pretext that Ms. Raji had dropped something suspicious on her food. Although both her children protested that their mother cannot survive without seeing her children as that is her motivation to live and also that she was psychologically dependent on them for support, Ms. Copeland while being aware of this fact is trying to use it to prevent Ms. Thankamma from providing testimony of her sexual abuse at Paramount and the neglect of her Guardian. Ms. Raji is innocent of any such wrong doing.
- 22) Harborview Hospital owns Paramount as a subsidiary and therefore has a vested interest in silencing Ms. Thankamma, as does Ms. Copeland. This is obvious given that they wish to avoid the strict liability on her exposed murder attempt (on which Ms. Raji has filed a criminal complaint with Seattle Police) and the details of her suffering and abuse.

Legal Contentions

Based on the undisputed facts, record trails of communications, testimonies of third parties as well as heart rendering digital testimonies from Ms. Thankamma herself of her incredible suffering from abuse and isolation from family, we have every reason to believe that at the very least, the following serious violations have occurred/ recurred and are still happening as of date: systemic and pernicious violations of our family's First and Fourteenth amendment rights, right to familial association, right to procedural due process, and right to not be discriminated based on national origin or race per US Code Title 42, Chapter 21. Moreover we have also been deprived of our fundamental rights to family integrity and deprived of property and freedom.

Equally importantly, we believe that examination of the evidence and testimonies by a Federal Jury will prove that the defendants had engaged in a devious conspiracy to commit murder through intentional negligence at Paramount "Nursing" Home, which was not qualified to treat or hold Ms. Thankamma. At least two of the defendants or their agents demonstrably wanted to accelerate Ms. Thankamma's death and make it appear through natural causes. To prevent family from saving/rescuing her, Ms. Copeland in conjunction with the murderous criminals at Paramount have plotted to abuse her powers as a Guardian to keep her in isolation, despite knowing fully well how catastrophic it would be to her physical and mental health, and only for the nefarious purpose of facilitating the murder of a paralyzed and helpless woman entrusted to her care.

Other matters to be investigated and brought before the Jury will include the well supported allegations of Abuse of Process, Financial Exploitation and Fraud, Defamation and Libel of an upstanding & Erudite member of the community, Abuse of Power, & Intentional Infliction of Emotional Distress on all members of our Family.

DEADLINE TO RESPOND

It has been almost a month since Omana has been allowed any visits or meeting with her Family, and no information has been passed to the Family either by the Guardian or Hospital staff, leading to incredible mental anguish for us, which it can only be imagined how cruel Ms. Thankamma's condition would be in isolation, as she is someone who is eager to be with her children for every waking moment to be able to survive. Therefore we DEMAND that Ms. Thankamma's whereabouts, condition and details be IMMEDIATELY updated to her children, and to confirm that her Family can meet her anytime and spend as much time with her as she desires, without any unnecessary restrictions as per her Federal visitation rights (by email: jknair@gmail.com).

Unless children of Ms. Omana Thankamma is given the opportunity to meet with her and ascertain her condition **on or before August 5th at 5:30 pm**, we may also be forced to file a writ of Habeas Corpus next day.

DUTY TO PRESERVE EVIDENCE

Finally, we request that you and your agents/representatives take all steps to preserve all potentially relevant documents, evidence, writings, internal memos, surveillance video from Floor 3 on or about July 4th, and all other information that may potentially be relevant to this matter and to prevent the intentional or accidental deletion or spoliation of any evidence that in any matter relates to this case and allegations within.

Any accidental, negligent, or intentional deletion or spoliation of evidence will be dealt with accordingly.

Please RESPOND before the deadline above by email: jknair@gmail.com, or phone: 347 746 2470, so Ms. Thankamma's severe emotional distress and mortal risk from succumbing to her anxiety and panic at her illegal isolation can be ended and we can be reunited with our mother at the earliest. Failure to do so will further imperil your interests and will certainly galvanize us into pressing for every legal action available to us for justice. Please have **NO doubt** that the Family is absolutely committed to holding you (and your criminal cohorts like Roger) **accountable for our mother's tears to the fullest extent of the law**. It will behoove your own family to make sure you stop messing with ours and not try to pry us apart, as we take our mother's pain very very seriously. Please make sure there will be no further restrictions in our right to visit our mother, without Fail.

Thank you.

Respectfully,



Jayakrishnan Nair