

1 IN THE KING COUNTY SUPERIOR COURT
2 FOR THE STATE OF WASHINGTON

3
4 In the Guardianship of:) CASE NO. 18-04-05231-6 SEA
5)
6 Omana Thankamma.) PETITION TO TERMINATE GUARDIANSHIP
7)
8 An Incapacitated person)
9)

10
11 **I. RELIEF REQUESTED**

12 COMES NOW plaintiffs Jayakrishnan Nair (hereinafter, "Jay", only son of Omana Thankamma,
13 Alleged Incapacitated Person and Citizen of India who became incapacitated from strokes while visiting
14 Jay in the USA), Rajakumari Susheelkumar ("Raji", only daughter of Omana), Jayakumar Nair (only
15 brother of Omana), and Sukanya Susheel (only grandchild of Omana), who in unison are empanelled to
16 speak for all Omana's close relatives & family, herein most respectfully request this Most Venerable
17 Court to decree the involuntary guardianship imposed on Omana Thankamma, as null and void ab initio,
18 and to order Molina Healthcare Inca. to reinstate her private insurance so she can receive the Botox Pain
19 injections for her leg cramps, care for her right eye currently losing vision from lack of follow-up care to
20 a Glaucoma surgery, as well as restart her speech, occupational & physical therapies and continue her
21 care as before at home. Furthermore, Plaintiffs request their assets marshalled by guardian and
22 Harborview, to be returned to them; and also for Omana to be moved to a hospital or skilled nursing
23 facility within 25 miles of Jay's home so he and rest of family can visit her without restrictions.
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II. STATEMENT OF ISSUES

1. Should the Court terminate the guardianship as volumes of medical records of Glucose levels, metabolic tests, lipase tests, blood panel results, eye witness testimonies from several family and friends, and Omana's own statement that shows the guardian had attempted to murder her through withholding of Insulin and other critical medication as she had no money for her care? (Yes)
2. Should the Court terminate the guardianship imposed on Omana on the basis that she had not consented to having a guardian per her [Ex_1] declaration to Court, in violation of RCW 74.34.067(7) that clearly states that AIP has a statutory right to refuse protective services (as she exercised)? (Yes)
3. Should the Court terminate the guardianship in accordance with RCW 11.88.120(1)(b), which conclusively states that when the needs of the AIP are not being served by the guardianship (as is obvious here), and a less restrictive alternative like a Power of Attorney is better suited as in this case, the Court shall always choose the less restrictive option? (Yes)
4. Should the Court terminate the guardianship for good cause shown per RCW 11.88. 120 (2)(c)(i) that shows the guardianship is not in the benefit of the alleged incapacitated person (AIP)? (Yes)
5. Should the Court terminate the guardianship because it infringes on Omana's travel rights to her home country as guaranteed by her B1/B2 visa and bilateral ties with India? (Yes)
6. Should the Court terminate the guardianship because it infringes on Omana's and her family's constitutional and civil rights (42 U.S.C. §1983), as well as the right to exercise Hindu religion? (Yes)
7. Should the Court terminate the guardianship for good cause per RCW 11.92.190. according to which Omana cannot be detained against her will as she currently is for the last 56 days? (Yes)
8. Should the Court terminate the guardianship as cause exists per RCW 11.92.160, for guardian's failure to file account or report to Family members despite their request per RCW 11.92.150? (Yes)
9. Should the Court terminate the guardianship because, Omana's timely opposition against using Dr. Janice Edwards for the mandatory report per RCW 11.88.045(4), which she had promptly expressed through Family's attorney Greg McBroom (his emails to Dr. Edwards strongly opposing and disallowing

1 her evaluation are noted in the opening of her report) was ignored in clear violation of RCW

2 11.88.045(4), as Omana had preferred to use her PCP Dr. Seema Diddee MD for the same? (Yes)

3 10. Should the Court terminate the guardianship as cause exists per RCW 9A.56.010, (1), (5), (10,
4 (11), (19) through 23(b) given that the Guardian has embezzled funds to the tune of \$10,500 from Jay's
5 personal funds in Bank of America account ending in 3880, as well as confiscated two of Omana's Dell
6 Inspiron laptops and two Motorola Cell phones each? (Yes)

7 11. Should the Court terminate the guardianship as cause exists per guardian's failure to respect
8 AIP's right to associate with persons of her choosing per RCW 11.92.195? (Yes)

9 12. Should the Court terminate the guardianship as cause exists per guardian's failure to apply for a
10 protection order from Court within 14 days of placing an arbitrary restriction between AIP and family
11 members qualified under 11.92.150, as stipulated by RCW 11.92.195 (c) (iii)? (Yes)

12 13 14 **III. EVIDENCE RELIED UPON**

15 About 50+ Declarations and Exhibits filed with the Federal Civil Rights Complaint Attached Herein.

16 17 18 **IV. STATEMENT OF FACTS**

19 Omana Thankamma is a 77 year quadriplegic that was staying happily and contentedly at her
20 son's home in Washington where she had him as the primary caregiver, a certified live-in CNA (Ashley
21 Redican) a live-in maid (Alexandria Hall), a visiting respite CNA (Karina Conspicion) and three therapies
22 each week of Physiotherapy, Speech Therapy and Occupational Therapy from Providence Health
23 Services. In addition, she had an active social & religious life and was doing better than prognosis.

24 She vehemently opposed all efforts from Adult Protection Services to place her at a different
25 facility as she thoroughly enjoyed staying at home with family. especially due to the language barrier
26 and the fact that she could only communicate in Malayalam with those familiar with her Dysarthria.
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1 Family agreed to appointing a guardian only under certain conditions that were thought to be
2 favorable to Omana, such as naturalization and Medicaid, and getting unrestricted access to her family
3 by being placed at a Skilled Nursing Facility within 25 miles of Jay's home.

4 However, the DSHS-appointed Guardian Channa Copeland has completely been a disaster. She
5 has failed to initiate her naturalization application, and has dumped Omana into a shelter home not
6 equipped take care of her as she did not have the money to pay for her insurance or Medicaid coverage
7 that would have enabled Omana to be at a Skilled Nursing Facility as was promised to her family.
8

9 After Jay, Kavesh, Hariprasad and all other family and friends in USA that visited Omana at
10 Paramount Shelter for Homeless unanimously complained to Guardian about her pathetic condition
11 being left for hours in vomit and excreta, the Guardian blocked all access to her and kept her in isolation.

12 Raji flew in from India to check on her mother and went to Paramount on 6/13 to see her hand
13 having severe inflammation injuries consistent with bullosis diabeticorum, and was drenched in dry
14 vomit and left to die. She was having a high fever and was delirious. She was moved to Harborview Burn
15 ICU after a lot of insistence with the staff that had been asked by the guardian to let her die.
16

17 After Omana was stabilized with Insulin at Harborview, Raji and Jay filed complaints with DSHS
18 and Seattle Police about their mother's attempted murder on July 3d. On July 5th, as they were visiting
19 their mother as usual, they were told that they would not be allowed to visit again on a completely
20 baseless allegation of a "floating substance" that was "thrown away" previous night in her food after the
21 children had left for the night. The alleged substance suspiciously was not preserved for evidence.

22 As of date of filing it has been 56 days since anybody from Omana's family has even been
23 allowed a phone call to her. She is being held in illegal isolation only with the view to accelerate her
24 death through the most inhuman, cruel and evil murder modus operandi of illegal solitary confinement.
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V. TIMELINE

1
2 2/2002- Omana gets her 10 year Visa to visit Jay studying for his masters at Massachusetts. They move
3 to Seattle after Jay gets hired by Microsoft in 8/2003. She visits every year for 6 months, never
4 overstayed her I-94, then renews her B1/B2 for another 10 years in 2/2012. [Ex_ D25 at Docket 1]
5

6
7 4/2012 - Omana's triple bypass heart surgery at Atlanticare Hospital, NJ. Jay and Raji spend 4 months
8 by her bedside after renting a house next to hospital for her rehabilitation.
9

10 4/2014 - Omana becomes disabled and unable to return to India, Jay becomes her full time caregiver
11 working from home. Next four years she stays without any problems happily at home.
12

13 8/2016- Omana suffers a second stroke during a vacation. Three months later she is flown back home in
14 a chartered medical flight, and dropped off at Jay's home by Molina. Despite now also requiring PEG
15 tube and catheter, they deny placement in a Skilled Nursing Facility. Jay is forced to hire additional TWO
16 live-in helpers and continues as her primary care provider, with 2 CNAs and a maid to help him at home.
17

18
19 3/12/2018- Maid goes to neighbor to borrow a blender, all hell breaks loose.
20

21 8/10/2018 - DSHS takes Omana into custody and keeps her at Harborview, against her wishes and tears
22 to be allowed to go back home [Ex_D08 at Docket 1: Omana's Declaration]. Jay is restrained from taking
23 her home by the VAPO, although the [Ex_D21 at Docket 1: DSHS Petition] does NOT ALLEGE ANYTHING
24 other than ONLY a mistaken allegation of hiring unqualified caregivers, which is PROVEN false as Jay
25 hired qualified caregivers [Ex_D11 & D12 at Docket 1: Ashley Redican CNA's Certificates & Resume,
26 Ex_D13 & D14 at Docket 1: Karina Conspicion CNA's Certificates and Resume] from regulated PAID sites
27 [Ex_D45 at Docket 1: Care.com membership].
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2 11/28/2018- Under the harassment from DSHS, Omana and Jay agree to an outside guardian ONLY
3 under certain conditions, most important of which is unrestricted access by keeping her within 25 miles
4 of Jay's home, and that her care and insurance will be pickup up through Medicaid, releasing the
5 financial burden of hiring two live-ins and her insurance and therapies etc from Jay's shoulders.
6

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8 Literally within hours, Jay arranges all Omana's passport and documents to be handed over to
9 Ms. Copeland. However, her reaction turns him petrified: she says she has no choice but to put her at a
10 homeless place she *"would not put my dogs in for a day"* (she has always used such words to describe us).
11

12 2/ 16/2019: After two months of no progress with the citizenship application, while frustrated that
13 Omana is continuing to suffer at Paramount ALWAYS drenched in excreta, Jay sends a very polite email
14 to Ms. Copeland [Ex_D29: Jay's Email 1 to Channa] requesting to expedite Medicaid so she can return
15 home, and also documenting her condition with pictures. Ms. Copeland replies [Ex_D30: Channa's reply
16 on 2/16] that she has forwarded Jay's email to the "facility", i.e. presumably to administrator Roger.
17

18
19 TWO DAYS LATER

20 2/ 18/2019: Jay is visiting Omana as usual at Paramount, and spending some quality time with her as
21 she had been looking forward to, when this administrator Roger (whom Jay never met before) comes
22 into the room while he is visiting and rudely asks him to hand over his smartphone. Jay politely refuses
23 to comply as the device has his personal information. He even reported the incident promptly by email
24 to Channa from within the room after Roger left [Ex 101: Channa Roger Email]. As his visit continued,
25 two Seattle Police Department officers barged into the room and escorted Jay out of the facility.
26

27 For the first time in their lives, mother and son were unable to see or make contact for the next
28 12 days. During this period, Ms. Copeland stole the \$10,500 that Jay had earned through his own hard

1 work as a computer engineer, as records prove, and closed his PRIMARY account that he had used for all
2 his billpays for his businesses. Channa keeps this money as ransom and DOES NOT report to Courts.

3 After agreeing to turn a blind eye to her fraud, Channa agrees to restore Jay's access to Omana.
4 His access to Omana is restored after 12 days. From 03/03 to 05/05, Jay and family continues to visit
5 Omana every day for three hours at Paramount and document her severe ongoing neglect.

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8 5/6/2019: Omana was left in her excreta for five hours, and Jay had been in the room for three hours
9 with the call light on and no response. He requests the head nurse "Pauline" to witness Omana's
10 condition covered with her own stool that has soaked through and the stench is unbearable in the room.
11 Jay takes pictures in front of Pauline and asks her to acknowledge the terrible abuse.

12
13 VERY NEXT DAY

14 5/7/2019: Jay is assaulted by an African American male "nursing assistant" named Tedlaw, for Jay
15 questioning his inappropriate touching of Omana's breasts. Jay sustains several injuries and bruises and
16 held in false arrest for trying to "record Tedlaw's crime using his phone". He was released an hour later
17 but again trespassed from visiting his mother.

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19
20 5/12/2019: Jay is able to restore his visits through the help of his attorney. However, the harassing
21 behaviour at him and the neglect continues and he is not able to witness this silently any more.

22
23 5/20/2019: Jay submits a detailed complaint to ACLU's website about their mother's condition, as well
24 as local authorities [Please see Declaration of Jayakrishnan Nair at Docket 1, Addendum 2].
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1 5/26: Family relative Kavesh Sharma visits Omana to find her covered with vomit and stool, and
2 unresponsive. He insists the staff to move her to emergency, where it is found she has high fever. She is
3 stabilized with antibiotics and insulin, and returned to Paramount on 5/29. [Ex_D43 at Docket 1]
4

5 5/29: As Jay learns from Harborview that Omana is back to Paramount, he goes there to meet her only
6 to be told that the Guardian has asked Omana to be held in isolation without access to Jay or Kavesh.
7

8
9 5/30: Raji, Sukanya, Jayakumar and rest of Omana's family sends complaints to nearly a dozen
10 dignitaries to save Omana's life [Please see Declaration of Rajakumari at Docket 1, Addendum 1]. Raji
11 books emergency tickets to fly to USA to save Omana from Paramount.
12

13 6/13: She goes to Paramount as a new visitor and finds Omana's room, and is horrified to find that her
14 mother is in a state of delirium, mumbling "vedana" (pain in Malayalam), unable to open her eyes,
15 having a high fever. Her right was covered with linen, upon removing which ghastly sacs of pulp
16 consisted with scalding injuries became visible, which the staff had hidden under a cover of linen.
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18
19 After about an hour of insisting with staff that said they had been asked to not intervene with
20 her and to let her die, Raji was eventually able to get them to call paramedics and move her to
21 Harborview. The ER doctors confirmed she was not getting insulin [Ex 102: Glucose Records] and her
22 vitals were falling [Ex 103_Falling Vitals Metabolic, Ex 104_Blood Tests], and that it was a miracle if she
23 survived the murder attempt.
24

25 7/3: Raji files a criminal complaint with Seattle PD and reports this information to Dr. Hahn [Ex 105:
26 Hahn Emails] as well as WA LTC Ombudsman Ms. Patricia Hunter. Raji and Jay visits Omana every day
27
28

1 from morning to evening that Raji sits with her mother while Jay drops off and collects his sister. Omana
2 makes a spectacular recovery, provides video testimony of her abuse at Paramount, and is happy again.
3

4 7/5: After Harborview learns of the police complaint against their subsidiary, they block all access to
5 Raji and Jay. Dr. Hahn is asked by Harborview Risk Management to ask us to not visit for two weeks.
6

7
8 7/20: Jay and Raji lost all communications with their mother and after politely waiting for two weeks,
9 they contact Dr. Hahn and Harborview but they do not respond other than stating that "We understand
10 she has a Guardian", implying the decision was the Guardian's responsibility not the Hospital's. [Ex 106:
11 Flaherty Email]. When asked if that she is still alive, Ms. Flaherty did not respond.
12

13 7/26: Jay and Raji sends legal demand letters to Harborview and Ms. Copeland demanding to arrange a
14 meeting with their mother before 8/5 and asking her whereabouts and condition. They do not respond.
15 Please see Appendix C at Docket 1.
16

17
18 8/6: Guardian files for a state action seeking to restrict Jay's visits before Commissioner Judson (same
19 commissioner who had signed the VAPO restricting him from removing Omana from any facility). This is
20 after 31 days, not 14 days as the statute requires, after imposing arbitrary restrictions. In this she make
21 baseless allegations that Raji had used chemicals to produce Omana's bullosis diabeticorum and other
22 nonsensical claims which are clearly only for retaliatory and coverup purposes.
23

24 8/27: Jay reports the medical evidence of her attempted murder to Police after being able to retrieve her
25 online medical charts that clearly show she was not receiving any glucose or life saving medications at
26 Paramount, through accessing Omana's online medical account. This clear cut damning evidence can be
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1 found in Ex_102 Glucose, Ex_ 104 Blood Tests, Ex_103 Metabolic Panel etc. These records were
2 forwarded to Detective Heather Burr of Seattle Police in this email: [Ex 107: Burr Email 1]
3

4 VERY NEXT DAY

5 8/28: Jay's access to Omana's medical account is disabled [Ex_108: Login Disabled]. Jay's only access on
6 knowing Omana's aliveness is taken away, again for whistleblowing the irrefutable medical evidence of
7 her attempted murder to police. Please see second email to Ms. Burr: [Ex 109: Burr Email 2]
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10 **VI. LEGAL ANALYSIS**

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13 **Guardianship is in violation of RCW 74.36.067 (7)**

14 RCW 74.36.067(7) is very clear that an alleged incapacitated person may CHOOSE to not accept the
15 protective services from DSHS, which Omana had exercised very vehemently in her declaration to Court
16 [Ex_1]. Therefore any proceeding thereon is moot by statutory definition.
17

18
19 **Guardianship is in violation of Legislative Intent (RCW 11.88.005)**

20 *It is the intent of the legislature to protect the liberty and autonomy of all people of this state, and to enable*
21 *them to exercise their rights under the law to the maximum extent, consistent with the capacity of each*
22 *person. The legislature recognizes that people with incapacities have unique abilities and needs, and that*
23 *some people with incapacities cannot exercise their rights or provide for their basic needs without the help*
24 *of a guardian. However, their liberty and autonomy should be restricted through the guardianship process*
25 *only to the minimum extent necessary to adequately provide for their own health or safety, or to*
26 *adequately manage their financial affairs.*
27
28

1 It is clear to everyone that in Omana's case this mandate was reversed: she was taken from a well-
2 provided for home to a homeless shelter where she was abused and conspired to be murdered. After her
3 children foiled the attempt, she is being kept in solitary incarceration for nearly 60 days as of date. This
4 is the very opposite of the legislative intent as can be surmised by any reasonable person.
5

6 **Guardianship is in violation of Constitution**
7

8 U.S. Constitution clearly provides that only Congress and Federal Courts can hear matters
9 concerning the bilateral treating between United States and other Sovereign States like India, and State
10 Courts such as the Hon. King County Superior Court do not have the jurisdiction to place a custodial
11 guardianship in violation of Ms. Thankamma's travel rights governed by the bilateral treaties.
12

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15 **DESPITE MOST VEHEMENT AND REPEATED REQUESTS, PLAINTIFFS HAVE NOT BEEN**
16 **ALLOWED ANY CONTACT OR INFORMATION WITH OMANA IN 68 DAYS TO-DATE; OMANA IS**
17 **STILL IN ILLEGAL ISOLATION AND FAMILY AND FRIENDS HAVE NO ACCESS OR UPDATES.**

18 Please see Attached Certifications from Rajakumari, Sukanya and Jayakumar to corroborate this fact.
19

20 **THE MURDEROUS GUARDIAN HAD APPROVED WITHHOLDING INSULIN TO BUMP HER OFF**
21

22 Attached please find the glucose records of Omana at Paramount and then at Harborview after
23 she had been rescued by her family. showing clearly that her insulin was over 400 at Paramount but
24 immediately stabilized to 90-150 range with insulin at Harborview. Furthermore, her metabolic panel
25 test results, lipase test results and blood test details show conclusively that she was not receiving blood
26 pressure medication and other critical medication needed for survival of a patient in her condition.
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1 **MS.COPELAND IS A SADIST THAT REVELS IN HURTING OTHERS**

2 Please see attached Certifications from Omana's family Rajakumari, Jayakumar and Sukanya
3 about the outrageously harassing, cruel and aggressive behavior of the Guardian towards them.
4

5 **THE PROPOSAL TO MOVE OMANA TO INDIA WAS MADE BY THE PLAINTIFFS SEVERAL TIMES**

6 **BUT THE DEFEDANTS HAD IGNORED ALL PLEAS UNTIL HITHERTO.**

7
8 The first time the Defendant has showed any inclination towards this proposal is herein, and
9 only as a way to hoodwink this court from uncovering their serious human rights and civil rights
10 violations. There were several emails in which this was suggested earlier (please see Channa Emails).
11

12 **VAPO DOES NOT RESTRICT THE VISITS OF JAY OR ANY OTHER FAMILY MEMBERS**

13
14 A true copy of the VAPO is attached in [Ex: D20 at Docket 1]. The VAPO does not have any
15 restrictions other than removing her from a facility, and the only reason the guardianship proposal was
16 accepted was under the condition that Omana would be at a facility within 25 miles from home, which
17 clearly obviously is only for the purpose of unrestricted access to family. But for this promise, Family
18 would have never accepted an external guardian and instead certainly would have made arrangements
19 to take Omana back to India before any of this ever had come about.
20

21 **OMANA AND FAMILY HAD VEHEMENTLY ALWAYS OPPOSED THE GUARDIANSHIP ACTION**

22
23 Omana's declaration clearly shows she never wanted a guardian, a sentiment she echoed to Dr.
24 Edwards and noted in her report. Legislature is clear that when a less restrictive option like Power of
25 Attorney is sufficient, the Court shall always choose that option instead of a full guardianship. Here it is
26 clear that Omana has NO estate, and that the \$10,500 the Guardian embezzled from Jay's account is
27 Jay's BofA account is Jay's money. Therefore the natural and logical thing to do would be return his
28

1 money to him and terminate the guardianship so he can resume his mother's care with the Power of
2 Attorney and continue to take care of her happily and peacefully at their home as before.

3
4 **GUARDIAN HAD RETALIATED AGAINST JAY AND RAJI FOR REPORTING OMANA'S MURDER**

5 **ATTEMPT AND TERRIBLE NEGLECT BY STOPPING ALL VISITS FROM ALL FAMILY**

6
7 To any reasonable person examining the facts, the following dates stand out: each time there
8 has been a visitation restriction on Jay or Raji, it was THE VERY NEXT DAY of a complaint they had
9 initiated with authorities. The rest is self explanatory.

10
11 **GUARDIAN HAS AUTHORIZED OMANA'S MURDER THROUGH WITHHOLDING OF INSULIN**

12 The attached medical records of her glucose, metabolic panel and blood work is ample proof.

13
14
15 **GUARDIAN IS CONTINUING TO VIOLATE ALL OF OMANA'S AND PLAINTIFF'S CIVIL RIGHTS,**
16 **AND EVEN KNOWING THIS THE ATTORNEY IS ATTEMPTING TO DEFRAUD THE HON. COURT**

17 Contrary to what has been stated in the response, Family still has no clue about Omana's
18 condition or whereabouts. Immediately after the Defendant's fraudulent submission that they are not
19 violating our constitutional civil rights, Jay emailed Ms. Saphronia Young [Ex_111: Young emails], the
20 attorney who made the fraud submission, and asked her to follow through on her filing made under
21 penalty of perjury, to give us information about our mothers condition and whereabouts and to arrange
22 a meeting. A followup email was sent specifically referring to her response page 9 line that there are no
23 restrictions.

24
25 However, Ms. Young has failed to respond in two days, proving that the submission was in bad
26 faith and only intended to deceive the Honorable Court by covering up their client's criminal actions.

1 **OMANA OR HER FAMILY NEVER AGREED TO THE GUARDIANSHIP**

2 Ms. Thankamma and her family "admitted to agreeing to a guardianship" in so much as an
3 innocent victim agrees to sign a confession under most severe torture. Ms. Thankamma was being held
4 hostage by DSHS at Harborview, and accepting the guardianship was a Hobson's choice.
5

6 **JAY HAD NO RESPONSIBILITY TO KEEP PAYING INSURANCE PAYMENTS POST**

7 **GUARDIANSHIP SETTLEMENT (HE HAD MAINTAINED HER INSURANCE FOR 18 YEARS)**

8
9 The response states that Jay failed to pay the insurance premiums after the guardianship
10 settlement was approved by the King County Superior Court on 11/28- the main reason for which was
11 to relieve Jay from the exorbitant medical expenses of taking care of a Quadriplegic at home. Therefore
12 to say Jay stopped paying for the insurance is laughable, why else would he agree to a Guardian?
13

14 Since Omana's first visit in 2002, Jay has diligently maintained her visitor's travel insurance for
15 long 18 years without fail and paid for all her therapies and in-home live-in caregivers. The Guardian
16 had a responsibility to take over the baton and continue her care and coverage, which she failed to do.
17

18 **PLAINTIFFS DID EVERYTHING HUMANLY POSSIBLE TO ASSIST WITH OMANA'S CARE AND**

19 **NATURALIZATION, BUT MS. COPELAND'S CONDESCENDING ATTITUDE IS THE PROBLEM**

20 Yet Defendants shamelessly claim on the response that somehow plaintiffs "interfered" in the
21 defendants To any reasonable person examining the evidence, it is abundantly clear that the only thing
22 the Plaintiffs interfered with was the Defendants' plan to murder Omana on 6/13 through withholding
23 insulin, thereby saving their beloved mother's life from these psychopaths that conspired to kill her.
24

25
26 **GUARDIAN HAS NEVER INITIATED THE IMMIGRATION PETITION FOR OMANA**

27 Despite multiple requests and followups from the Family, Channa never bothered with Omana's
28 citizenship application, and has instead was of the opinion she does not need to live anymore and

1 therefore she was not going to bother with her application. This is a statement she has directly made to
2 the family, saying it is not worth her time to do so because Omana is going to "die soon". Despite these
3 communications and proofs, the response shamelessly lies that Channa had started the application.
4

5 **JAY OR RAJI NEVER HAD ANY ALTERCATION WITH ANY STAFF AT HARBORVIEW; NOR HAS**
6 **THERE EVER BEEN ANY COMPLAINTS OF "INAPPROPRIATE BEHAVIOR"**
7

8 As part of the conspiracy for character assassination attempts, guardian claims there was a
9 verbal altercation between Jay and staff, which is another figment of her imagination. As can be seen
10 from the emails to Ombudsman in [Ex 105: Dr Hahn Emails], Jay and Raji has always been most polite to
11 all medical staff at the hospital and even showered praise for saving Omana's life after being rescued
12 from her pitiable mortal condition at Paramount. They have always been very respectful.
13 The simple truth is that Jay and Raji had nothing but the most cordial of relations with all staff at
14 Harborview, until the time Dr. Hahn blocked access to Omana based on . All the emails with Dr. Hahn
15 and Harborview staff are attached herein as Exhibits 105 and 106.
16

17
18 **VII. CONCLUSION**
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20 For the Foregoing Reasons, the Honorable Court should grant the petition to terminate the
21 illegal guardianship, return marshalled assets sourced from the Plaintiffs, and for Omana's care and
22 insurance to be reinstated as was from before the guardianship.
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