

**Superior Court of Washington
For KING County**

In re the Matter of:

OMANA THANKAMMA
a Vulnerable Adult (Person to be Protected)

CHANNA COPELAND
Respondent (Person to be Restrained)

No. _____

**Petition for Vulnerable Adult
Order for Protection
(PTORVA)**

1. Identification of Petitioner:

My name is (please print):

Jayakrishnan Nair.

- I am a vulnerable adult filing on my own behalf.
- X I am filing on behalf of a vulnerable adult, and (select one of the options below):
 - I am the vulnerable adult's guardian or legal fiduciary.
 - [X] I am an interested person as defined in RCW 74.34.020(12).
- DSHS petitions on behalf of the vulnerable adult who:
 - Has consented to this petition.
 - Lacks the capacity or ability to consent to this petition.

2. Respondent's relationship to the vulnerable adult is (check all that apply):

- Spouse or former spouse.
- Parent of a common child.
- Current or former cohabitant as intimate partner.
- X Other Family Member (describe):
Son.
- X Care Provider.
- Guardian.
- Trustee.
- Payee.
- X Power of Attorney. [Exhibit 9]
- Other: _____.

3. The vulnerable adult (check all that apply):

- | | | |
|---|--|---|
| <ul style="list-style-type: none"> X Is over 60 years old and does not have the functional, mental, or physical ability to care for himself or herself. X Was found incapacitated under chapter 11.88 RCW. <input type="checkbox"/> Has a developmental disability as defined in RCW 71A.10.020. | <ul style="list-style-type: none"> <input type="checkbox"/> Self-directs his or her own care and receives services from a personal aide under RCW 74.39. <input type="checkbox"/> Is receiving services from a home health, hospice, or home care agency licensed or required to be licensed under RCW 70.127. | <ul style="list-style-type: none"> <input type="checkbox"/> Is receiving in-home services from an individual provider under contract with DSHS X Has been admitted to a boarding home, nursing home, adult family home, soldiers' home, residential habilitation center or any other facility licensed by DSHS. |
|---|--|---|

4. The vulnerable adult lives in this county. **Or** This is the county of the vulnerable adult's new or former residence and he or she left or was removed from his or her previous residence as a result of, or to prevent, abandonment, abuse, personal exploitation, improper use of restraints, neglect, or financial exploitation.

5. My address for receiving legal documents is:

11031 Elliston Way NE Redmond WA 98053

(If you wish to keep your residential address **confidential**, you may list an alternate address.)

6. My relationship to the vulnerable adult and authority to act:

(If you are filing on your own behalf, or if you are filing as DSHS, go to paragraph 7.)

I am the vulnerable adult's guardian or limited guardian. I was appointed in _____ County, State of _____, Cause No: _____ on or about _____ (date). (Attach a copy of your letters or order appointing guardian, if available.)

On _____ (date) I imposed an emergency restriction on the vulnerable adult's right to associate with the respondent to protect the vulnerable adult.

I am the vulnerable adult's legal fiduciary. I was appointed trustee power of attorney on or about 10/27/2016. (Attached)

I am interested in the welfare of the vulnerable adult. I have a good faith belief that the court's intervention is necessary and that the vulnerable adult is unable at this time to protect his or her own interests, due to incapacity, undue influence, or duress.

Describe the length and nature of your relationship to the vulnerable adult:

I am the only surviving son of three children of Omana Thankamma. She has been visiting me in the USA for 6 months out of a year since 2002, when I immigrated to USA on merit-based EB2 under Microsoft sponsorship, where I worked as a senior Program Manager managing a team of 26 engineers. My mother suffers from severe anxiety disorders and Clinical Depression from her stroke, as can be seen from Exhibit 1. She also suffers from Separation Anxiety as she loves me more than her own life (and vice versa) and as can be seen from (attached as Exhibit 2) Report from Court-Appointed Psychologist Dr. Janice Edwards, she is very stressed about missing me and loves living at our home. Based on this recommendation, the Court has kindly ordered that my mother should always have continuous access to her family by being kept within 25 miles of home

While visiting me in 2014, she became disabled from the progression of a first stroke she had suffered in 2013 in India, and could not return to India as she only has a brother and a step-daughter there, and is incredibly close to me as her only biological child. Therefore I had to quit my job and become her fulltime caregiver, working from home while also managing some rental homes for income. I also hired TWO live-ins to help me: a qualified CNA and a maid, in addition to another visiting CNA and three therapists visiting twice each week for Speech, Occupational and Physical Therapies.

She had been happily staying with me at our 6 bed luxury home since 2014 for over four years under my dedicated care, enjoying a social life and having all the best in

professional gold-standard care and therapies. It is very hard to imagine what more an ideal son could have done for his mother in this situation, as she is not eligible for any state assistance or Medicare due to her visiting status. As her Power of Attorney I managed all her finances [Exhibit 9] since 2002, while she has also been her tax dependent on 1040, and I have paid over \$400k in medical bills for all her surgeries, strokes and hospitalizations over 18 months in this period out of my pocket, in addition to caregiver salaries, private therapies and private insurance, spending over \$10k a month to give her the best care and happiness at home that money could buy; and also to keep her loved and contented. My mother herself mentions this in her statement to Court, as attached in Exhibit 3.

In 2018 March 12, a newly hired maid went to a neighbor to borrow a blender, and the neighbor called Police to check on the girl as she suspected drug activity. When the police checked on the home, she was immediately welcomed inside the home by the maid. He then saw Omana, and not able to understand that her condition was due to a stroke and believing her to be "99 years old with her colostomy bag lying on the floor" (all of which is complete nonsense), he sent her to emergency room in Swedish Issaquah, where she was evaluated to be at her baseline and sent back home with her caregivers. The doctors report states [Exhibit 7] she was found in healthy condition and well cared for.

However, City of Snoqualmie charged me with abandonment in the third degree (even though the CNA and the maid both certified that they were home when I left) and as a result DSHS was able to obtain a VAPA (on the basis of this nonsensical criminal case which has since been dismissed). A CR60 motion to rescind the VAPO is being brought as I had NEVER neglected my mom, and hired qualified CNA [Ashley and Karina] caregivers from care.com, whose paid membership is attached in [Exhibit 4, 5, 6].

After the guardian was appointed, I stopped paying for her insurance, which therefore lapsed on 12/31/2018 as Ms. Copeland did not renew her insurance or make other arrangements to continue her care. All her pain injections (which are critically needed), therapies and care were stopped abruptly, and she was dumped into a shelter for homeless which is OFFICIALLY RANKED as the ENTIRE nation's worst nursing home per CMS [Exhibit 8]. Online reviews show rape and murder are quotidian routine at this "Auschwitz of Seattle", overflowing with homeless drug addicts and dangerous convicts.

My mother suffered loss of vision in her right eye as the guardian did not make arrangements for her followup visit to Dr. Philip Chan for her glaucoma surgery that had occurred under my care just before the change of guardianship. The ophthalmologist had warned how critical it is to do the followup care, but it was ignored leading to her avoidable blindness. In addition, her leg cramps were severely worsened from having no physical therapy or pain injections or stretching exercises as she had been getting at home.

Her only remaining function, of speech, was on a miraculous recovery due to me having found a Malayalam speaking local speech therapist, Mr. Dinesh Kannada. However, from having discontinued his services, she lost her voice quite a lot and terribly regressed. Furthermore, every day as me and other family members visited, we noted she was always covered in poop and vomit, and neglected for hours. Therefore we took pictures and forwarded to the guardian, who indiscriminately sent it to this " facility"

notorious for rapes and murders as can be seen from its online reviews. It is not ranked THE absolute worst among all the 45,000+ nursing homes in this country for no reason.

As retaliation for the whistleblowing, an administrator from the facility trespassed me from visiting my mother the next day. My sister flew in from India on June 11 2019 and went to Paramount only to find our mother severely neglected without insulin or hydration, and left to die, covered in stool and vomit, with most horrendous blisters all over her body from very high glucose levels over 400, and with a burning fever of over 102 degrees. My sister called paramedics and saved our mother, and she was stabilized with insulin and nutrition at Harborview Medical Center burn unit. Blisters were due to 400+ glucose levels from lack of insulin leading to bullosis diabeticorum, as all her medical charts show [Exhibit 10] that she was not receiving insulin at paramount, and that her glucose was returned to normal every time she was returned to Harborview and given insulin -the same is the case with all her other vitals also. Furthermore, other tests such as lipase and her blood work confirmed she was not receiving any medication at all, as part of a murder attempt authorized by the guardian, who had also earlier changed her POLST Code to No resuscitation [Exhibit 11] without consulting the family. She endorsed her murder in several harrassing emails to family [Exhibit 12] stating that "she was now head of household" and based on her research on Hinduism our mother did not "deserve or want to live in this condition" and that "Family's opinion on letting her live is just that, only opinions, and ultimately all that matter is what I decide, which is that she should die".

My sister and I went to Seattle Police and lodged a complaint against the criminal guardian for endorsing her murder. On the next day, as we were visiting our mother as usual at Harborview, we were told we were trespassed again, for absolutely no reason other than blatant retaliation for making the complaint. Since then it has been about 100 days that a helpless quadriplegic has been crying in isolation without being able to speak to anyone that she cares about or loves. This is the very definition of the utmost tyrannical evil, the parallels can only be found in Nazi Germany or ISIS controlled terrorist territories, that a quadriplegic is taken against her wish from her home and withheld all care and medicines to kill her, and when the attempt is thwarted by her loving children, the wicked shameless murderers are now keeping her in soitary confinement in violation of all the guardianship statutes such as the following:

Omana's Isolation is in violation of Legislative Intent (RCW 11.88.005)

"It is the intent of the legislature to protect the liberty and autonomy of all people of this state, and to enable them to exercise their rights under the law to the maximum extent, consistent with the capacity of each person. The legislature recognizes that people with incapacities have unique abilities and needs, and that some people with incapacities cannot exercise their rights or provide for their basic needs without the help of a guardian. However, their liberty and autonomy should be restricted through the guardianship process only to the minimum extent necessary to adequately provide for their own health or safety, or to adequately manage their financial affairs." It is clear to everyone that in Omana's case this mandate was reversed: she was taken from a well-provided for home to a homeless shelter where she was abused and conspired to be murdered. After her children foiled the attempt, she is being kept in solitary incarceration for nearly 60 days as of date. This is the very opposite of the legislative intent as can be surmised by any

reasonable person. She was taken from a 6 bed luxury home to be murdered in a shelter where she has been abused and neglected worse than an animal. She is now being kept in isolation against all fundamental human values, and any reasonable person can see these criminals that has deliberately hurt a helpless quadriplegic entrusted to their care ought to be rigorously prosecuted and exemplarily punished so they don't do this to anyone else. Her plight is more Kafkaesque than anything Franz Kafka ever imagined.

Psychologist Dr. Edwards' Report shows Omana needs her Family to Survive

The evaluation of Omana's mental abilities by Dr. Edwards is attached herein as Exhibit 2. It is clear that Omana is a highly functional individual who can still do arithmetic by mind that most average persons cannot. Dr. Edwards has stated that Omana is capable of holding a conversation, understands Court proceedings, LOVES her son and her home, and would want to return home. She also showed awareness of her location, time, and answered General Knowledge Questions such as "who was the previous president of USA". To hold such an individual in isolation is beyond cruel, it is CRIMINAL.

Omana's Isolation is in violation of RCW 74.34.067 (7)

RCW 74.34.067(7) is very clear that an alleged incapacitated person may CHOOSE to not accept the protective services from DSHS, which Omana had exercised very vehemently in her declaration to Court [Ex. D]. Therefore any proceeding thereon is moot by statutory definition.

"When the investigation is completed and the department determines that an incident of abandonment, abuse, financial exploitation, neglect, or self-neglect has occurred, the department shall inform the vulnerable adult of their right to refuse protective services, and ensure that, if necessary, appropriate protective services are provided to the vulnerable adult, with the consent of the vulnerable adult. The vulnerable adult has the right to withdraw or refuse protective services."

Omana's Isolation is in violation of Guardianship Settlement Order

Page 5, Line 15 of the guardianship order clearly states that Omana should be kept in a facility no further than 25 miles from Plaintiff's residence in Redmond, clearly for the purpose of facilitating their unrestricted access as any reasonable person can surmise. But for the guarantee for this access and her naturalization (and thus Medicaid coverage eligibility), this guardianship was completely useless.

Omana's Isolation is in violation of Plaintiff's Civil Rights

U.S. Constitution as well as 42 U.S.C. §1983 grants Plaintiffs the rights to familial consortium and association, which have been denied by this isolation. Not even

the APS' complaint alleges any reason for concern about Plaintiffs visits with Omana, and the complaint and the guardianship is ENTIRELY centered on adequate care being provided at home. The Guardian has repeatedly said that she is willing to release Omana with family if they put up money for her care. Therefore it is clear that the isolation serves no legitimate purpose other than retaliation (for complaining about her horrible neglect at Paramount), and intentional infliction of emotional distress on Omana and her family.

Omana's Isolation is in violation of RCW 11.92.195(c)(iii)

Guardian has failed to apply for a protection order within 14 days (let alone 62 days) of placing such arbitrary & baseless Draconian restrictions on closely related family members qualified under 11.92.150, as stipulated by RCW 11.92.195 (c) (iii). The isolation commenced two days after her children complained to Seattle Police about her attempted murder through withholding of insulin at Paramount, a wholly owned subsidiary of Harborview that desperately wants to cover this up.

Omana's Isolation is in violation of RCW 11.92.190.

Guardian is in violation of RCW 11.92.190. according to which Omana cannot be detained against her will (as she currently has been for the last 62 days). "Any court order, other than an order issued in accordance with the involuntary treatment provisions of chapters 10.77, 71.05, and 72.23 RCW, which purports to authorize such involuntary detention or purports to authorize a guardian or limited guardian to consent to such involuntary detention on behalf of an incapacitated person shall be void and of no force or effect". Guardian has never taken any oversight from any court for these unlawful actions such as holding her in illegal detention or violating her family's visitation rights.

Omana's Isolation is in violation of her Religious Rights

Omana has a Federal right to exercise her Hindu religion which has been seriously impacted by this illegal solitary confinement. She needs her son or daughter to play the Hymns she likes on her laptop, or to help her do "Puja" (Hindu Ritual) using her limited mobility in right hand. She has not been able to do either in the last 62 days due to this illegal isolation, causing severe grief.

Guardian has abused the Court Order to steal \$10,500 from Son's Bank Account

As can be seen in detail from the attached Federal Civil Rights Complaint, the guardian has interfered with our real estate business and caused enormous losses by stealing \$10,500 that was in her SON's primary account, that had nothing whatsoever to do with Omana, and the amount had just been transferred from another account he owns 100%. Despite all the proof of the source of his hard earned money, this has not been retained, which has had a domino effect of causing enormous harm for our finances.

Describe the incapacity, undue influence, or duress that makes the vulnerable adult unable to protect his or her own interests: she has had two strokes in 2013 and 2016

7. Do you know of any person who is or claims to be the guardian or legal fiduciary (such as, trustee, payee, power of attorney) of the vulnerable adult? no [X] yes. If yes, provide name and address: Channa Copeland, 1602 Riddell Ave Orting WA

8. Other court cases or other restraining, protection or no-contact orders involving the petitioner, the vulnerable adult or the respondent:

Case Name	Case Number	Court/County
Federal Civil Rights Complaint	C19-01296-MJP	US District Court. Western District of Washington
Federal Fraud and unlawful Interference with Business Complaint	C19-01577-MJP	US District Court. Western District of Washington

<p>I Request a Vulnerable Adult Protection Order that will grant the relief requested below:</p>
<p>X ¹ Restrain the respondent from committing or threatening to commit physical harm, bodily injury, assault, including sexual assault, against the vulnerable adult and from molesting, harassing, or stalking the vulnerable adult.</p> <p>(If the court orders this relief after a hearing, and the respondent is the vulnerable adult's spouse or former spouse, the parent of a common child, a current or former cohabitant as intimate partner, the respondent will be prohibited from possessing a firearm or ammunition under federal law for the duration of this order. An exception exists for law enforcement officers and military personnel when carrying department/government-issued firearms. 18 U.S.C. § 925(a)(1).)</p>
<p>X ² Restrain the respondent from committing or threatening to commit acts of abandonment, abuse, personal exploitation, improper use of restraints, neglect, or financial exploitation against the vulnerable adult.</p>
<p>X ³ Exclude the respondent from the vulnerable adult's residence or residing institution.</p>
<p>X ⁴ Restrain the respondent from coming near and from having any contact with the vulnerable adult or any member of her family including her both children, in person or through others, by phone, mail, or any means, directly or indirectly, except through an attorney, or mailing or delivery by a third party of court documents.</p>
<p>X ⁵ Prohibit the respondent from knowingly coming within, or knowingly remaining within <u>1000ft</u> (distance) of the vulnerable adult's X residence <input type="checkbox"/> workplace <input type="checkbox"/> adult day program; X the premises of the long-term care facility where the vulnerable adult resides.</p> <p>X other: Residence of her family in Redmond</p>
<p>X ⁶ Require the respondent to provide an accounting of the disposition of the vulnerable adult's income or other resources.</p>

X ⁷ Restrain the respondent from transferring the vulnerable adult's property for up to 90 Days.
X ⁸ Restrain the respondent from transferring respondent's property for up to 90 Days.
X ⁹ Require the respondent to pay a filing fee, the court costs, including service fees, and costs incurred in bringing this action, including attorney's fees.
X ¹⁰ Other: Restrain from interfering with family's visitation rights and to obey the Court order to keep her within 25 miles of our home for unrestricted access as is medically certified as required for her survival. It is psychopathic murder to keep her from seeing her most beloved children, while she is suffering from separation anxiety and panic attacks, and is clinically diagnosed with Depression for treating which she depends on family's support.
Request for a Temporary Vulnerable Adult Protection Order: An Emergency Exists as described in the statement below. The vulnerable adult needs a temporary protection order issued immediately, without prior notice to the respondent, that grants the relief requested above.

Request for Special Assistance From Law Enforcement Agencies:

I request the court order the appropriate law enforcement agency to assist the vulnerable adult in obtaining:

Restrain the respondent in interfering with her rights to receive her family and friends as visitors. Order the respondent to reinstate her care and therapies.

A **Vulnerable Adult protection order** is available to protect a vulnerable adult from abandonment, abuse, financial exploitation or neglect.

"**Abandonment**" means action or inaction by a person or entity with a duty of care for a vulnerable adult that leaves the vulnerable person without the means or ability to obtain necessary food, clothing, shelter, or health care.

"**Abuse**" means the willful action or inaction that inflicts injury, unreasonable confinement, intimidation, or punishment on a vulnerable adult. In instances of abuse of a vulnerable adult who is unable to express or demonstrate physical harm, pain, or mental anguish, the abuse is presumed to cause physical harm, pain, or mental anguish. Abuse includes sexual abuse, mental abuse, physical abuse, and personal exploitation of a vulnerable adult, and improper use of restraints against a vulnerable adult, which have the following meanings:

(a) "**Sexual abuse**" means any form of nonconsensual sexual conduct, including but not limited to unwanted or inappropriate touching, rape, sodomy, sexual coercion, sexually explicit photographing, and sexual harassment. Sexual abuse also includes any sexual conduct between a staff person, who is not also a resident or client, of a facility or a staff person of a program authorized under RCW 71A.12, and a vulnerable adult living in that facility or receiving service from a program authorized under RCW 71A.12, whether or not it is consensual.

(b) "**Physical abuse**" means the willful action of inflicting bodily injury or physical mistreatment. Physical abuse includes, but is not limited to, striking with or without an object, slapping, pinching, choking, kicking, shoving, or prodding.

(c) "**Mental abuse**" means a willful verbal or nonverbal action that threatens, humiliates, harasses, coerces, intimidates, isolates, unreasonably confines, or punishes a vulnerable adult.

Mental abuse may include ridiculing, yelling, or swearing.

“Isolate” or **“isolation”** means to restrict a vulnerable adult’s ability to communicate, visit, interact, or otherwise associate with persons of his or her choosing. Isolation may be evidenced by acts including but not limited to:

- (1) Acts that prevent a vulnerable adult from sending, making, or receiving his or her personal mail, electronic communications, or telephone calls; or
- (2) Acts that prevent or obstruct the vulnerable adult from meeting with others, such as telling a prospective visitor or caller that a vulnerable adult is not present, or does not wish contact, where the statement is contrary to the express wishes of the vulnerable adult.

The term “isolate” or “isolation” may not be construed in a manner that prevents a guardian or limited guardian from performing his or her fiduciary obligations under RCW 11.92 or prevents a hospital or facility from providing treatment consistent with the standard of care for delivery of health services.

(d) **“Personal exploitation”** means an act of forcing, compelling, or exerting undue influence over a vulnerable adult causing the vulnerable adult to act in a way that is inconsistent with relevant past behavior, or causing the vulnerable adult to perform services for the benefit of another.

(e) **“Improper use of restraints”** means the inappropriate use of chemical, physical, or mechanical restraints for convenience or discipline or in a manner that: (i) is inconsistent with federal or state licensing or certification requirements for facilities, hospitals, or programs authorized under RCW 71A.12; (ii) is not medically authorized; or (iii) otherwise constitutes abuse under this section.

“Chemical restraint” means the administration of any drug to manage a vulnerable adult’s behavior in a way that reduces the safety risk to the vulnerable adult or others, has the temporary effect of restricting the vulnerable adult’s freedom of movement, and is not standard treatment for the vulnerable adult’s medical or psychiatric condition.

“Mechanical restraint” means any device attached or adjacent to the vulnerable adult’s body that he or she cannot easily remove that restricts freedom of movement or normal access to his or her body. “Mechanical restraint” does not include the use of devices, materials, or equipment that are (a) medically authorized, as required, and (b) used in a manner that is consistent with federal or state licensing or certification requirements for facilities, hospitals, or programs authorized under RCW 71A.12.

“Physical restraint” means the application of physical force without the use of any device, for the purpose of restraining the free movement of a vulnerable adult’s body. “Physical restraint” does not include (a) briefly holding without undue force a vulnerable adult in order to calm or comfort him or her, or (b) holding a vulnerable adult’s hand to safely escort him or her from one area to another.

“Financial exploitation” means the illegal or improper use, control over, or withholding of the property, income, resources, or trust funds of the vulnerable adult by any person or entity for any person’s or entity’s profit or advantage. “Financial exploitation” includes, but is not limited to:

- (a) The use of deception, intimidation, or undue influence by a person or entity in a position of trust and confidence with a vulnerable adult to obtain or use the property, income, resources, or trust funds of the vulnerable adult for the benefit of a person or entity other than the vulnerable adult;
- (b) The breach of a fiduciary duty, including, but not limited to, the misuse of a power of attorney, trust, or a guardianship appointment, that results in the unauthorized appropriation, sale, or transfer of the property, income, resources, or trust funds of the vulnerable adult for the benefit of a person or entity other than the vulnerable adult; or
- (c) Obtaining or using a vulnerable adult’s property, income, resources, or trust funds without lawful authority, by a person or entity who knows or clearly should know that the vulnerable

adult lacks the capacity to consent to the release or use of his or her property, income, resources, or trust funds.

"Neglect" means (a) a pattern of conduct or inaction by a person or entity with a duty of care that fails to provide the goods and services that maintain physical or mental health of a vulnerable adult, or that fails to avoid or prevent physical or mental harm or pain to a vulnerable adult; or (b) an act or omission by a person or entity with a duty of care that demonstrates a serious disregard of consequences of such a magnitude as to constitute a clear and present danger to the vulnerable adult's health, welfare, or safety, including but not limited to conduct prohibited under RCW 9A.42.100.

Statement: The respondent has committed or threatened to commit acts of abandonment, sexual abuse, mental abuse, physical abuse, exploitation, neglect, and/or financial exploitation as follows.

Describe the most recent incidents or threats of abandonment, sexual abuse, mental abuse, physical abuse, personal exploitation, improper use of restraints, neglect, and/or financial exploitation and date (**describe specific incidents or threats and the approximate dates**):

ATTACHED AS SEPERATE DOCUMENT

Describe past threats or incidents of abandonment, sexual abuse, mental abuse, physical abuse, personal exploitation, improper use of restraints, neglect, and/or financial exploitation (**describe specific incidents or threats and their approximate dates**):

ATTACHED AS SEPERATE DOCUMENT

Does the respondent own or possess weapons? Yes No Unknown

Does the respondent use firearms, weapons or objects to threaten or harm the vulnerable adult? Please describe:

Explain any additional reasons why this order should be issued immediately. List any immediate and irreparable injury, loss, or damage that would result to the vulnerable adult before the respondent or vulnerable adult can be served and heard:.

Omana is reported to be crying every day until she passes out in sheer exertion, constantly calling loudly for her son and daughter who stopped visiting her abruptly on July 5th, and from whom she has not heard from since. She does not understand why we are not visiting her, and she must be very worried about us as she has never spent a day before without talking to us.This is causing her enormous stress and will inevitably lead to organ failure and/or stroke leading to her death, as the respondent has planned. The Court is prayed to stop this evil immediately.

Efforts to give notice: Did you make efforts to give notice of your request for temporary relief to X respondent vulnerable adult? If so, describe how and when notice was given. If no notice was given, explain why not: Mail and Email

Other: _____

(Continue on separate page if necessary)

Personal service cannot be made upon Respondent within the state of Washington.

You could be required to post a bond or provide alternate security as a condition for obtaining a temporary order. The court may waive the bond in situations in which the vulnerable adult's health or life would be jeopardized. RCW 7.40.080, 74.34.120(5)(a).

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated 10/10/2019 at Redmond, Washington.

Signature of Petitioner

Jayakrishnan Nair
Print Name