

IN THE SUPREME COURT OF THE STATE OF NEVADA

IN THE MATTER OF THE
GUARDIANSHIP OF THE PERSON
AND ESTATE OF KATHLEEN JUNE
JONES, PROTECTED PERSON

KATHLEEN JUNE JONES,

Appellant,

vs.

ROBYN FRIEDMAN; AND DONNA
SIMMONS,

Respondents.

No. 83967

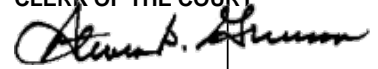
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**RESPONDENTS' APPENDIX
Volume 15 (Nos. 2501–2671)**

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**DISTRICT COURT
CLARK COUNTY, NEVADA**

IN THE MATTER OF THE GUARDIANSHIP)
OF THE PERSON AND ESTATE OF:)

Kathleen June Jones,)

An Adult Protected Person.)

Case Number: G-19-052263-A
Department: B

**PETITION FOR AN ORDER TO ENFORCE AND/OR FOR AN ORDER TO SHOW
CAUSE REGARDING CONTEMPT; PETITION FOR ATTORNEYS FEES**

TO: KIMBERLY JONES
TO: Counsel for Kimberly Jones

PLEASE TAKE NOTICE THAT Robyn Friedman, Guardian of the Person and Estate of Kathleen June Jones, has filed a Petition seeking to enforce an existing order and/or for an order to show cause why the Court should not hold you in contempt.

IF YOU OBJECT TO ANY OF THE RELIEF SOUGHT BY THIS PETITION, YOU ARE REQUIRED TO FILE A WRITTEN RESPONSE TO THIS PETITION WITH THE CLERK OF THE COURT AND TO PROVIDE THE GUARDIAN WITH A COPY OF YOUR RESPONSE WITHIN 10 COURT DAYS OF THE SERVICE OF THIS PETITION. FAILURE TO FILE A WRITTEN RESPONSE WITH THE CLERK OF COURT WITHIN 10 COURT DAYS OF THE SERVICE OF THIS PETITION MAY RESULT IN THE REQUESTED RELIEF BEING GRANTED BY THE COURT WITHOUT YOU HAVING AN OPPORTUNITY TO BE HEARD. (NOTE: IF SERVICE WAS MADE ON YOU BY MAIL, YOU HAVE AN ADDITIONAL 3 DAYS TO FILE YOUR WRITTEN RESPONSE).

Submitted By:

MICHAELSON LAW
/s/ John P. Michaelson
John P. Michaelson, Esq.
Nevada Bar No. 7822

1 Robyn Friedman (“Guardian” or “Robyn”), and Donna Simmons, an Interested Party, by
2 and through their counsel at Michaelson Law, submit this *Petition for an Order to Enforce*
3 *and/or for an Order to Show Cause Regarding Contempt; Petition for Attorneys Fees* (this
4 “*Petition*”) asking this Court for an order to enforce the *Order from December 20, 2021 Hearing*
5 and/or for issuance of an order to show cause why Kimberly Jones (“Kimberly”) should not be
6 held in contempt and punished accordingly for violating the this Court’s Order.
7

8 **POINTS AND AUTHORITIES**
9 **LEGAL ARGUMENT**

10 1. The refusal to obey a lawful order issued by the court is an act of contempt.
11 Nevada Revised Statutes (“NRS”) 22.010(3). The facts of contempt must be presented to the
12 court through an affidavit. NRS 22.030(2). A person found guilty of contempt may be fined up to
13 \$500 for each act of contempt, may be imprisoned for up to 25 days, or both. A person found
14 guilty of contempt may also be required to pay the reasonable expenses, including attorney’s
15 fees, of the person seeking to enforce the order. NRS 22.100.

16 **FACTS AND ARGUMENTS**

17 2. Kimberly has failed and is failing to comply with this Court’s *Order from*
18 *December 20, 2021 Hearing* filed on December 21, 2021 (the “*Order*”).

19 3. Her failure to comply with the Court’s *Order* harms both Kathleen June Jones
20 (“June”) and the Guardian by delaying the medical care needed for June, and the financial
21 protection presently needed for June’s estate.

22 4. On December 8, 2021, counsel for Guardian sent an email to counsel for
23 Kimberly requesting documents and items needed from Kimberly. On December 8, 2021,
24 counsel for Kimberly responded, stating:
25

1 Kimberly tried to contact Robyn. Please have her communicate directly with her
2 sister. I have also forwarded this email to Kimberly.

3 We are in the process of withdrawing from the case.

4 * * *

5 If Robyn will speak with Kimberly, they could work all of these items out. I am
6 not getting involved in negotiations involving, “what June wants to eat” or what
7 “TV shows she likes.” I am a lawyer not a babysitter. They can coordinate times,
8 transitions, move-out, and production of any documents in an orderly manner.
9 Kimberly is ready and willing to facilitate an orderly transition.

10 A copy of said emails is attached here to as **Exhibit 1** and incorporated herein by reference.

11 5. Kimberly was electronically served with a copy of the *Order* on December 21,
12 2021 through the court’s electronic e-File system.

13 6. Also on December 21, 2021, Kimberly was electronically served with a copy of
14 the *Notice of Entry of Order from December 20, 2021* through the court’s electronic e-File
15 system.

16 7. In the *Order*, Kimberly was ordered to provide all ordered information to Robyn
17 via email on or before Monday, December 27, 2021 at 5:00 pm. Kimberly did not follow the
18 *Order* of this Court. Instead, after the Court-imposed deadline, Kimberly sent partial answers
19 and incorrect information via email only to James Beckstrom, Esq., her attorney, and Maria
20 Parra-Sandoval, Esq. from the Legal Aid Center of Southern Nevada. The flash drive Kimberly
21 provided to Robyn in early December 2021 contained useless information, and did not help
22 satisfy the requirements placed upon Kimberly in the *Order*.

23 8. Information was not provided to Robyn, or Robyn’s Counsel until Wednesday,
24 December 29, 2021, contrary to this Court’s simple direction.

25 9. In the month that Robyn has been Guardian, she has made many phone calls to
doctor’s offices, utility companies, financial institutions, government agencies and other

1 institutions and/or individuals that are associated with June to painstakingly re-obtain
2 information that Kimberly has and or should have already provided regarding medical, financial
3 and physical aspects of June's care and well-being.

4 10. Guardian continues to receive misinformation, or complete refusal and silence
5 from Kimberly, the former guardian, as Guardian works to make the transition between
6 guardians.

7 11. Attached hereto as **Exhibit 2** and incorporated herein by reference is a breakdown
8 of the items Kimberly was ordered to provide by December 27, 2021, but has failed to provide.

9 12. The *Order* states, "Kimberly Jones shall endeavor to provide the information
10 necessary to ensure a smooth transition between the guardians and make sure that the Protected
11 Person continues to have access to medical treatment, prescriptions, and other resources." As
12 she has done in the past with many other orders and directives from the Court, and contrary to
13 what is routinely expected of any ethical person, much less someone who professes an advanced
14 degree in geriatric care and experience in hundreds of similar cases, Kimberly Jones is ignoring
15 this mandate in the following ways by not providing the following, albeit they are not
16 specifically and separately enumerated in the *Order*:

17 a. Kimberly has failed to provide Robyn with critical information regarding
18 the remodel of the Anaheim House. This Court ordered that Kimberly could use
19 individuals qualified to make repairs on the home. Some of the repairs to the home have
20 been in place less than a year, but already need to be replaced. Robyn has repeatedly
21 asked for the information for the electrician and plumber who performed the work on the
22 Anaheim House. The electrician failed to install Ground-Fault Circuit Interrupters, OR
23 GFCIs, and the plumber failed to fix a potentially dangerous water hearing issue. The
24
25

1 floor that was replaced a little over seven months ago is already coming up in places and
2 will need to be either corrected or redone. Given the relatively short time from the
3 installation of the flooring until now, Guardian hopes there may be a warranty on the
4 installation of the flooring that may fix the issues without using any more of June's funds.
5 Guardian has asked Kimberly for the information on who installed the flooring many
6 times, but has not received any information. If June continues to live in the home, the
7 flooring creates a potential tripping hazard and will need to be corrected or replaced. If
8 the home is to be rented or sold, the floor would need to be corrected or replaced.
9 Kimberly failing to give the Guardian needed information on the flooring may cost
10 June's estate thousands of dollars to pay to replace, rather than invoke a warranty to get
11 the repairs done under the original contract. For more information regarding the
12 necessary repairs needed to the Anaheim House, see exhibit 3 "Home Inspection Report"
13 attached to the Inventory, Appraisal, Oath and Verified Record of Value filed on June 7,
14 2022 in this matter.

15
16 b. Kimberly was admonished by this Honorable Court repeatedly at the last
17 hearing to attend the cardiologist appointment with Robyn and June on January 5, 2021.
18 Kimberly showed up at the facility lobby for the appointment but did not go into the
19 actual exam when June was being evaluated. Kimberly was advised by the front desk
20 personnel that because she had established the entire medical engagement with this
21 provider and had not advised the provider of the existence of a guardianship, her
22 permission would be needed to update all emails, access codes and other permissions to
23 transition access from Kimberly to Guardian. Kimberly was asked to stay to resolve
24 those matters so that Guardian would have complete access and permissions on a go
25

1 forward basis. Rather than remaining to cooperate as she was asked, and as the Court
2 directed her to do, Kimberly waited until Guardian and June went in to see the doctor,
3 and then she left. This is one of the literally thousands of ways Kimberly uses subterfuge
4 to undermine Guardian and the rest of her family on a regular basis. Kimberly's leaving
5 delayed the cardiologist's office allowing access to Guardian because Kimberly had not
6 previously identified herself as Guardian of June. The cardiologist's office was not aware
7 that June was under a guardianship, nor that Kimberly was previously acting as guardian
8 when she attended the visits with June. Additionally, and as discussed further below in
9 sub-section (c), when Guardian and her husband Perry Friedman attempted to reset online
10 access points, the PIN or other verifications codes needed for the resets were sent to
11 Kimberly. Instead of providing the codes promptly (the reset protocols had limited time
12 durations before new codes are sent), Kimberly slowly but eventually only advised that
13 she had received codes. When asked what those codes were, she did not respond.

14
15 c. Kimberly is also acting contrary to June's best interest and the Court
16 Order by not providing a copy of June's medical records, in part, by not providing
17 Guardian with June's original vaccination cards/records. **Exhibit 3** attached hereto and
18 incorporated herein by reference shows that such records exist. It is a *copy* of June's
19 COVID vaccination card. Kimberly needs to provide June's original vaccination cards to
20 Guardian.

21 d. As explained more briefly above, on January 5, 2022, Kimberly refused to
22 go to the medical records department at UCI to empower Guardian to get medical
23 records. Then, on January 6, 2022, Kimberly Jones did finally send verification codes for
24 the medical records to Guardian, but with only one (1) and three (3) minutes remaining to
25

1 enter the codes. **Exhibit 4** attached hereto and incorporated herein by reference is a copy
2 of the email Kimberly Jones sent to Guardian with the verification codes. Exhibit 4
3 shows Kimberly withholding from Guardian the power to access the records transferred
4 to Guardian, either in person, or even by providing the email associated with the account
5 to Guardian.

6 e. On January 5, 2022, Guardian learned at the cardiologist appointment that
7 June was only supposed to wear her heart monitor for two weeks from when it was
8 applied. This is totally different from Kimberly's representation to this Court in the last
9 hearing that June was supposed to wear the monitor until the next appointment. As a
10 result, June wore the monitor for weeks, and maybe even a month longer than she was
11 supposed to wear it. This was contrary to June's best interest as the monitor caused her
12 stress, discomfort, she continually tried to remove it, and the tape irritated her skin from
13 prolonged use. Kimberly knew all this and did not assist June's situation by providing
14 simple, accurate information. Once again, Kimberly lied, and June suffered because of
15 her lie.
16

17 f. This is another of the almost limitless ways in which Kimberly's
18 negligence and refusal to attend to any detail whatsoever, even as a supposedly seasoned
19 and educated professional, has hurt June.

20 g. Also on January 5, 2022, Guardian learned from the cardiologist that
21 June's blood pressure was supposed to have been monitored twice a day during the time
22 between cardiologist appointments to get an accurate assessment of her heart. Kimberly
23 provided a blood pressure cuff, but no instruction on the data that was supposed to be
24 kept for June. The monitoring directive was not even mentioned to Guardian. Once
25

1 again, Kimberly acted contrary to June's best interest by failing to provide this
2 information to Guardian. This interfered with June getting an accurate heart assessment
3 back to her cardiologist, again, due to Kimberly, a supposedly trained professional in
4 geriatric care, failing to provide in good faith basic information about June's care.

5 h. Kimberly's modus operandi is to provide no information at all. Then, wait
6 to be compelled to assist or provide information after costly and exhaustive legal battles,
7 following which she will provide only partial information or assistance. Whereupon the
8 cycle begins again with more expensive and exhaustive litigation, and so forth, as she
9 causes it to continue.

10 13. To date, though the deadline for Kimberly to submit all the requested information
11 in the Court's order was December 27, 2021 at 5:00 pm, Guardian still does not have emails or
12 PIN numbers associated with the bank accounts.

13 14. Moreover, upon information and belief, most or all of June's utilities, including
14 her phone and internet service, were set up under Kimberly and not June, making transition to
15 anyone else, not to mention transparency to the Court, much more difficult. As soon as Kimberly
16 was removed as guardian, she shut off internet access at June's Anaheim House, claiming it is
17 her own business. No internet makes it impossible to install a "Ring" doorbell or external
18 security cameras to provide extra protection for June if she were to continue to reside at the
19 Anaheim House. Kimberly often escapes personal responsibility for her conduct. However, at
20 this time, she should be held personally liable for the expense her conduct is causing, including
21 for Guardian being forced to file this *Petition* and other filings to get Kimberly to help June by
22 cooperating in the transition of information.
23
24
25

1 15. Guardian asks the Court to order Kimberly, again, to comply with the *Order from*
2 *December 20, 2021 Hearing* and to order Kimberly to pay attorney's fees and costs personally
3 for Guardian having to ask this Court to compel information that should have been turned over
4 already under the *Order from December 20, 2021 Hearing*. Providing the information and
5 documentation explicitly referenced in the Order as well as logically related or additional
6 information that becomes pertinent is both the ethical thing to do and the least that should be
7 expected of Kimberly who took an oath to serve as guardian, boasts an advanced degree in
8 geriatric care and who claims to have been involved in hundreds of similar cases in California
9 courts.

10 **ATTORNEY'S FEES AND COSTS**

11 16. Guardian requests that fees for being forced to bring this *Petition* be assessed to
12 Kimberly.

13 17. Kimberly Jones believed and still believes she can engage in misconduct and be
14 passive aggressive with no cost to her, despite orders of this Court. This Court should order
15 Kimberly Jones to pay Guardian's attorney's fees and costs for having to request in this *Petition*
16 again, that this Court admonish Kimberly Jones to provide information, documents, etc. as
17 previously ordered in the *Order from December 10, 2021 Hearing*.

18 **A. Law – Attorney's Fees and Costs**

19 18. NRS 18.010 establishes as follows:
20

21 **NRS 18.010 Award of attorney's fees.**

22 1. The compensation of an attorney and counselor for his or her services is
23 governed by agreement, express or implied, which is not restrained by law.

24 2. In addition to the cases where an allowance is authorized by specific statute,
25 the court may make an allowance of attorney's fees to a prevailing party:

 (a) When the prevailing party has not recovered more than \$20,000; or

 (b) Without regard to the recovery sought, when the court finds that the claim,
 counterclaim, cross-claim or third-party complaint or defense of the opposing party

1 was brought or maintained without reasonable ground or to harass the prevailing
2 party. The court shall liberally construe the provisions of this paragraph in favor of
3 awarding attorney's fees in all appropriate situations. It is the intent of the
4 Legislature that the court award attorney's fees pursuant to this paragraph and
5 impose sanctions pursuant to Rule 11 of the Nevada Rules of Civil Procedure in all
appropriate situations to punish for and deter frivolous or vexatious claims and
defenses because such claims and defenses overburden limited judicial resources,
hinder the timely resolution of meritorious claims and increase the costs of
engaging in business and providing professional services to the public.

6 3. In awarding attorney's fees, the court may pronounce its decision on the
7 fees at the conclusion of the trial or special proceeding without written motion and
with or without presentation of additional evidence.

8 4. Subsections 2 and 3 do not apply to any action arising out of a written
instrument or agreement which entitles the prevailing party to an award of
reasonable attorney's fees.

9 [1911 CPA § 434; A 1951, 59] — (NRS A 1957, 129; 1967, 1254; 1969,
10 435, 667; 1971, 165, 802; 1975, 309; 1977, 774; 1985, 327; 1999, 903; 2003,
11 3478)

12 19. NRS 18.020 establishes as follows:

13 **NRS 18.020 Cases in which costs allowed prevailing party.** Costs must
be allowed of course to the prevailing party against any adverse party against whom
judgment is rendered, in the following cases:

14 1. In an action for the recovery of real property or a possessory right thereto.

15 2. In an action to recover the possession of personal property, where the value
of the property amounts to more than \$2,500. The value must be determined by the
jury, court or master by whom the action is tried.

16 3. In an action for the recovery of money or damages, where the plaintiff seeks
to recover more than \$2,500.

17 4. In a special proceeding, except a special proceeding conducted pursuant
to NRS 306.040.

18 **B. Analysis and Conclusion – Attorney's Fees and Costs**

19 20. Under NRS 18.010(2)(a), Guardian's payment of attorney's fees as the prevailing
20 party is available, and should be ordered, if Guardian recovers less than \$20,000.00 for the
21 guardianship estate.

22 21. Under NRS 18.010(2)(b), the Court should order Kimberly Jones to pay
23 Guardian's attorney's fees without regard to the recovery sought, given that this Court is able to
24 find that Kimberly has disobeyed the *Order*. Kimberly Jones has no good reason for failing to
25

1 provide the information required in the *Order*. That Kimberly should be ordered to pay fees and
2 costs is especially true given that NRS 18.010 is written such that the Court is required to
3 liberally construe it in favor of awarding attorney's fees in this, an appropriate situation for same.
4 NRS 18.010 explains further that the Legislature intends the Court to award attorney's fees
5 pursuant to NRS 18.010(2)(b) in this appropriate situation to punish for and deter frivolous or
6 vexatious claims and defenses because such claims and defenses overburden limited judicial
7 resources, hinder the timely resolution and meritorious claims and increase the costs of engaging
8 in business and providing professional services to the public.

9 22. Under NRS 18.020, upon becoming the prevailing party, Guardian's costs should
10 also be allowed in this action.

11 23. Under NRS 22.100, a person found guilty of contempt may also be required to
12 pay the reasonable expenses, including attorney's fees, of the person seeking to enforce the
13 order. Kimberly should be ordered to pay Robyn's attorney's fees and costs pursuant to NRS
14 22.100.
15

16 24. Guardian will provide an affidavit of fees with a *Brunzell* analysis when
17 appropriate and/or directed to do so.

18 **RELIEF REQUESTED**

19 WHEREFORE, based upon the foregoing, Successor Guardian Robyn Friedman, and
20 Interested Party, Donna Simmons, request:

21 1. That this Court set a hearing and issue an Order to Show Cause to Kimberly
22 Jones ordering her to appear and show cause why she has failed to comply with the *Order from*
23 *December 10, 2021 Hearing*.
24
25

2. That this Court order Kimberly Jones to pay Guardian's attorney's fees and costs for having to bring this this *Petition*.

3. That this Court grant such other and further relief as it deems necessary and proper.

DATED this 11th day of January 2022.

MICHAELSON LAW

/s/ John P. Michaelson
John P. Michaelson, Esq.
Nevada Bar No. 7822
Ammon E. Francom, Esq.
Nevada Bar No. 14196
*Counsel for Robyn Friedman, Guardian,
and Donna Simmons, Interested Party*

**DECLARATION IN SUPPORT OF MOTION FOR AN ORDER TO ENFORCE
AND/OR FOR AN ORDER TO SHOW CAUSE REGARDING CONTEMPT**

Robyn Friedman hereby declares under penalty of perjury that she is Guardian in, and has read the foregoing PETITION FOR AN ORDER TO ENFORCE AND/OR FOR AN ORDER TO SHOW CAUSE REGARDING CONTEMPT; PETITION FOR ATTORNEYS FEES, that she has personal knowledge of the facts therein, that she is competent to testify to those facts, and that the statements in said Petition are true and correct to the best of her knowledge, except as to those matters therein stated upon information and belief, and as to those matters, she believes them to be true.

/s/ Robyn Friedman
ROBYN FRIEDMAN

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) and NEFCR 9 the undersigned hereby certifies that on January 11, 2022, a copy of the *Petition for an Order to Enforce and/or for an Order to Show Cause Regarding Contempt; Petition for Attorneys Fees* asking this Court for an order to enforce the *Order from December 20, 2021 Hearing* was e-served to the following individuals and/or entities at the following addresses:

Scott Simmons scott@technocoatings.com	Robyn Friedman ygsfun@hotmail.com <i>Guardian</i>
Perry Friedman friedman@cs.stanford.edu	Donna Simmons donnamsimmons@hotmail.com
Jeffrey R. Sylvester, Esq. jeff@sylvesterpolednak.com Kelly L. Easton kellye@sylvesterpolednak.com <i>Co-Counsel for Guardian, Robyn Friedman, and Interested Party, Donna Simmons</i>	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada mparra@lacs.org <i>Attorney for Kathleen June Jones</i> Rosie Najera rnajera@lacs.org <i>Assistant to Attorney for Kathleen June Jones</i>
Elizabeth Brickfield DAWSON & LORDAHL PLLC ebrickfield@dlnevadalaw.com Melissa R. Douglas mdouglas@dlnevadalaw.com <i>Guardian Ad Litem for Kathleen June Jones</i>	Geraldine Tomich, Esq. gtomich@maclaw.com Kimberly Jones c/o James Beckstrom, Esq. jbeckstrom@maclaw.com Deana DePry ddepri@maclaw.com Kellie Piet kpiet@maclaw.com <i>Attorneys for Kimberly Jones</i>

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	Sonja Jones sjones@nvcourts.nv.gov
Cameron Simmons Cameronnscottt@yahoo.com	

Pursuant to NRCP 5(b) and NEFCR 9 the undersigned hereby certifies that on January 12, 2022, a copy of the *Petition for an Order to Enforce and/or for an Order to Show Cause Regarding Contempt; Petition for Attorneys Fees* asking this Court for an order to enforce the *Order from December 20, 2021 Hearing* will be mailed by regular US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada to the following individuals and/or entities at the following addresses:

Kathleen June Jones 1054 S. Verde Street Anaheim, CA 92805 <i>Protected Person</i>	Courtney Simmons 765 Kimbark Avenue San Bernardino, CA 92407
Teri Butler 586 N. Magdalena Street Dewey, AZ 86327	Ampersand Man 1315 Enchanted River Drive Henderson, Nevada 89012
Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Jon Criss 804 Harkness Lane, Unit 3 Redondo Beach, CA 90278
Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832	Tiffany O'Neal 177 N. Singing Wood Street, Unit 13 Orange, CA 92869

MICHAELSON LAW

/s/ Heather Ranck
Employee of Michaelson Law

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EXHIBIT 1

From: [John Michaelson](#)
To: [Ammon Francom](#); [Heather Ranck](#); [Matthew Whittaker](#); [Patrick McDonnell](#); [Lenda Murnane](#)
Subject: FW: Kathleen June Jones
Date: Wednesday, December 8, 2021 4:56:45 PM

FYI

John P. Michaelson, Esq. | Michaelson & Associates, Ltd. | john@michaelsonlaw.com | 702.731.2333

From: James A. Beckstrom <jbeckstrom@maclaw.com>
Date: Wednesday, December 8, 2021 at 4:16 PM
To: John Michaelson <john@Michaelsonlaw.com>, Ammon Francom <Ammon@Michaelsonlaw.com>
Cc: 'Maria Parra-Sandoval' <MParra@lacs.org>
Subject: RE: Kathleen June Jones

Kimberly tried to contact Robyn. Please have her communicate directly with her sister. I have also forwarded this e-mail to Kimberly.

We are in the process of withdrawing from the case.

It should come of no surprise that June is safe and happy at the Anaheim property. Kimberly wants an orderly transition and will continue to care for June until Robyn is ready. I hope you include June's attorney in this discussion on transition of care. She is copied to keep her in the loop.

If Robyn will speak with Kimberly, they could work all of these items out. I am not getting involved in negotiations involving "what June wants to eat" or what "TV shows she likes." I am a lawyer not a babysitter. They can coordinate times, transitions, move-out, and production of any documents in an orderly manner. Kimberly is ready and willing to facilitate an orderly transition.



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From: John Michaelson <john@Michaelsonlaw.com>
Sent: Wednesday, December 8, 2021 12:13 PM
To: James A. Beckstrom <jbeckstrom@maclaw.com>; Ammon Francom <Ammon@Michaelsonlaw.com>
Subject: [External] Kathleen June Jones

James,

As you're likely aware, the Court appointed Robyn as successor guardian in Monday's order. Accordingly, we're reaching out to you about coordinating the transition. We're filing our necessary guardianship documents starting today to initiate the transition. Robyn will arrive at the Anaheim home on Monday.

In the meantime, and until we are notified otherwise, our understanding is that Kim will continue to provide physical care. If not, please let us know immediately as we have lined up independent care if needed until Monday evening when Robyn arrives. We intend to continue with any outside in-home care providers already scheduled if they are willing and honor any other social or medical appointments we are made aware of. If Kim has alternate suggestions to make the transition easier for June, please let us know immediately.

Please let Kim know that Robyn intends to begin the eviction process immediately unless Kim intends to move out quickly. Robyn further intends that the third bedroom will be used by the care providers and/or Robyn when she is there. Additionally, let Kim know that Dean is not welcome to stay in the Anaheim property past Sunday evening because he is not a tenant.

Additionally, we need the following information, documents, and items from Kim by this Friday by 10 a.m. to smooth the transition:

1. All of June's identifications including passport;
2. List of June's doctors including addresses, phone numbers, identification of what each doctor is for, and the issues that the doctor is currently treating June for;
3. List of upcoming doctor appointments;
4. List of June's medications including what the medications are for;
5. The actual medications themselves, *i.e.*, bottles, etc.;
6. Contact information for any caregivers currently providing care to June;
7. Schedule for any caregivers along with how much each caregiver is paid and how those payments are made;
8. Copy of June's medical records;
9. All of June's insurance and government benefits information;
10. Keys and garage fobs to the Anaheim property;
11. List of all utilities including account numbers and balances;
12. Copy of the homeowner's insurance policy on the Anaheim property along with the most recent statements;
13. Statements for June's financial accounts including all bank accounts and credit cards;
14. A list of June's friends that she stays in contact with including contact information;
15. List of all the foods that June likes and doesn't like to eat;
16. List of all medical and personal hygiene supplies June uses and the brands/types;
17. List of June's clothing sizes;
18. List of June's favorite TV shows;

19. List of activities and traditions June currently enjoys and participates in;
20. List of any entertainment June enjoys or other groups she's a part of;
21. List of the doctors June saw in Nevada, including contact info;
22. List of June's upcoming social appointments;
23. Any upcoming travel that had been planned for June;
24. June's passwords to online accounts including financial accounts, utilities accounts, and doctor portal accounts;
25. Safety deposit box information and keys; and
26. Copy of June's Last Will and Testament.

Additionally, the Guardian's Acknowledgment of Duties and Responsibilities filed today has a list of information that Robyn is responsible for. We incorporate that information into this letter and ask for Kim to assist in transitioning that information to Robyn.

It is imperative that we know immediately if Kim is able to continue to care for June through Monday. We also ask you to forward this email to Kim.

Please let me know when you are available to discuss. We'd like to move quickly to ensure that June is well taken care of.

John P. Michaelson, Esq.
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The District

2200 Paseo Verde Parkway, Suite 160
Henderson, Nevada 89052

*Please send correspondence to Henderson address

Downtown Summerlin

1980 Festival Plaza Drive, Suite 300
Las Vegas, Nevada, 89135

Reno

5470 Kietzke Lane, Suite 300
Reno, Nevada 89511

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EXHIBIT 2

**ITEMS KIMBERLY WAS TO PROVIDE PURSUANT TO COURT ORDER
AND DID NOT**

2. Did Not Complete - doctors missing: gastroenterologist, ENT, gynecologist, dentist

4. Lied - Did not list what the medications were given for causing great stress, time and some money to refill prescriptions

6./7. Lied - said there were no caregivers for my mom. We didn't just ask for them at the present. We know they exist per court documents KIM filed. Who are they, what company, what rate of pay, when did they work, phone numbers and emails, contracts for tax filing? Kim also said in court documents she had set up services with another company for my mom. Who are they, phone address, account number, service rep. and all other information. She provided vague information about this in court record so she can't say there aren't/weren't any.

9. Did Not Complete = No passwords, associated emails or other required information given.

10. Lied - Only provided one single key that ONLY worked for the front door. All other keys (upwards of 5) were not given even though they were newly installed after Scott moved out. We were told there were ZERO keys for the garage door, yet somehow, they very next morning, Dean was found in the very same garage that had no key and was currently locked by a locksmith after they were called to the home. This was an approximate \$2000 expense.

11. Did Not Complete - Utilities were in Kim's name instead of June's name. Even though, Kim provided no account information for and did not provide the landscapers phone number and he is not listed as business on the internet and also no rate of pay or services he provides.

12. Did Not Complete - didn't provide password or any other identifying information for this account and did not provide the most recent statement which we have since come to find out, the insurance is being cancelled later this month because the roof of the home is being visibly neglected.

13. Did Not Complete - Kim's actions have resulted in June and Robyn being effectively locked out of some the accounts with Kim remaining as the only one with access to Junes funds (Bank of America) because it wasn't informed properly, per their rules, that this had become a guardianship with a protected person with a capacity change. One account was set up recently and was not a guardianship account. The bank PINS still have not been provided and neither have the credit card pins. None were informed there was a change in capacity or guardianship properly.

14. Lied - My mom has more than 4 people that she stays in contact with. Some of them send Christmas cards each year and their addresses and names and who they are would be nice for my mom. While her circle is small it is NOT 3 people. To assist with this, if Kim insists that there are only 3 people, we would like access to my mom's phone records, that Kim had on her personal account, instead of my mom's own account.

1 15. Did Not Complete - Or even try to provide a list of foods beyond that she doesn't like
2 vegetables. Yet she has commented since then that Weinerschnitzel is her favorite, and that she
3 loves Costco chicken directly to my mom. Kim has a recording of one of these taken of the
4 Costco chicken conversation in the UCI cardio waiting room. It's abhorrent that Kim wouldn't
5 even try to do this to make life better for my mom as my mom does not generally have the
6 capacity or recall to tell you what she wants to eat or likes regularly and then relies solely on
7 suggestions to be made. My mom didn't need to suffer this disruption to her nutrition when it
8 could have taken 20 seconds for Kim to make a list. She has been the person exclusively feeding
9 her for years. This, singularly, in my opinion, shows why Kim is a danger to my mom. She
10 would rather my mom suffer than give simple information that doesn't cost Kim a penny.

11 16. Did Not Complete - Did not provide the general size even of the disposable underwear
12 resulting in multiple packs of \$30 plus underwear needing to be purchased and tried out. Did not
13 provide toothpaste she uses or deodorant or shampoo or soap, all causing a change for my mom
14 as she can't tell you what products she has used and liked.

15 17. Did Not Complete and Lied: Did not provide my mom's bra size or shoe size, resulting in
16 shoes and bras being purchased at additional expense until the proper size was found. Provided
17 inaccurate sizing for my mom's shirt (she's a large, never an XL, she has a petite frame and the
18 sleeves would cover her entire hand in an XL), and there weren't a single pair of pants in an 18-
19 20 (standard xxl) nor were ANY pants beyond one pair of XL produced upon request, zero pants
20 in her closet in December, just shorts. This disappearing wardrobe phenomenon occurred prior
21 when Kim was the guardian and we were made temporary guardians. My mom had more than
22 one pair of pants and two pair of pajamas. Period. Again, this is just cruelty to my mom and lack
23 of effort along with taking or disposing of my mom's property.

24 19. Did Not Complete - mentions bingo that's a senior center but refuses to say or list which one
25 when directly asked in order to continue something June enjoys. Again, this information would
cost Kim NOTHING, she has just refused to give the information to play games and satisfy her
own needs.

21. Did Not Complete - Multiple doctors and dentist missing

25. Lied - There were past safety deposit boxes mentioned in court records. Donna and was
involved and spoke with Kim as Kim attempted to access safety deposit boxes in CA and was
denied. What banks were these at and ALL records to verify should be provided.

26. CONCERNING - The mortgage was not informed that there was a lack of capacity OR a
guardianship and we believe the refinance was signed ONLY by the protected person without the
guardian's signature which quite possibly is about to result in the mortgage being called due
under false pretense of the loan being made. Kim was well aware that she, alone, should be
signing and that the bank should be made aware of the guardianship and incapacity of the client.
This may result in an immediate \$157,000 plus demand from June that she can't pay without
selling the home. It's absurd and possibly illegal to have done what Kim allowed while she was
the guardian. The current guardian will not be involved with this deception upon a financial
institution.

1 26. B - CONCERNING - Incomplete or Inaccurate Information - we have reason to believe after
2 seeing the phone and the case that the phone that Dean represented to the police as his that was
3 found recording and that Kim then represented as one she had and left in the cabinet to be June's
4 old phone. That it was not "exchanged" for the Apple watch, but rather was taken and if any
5 phone was exchanged it was not June's. Furthermore - the phone number was added to Kim (or
6 Dean's) personal cell phone account versus being handled properly and retained as June's sole
7 account. This has caused a complete lack of access needed for June's phone records, which are
8 needed to determine if June's phone number has been recently used in activity for Dean. People
9 have called June's phone asking for Dean or expecting him to answer when called from June's
10 number - including his brother, Rex Loggans. WHY? is Dean in any way connected to June's cell
11 phone number or Apple Watch. Exceptionally concerning given the suspicion of illegal theft
12 activities occurring previously at the Anaheim house on behalf of neighbors and family due to
13 suspicious activity while there was a renter there and with Dean there. Kim will not answer these
14 questions when asked and will not provide access to the phone records. If this has to be done
15 through a court order, Kim, personally, should have to pay the legal costs associated as she could
16 easily provide access and NEVER should of added June to someone else's account when June is
17 completely capable financially and otherwise of retaining her own account. Finally - the pin and
18 information given for the number to be transferred did not work and the store employee had to
19 call Kim directly to get the release. IF the phone number needs to be changed because of other
20 people using her number for who knows what communication, this will cause a complete loss of
21 contact with people that have had my mom's number for many many years. Especially
22 considering Kim will only provide information for 3 people my mom has known.

23 26. C. CONCERNING - Did Not Complete - PIN numbers to access the accounts NEVER
24 given. Accounts not operating as guardianship accounts as properly required, including for
25 transfers of tens of thousands of dollars. June currently locked out completely of these funds.
The financial cost of this knowing neglect to act properly as the guardian in regards to June's
finances has yet to be determined but has already been costly legally. This burden should be
borne solely by the person causing it, Kim. Legal Aid should also have great concern over these
financial issues and inappropriateness and act on June's behalf to rectify and recoup any losses to
June through legal costs and not having access to her own assets. Every last penny of her liquid
assets. Effectively leaving June penniless in liquidity.

26 List of times Kimberly should have but states she does not:

- 27 1. Social security card
- 28 2. Insurance cards
- 29 3. Birth certificate
- 30 4. Passport
- 31 5. Medicaid card
- 32 6. Handicap Placard

33 Further items needed:

- 34 1. Pins for Citibank and Wells Fargo
- 35 2. FULL and continued access to Bank of America accounts
- 36 3. Veterinary information, including chips, shots, etc.
- 37 4. Pet food brand/type

5. June's original vaccine cards
6. Ophthalmologists information for Nevada and/or California
7. Dermatologist information for Nevada and/or California
8. Hearing doctor information for Nevada and/or California
9. Hearing aids
10. Records, receipts, contracts, warranties, paint colors, contact information for any person and/or contractor that had anything to do with the remodel of the Anaheim House
11. Refinance company and information
12. Key to the master bedroom
13. Email account associated with Apple Watch
14. Care providers contact information, contracts, rate of pay – Kimberly said in court records there were at least two
15. Contact and account information she mentioned in court documents about setting up care or communication for June
16. UCI portal all information including email and password
17. \$2,500 in emergency funds
18. All funds transferred, including the extra mortgage payment
19. Any mail or personal effects like her phone book
20. Humana password – email
21. Medicare passwords – email
22. State Farm passwords – email
23. OC Register account and passwords
24. Farmers Ins. (house) password – email
25. Cards for Bank of America accounts were not given, only given password for one - need emails and passwords for both online
26. All June's clothing
27. June's Tax returns during the years Kimberly was Guardian
28. Any and all mail, including but not limited to financial statements, legal documents and insurance information mailed to the Anaheim house for the last month.
29. List of outstanding bills that need to be paid.
30. Phone records for the time Kimberly was Guardian
31. Internet or cable account that currently exists, or was previously used, at the Anaheim House

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EXHIBIT 3

11:08



PUBLIC PORTAL

HOME | HELP | DOWNLOAD FULL RECORD | DOWNLOAD COVID-19 RECORD

JONES, KATHLEEN

DATE OF BIRTH: 01/20/1937 AGE: 84 years 10 months 11 days
GENDER: Female

I = Invalid Dose O = Dose determined invalid by provider

Dose #	Vaccine	Date Given MM/DD/YYYY	Age at Time of Vaccination
COVID-19			
1	COVID-19 mRNA (MOD)	01/19/2021	83 years 11 months 30 days
2	COVID-19 mRNA (MOD)	02/16/2021	84 years 0 months 27 days

The immunization records on this page may contain acronyms and abbreviations. For a detailed list of the acronyms and abbreviations, as well as their meanings, please refer to the CDC's (Centers for Disease Control) vaccine acronyms and abbreviations guide: <https://www.cdc.gov/vaccines/terms/vacc-abbrev.html>



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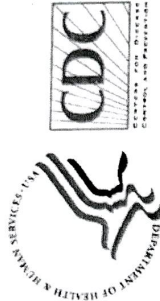
izrecord.nv.gov



COVID-19 Vaccination Record Card

Please keep this record card, which includes medical information about the vaccines you have received.

Por favor, guarde esta tarjeta de registro, que incluye información médica sobre las vacunas que ha recibido.



Jones June

Last Name

First Name

MI

1-20-37

Date of birth

Patient number (medical record or IIS record number)

Vaccine	Product Name/Manufacturer Lot Number	Date	Healthcare Professional or Clinic Site
1 st Dose COVID-19	<i>/</i>	<i>/</i> mm dd yy	
2 nd Dose COVID-19	<i>/</i>	<i>/</i> mm dd yy	
<i>Booster</i>	MODERNA	<i>12-8-21</i>	Savon 0194
Other	048F21A		

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EXHIBIT 4

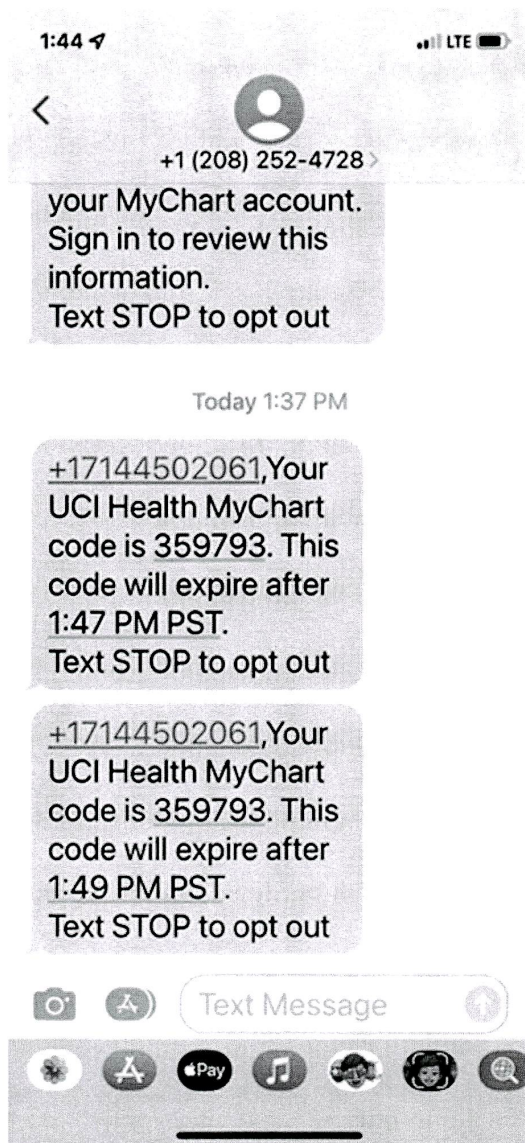
From: Robyn Friedman <vgsfun@hotmail.com>
Sent: Thursday, January 6, 2022 1:57 PM
To: Kimberly Jones <flyonthewall2you@gmail.com>
Subject: Re: Verification code

Yes, because you refuse to give us ALL of the information for this chart and we can't get into it without you at records at UCI yesterday. What is the email associated with moms UCI chart. One more verification code is being sent. Please send it.

From: Kimberly Jones <flyonthewall2you@gmail.com>
Sent: Thursday, January 6, 2022 1:46 PM
To: Robyn Friedman <vgsfun@hotmail.com>
Subject: Verification code

Robyn,

I just received the verification codes below



1:45

LTE

< All Inboxes

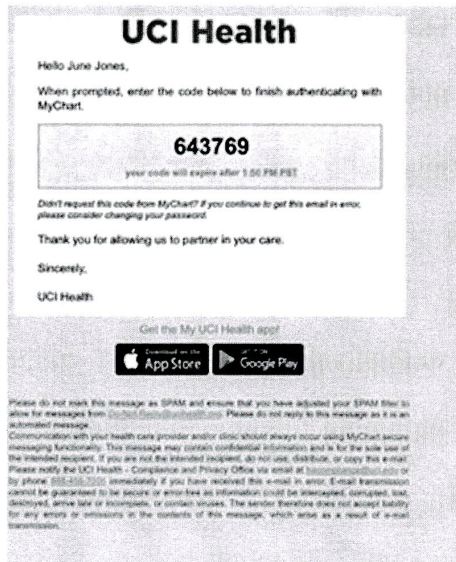


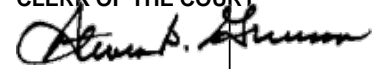
Do-Not-Reply...

1:40 PM

To: Kimberly Jones >

UCI Health MyChart Verification Code





PET

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*Counsel for Robyn Friedman, Guardian,
and Donna Simmons, Interested Party*

DISTRICT COURT

CLARK COUNTY, NEVADA

IN THE MATTER OF THE GUARDIANSHIP)
OF THE PERSON AND ESTATE OF:)
Kathleen June Jones,)
An Adult Protected Person.)

Case Number: G-19-052263-A
Department: B

**PETITION TO RESTRICT VISITATION, COMMUNICATION AND INTERACTION
WITH THE PROTECTED PERSON KATHLEEN JUNE JONES**

Robyn Friedman ("Guardian"), and Donna Simmons, an Interested Party, by and
through their counsel at Michaelson Law, submit this Petition to Restrict Visitation,
Communication and Interaction with the Protected Person Kathleen June Jones.

MEMORANDUM OF POINTS AND AUTHORITIES

1. INTRODUCTION

1. The conduct of the former guardian, Kimberly Jones ("Kimberly" or "Kim") and her
boyfriend, Dean Loggans ("Dean"), has threatened, and continues to threaten the safety and
well-being of the Protected Person, Kathleen June Jones ("Protected Person" or "June").

2. By this Petition, Guardian is seeking an order from this Honorable Court authorizing
her to restrict Kim's and Dean's visitation, communication and interaction with June by

1 ordering that neither they nor any other person or entity may audio or video record the
2 protected person and any prior recordings made from the time a guardianship was ordered over
3 the protected person shall be destroyed unless already filed with this court, and also by
4 ordering that Dean be denied visitation, communication and interaction with June and that
5 Kimberly be subject to supervised visitation, communication and interaction to ensure she is
6 not recording and to keep Dean away from June.

7 2. FACTS OF CASE

8 A. KIMBERLY JONES AND/OR DEAN LOGGANS ARE IMPROPERLY 9 RECORDING THE GUARDIAN, PROTECTED PERSON AND THOSE NEAR 10 HER

11 3. As set forth in additional detail in the *Petition to Relocate the Protected Person to*
12 *Nevada*, paragraph 35, on December 14, 2021, Guardian contacted a locksmith to open the
13 Garage door. Kimberly had previously told Guardian that she had been using the garage as her
14 office but had since lost the keys and could not open the door. Upon opening the garage door,
15 Dean Loggans was found inside the garage with his Corvette along with several other items of
16 personal property that presumably belong to Dean.

17 4. Shortly thereafter, while doing an inventory of the garage contents, Guardian located an
18 iPhone inside of cabinet. The iPhone was actively recording every sound in the garage and had
19 been recording for the past fifty-five (55) minutes.

20 5. When Dean left the day he was found in the garage, he calmly walked out of the
21 garage, but ***left his phone, which was recording, in a cabinet in the garage.*** There is no doubt
22 that Dean (and most likely Kimberly) purposely left a recording device behind in an effort to
23 record Guardian and June after vacating the property that day.
24
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1 6. Not less than two weeks later, on or about December 24, 2021, after Guardian dropped
2 June off to visit Kimberly at the Anaheim House, Kimberly texted Guardian, stating she has
3 Guardian's statements "*on audio.*" **Exhibit 1** is attached hereto and incorporated herein by
4 reference is a copy of the text from Kimberly admitting to recording Guardian.

5 7. On January 5, 2022, while June, Guardian and Kimberly were at Bank of America
6 discussing June's bank accounts, Guardian observed Kimberly take her cell phone out of her
7 purse, press record on the video function, and slide the phone back into her purse. Guardian
8 stated she was not comfortable with Kimberly recording the conversation. The bank employee
9 they were meeting with, Marisol, told Kimberly that recording was not okay. Kimberly ignored
10 her. Eventually, however, she removed the phone from her purse and stopped recording.

11 8. Guardian stated she believed Kimberly was probably still recording, possibly with
12 another device, that Guardian was not comfortable with Kimberly recording her and June and
13 asked if the bank could ask Kimberly to leave her bag somewhere else. Kimberly held up her
14 phone, stated she was not recording, and then walked away.

15 9. The next day, on January 6, 2022, Guardian, who had been staying at a hotel with June
16 for their own safety, brought June to the Anaheim House. Upon arrival, Kimberly was not
17 there. However, when Guardian and June were leaving the neighborhood shortly thereafter,
18 they saw Kimberly arriving. Guardian returned to the home so June could visit Kimberly.
19 Guardian went back inside to see if Kimberly wanted to visit with June, but Kimberly had
20 gone to her room and locked the door without speaking to anyone. Then, when June called
21 Kimberly, Kimberly did not answer. Kimberly responded later that Guardian was silly, and
22 Kimberly had it all on audio tape. The foregoing shows Kimberly is improperly recording
23
24
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1 June and Guardian. **Exhibit 2** is attached hereto and incorporated herein by reference is a
2 copy of the text from Kimberly admitting to recording Guardian.

3 10. Guardian has steadfastly objected and continues to object to Kimberly and/or Dean
4 constantly recording June and those near her.

5 11. Upon information and belief, Guardian suspects that June may be the subject of video
6 and audio recording frequently at the hands of Kimberly and/or Dean or others they allow to
7 record June. Guardian's suspicions are based on statements made by Kimberly wherein she has
8 expressed to Guardian, on more than one occasion, her desire and consideration of secretly
9 recording for the purpose of writing a book or making a tell-all type documentary.

10 12. The Guardian is adamant that using these recordings of June is **NOT in June's best**
11 **interest as she has always remained an exceptionally private person and would only**
12 **result in personal gain for Kimberly and others at June's personal expense.**

13 13. Based on the need for a guardianship in the first place, Guardian believes that June
14 lacks the capacity to judge for herself when, where and how she may be recorded and that the
15 ongoing recordings *by anyone* must cease and desist from making any such recordings, and if
16 any have been made, except any such that have already been filed in this proceeding, to delete
17 them immediately.

18 14. It should be noted that under California law, all parties to a confidential
19 communication, which would include a conversation taking place in an area wherein an
20 individual has a reasonable expectation of privacy, must give permission to be recorded. This
21 law applies to conversations conducted in person and by "telephone or other device, except
22 radio". See Cal. Penal Code § 632(a).

23 ///

1 **B. KIMBERLY JONES AND/OR DEAN LOGGANS ARE STALKING AND/OR**
2 **HARASSING GUARDIAN, PROTECTED PERSON, AND THOSE NEAR HER**

3 15. In that same section of text thread from January 6, 2022, it is documented that, as
4 Guardian drove away, she observed Dean Loggans parked in his Corvette on the street behind
5 June's home. This was the second time in the few days since arriving that Guardian observed
6 Dean Loggans parked in his Corvette on streets near June's home.

7 16. Since then, Guardian and other witnesses, including Donna Simmons' daughter,
8 Tiffany, have observed Dean drive by in his white Corvette several times.

9 17. Guardian has texted Kimberly about these incidents, noting that it is "super creepy," as
10 Dean Loggans was again parked where he could watch June's house. **Exhibit 3** is attached
11 hereto and incorporated herein by reference is a copy of the text from Guardian to Kimberly.

12 18. Guardian reports that it is eerie that each time she shows up at the Anaheim House,
13 almost without fail, Kimberly and/or Dean will miraculously show up within minutes, seeming
14 to indicate the house is being watched or monitored in some way that Guardian is not aware of.

15 19. Upon information and belief, Guardian, believes that Kimberly has been attempting to
16 track June's location. Furthermore, Dean Loggans is continually parking in his Corvette near
17 the Anaheim House in such a way that he can watch the house.

18 20. None of this is appropriate and all of it is creating an unsafe, creepy, stressful
19 environment for June. It is contrary to June's best interest to remain in California. It is also
20 having an extremely chilling effect on other family members' desire to visit June under the
21 current circumstances. Past altercations and issues between Dean and the family are well-
22 documented in this case. Most family members – indeed all who have testified in these
23 proceedings – stated they would not go to their childhood home, June's Anaheim House, if
24 Dean were there or likely to drop by. Despite knowing this, and despite stating repeatedly that
25

1 he does not live there, Kim has allowed Dean to live at the Anaheim House and Dean
2 continues to stop by frequently and randomly when others are there.

3 **C. DEAN'S CRIMINAL HISTORY AND PAST ALTERCATIONS WITH**
4 **GUARDIAN AND JUNE'S FAMILY HAVE A CHILLING EFFECT ON THE**
5 **FAMILY'S DESIRE TO VISIT JUNE UNDER THE CIRCUMSTANCES.**

6 21. Dean has a significant criminal record. See Criminal Case Report, Riverside Superior
7 Court, attached hereto as **Exhibit 4**.

8 22. Dean has been known to use several aliases, including Dean Arlin Curry and Dean
9 Lorrans. *Id.*

10 23. Dean has been accused in California of using a tracking device to track an individual.
11 *Id.*

12 24. Dean has been accused and convicted of harassment by telephone. *Id.*

13 25. Dean has been the subject of at least two criminal protective orders for domestic
14 violence, one in 2017 and another in 2018, the latter of which appears to have not been set to
15 expire until August 2021. *Id.*

16 26. Upon information and belief, Dean has been accused repeatedly of harassment, using
17 tracking devices, recording devices, breaking and entering and theft. If necessary, Guardian
18 would be prepared to provide significant additional evidence in support of these statements in
19 this guardianship proceeding.

20 27. At an evidentiary hearing in this guardianship matter, witnesses testified of bad
21 experiences and altercations with Dean that made them afraid for their safety to be around him.
22 One witness testified that Kimberly reached out to him at one point apparently in great fear
23 asking him to help her completely wipe her digital device in search of or to remove any
24 tracking software or devices that may have been installed by Dean.
25

1 28. Since arriving at the Anaheim House on or about December 14, 2021, Guardian has
2 witnessed at least one phone call to June's phone from someone who seemed certain the phone
3 number belonged to Dean.

4 29. Despite Kimberly asserting in these guardianship proceedings that Dean does not live
5 with her at the Anaheim House, Dean recently told police he does live at the property, as
6 witnessed by Guardian herself.

7 30. Dean's presence at the house and his constant surveillance from nearby hurt June.
8 Guardian and multiple family members are afraid for June's safety as well as their own when
9 he is around. Dean's presence as well as his associates who have been observed at the house
10 prevent June from receiving visits from her family. At the evidentiary hearing, there was
11 abundant testimony that June's normal practice was to have her family over very often, almost
12 every day.

13 3. LEGAL ARGUMENT

14
15 31. Chapter 159 of the Nevada Revised Statutes ("NRS") provides a mechanism for a
16 guardian to restrict access to a protected person for good cause. NRS 159.332 states:

17 **NRS 159.332 Guardian prohibited from restricting communication, visitation or interaction between
18 protected person and relative or person of natural affection; exceptions.**

19 1. A guardian shall not restrict the right of a protected person to communicate, visit or interact with a
20 relative or person of natural affection, including, without limitation, by telephone, mail or electronic
21 communication, *unless*:

22 (a) The protected person expresses to the guardian and at least one other independent witness who is not
23 affiliated with or related to the guardian or the protected person that the protected person does not wish to
24 communicate, visit or interact with the relative or person of natural affection;

25 (b) There is currently an investigation of the relative or person of natural affection by law enforcement or
a court proceeding concerning the alleged abuse of the protected person and the guardian determines that it is
in the best interests of the protected person to restrict the communication, visitation or interaction between the
protected person and the relative or person of natural affection because of such an investigation or court
proceeding;

(c) The restriction on the communication, visitation or interaction with the relative or person of natural
affection is authorized by a court order;

(d) Subject to the provisions of subsection 2, the guardian determines that the protected person is being
physically, emotionally or mentally harmed by the relative or person of natural affection; or

(e) Subject to the provisions of subsection 3, a determination is made that, as a result of the findings in a
plan for the care or treatment of the protected person, visitation, communication or interaction between the

protected person and the relative or person of natural affection is detrimental to the health and well-being of the protected person.

2. Except as otherwise provided in this subsection, if a guardian restricts communication, visitation or interaction between a protected person and a relative or person of natural affection pursuant to paragraph (d) of subsection 1, the guardian shall file a petition pursuant to [NRS 159.333](#) not later than 10 days after restricting such communication, visitation or interaction. A guardian is not required to file such a petition if the relative or person of natural affection is the subject of an investigation or court proceeding pursuant to paragraph (b) of subsection 1 or a pending petition filed pursuant to [NRS 159.333](#).

3. A guardian may consent to restricting the communication, visitation or interaction between a protected person and a relative or person of natural affection pursuant to paragraph (e) of subsection 1 if the guardian determines that such a restriction is in the best interests of the protected person. If a guardian makes such a determination, the guardian shall file a notice with the court that specifies the restriction on communication, visitation or interaction not later than 10 days after the guardian is informed of the findings in the plan for the care or treatment of the protected person. The guardian shall serve the notice on the protected person, the attorney of the protected person and any person who is the subject of the restriction on communication, visitation or interaction.

(Added to NRS by [2017, 2547](#))

32. Thus, a guardian is generally restricted from restricting access to the protected person unless certain conditions are met. At this time, Guardian seeks this Court's authorization to restrict access to June from Kimberly and Dean.

33. NRS 159.333 outlines the process for petitioning for an order restricting communication, visitation or interaction. The statute provides:

Petition for order restricting communication, visitation or interaction between protected person and relative or person of natural affection; issuance of order; petition to modify or rescind order.

1. For good cause, a guardian may petition a court to issue an order restricting the ability of a relative or person of natural affection to communicate, visit or interact with a protected person.

2. After a petition is filed by a guardian pursuant to subsection 1, a court:

(a) May appoint a person to meet with the protected person to determine his or her wishes regarding communication, visitation or interaction with the relative or person of natural affection;

(b) Shall give notice and an opportunity to be heard to the guardian, the protected person and the relative or person of natural affection;

(c) Shall preserve the right of the protected person to be present at the hearing on the petition; and

(d) May order supervised communication, visitation or interaction between the protected person and the relative or person of natural affection before the hearing on the petition.

3. Upon a showing of good cause by a guardian, a court may issue an order restricting the communication, visitation or interaction between a protected person and a relative or person of natural affection pursuant to this section. When determining whether to issue an order, a court shall consider the following factors:

(a) Whether any protective order has been issued to protect the protected person from the relative or person of natural affection;

(b) Whether the relative or person of natural affection has been charged with abuse, neglect or financial exploitation of the protected person;

(c) Whether the protected person has expressed to the court or to the guardian and at least one other independent witness who is not affiliated with or related to the guardian or the protected person a desire to or a desire not to communicate, visit or interact with the relative or person of natural affection;

(d) If the protected person is unable to communicate, whether a properly executed living will, durable power of attorney or other written instrument contains a preference by the protected person regarding his or her communication, visitation or interaction with the relative or person of natural affection; and

(e) Any other factor deemed relevant by the court.

1 4. If a protected person is unable to communicate verbally, the guardian shall provide the court with
2 documentation of any physical reactions or manifestations of agitation, distress or combative or overly
3 emotional behavior by the protected person during or following any contact with a relative or person of natural
4 affection or any opposition by the protected person to any communication, visitation or interaction with a
5 relative or person of natural affection for the purpose of allowing the court to consider whether the protected
6 person has expressed a desire not to communicate, visit or interact with the relative or person of natural
7 affection, as set forth in paragraph (c) of subsection 3. Such documentation may include, without limitation, any
8 nursing notes, caregiver records, medical records or testimony of witnesses.

9 5. A guardian, protected person, relative or person of natural affection may petition the court to modify or
10 rescind any order issued pursuant to this section.

11 (Added to NRS by [2017, 2547](#))

12 34. Guardian has the burden of proof in this Petition. NRS 159.337.

13 35. Upon information and belief, no protective order has been issued against Kimberly or
14 Dean in this matter.

15 36. Upon information and belief, neither Kimberly nor Dean has yet been charged with
16 elder abuse.

17 37. Upon information and belief, many family members have or will testify that June has
18 always been a very private person. She would not want to be audio or video recorded at all and
19 certainly not in any way for some person or party's personal gain or for any type of public
20 dissemination, especially when she lacks the capacity to understand and consent and when it
21 could be used to shame herself or her family.

22 38. Dean's extensive criminal record and treatment of June's family members has a
23 severely chilling effect on June's ability to visit with her loved ones. Upon information and
24 belief, Dean is not authorized to live at the Anaheim House, nor is he paying any rent, nor is he
25 authorized to use June's garage as a storage unit.

39. Kimberly has been asked repeatedly – actually Guardian has demanded – that Kimberly
not record June or people in her presence. Kimberly will not stop recording. Dean has left
recording devices. On at least one occasion, when Guardian opened a door to let Kimberly in,
and demanded that Dean not come in out of fear for her own safety, Dean pushed his way in to
the Anaheim House.

1 40. Dean claims to live at the Anaheim House. He will not stop storing his vehicle and
2 belongings at June's house. Despite knowing the chilling effect he is having on June's life and
3 in her family relations, he will not stop randomly coming by and entering without permission.
4 Kimberly is either unwilling or unable to take any action to ward Dean off and/or keep him
5 away from June or her house.

6 41. This Court must issue an order restricting Kimberly and Dean from visiting,
7 communicating or interacting with June.

8 42. NRS 159.334 governs the imposition of such restrictions.

9 **NRS 159.334 Imposition of certain restrictions on communication, visitation or interaction between**
10 **protected person and relative or person of natural affection before issuance of order.**

11 1. Before issuing an order pursuant to [NRS 159.333](#), a court shall consider imposing any restrictions on
12 communication, visitation or interaction between a protected person and a relative or person of natural affection
13 in the following order of preference:

14 (a) Placing reasonable time, manner or place restrictions on communication, visitation or interaction
15 between the protected person and the relative or person of natural affection based on the history between the
16 protected person and the relative or person of natural affection or the wishes of the protected person;

17 (b) Requiring that any communication, visitation or interaction between the protected person and the
18 relative or person of natural affection be supervised; and

19 (c) Denying communication, visitation or interaction between the protected person and the relative or
20 person of natural affection.

21 2. If the court determines that the relative or person of natural affection poses a threat to the protected
22 person, the court may order supervised communication, visitation or interaction pursuant to paragraph (b) of
23 subsection 1 before denying any communication, visitation or interaction.

24 (Added to NRS by [2017, 2548](#))

25 43. Since Kimberly has proven to routinely not abide by orders of this Court, Guardian
believes they will continue to record June and her family and friends with impunity. Thus,
Guardian requests that the act to protect June and her family and loved ones from Dean by
denying his visitation, communication and interaction with June. Guardian further requests
that Kimberly's visitations, interactions and communications with June be done only at pre-
planned opportunities supervised by an independent third party.

44. Guardian further requests that this Court order that no party record June and that any
recordings made other than those filed in these proceedings be destroyed.

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4. CONCLUSION

WHEREFORE, based upon the foregoing, Successor Guardian Robyn Friedman requests:

1. That this Court grant the relief requested in Petition to Restrict Visitation, Communication and Interaction with the Protected Person, Kathleen June Jones.
2. That this Court order such other and further relief as it deems appropriate.

DATED this 11th day of January 2022.

MICHAELSON LAW

/s/ John P. Michaelson
John P. Michaelson, Esq.
Nevada Bar No. 7822

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VERIFICATION

Robyn Friedman, being first duly sworn, under penalty of perjury, hereby deposes and says: that she is Guardian in the Supplement above; that she has read the foregoing *Petition to Restrict Visitation, Communication and Interaction with the Protected Person Kathleen June Jones* and knows the contents thereof; that the same are true of her own knowledge except as to those matters therein stated upon information and belief, and as to those matters, she believes them to be true.

/s/ Robyn Friedman
ROBYN FRIEDMAN

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) and NEFCR 9 the undersigned hereby certifies that on January 12, 2022, a copy of the *Petition to Restrict Visitation, Communication and Interaction with the Protected Person Kathleen June Jones* was e-served to the following individuals and/or entities at the following addresses:

Scott Simmons scott@technocoatings.com	Robyn Friedman vgfun@hotmail.com <i>Guardian</i>
Perry Friedman friedman@cs.stanford.edu	Donna Simmons donnamsimmons@hotmail.com
Jeffrey R. Sylvester, Esq. jeff@sylvesterpolednak.com Kelly L. Easton kellye@sylvesterpolednak.com <i>Co-Counsel for Guardian, Robyn Friedman, and Interested Party, Donna Simmons</i>	Maria L. Parra-Sandoval, Esq. Legal Aid Center of Southern Nevada mparra@lacs.org <i>Attorney for Kathleen June Jones</i> Rosie Najera rnajera@lacs.org <i>Assistant to Attorney for Kathleen June Jones</i>
Elizabeth Brickfield DAWSON & LORDAHL PLLC ebrickfield@dlnevadalaw.com Melissa R. Douglas mdouglas@dlnevadalaw.com <i>Guardian Ad Litem for Kathleen June Jones</i>	Geraldine Tomich, Esq. gtomich@maclaw.com Kimberly Jones c/o James Beckstrom, Esq. jbeckstrom@maclaw.com Deana DePry ddepry@maclaw.com Kellie Piet kpiet@maclaw.com <i>Attorneys for Kimberly Jones</i>

Monica L. Gillins mlg@johnsonlegal.com	Kate McCloskey NVGCO@nvcourts.nv.gov
David C. Johnson dcj@johnsonlegal.com	LaChasity Carroll lcarr@nvcourts.nv.gov
	Sonja Jones sjones@nvcourts.nv.gov
Cameron Simmons Cameronnscottt@yahoo.com	

Pursuant to NRCP 5(b) and NEFCR 9 the undersigned hereby certifies that on January 12, 2022, a copy of the *Petition to Restrict Visitation, Communication and Interaction with the Protected Person Kathleen June Jones* will be mailed by regular US first class mail, postage prepaid, in a sealed envelope in Henderson, Nevada to the following individuals and/or entities at the following addresses:

Kathleen June Jones 1054 S. Verde Street Anaheim, CA 92805 <i>Protected Person</i>	Courtney Simmons 765 Kimbark Avenue San Bernardino, CA 92407
Teri Butler 586 N. Magdalena Street Dewey, AZ 86327	Ampersand Man 1315 Enchanted River Drive Henderson, Nevada 89012
Jen Adamo 14 Edgewater Drive Magnolia, DE 19962	Jon Criss 804 Harkness Lane, Unit 3 Redondo Beach, CA 90278

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Ryan O'Neal 112 Malvern Avenue, Apt. E Fullerton, CA 92832	Tiffany O'Neal 177 N. Singing Wood Street, Unit 13 Orange, CA 92869
--	---

MICHAELSON LAW

 /s/ Heather Ranck
Employee of Michaelson Law

EXHIBIT 1

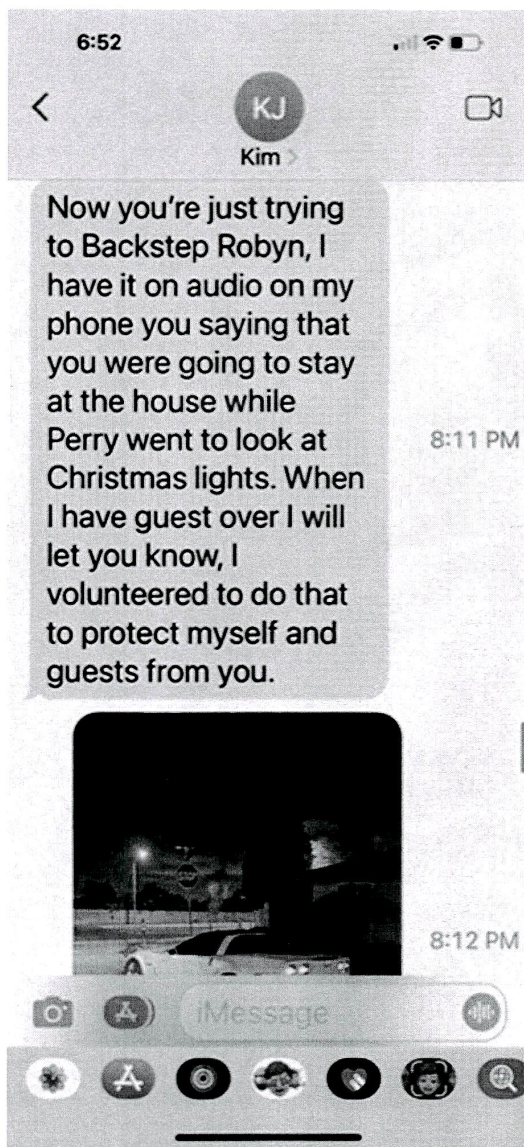


EXHIBIT 2

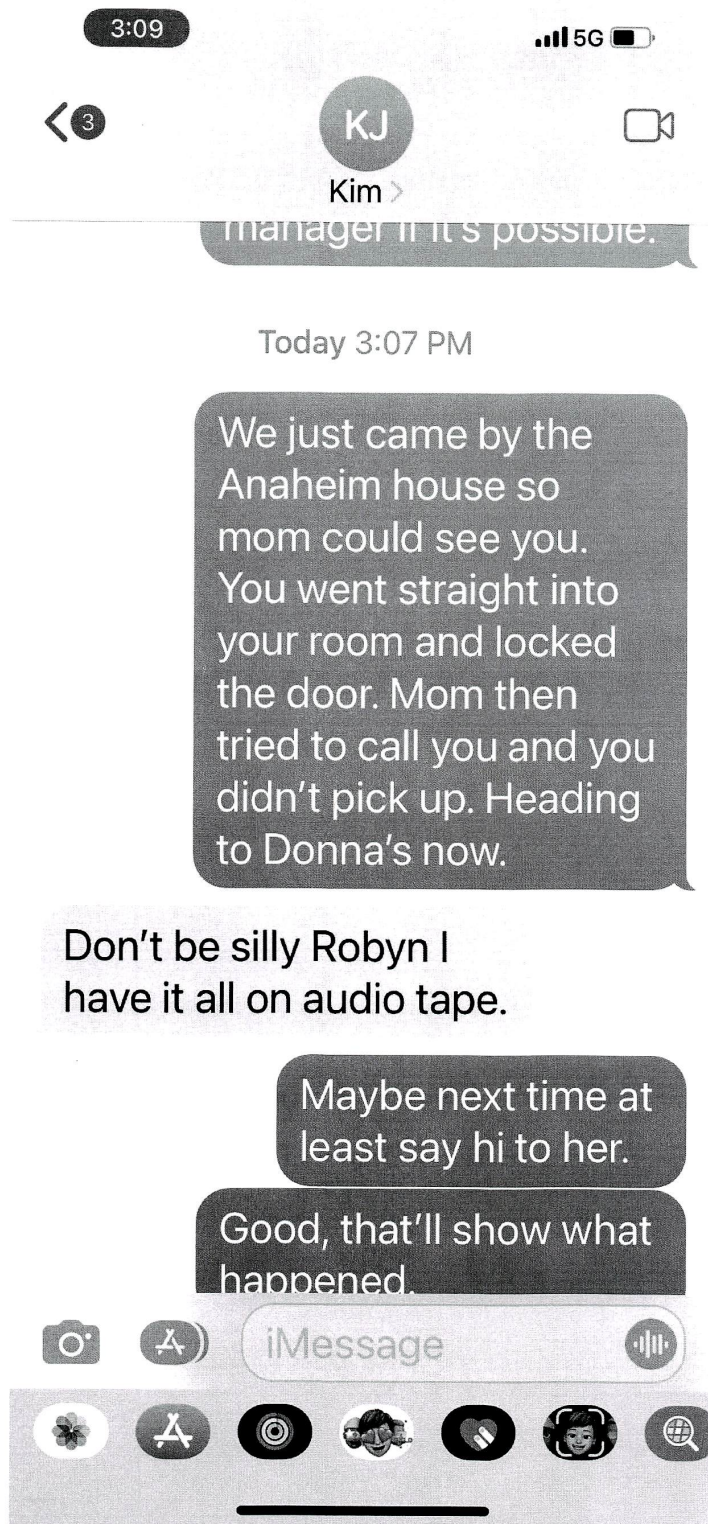
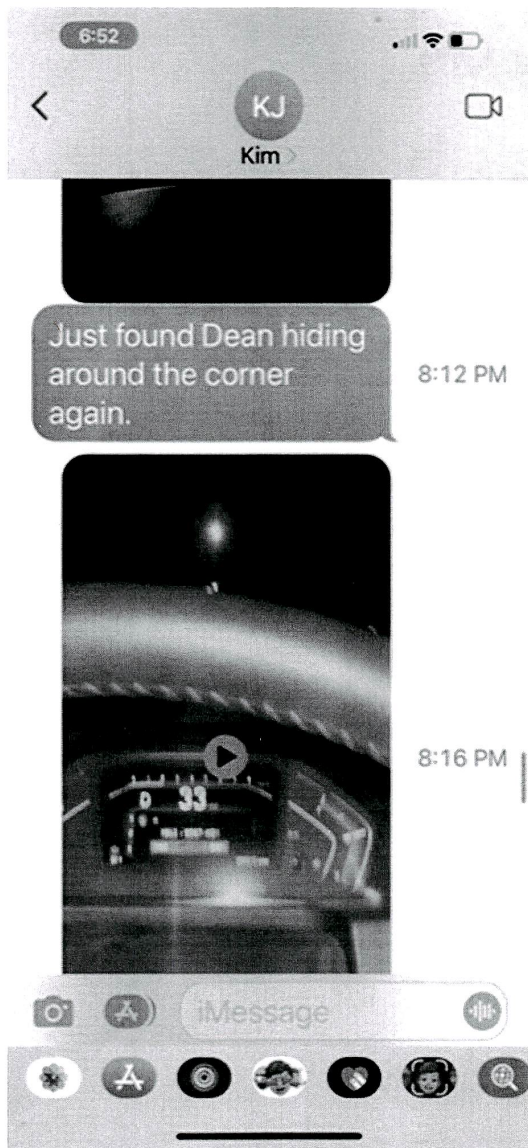


EXHIBIT 3



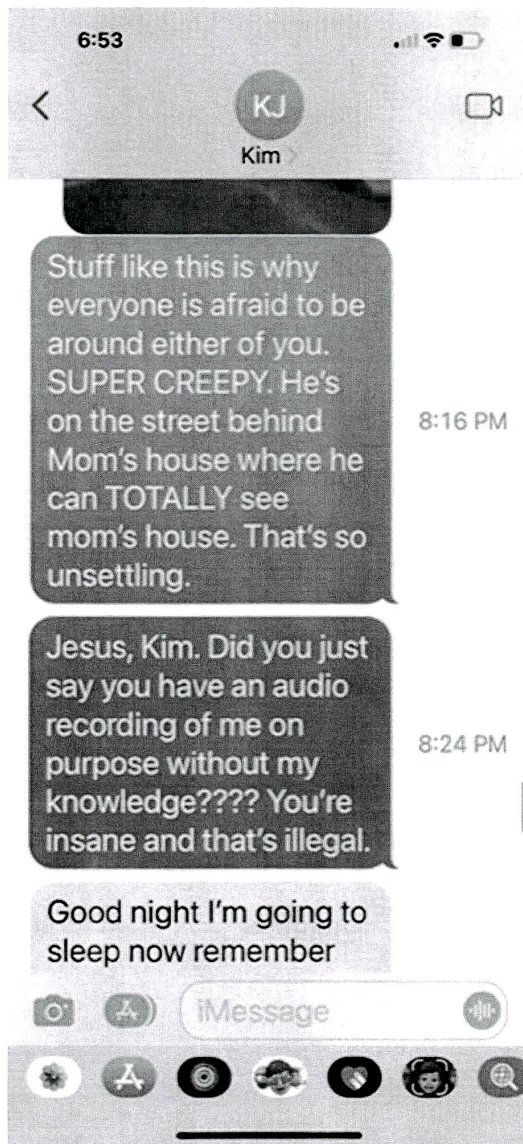


EXHIBIT 4

RIVERSIDE SUPERIOR COURT

PUBLIC ACCESS

Criminal Case Report

[Pay Ticket / Case Fine](#)

[Send me an email when this case is updated \(click here\)](#)



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Case RIM1706160 - Defendants

Seq	Defendant	Next Court Date	Status	Agency / DR Number	Arrest Date	Count 1 Charge	Violation Date
1	LOGGANS, DEAN BRADLEY			CRPD 172953	03/13/2017	PC 653M(A)	03/13/2017
	ALIAS: LORRANS, DEAN						
	ALIAS: CURRY, DEAN ARLIN						
	ALIAS: LORRANS, DEAN						
	ALIAS: CURRY, DEAN ARLIN						

Case RIM1706160 - LOGGANS, DEAN BRADLEY - Status

Filing Type	Complaint	Custody	N/A
Ordered Bail	\$5,000.00	Filing Date	07/05/2017
D.A.	Jessica Roundy	Posted Bail	\$0.00
Next Action:		Defense	VMB Paul Lin
		Deputy Report #:	CRPD 172953

Warrant	Type	Status	Issued	Affidavit
		NONE	N/A	N/A
Probation	Type	Granted	Expiration	
	N/A	N/A	N/A	
Sentence	Convicted Date	Fine and Penalty	Restitution Fine	
	03/08/2018		0	

Case RIM1706160 - LOGGANS, DEAN BRADLEY - Charges

Arrest Charges

Count	Charge	Severity	Description	Violation Date	Plea	Status
1	PC 653M(A)	M	Harassing by Telephone	03/13/2017		
Filed Charges						
Count	Charge	Severity	Description	Violation Date	Plea	Status
1	PC 653M(A)	M	Harassing by Telephone	03/13/2017	GUILTY	CONVICTED
2	PC 637.7	M	Use of electronic tracking device to track individual	03/13/2017	NOT GUILTY	DISMISSED

Case RIM1706160 - LOGGANS, DEAN BRADLEY - Probation

Probation Has Not Been Granted On This Case For This Defendant.

Case RIM1706160 - LOGGANS, DEAN BRADLEY - Related Cases On Calendar

Related Cases On Calendar
<i>This Defendant Does Not Have Any Other Cases With Future Hearings Scheduled.</i>

Case RIM1706160 - LOGGANS, DEAN BRADLEY - All of Defendant's Other Cases

Case Number	Filed Date	Charges	Next Hearing	Jurisdiction	Status
507810DL	09/25/2020	VC 22350 VC 12951A PC 1214.1	None Scheduled	SUPERIOR COURT - CORONA	Active
RIF130696	06/08/2006	HS 11377(A) HS 11550(A) VC 14601.1(A) PC 1214.1(A)	None Scheduled	SUPERIOR COURT - RIVERSIDE	Closed
RIF129441	04/04/2006	PC 496A	None Scheduled	SUPERIOR COURT - RIVERSIDE	Closed
RIF129196	03/29/2006	HS 11379(A) VC M23152(A) PC 1214.1(A)	None Scheduled	SUPERIOR COURT - RIVERSIDE	Fine
SWF013065	08/17/2005	PC 12316(B)(1) HS 11550(A) PC 667.5(B)	None Scheduled	SUPERIOR COURT - SOUTHWEST JUSTICE CENTER	Closed
RIF120554	11/22/2004	HS 11377(A) HS 11364	None Scheduled	SUPERIOR COURT - RIVERSIDE	Closed
RIF120099	11/01/2004	VC 10851(A) PC 496D(A) VC 10751(A)	None Scheduled	SUPERIOR COURT - RIVERSIDE	Closed

Case RIM1706160 - LOGGANS, DEAN BRADLEY - Actions & Minutes

Action Date	Action Text	Disposition	Hearing Type
-------------	-------------	-------------	--------------

03/12/2018	PAYMENT OF \$220.00 RECEIVED		
Minutes	Print Minute Order		
CRRSG	180312-1556-CS CFS/ 40.00 001		
CRRSG	180312-1556-CS INM/ 30.00 002		
CRRSG	180312-1556-CS RFS/ 150.00 003		
03/08/2018	MISDEMEANOR PLEA FORM FILED		
03/08/2018	NOTICE OF TERMINATION OF PROTECTIVE ORDER FILED. (CR-165)		
03/08/2018	CRIMINAL PROTECTIVE ORDER - DOMESTIC VIOLENCE FILED. ORDER EXPIRES 03/08/2021. (CR-160/RI-CR001)		
03/08/2018 8:30 AM DEPT. 33	JURY TRIAL TRAILING	DISPOSED	
Minutes	Print Minute Order		
03/07/2018 8:30 AM DEPT. 33	JURY TRIAL	DISPOSED	
Minutes	Print Minute Order		
02/26/2018	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
02/26/2018 8:30 AM DEPT. 33	JURY TRIAL	DISPOSED	
Minutes	Print Minute Order		
01/22/2018	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
01/22/2018 8:30 AM DEPT. 33	JURY TRIAL	DISPOSED	
Minutes	Print Minute Order		
01/02/2018	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
01/02/2018 8:30 AM DEPT. 33	TRIAL READINESS CONFERENCE	DISPOSED	TRC
Minutes	Print Minute Order		
12/12/2017	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
12/12/2017 8:30 AM DEPT. 33	TRIAL READINESS CONFERENCE	DISPOSED	TRC
Minutes	Print Minute Order		
11/14/2017	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
11/14/2017 8:30	TRIAL READINESS CONFERENCE	DISPOSED	TRC

AM DEPT. 33			
Minutes	Print Minute Order		
10/19/2017	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
10/19/2017 8:30 AM DEPT. 33	TRIAL READINESS CONFERENCE	DISPOSED	TRC
Minutes	Print Minute Order		
09/21/2017	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
09/21/2017 8:30 AM DEPT. 33	TRIAL READINESS CONFERENCE	DISPOSED	TRC
Minutes	Print Minute Order		
09/12/2017 8:30 AM DEPT. 33	JURY TRIAL	VACATED	
08/25/2017	REQUEST FOR CONTINUANCE PURSUANT TO PC 1050 FILED.		
08/25/2017	WAIVER OF DEFENDANT'S PERSONAL PRESENCE PURSUANT TO 977 PC FILED.		
08/25/2017 8:30 AM DEPT. 33	TRIAL READINESS CONFERENCE	DISPOSED	TRC
Minutes	Print Minute Order		
08/11/2017	DEFENDANT'S FINANCIAL STATEMENT AND NOTICE TO DEFENDANT FILED. (CONFIDENTIAL)		
08/11/2017	CRIMINAL PROTECTIVE ORDER - DOMESTIC VIOLENCE FILED. ORDER EXPIRES 08/11/2020. (CR-160/RI-CR001)		
08/11/2017 8:30 AM DEPT. 33	ARRAIGNMENT	DISPOSED	ARRAIGNMENT
Minutes	Print Minute Order		
07/13/2017	AGREEMENT FOR OWN RECOGNIZANCE RELEASE FILED.		
07/12/2017	DEFENDANT'S FINANCIAL STATEMENT AND NOTICE TO DEFENDANT FILED. (CONFIDENTIAL)		
07/12/2017	AGREEMENT FOR OWN RECOGNIZANCE RELEASE FILED.		
07/12/2017 7:30 AM DEPT. 22	ARRAIGNMENT	DISPOSED	ARRAIGNMENT
Minutes	Print Minute Order		
07/05/2017	DEFENDANT ALSO KNOWN AS: DEAN ARLIN CURRY		
07/05/2017	DEFENDANT ALSO KNOWN AS: DEAN LORRANS		
07/05/2017	CASE DESIGNATION: VERTICAL. CASE ASSIGNED TO DEPT. 22		
07/05/2017	ELECTRONIC - DECLARATION IN SUPPORT OF ARREST		

	WARRANT RECEIVED.		
07/05/2017	ELECTRONIC - CITATION		
07/05/2017	ELECTRONIC - COMPLAINT FILED.		
05/02/2017	RELEASED ON SIGNED CITE 05/02/2017. APPEARANCE DATE IS 07/12/2017.		

Case RIM1706160 - LOGGANS, DEAN BRADLEY - Fine Information

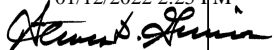
Date To Pay: **03/08/2018** *First Payment:* **03/12/2018**
Prior NSF: *Payment Amount:* **\$0.00** *Last Payment:* **03/12/2018**

<i>Fine Number</i>	<i>Fine Type</i>	<i>Fine Description</i>	<i>Original Amount</i>	<i>Paid To Date</i>	<i>Current Due</i>
1	CFS	Operations/Security Fee (conv)	\$40.00	\$40.00	\$0.00
2	CAF	Conviction Assess Fee	\$30.00	\$30.00	\$0.00
3	RFS	Restitution Fund (State)	\$150.00	\$150.00	\$0.00
Total:			\$220.00	\$220.00	\$0.00

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CLERK OF THE COURT

FFCL

EIGHTH JUDICIAL DISTRICT COURT
FAMILY DIVISION

CLARK COUNTY NEVADA

In the Matter of the Guardianship of:)
)
Kathleen Jones,) Case No.: G-19-052263-A
) Dept. No.: B
Protected Person(s).)
) Hearing Date: January 12, 2022
) Hearing Time: 9:00 AM
_____)

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER GRANTING
SUCCESSOR GUARDIAN'S MOTION TO RELOCATE

Relevant Procedural History

On April 15, 2021 the Court approved the temporary relocation of the Protected Person from her long time Clark County residence to her rental property in California. The temporary relocation was based on extenuating circumstances. As a result of settlement negotiations in a related civil case concerning the Protected Person's Clark County residence, the Protected Person and her Guardian were forced to vacate the residence and find alternative housing on short notice. The Guardian was unable to identify any reasonable short or long term housing option, other than the existing rental property.

On December 6, 2021, this Court issued an Order removing Guardian, Kimberly Jones, and appointing Successor Guardian, Robyn Friedman. The Court also anticipated and required that Successor Guardian file petition to

Linda Marquis
DISTRICT JUDGE
FAMILY DIVISION, DEPT. B
LAS VEGAS, NV 89101

Statistically closed: USJR Guardianship - Set/Withd With Jud Conf/Hr (UGSW)

1 vacate the order allowing temporary relocation and request permission to
2 move Protected Person back to Clark County, Nevada.

3
4 On December 7, 2021, the Court issued an Order Appointing Investigator
5 to conduct a financial forensic audit of the Estate and previous Guardian,
6 Kimberly Jones.

7
8 On December 7, 2021, an Order Appointing Successor Guardian was filed.
9 Counsel for former Guardian, Kimberly Jones, filed a motion to withdraw on
10 December 10, 2021.

11
12 Protected Person filed a Notice of Appeal and Case Appeal Statement on
13 December 15, 2021.

14
15 Successor Guardian filed a Petition to Compel and Petition to Relocate on
16 December 15, 2021, and a request for Order Shortening Time relative to both
17 petitions was granted and set for December 20, 2021. At the December 20,
18 2021, Hearing Counsel for Protected Person requested additional time to
19 brief the Petition to Relocate, requesting it be heard in the ordinary course.
20

21 The Court granted Counsel for Protected Person's request for additional
22 time to file a responsive pleading and the Petition to Relocate was continued
23 to January 12, 2021. Although Counsel for Protected Person did not file any
24 responsive pleading, Counsel for Protected Person orally objected to the
25 request to relocate, indicating that the Protected Person desired to remain in
26 her home.
27
28

1 Kimberly Jones, against the advice of her Counsel and being admonished
2 by the Court, made several statements at the hearing relative to unrelated
3 issues and requested additional time to submit an alternate care plan.
4

5 Successor Guardian also filed the following pleadings, which were
6 considered by the Court: Physician's Certificate, including Expert's Report
7 on January 4, 2022; Inventory on January 7, 2022; Care Plan, including
8 alternatives filed January 7, 2022; Budget, including alternatives filed
9 January 7, 2022; and a Supplement to the Petition to Relocate on January 8,
10 2022.
11
12

13 ***Findings of Fact***

14 THE COURT HEREBY FINDS that on April 15, 2021, the Court
15 granted Guardian Kimberly Jones' request to temporarily relocate the
16 Protected Person to the Protected Person's California rental home based upon
17 extraordinary and unique circumstances. Circumstances created by the
18 settlement of civil litigation regarding the Protected Person's Las Vegas
19 residence, required the Protected Person a short time to vacate her longtime
20 Las Vegas residence. The Guardian and Protected Person were both living in
21 the Protected Person's Las Vegas residence and were unable to locate any
22 reasonable housing alternatives for the Protected Person. The emergent
23 circumstances resulted in the Protected Person temporarily relocating to the
24 Protected Person's California rental home.
25
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1 THE COURT FURTHER FINDS that the Protected Person has been a
2 resident of Clark County, Nevada for decades and lived her Clark County
3 residence for two decades before she was required to vacate the home.
4

5 THE COURT FURTHER FINDS that although Protected Person lived
6 in the California rental property at one time while raising her children, she
7 later maintained the residence as a rental property while she resided in Clark
8 County, Nevada.
9

10 THE COURT FURTHER FINDS that Protected Person has lived
11 temporarily at the California rental property for a period of months, after
12 vacating her long-time home in Clark County.
13

14 THE COURT FURTHER FINDS that the current financial and
15 logistical conditions make the continued presence of the Protected Person in
16 the California rental property unreasonable.
17

18 THE COURT FURTHER FINDS that the Budgets, Inventories,
19 Forensic Accounting Investigator's Report, and unapproved outstanding
20 Annual Accountings filed establish that the Protected Person's estate cannot
21 afford the cost associated with the Protected Person's care at the California
22 home.
23

24 THE COURT FURTHER FINDS that the transition between the initial
25 Guardian, Kimberly Jones, and her sister and court appointed Successor
26 Guardian, Robyn Friedman, has been fraught with obstacles that have
27
28

1 impeded a smooth transition between guardians promoting a consistent
2 continuum of care which is in the Protected Person's best interest.

3
4 THE COURT FURTHER FINDS that there are allegations that the
5 home in its current condition requires additional flooring repairs to eliminate
6 potential falling hazards.

7
8 THE COURT FURTHER FINDS that the Former Guardian, Kimberly
9 Jones, continues to live in the locked master bedroom of the California
10 property and the Protected Person has a secondary bedroom and bathroom.

11
12 THE COURT FURTHER FINDS there are allegations Kimberly Jones
13 has inadequately resolved problems, despite Court intervention, with utilities,
14 prescription drugs, medical appointments, medical records, medical devices,
15 identification documents, five separately keyed locked doors at the California
16 property, and the presence of Kimberly Jones' partner at the California
17 property.

18
19
20 THE COURT FURTHER FINDS that law enforcement has responded
21 to the California property relative to the ongoing problems between
22 Successor Guardian and Former Guardian.

23
24 ***Conclusions of Law***

25 NRS 159.0807 governs the movement of the Protected Person and
26 states as follows:

- 27
28 1. Every protected person has the right, if possible, to:
(a) Have his or her preferences followed; and

1 (b) Age in his or her own surroundings or, if not possible, in the
2 least restrictive environment suitable to his or her unique needs and
abilities.

3 2. Except as otherwise provided in subsection 4, a proposed
4 protected person must not be moved until a guardian is appointed.

5 3. Except as otherwise provided in this section and subsections 5
6 and 6 of NRS 159.079, the guardian shall notify all interested persons
in accordance with subsection 4 if the protected person:

7 (a) Is admitted to any residential long-term care facility;

8 (b) Changes his or her residence, including, without limitation,
to or from one residential long-term care facility to another; or

9 (c) Is admitted to a hospital or is temporarily placed in a facility
that provides rehabilitative services.

10 4. Except as otherwise provided in this section and subsections 5
11 and 6 of NRS 159.079, a guardian shall file with the court a notice of
12 his or her intent to move the protected person to a higher level of care
and shall serve notice upon all interested persons not less than 10 days
before moving the protected person unless:

13 (a) An emergency condition exists, including, without
14 limitation, an emergency condition that presents a risk of imminent
15 harm to the health or safety of the protected person, and the protected
16 person will be unable to return to his or her residence for a period of
more than 24 hours;

17 (b) The move or change in placement is made pursuant to a
written recommendation by a licensed physician, a physician
18 employed by the Department of Veterans Affairs, a licensed social
worker or an employee of a county or state office for protective
19 services; or

20 (c) The move or change in placement is a result of the protected
21 person being admitted to a hospital or facility that provides
rehabilitative services.

22 5. If an emergency condition exists pursuant to paragraph (a) of
23 subsection 4, the guardian may take temporary action to mitigate the
24 condition without the permission of the court, and shall file notice with
the court and serve such notice upon all interested parties as soon as
25 practicable after the action is taken.

26 6. If no objection to the move is received from any interested
27 person within 10 days after receiving a notice pursuant to subsection 4
or 5, the guardian may move the protected person without court
28 permission. Once a permanent placement for the protected person is
established, the guardian shall, as soon as practicable after such
placement, file a notice of change of address with the court.

1 7. Except as otherwise provided in this subsection, any notice
2 provided to a court, an interested person or person of natural affection
3 pursuant to this section or NRS 159.0809 must include the current
4 location of the protected person. The guardian shall not provide any
5 contact information to an interested person or person of natural
6 affection if an order of protection has been issued against the interested
7 person or person of natural affection on behalf of the protected person.

8 8. A guardian is not required to provide notice to an interested
9 person or person of natural affection in accordance with this section or
10 NRS 159.0809 if:

11 (a) The interested person or person of natural affection informs
12 the guardian in writing that the person does not wish to receive such
13 notice; or

14 (b) The protected person or a court order has expressly
15 prohibited the guardian from providing notice to the interested person
16 or person of natural affection.

17 Here, appropriate notice was given and no written objections filed.

18 Counsel for Protected Person's oral objection was based upon the Protected
19 Person's desire to remain in "her home."

20 The Court has considered the Protected Person's preference and desire
21 as represented by her Counsel at the Hearing. However, it is no longer
22 financially nor logistically possible for the Protected Person to remain in the
23 California rental property as discussed herein.

24 ***Orders***

25 IT IS HEREBY ORDERED that the order allowing temporary
26 relocation of the Protected Person to the Protected Person's California rental
27 property is vacated.
28

1 IT IS HEREBY ORDERED that the Guardian's request to move the
2 Protected Person from Protected Person's California rental property to the
3 Guardian's home in Las Vegas, Nevada is GRANTED.
4

5 IT IS SO ORDERED.
6

Dated this 12th day of January, 2022

Linda Marquis

3E8 B03 D2B3 A5DE
Linda Marquis
District Court Judge

1 CSERV

2 DISTRICT COURT
3 CLARK COUNTY, NEVADA

4
5
6 In the Matter of the Guardianship of: CASE NO: G-19-052263-A
7 Kathleen Jones, Protected DEPT. NO. Department B
8 Person(s)
9

10 **AUTOMATED CERTIFICATE OF SERVICE**

11 This automated certificate of service was generated by the Eighth Judicial District
12 Court. The foregoing Findings of Fact, Conclusions of Law and Judgment was served via the
13 court's electronic eFile system to all recipients registered for e-Service on the above entitled
14 case as listed below:

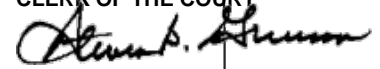
15 Service Date: 1/12/2022

16 Heather Ranck	heather@michaelsonlaw.com
17 Kelly Easton	kellye@sylvesterpolednak.com
18 Monica Gillins	mlg@johnsonlegal.com
19 Lenda Murnane	lenda@michaelsonlaw.com
20 Rosie Najera	rnajera@lacs.org
21 John Michaelson	john@michaelsonlaw.com
22 John Michaelson	john@michaelsonlaw.com
23 James Beckstrom	jbeckstrom@maclaw.com
24 Jeffrey Sylvester	jeff@sylvesterpolednak.com
25 Maria Parra-Sandoval, Esq.	mparra@lacs.org
26 Kate McCloskey	NVGCO@nvcourts.nv.gov

27
28

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3	Melissa Romano	mdouglas@dlnevadalaw.com
4	Elizabeth Brickfield	ebrickfield@dlnevadalaw.com
5	David Johnson	dcj@johnsonlegal.com
6	Geraldine Tomich	gtomich@maclaw.com
7	Robyn Friedman	vgsfun@hotmail.com
8	Perry Friedman	friedman@cs.stanford.edu
9	Donna Simmons	donnamsimmons@hotmail.com
10	Scott Simmons	scott@technocoatings.com
11	Cameron Simmons	Cameronnscott@yahoo.com
12	Deana DePry	ddepry@maclaw.com
13	Matthew Whittaker	matthew@michaelsonlaw.com
14	Ammon Francom	ammon@michaelsonlaw.com
15	Matthew Whittaker	matthew@michaelsonlaw.com
16	Ammon Francom	ammon@michaelsonlaw.com
17	Kellie Piet	kpiet@maclaw.com
18	Kimberly Jones	flyonthewall2you@gmail.com
19		
20		
21		
22		
23	If indicated below, a copy of the above mentioned filings were also served by mail	
24	via United States Postal Service, postage prepaid, to the parties listed below at their last	
25	known addresses on 1/13/2022	
26	Elizabeth Brickfield	Dawson & Lordahl PLLC
27		Attn: Elizabeth Brickfield, Esq
28		9130 West Post Road, Suite 200
		Las Vegas, NV, 89148

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KIMBERLY JONES
18543 YORBA LINDA BLVD., #146
YORBA LINDA, CA 92886
714-450-2061
flyonthewall2you@gmail.com

DISTRICT COURT
CLARK COUNTY, NEVADA

IN THE MATTER OF GUARDIANSHIP OF THE
PERSON AND ESTATE,

KATHLEEN JONES,
PROTECTED PERSON(S)

vs.

KIMBERLY JONES,

Defendant

Case No.: Number

RESPONSE TO PETITION TO COMPEL

Page 3 line 21 – My mom does not have severe memory impairment. She was diagnosed with late onset Alzheimer's in 2019 however she is alert and oriented and able to verbalize needs/wants and participate in her daily activities which has been well document by her attorney Maria Sandoval Perez and medical professionals.

Page 3 item B:

Robyn asked for me to care for mom job Monday and I agreed to do it and that I was also being tasked with getting the paperwork and medicines together for Robyn so that she could take over moms care I did that while taking care of mom at the same time but Robyn is so overzealous in wanting detailed information that most would not be expected to have.

Page 4 & 5 communication: I responded in a timely manner. It was emailed to Robin as my Attorney as well as hers was on vacation.

Page 5 & 6 medication: She was provided the medication as well as the bottles which clearly indicate dosing directions. I took extra time to fill the pill bottles for her so they should have them already to go for three weeks in addition to providing the doctors phone number and the pharmacy she uses.

Page 6 line 21: Missed 1 night medication, Robyn trusted me so much so that she asked me if I could stay and continue caring for my mom for four days until she was able to travel from her home in Las Vegas to California then as soon as she gets there she makes claims about medication and would rather

RESPONSE TO PETITION TO COMPEL - 1

1 my mom go without her medication then ask the doctor to prescribe new medications and pick them
2 up.

3 Page 6 line 24: print email sent to Robyn and Donna.

4 Page 7 heart monitor: I was aware of the heart monitor but I did not include it in the medication list
5 however she was given the phone number to the cardiologist. I did hear Robyn asking my mom what
6 was on her chest and I immediately went in the room and told her what it was, not to get it wet and that
7 she had a follow up appointment scheduled. In addition Robyn was given the cardiologist phone
8 number. The heart monitor was not an immediate or emergency medical issue, it was to monitor a prior
9 issue that she has had for several years related to syncope and they were you explained it to her when
10 you when she brought it up which was explain to Robyn at the time. In addition I provided an email to
11 Robyn stating the same thing.

12 Page 7 line 28: Information Robyn claims she was not given related medical needs is simply not true. Her
13 doctor does not use a portal system. She was given the cardiologist phone number and address, she was
14 given the follow up date and time, she was given the instructions on how it is used, she was told it was
15 in place as a follow up to her episode of syncope and not to get it wet. Robyn was given the information
16 verbally as well as by email and it was not acceptable to her.

17 Page 8 line 20: Robyn was given the walker my mom has used for the past 9 months, it's a walker that
18 converts into a wheelchair. Her mobility has increased significantly and the walker in perfect working
19 condition.

20 ****Page 8 #30 Keys: There has always been only one key to the house. On December 9th a lock was put
21 on the door that connects the garage to the spare room that I used as a home office and another lock on
22 my bedroom door. At Robyn's request, prior to her arrival, I cleared out my office and put my work and
23 personal files in the garage and ask that the garage and my bedroom be kept private. I put a lock on my
24 bedroom door and the door that connects the garage to the spare room. I felt that asking for the space
25 to remain private was reasonable.

26 Page 8 #31: Cell phone: she does not have a per se cell phone she has an Apple Watch which has a built-
27 in cell phone which was provided to Robyn.

28 Page 8 #32 Debit card: My mom does not have a debit card. The debit card that was provided to Robyn
on January 10th was in my name.

Page 9 Dean Loggans and Recording Device in Garage:

Page 9 line #34: Robyn asked that my home office be cleared out and available. I accommodated her
request and let her know that I had moved the contents of my home office into the garage and asked if
that area remain private due to having work and personal files. Robyn was being unreasonable and
unwilling to make a smooth transition. Instead of asking me to move my things from the garage she
hired a locksmith. Furthermore, **there is no lease agreement.**

RESPONSE TO PETITION TO COMPEL - 2

1 Page 9 line #35: Dean and I got to the house and went to bed early the prior evening. Petitioners picture
2 on page 10 clearly shows the door leading from the garage to the house opened. **It is impossible that**
3 **Dean locked himself in the garage or was "hiding" because the door was locked from the inside. The**
4 **locksmith could not have opened the door so essentially Robyn paid a locksmith to open a door that**
5 **Dean opened.** It was early in the morning, Dean walked out the bedroom door and into the garage to
6 get in his car to go to work. When he opened the garage door he was shocked to see a locksmith as
Robyn standing there. Again, Robyn chose to create a dramatic and expensive situation when she could
have simply asked that I move my personal/work files and belongings. The picture on page 10 of the
petition clearly shows the door is opened. Robyn is lying.

7 Page 9 line 37: The idea that Dean had been locked in the garage for an unknown amount of time is
8 absolutely ridiculous and should show the degree to which Robyn will go to make up stories that sound
9 completely irrational to discredit me. I did not have a key to the garage because I had given it to Dean
the day prior.

10 Page 10 line 38:

11 Line 18: If I was recording it, I would have waited to put it in a closed cabinet and closed and locked the
12 garage door where she couldn't get into it.

13 When Dean left the bedroom he had his phone in his with the recorder on incase Robyn confronted him
14 in the hallway as he went into the garage. He didn't see her when he walked in the garage so he sat his
15 cell phone down on the cabinet when he was picking up some papers and went to the front of the
16 garage to open the garage door. Dean opened the garage door to find Robyn and the locksmith standing
17 there. Robyn came running over and started all this commotion and he forgot to go back and pick up his
phone. He got in his car and drove off. Again the picture provided on page 10 proves it to true as you
can see the bedroom door opened. Clearly he was not locked in the garage or "hiding" in the garage
overnight.

18 Robyn is so zealous over skewing stories and that Dean and I have had to resort to walking around the
19 house with our cell phone videos on. Certainly, he did not leave his cell phone to record her because the
garage was locked.

20 Page 12 #39: Crates in garage. Robyn was made aware that I had moved my home office into the garage
21 to accommodate her request for use of the spare bedroom upon her arrival. On December 11th Donna
22 and Robyn were at the house, Donna was in the garage and he car was parked in the driveway while
23 Robyn was in the house. Donna went into the living room and to Robyn said, "What should I do will all
24 the stuff in the boxes?". Robyn said, "Take what we need and throw the rest away". When Donna and
Robyn left, I went in the garage and saw that the zip ties I had on my personal boxes had been cut off
and what was in the boxes was gone.

25 Page 12 #3 Dean and I went to the house to get his phone and then had plans to go to diner. I put my
26 key in the front door and Robyn had changed the locks. I knocked on the door, Robyn answered and we
27 entered the house. I entered first, Robyn was standing in the doorway, Dean walked behind me into the
28 house into the hallway. Dean never touched Robyn, he never forced his way into the house. There was
plenty of space between myself and the doorway for Dean to walk in behind me and that is what he did.
During all of this Robyn is on speakerphone with her attorney Mr. Michelson. Dean went to the garage
RESPONSE TO PETITION TO COMPEL - 3

1 During all of this Robyn is on speakerphone with her attorney Mr. Michelson. Dean went to the garage
2 to get his phone and it was not sitting on the shelf where he left it. I asked Robyn for the phone she
3 refused to give it to me. Robyn called the police, they arrived and encouraged Robyn to give the phone
back which she did. Dean and I left and went to diner.

4 If Dean had pushed Robyn as she claimed, the outcome would be much different than the police
5 convincing Robyn to give Dean's cell phone back so we could go to diner. Another example of Robyn
6 skewing the events to discredit me at any cost. The better way to handle it would have been to email me
or let my attorney know that she change the lock and where she would leave the key.

7 Robyn was notified by email that we did not have video security in the home nor did we own any
8 weapons.

9 Page 13 line 44: Robyn received answers to the lengthy list of questions by email. Robyn is unreasonable
10 in her request for detailed information about what about what TV shows she likes to watch and what
11 are her favorite foods when you're talking about somebody who is 100% verbal and can answer those
12 questions anytime. She was given the pertinent information including medication upcoming
13 appointments med prescriptions pharmacy doctors and contact information. Anything important it was
14 nothing that was left out do your knowledge intentionally or otherwise. Robyn could have talk to the
15 doctors discussed medication and what they were for there was no reason to think that I would give my
mom something unsafe, I have been caring for my mom and giving her medication for the last 3 years.
Robyn could've contacted her primary physician and asked him to put in all new medication at the
pharmacy and go pick it up if she did not trust that I would give my mom the right medication. However
Robyn had no concerns asking me to continue to care for my mom for an additional 4 days until she
could travel to California.

16 Summary: I would never do anything to harm my mom either physically or emotionally. I have provided
17 the information that was asked of me. I answered the list of questions that were presented to me and
18 emailed them to my mom's attorney Maria Sandoval Perez as well as my prior attorney James
19 Beckstrom, both were out of town for the holidays. Robyn contacted me and let me know that she did
20 not receive the answers to her questions and I emailed it to her directly. Robyn was given contact
information to care providers and other pertinent information.

21 This would be totally reasonable for anybody else however Robyn deliberately makes every single
22 interaction problematic to the point that what was once a normal household became immediately
23 disrupted with Robyn's arrival. Changing of the locks, taking a cell phone and when she was asked for it
would not give it back until the police encouraged her to do so.

24
25 DATED: 11/26/2022

26
27 
28 KIMBERLY JONES

RESPONSE TO PETITION TO COMPEL - 4

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Mom
Date: Dec 8, 2021 at 9:49:35 PM
To: Robyn Friedman vgsfun@hotmail.com

Robyn,

Yes, 5:00 on Monday is fine. I did not receive a text from you, please use 714-450-2061.

On Dec 8, 2021, at 6:08 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

I've reached out via text today but haven't heard back. We were told this, this afternoon, from James.

Kimberly wants an orderly transition and will continue to care for June until Robyn is ready.

Can you confirm you are ok caring for Mom until 5pm on Monday, when I arrive and that you've received the other longer email with lots of questions and requests?

Thanks,

Robyn

From: Kimberly Jones <flyonthewall2you@gmail.com>
Sent: Wednesday, December 8, 2021 7:17 AM
To: Robyn Friedman <vgsfun@hotmail.com>
Subject: Mom

Robyn,

Although I disagree with the decision, I would like to make this transition as smooth as

possible for mom. Would you please let me know what you intend to do regarding her care and living arrangement. In addition, if you need to contact me please use 714-450-2061.

Sincerely,
Kimberly

Kimberly Jones
Re: Mom
Dec 13, 2021 at 8:58:51 AM
Robyn Friedman

Hi Robyn,

My understanding was that James had communicated the following to Michelson last week. Mom has no immediate health needs or appointments and her health condition is good right now. With what's been going on in the last few days, she has had a couple bouts of diarrhea and is vocal regarding her thoughts and feelings. I called/texted Donna asking her to talk to mom because I thought it would be helpful.

Regarding scheduled appointments, she doesn't have anything until January 5th and that's with her cardiologist for a follow up at UCI at 10 o'clock. I will give you a list of all of her pending appointments, medication and the other things that you had asked for.

I intend to move out of the Verde Street house as soon as possible, I estimate it's gonna take at least 30 days to find a place and get moved. The spare room which is my office that I work in, I can move into the garage. My room is the master bedroom, I'm asking that these two areas are off limits to anyone until I've moved. I will give you a list of her

preferences as you have asked as well.

Sincerely,
Kimberly

On Dec 12, 2021, at 10:30 AM, Robyn Friedman
< > wrote:

Below is a copy of the text you were just sent in the group text that includes Scott, Donna, and I. This text is in response to you sending Donna a text earlier this morning asking her to come talk to Mom about the transition. Please confirm you are receiving these texts.

Kim -

In order to talk to Mom appropriately and make it as smooth for her as possible, we need to know from you what's happening on your end first. Which is why you were sent an email (and texts) asking you multiple questions and

requesting documents that we needed by Friday. Which you've completely ignored. At Mom's expense. We'd like to be able to talk to Mom (multiple of us together have planned this already) and make it easier for her as well, but unless you start answering questions we intend to talk to her together on Monday evening, in person. Since we have no reliable information to make plans on for her yet without you answering some of the basic questions. So please cooperate and respond to all of the questions asked in the email and turn over all documents and information forthwith. If we don't even know when you plan on moving out, and you won't give any information about Mom to us that we've requested, it makes it difficult to discuss the situation with Mom. Although that will happen in person on Monday, with or without your input about your plans and all the things we requested. Don't think for a minute that if you continue to make this intentionally harder for mom, as you have already this week by ignoring the requests for documents and information, that that won't be a problem. You will not be able to harm mom for your own ego anymore. Your attorney, in writing, has said you were sent the list of questions and documents and you've contributed NO ANSWERS YET. Yet you want someone to talk to Mom and make it easier when we have zero idea what your plans are. Please answer the questions and turn

everything over immediately so when we see Mom in person and a couple of us talk to her, we know what to even accurately tell her. The most timely question being, will you be gone from the house on Monday and if not, when? The details of Mom's care depends on who is in that house and for how long and who her auxiliary care providers will or won't be. While the fact you e provided care for her until Monday is helpful, refusing to turn over information, documents, medical supplies, Mom's keys, and other stuff by last Friday, or even recognizing and attempting to discuss it, so we could train Mom's care providers and ourselves before arriving Monday, is not helpful.

- Robyn

From: Kimberly Jones < >
Sent: Thursday, December 9, 2021 10:09 AM
To: Robyn Friedman < >
Subject: Re: Mom

Group messaging was turned off.

On Dec 9, 2021, at 1:25 AM, Robyn Friedman < > wrote:

Begin forwarded message:

From: Kimberly Jones <kimberly@elderactioncenter.com>

Date: December 14, 2021 at 11:18:12 AM PST

To: Donna Cell <donnamsimmons@hotmail.com>, Robyn Friedman <vgsfun@hotmail.com>

Subject: Mom

Robyn and Donna,

Last night I told Robyn that mom is wearing a heart monitor and not to get it wet. Everyone is aware, mom has had 3 episodes of Syncope over the years and the monitor is a follow up to the last one and you both spoke with her on the phone that evening. I also gave her the Cardiologist, Dr. Donaldson's phone number 714-456-6699 and told her that there is a follow up appointment on January 5th at 10:00.

I put her iPhone watch on her nightstand when I left for work this morning. Regarding something or someone "hiding" in the garage, it is not true. Despite the echo of Robyn talking to Mr. Michelson on the phone and the drilling of the lock smith the morning was nonevent-full.

Sincerely,
Kimberly

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Mom
Date: Dec 14, 2021 at 3:58:58 PM
To: Robyn Friedman vgsfun@hotmail.com
Cc: Donna Cell donnamsimmons@hotmail.com

I went over the medication with you last night and gave you her doctors phone number. You wanted hard copy prescriptions and digital prescriptions, I told you the doctor calls them into the pharmacy and gave you the pharmacy phone number. If you are implying that I have or intend to hurt mom you are mistaken. Mom wears slip on shoes and doesn't wear socks with them. In the house she'll wear socks/pull on slippers with rubber on the bottom that are in the drawers in her closet with her bras or in the dirty clothes.

Sincerely,
Kimberly

On Dec 14, 2021, at 1:26 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

Just so you're clear Kim, because we haven't received other documents from you we are unable to access ANY of moms medical information or speak with her doctors. We've been trying and documenting all day the failures due to information and documents you have and will not turn over.

Just so you're aware.

Regarding the heart monitor, you did NOT mention it when I asked you twice if there was medical information I needed, it wasn't mentioned in the email from your attorney and you ONLY said something AFTER it was found by me when mom was changing for bed. Again, Sam is a witness to that occurring when it did.

Thanks,

Robyn

From: Kimberly Jones <flyonthewall2you@gmail.com>
Sent: Tuesday, December 14, 2021 11:23 AM
To: Donna Cell <donnamsimmons@hotmail.com>; Robyn Friedman <vgsfun@hotmail.com>
Subject: Fwd: Mom

Donna and Robyn,

I sent the last email from my work email on accident so here it is again.

Sincerely,
Kimberly

From: Kimberly Jones

kimberly@elderactioncenter.com

Subject: Walmart

Date: Dec 17, 2021 at 12:23:17 PM

To: Robyn Friedman vgsfun@hotmail.com

Robyn,

Below is a voicemail I received from Walmart pharmacy. I'm happy to let you know ahead of time if I have guest at the house. In addition there are not any weapons and we've never used any type of security cameras/audio in or outside the house. Mom saw her breast doctor, Doctor Shirley (702-243-7200 ext. 27228) prior to moving to California and she usually does 6 month follow up appointments. If you ask her Primary, Doctor Rodriguez to give you a referral I'm sure he will recommend a good one here in Orange County.

I'd like to take mom to lunch or dinner on Saturday or Sunday, please let me know if she's available and which day works for her.

Sincerely,
Kimberly



voicemail-1740.m4a

108 KB

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Tuesday at 10:00
Date: Dec 21, 2021 at 8:05:29 AM
To: Robyn Friedman vgsfun@hotmail.com

Copied from Robyn's text Sunday December 19th:

Mom wants to see you on Christmas Eve for lunch to exchange gifts. She'll be at Donna's and Scott's on Christmas Day. Does noon 11am-1pm on Christmas Eve work for you? Take her to lunch or I can order lunch for you guys at the Anaheim house? We're heading to San Diego after that. If lunch doesn't work she can do breakfast as well. If you're working Christmas Eve let me know and I'll arrange for you to be able to see her in the evening from 7-9pm but during the day is easier. Just want to make sure see sees you if you want to see her. Instead of Christmas Eve, another option instead if you wanted to see mom on Christmas we can meet in Canyon Lake area. We'll get a hotel there since you can't come to Donna's or Scott's house. Noon - 2pm? That would just be a lot of moving around for mom on Christmas but want to make it easy for you as well. Please let me know as soon as possible so we can plan where we need to be and if we need a hotel room there.

Robyn,

In response to the text you sent above on Sunday December 19th, let's do Christmas Eve from 7:00-9:00pm. Would you also please let me know when you can make mom available for a few days and what her schedule is until January 12th.

Sincerely,
Kimberly

On Dec 20, 2021, at 8:34 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

Got it.

From: Kimberly Jones <flyonthewall2you@gmail.com>
Sent: Monday, December 20, 2021 7:55 PM
To: Robyn Friedman <vgstfun@hotmail.com>
Subject: Tuesday at 10:00

Robyn,

Tomorrow at 10:00 I'm moving the heavy status out of the garage and will have people at the house for 3-4 hours.

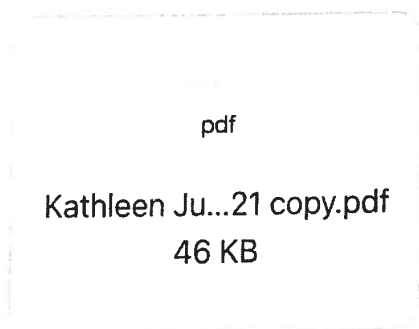
Sincerely,
Kimberly

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Kathleen June Jones Requested Documents
Date: Dec 27, 2021 at 8:27:52 PM
To: Maria Parra-Sandoval Ext. 1526
mparra@lacsns.org, James Beckstrom
jbeckstrom@maclaw.com

Maria and James,

Below are the documents requested.

Sincerely,
Kimberly



1. All of June's identifications including passport; ID cards given on December 10, 2021, do not have passport.
2. List of June's doctors including addresses, phone numbers, identification of what each doctor is for, and the issues that the doctor is currently treating June for; Primary Dr. Rodriguez (714) 577-2271 2592 N. Santiago Canyon Rd Orange, CA 92867, Cardiologist UCI David Donaldson (714) 456-6699, Ophthalmology UCI (714) 456-7002. Is due for breast exam as well as dermatology follow up.
3. List of upcoming doctor appointments; Cardio December 5, 2021 at 10:00am, May 4, 20121 11:00am
4. List of June's medications including what the medications are for; Given December 10, 2021
5. The actual medications themselves, i.e., bottles, etc.; Given December 10, 2021
6. Contact information for any caregivers currently providing care to June;
-None
7. Schedule for any caregivers along with how much each caregiver is paid and how those payments are made;
-None
8. Copy of June's medical records; Do not have hard copies.
9. All of June's insurance and government benefits information; State Farm #HG4291527575 Humana #H56933860, Medicare 2HJ1-DN7-NV12. State Farm and Humana are on auto pay and Social Security is automatically deposited.
10. Keys and garage fobs to the Anaheim property; House key provided, no garage fob.
11. List of all utilities including account numbers and balances; All utilities have been in my name and I have paid them. Call So Cal Gas and Anaheim Public Utilities (electric, water & trash) prior to January 9, 2021 and give them the address to transfer service. Gardner comes Wednesday

afternoons, Santiago Landscaping Services P.O. Box 11031 Brea, CA 92822. OC Register

Newspaper autopay.

12. Copy of the homeowner's insurance policy on the Anaheim property along with the most recent statements; Farmers #33650-40-45 do not have hard copy
13. Statements for June's financial accounts including all bank accounts and credit cards; Bank of America (Primary) #5010 2149 7492, Bank of America (Renters) #5010-2555-8243, Citi Bank Visa (zero balance) #4100-3904-2619-1157. Cards given on December 10, 2021, do not have hard copies.
14. A list of June's friends that she stays in contact with including contact information; Marylin (907) 201-1780, Charlene (714) 267-8307, Judy (765) 366-0597.
15. List of all the foods that June likes and doesn't like to eat; Does not like vegetables but will eat peas.
16. List of all medical and personal hygiene supplies June uses and the brands/types; Nonspecific adult diaper and pad.
17. List of June's clothing sizes; XL shirt, 18-20 pants. Varies by brand.
18. List of June's favorite TV shows; Wheel of Fortune
19. List of activities and traditions June currently enjoys and participates in; Bingo, farmers market, bookstore, bowling, eating out, reading, Costco, Kohl's and Walmart.
20. List of any entertainment June enjoys or other groups she's a part of; Open to entertainment, if she sees a sign for and event or reads in newspaper.
21. List of the doctors June saw in Nevada, including contact info; P3 Medical (702) 844-4849, Comprehensive Cancer (Breast) (702) 243-7200, Retina Consultants (702) 369-0200, Desert Radiology (702) 759-8600, Strimling Dermatology Dr. Lionel Handler (702)243-6400
22. List of June's upcoming social appointments; None

23. Any upcoming travel that had been planned for June; None scheduled but **she really wants to go to Indiana to see her brother before he passes, he is not doing well.**

24. June's passwords to online accounts including financial accounts, utilities accounts, and doctor portal accounts; Primary does not use online system, UCI My Chart JUNEJONES Jjones1054

25. Safety deposit box information and keys; and None

26. Copy of June's Last Will and Testament: In court record

-Mortgage: Northpointe Bank #309-5000-885, double payment was made on October 6, 2021 and November's payment was made on November 2, 2021. My account was credited on November 15, 2021. Call to confirm December's payment was applied.

-Verizon: (702) 553-6060 I traded mom's old iPhone 6 and got her Apple watch a year ago. I did that because the watch has fall detection, heart monitor, handwashing reminder, location and phone capabilities. If someone called her phone she would talk to them but most often people would call my phone because I was with her 24 hours a day. To keep her phone number call Verizon and give them account #0073-6186-8600-001 and transfer pin: 582 184, it is good until January 2, 2022.

-Bank of America: Mom's accounts that I am on have shared the same username and ID as my business account. I have created a separate log in for my account and on December 28, 2021 the log in will be separated and I will provide Maria with that information. For me to get off the account Robyn, Mom and I need to go to the bank together. I made an appointment for January 5, 2021 at 1:00pm at Bank of America located at 1701 E. Katella Ave Anaheim, Ca. 92805, its right down the street from the cardio appointment that is at 10:00am. In addition, I held \$2,500 of accessible emergency funds which have been deposited as well as \$50 that was Zelled from the wrong account.

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Kathleen June Jones COVID Documents
Date: Dec 27, 2021 at 8:30:38 PM
To: Maria Parra-Sandoval Ext. 1526
mparra@lacs.n.org, James Beckstrom
jbeckstrom@maclaw.com

Maria and James,

Below are the COVID documents.

Sincerely,
Kimberly

pdf

Kathleen Ju...COVID.pdf
517 KB

-----Original Message-----

From: Kimberly Jones <kimberly@elderactioncenter.com>

Sent: Tuesday, December 28, 2021 11:35 AM

To: Maria Parra-Sandoval <MParra@lacs.org>; James Beckstrom <jbeckstrom@maclaw.com>

Subject: Kathleen June Jones

Maria and James,

The Bank of America online log in is: kjones11d4sq password:
Jjones10541

Sincerely,
Kimberly

From: **James A. Beckstrom**
jbeckstrom@maclaw.com
Subject: **RE: [External] Kathleen June Jones**
Date: **Jan 2, 2022 at 1:59:20 PM**
To: **Maria Parra-Sandoval** MParra@lacsns.org,
Kimberly Jones
kimberly@elderactioncenter.com

I was out of town. Kimberly-- forward all of this directly to Robyn. Copy John, Maria, and I.

James A. Beckstrom, Esq.
10001 Park Run Drive
Las Vegas, NV 89145
t | 702.207.6081
f | 702.382.5816
jbeckstrom@maclaw.com
maclaw.com

☰ Please consider the environment before printing this e-mail!

DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Fwd: Kathleen June Jones
Requested Documents
Date: Dec 29, 2021 at 11:11:40 AM
To: Robyn Friedman vgsfun@hotmail.com

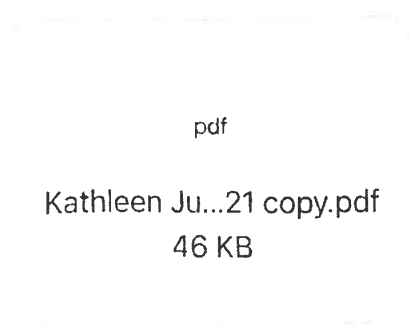
Begin forwarded message:

From: Kimberly Jones <flyonthewall2you@gmail.com>
Date: December 27, 2021 at 8:27:52 PM PST
To: "Maria Parra-Sandoval Ext. 1526" <mparra@lacs.org>, James Beckstrom <jbeckstrom@maclaw.com>
Subject: Kathleen June Jones Requested Documents

Maria and James,

Below are the documents requested.

Sincerely,
Kimberly



1. All of June's identifications including passport; ID cards given on December 10, 2021, do not have passport.
2. List of June's doctors including addresses, phone numbers, identification of what each doctor is for, and the issues that the doctor is currently treating June for; Primary Dr. Rodriguez (714) 577-2271 2592 N. Santiago Canyon Rd Orange, CA 92867, Cardiologist UCI David Donaldson (714) 456-6699, Ophthalmology UCI (714) 456-7002. Is due for breast exam as well as dermatology follow up.
3. List of upcoming doctor appointments; Cardio December 5, 2021 at 10:00am, May 4, 20121 11:00am
4. List of June's medications including what the medications are for; Given December 10, 2021
5. The actual medications themselves, i.e., bottles, etc.; Given December 10, 2021
6. Contact information for any caregivers currently providing care to June;
-None
7. Schedule for any caregivers along with how much each caregiver is paid and how those payments are made;
-None
8. Copy of June's medical records; Do not have hard copies.
9. All of June's insurance and government benefits information; State Farm #HG4291527575
Humana #H56933860, Medicare 2HJ1-DN7-NV12. State Farm and Humana are on auto pay and Social Security is automatically deposited.
10. Keys and garage fobs to the Anaheim property; House key provided, no garage fob.
11. List of all utilities including account numbers and balances; All utilities have been in my name and I have paid them. Call So Cal Gas and Anaheim Public Utilities (electric, water & trash) prior to January 9, 2021 and give them the address to transfer service. Gardner comes Wednesday

afternoons, Santiago Landscaping Services P.O. Box 11031 Brea, CA 92822. OC Register

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18. List of June's favorite TV shows; Wheel of Fortune
19. List of activities and traditions June currently enjoys and participates in; Bingo, farmers market, bookstore, bowling, eating out, reading, Costco, Kohl's and Walmart.
20. List of any entertainment June enjoys or other groups she's a part of; Open to entertainment, if she sees a sign for and event or reads in newspaper.
21. List of the doctors June saw in Nevada, including contact info; P3 Medical (702) 844-4849, Comprehensive Cancer (Breast) (702) 243-7200, Retina Consultants (702) 369-0200, Desert Radiology (702) 759-8600, Strimling Dermatology Dr. Lionel Handler (702) 243-6400
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25. Safety deposit box information and keys; and None

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-Verizon: (702) 553-6060 I traded mom's old iPhone 6 and got her Apple watch a year ago. I did that because the watch has fall detection, heart monitor, handwashing reminder, location and phone capabilities. If someone called her phone she would talk to them but most often people would call my phone because I was with her 24 hours a day. To keep her phone number call Verizon and give them account #0073-6186-8600-001 and transfer pin: 582 184, it is good until January 2, 2022.

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From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Mom
Date: Dec 8, 2021 at 9:49:35 PM
To: Robyn Friedman vgsfun@hotmail.com

Robyn,

Yes, 5:00 on Monday is fine. I did not receive a text from you, please use 714-450-2061.

On Dec 8, 2021, at 6:08 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

I've reached out via text today but haven't heard back. We were told this, this afternoon, from James.

Kimberly wants an orderly transition and will continue to care for June until Robyn is ready.

Can you confirm you are ok caring for Mom until 5pm on Monday, when I arrive and that you've received the other longer email with lots of questions and requests?

Thanks,

Robyn

From: Kimberly Jones <flyonthewall2you@gmail.com>
Sent: Wednesday, December 8, 2021 7:17 AM
To: Robyn Friedman <vgsfun@hotmail.com>
Subject: Mom

Robyn,

Although I disagree with the decision, I would like to make this transition as smooth as

possible for mom. Would you please let me know what you intend to do regarding her care and living arrangement. In addition, if you need to contact me please use 714-450-2061.

Sincerely,
Kimberly

Kimberly Jones
Re: Mom
Dec 13, 2021 at 8:58:51 AM
Robyn Friedman

Hi Robyn,

My understanding was that James had communicated the following to Michelson last week. Mom has no immediate health needs or appointments and her health condition is good right now. With what's been going on in the last few days, she has had a couple bouts of diarrhea and is vocal regarding her thoughts and feelings. I called/texted Donna asking her to talk to mom because I thought it would be helpful.

Regarding scheduled appointments, she doesn't have anything until January 5th and that's with her cardiologist for a follow up at UCI at 10 o'clock. I will give you a list of all of her pending appointments, medication and the other things that you had asked for.

I intend to move out of the Verde Street house as soon as possible, I estimate it's gonna take at least 30 days to find a place and get moved. The spare room which is my office that I work in, I can move into the garage. My room is the master bedroom, I'm asking that these two areas are off limits to anyone until I've moved. I will give you a list of her

preferences as you have asked as well.

Sincerely,
Kimberly

On Dec 12, 2021, at 10:30 AM, Robyn Friedman
< > wrote:

Below is a copy of the text you were just sent in the group text that includes Scott, Donna, and I. This text is in response to you sending Donna a text earlier this morning asking her to come talk to Mom about the transition. Please confirm you are receiving these texts.

Kim -

In order to talk to Mom appropriately and make it as smooth for her as possible, we need to know from you what's happening on your end first. Which is why you were sent an email (and texts) asking you multiple questions and

requesting documents that we needed by Friday. Which you've completely ignored. At Mom's expense. We'd like to be able to talk to Mom (multiple of us together have planned this already) and make it easier for her as well, but unless you start answering questions we intend to talk to her together on Monday evening, in person. Since we have no reliable information to make plans on for her yet without you answering some of the basic questions. So please cooperate and respond to all of the questions asked in the email and turn over all documents and information forthwith. If we don't even know when you plan on moving out, and you won't give any information about Mom to us that we've requested, it makes it difficult to discuss the situation with Mom. Although that will happen in person on Monday, with or without your input about your plans and all the things we requested. Don't think for a minute that if you continue to make this intentionally harder for mom, as you have already this week by ignoring the requests for documents and information, that that won't be a problem. You will not be able to harm mom for your own ego anymore. Your attorney, in writing, has said you were sent the list of questions and documents and you've contributed NO ANSWERS YET. Yet you want someone to talk to Mom and make it easier when we have zero idea what your plans are. Please answer the questions and turn

everything over immediately so when we see Mom in person and a couple of us talk to her, we know what to even accurately tell her. The most timely question being, will you be gone from the house on Monday and if not, when? The details of Mom's care depends on who is in that house and for how long and who her auxiliary care providers will or won't be. While the fact you e provided care for her until Monday is helpful, refusing to turn over information, documents, medical supplies, Mom's keys, and other stuff by last Friday, or even recognizing and attempting to discuss it, so we could train Mom's care providers and ourselves before arriving Monday, is not helpful.

- Robyn

From: Kimberly Jones < >
Sent: Thursday, December 9, 2021 10:09 AM
To: Robyn Friedman < >
Subject: Re: Mom

Group messaging was turned off.

On Dec 9, 2021, at 1:25 AM, Robyn Friedman < > wrote:

Begin forwarded message:

From: Kimberly Jones <kimberly@elderactioncenter.com>

Date: December 14, 2021 at 11:18:12 AM PST

To: Donna Cell <donnamsimmons@hotmail.com>, Robyn Friedman <vgsfun@hotmail.com>

Subject: Mom

Robyn and Donna,

Last night I told Robyn that mom is wearing a heart monitor and not to get it wet. Everyone is aware, mom has had 3 episodes of Syncope over the years and the monitor is a follow up to the last one and you both spoke with her on the phone that evening. I also gave her the Cardiologist, Dr. Donaldson's phone number 714-456-6699 and told her that there is a follow up appointment on January 5th at 10:00.

I put her iPhone watch on her nightstand when I left for work this morning. Regarding something or someone "hiding" in the garage, it is not true. Despite the echo of Robyn talking to Mr. Michelson on the phone and the drilling of the lock smith the morning was nonevent-full.

Sincerely,
Kimberly

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Mom
Date: Dec 14, 2021 at 3:58:58 PM
To: Robyn Friedman vgsfun@hotmail.com
Cc: Donna Cell donnamsimmons@hotmail.com

I went over the medication with you last night and gave you her doctors phone number. You wanted hard copy prescriptions and digital prescriptions, I told you the doctor calls them into the pharmacy and gave you the pharmacy phone number. If you are implying that I have or intend to hurt mom you are mistaken. Mom wears slip on shoes and doesn't wear socks with them. In the house she'll wear socks/pull on slippers with rubber on the bottom that are in the drawers in her closet with her bras or in the dirty clothes.

Sincerely,
Kimberly

On Dec 14, 2021, at 1:26 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

Just so you're clear Kim, because we haven't received other documents from you we are unable to access ANY of moms medical information or speak with her doctors. We've been trying and documenting all day the failures due to information and documents you have and will not turn over.

Just so you're aware.

Regarding the heart monitor, you did NOT mention it when I asked you twice if there was medical information I needed, it wasn't mentioned in the email from your attorney and you ONLY said something AFTER it was found by me when mom was changing for bed. Again, Sam is a witness to that occurring when it did.

Thanks,

Robyn

From: Kimberly Jones <flyonthewall2you@gmail.com>
Sent: Tuesday, December 14, 2021 11:23 AM
To: Donna Cell <donnamsimmons@hotmail.com>; Robyn Friedman <vgsfun@hotmail.com>
Subject: Fwd: Mom

Donna and Robyn,

I sent the last email from my work email on accident so here it is again.

Sincerely,
Kimberly

From: Kimberly Jones
kimberly@elderactioncenter.com
Subject: Walmart
Date: Dec 17, 2021 at 12:23:17 PM
To: Robyn Friedman vgsfun@hotmail.com

Robyn,

Below is a voicemail I received from Walmart pharmacy. I'm happy to let you know ahead of time if I have guest at the house. In addition there are not any weapons and we've never used any type of security cameras/audio in or outside the house. Mom saw her breast doctor, Doctor Shirley (702-243-7200 ext. 27228) prior to moving to California and she usually does 6 month follow up appointments. If you ask her Primary, Doctor Rodriguez to give you a referral I'm sure he will recommend a good one here in Orange County.

I'd like to take mom to lunch or dinner on Saturday or Sunday, please let me know if she's available and which day works for her.

Sincerely,
Kimberly

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Tuesday at 10:00
Date: Dec 21, 2021 at 8:05:29 AM
To: Robyn Friedman vgsfun@hotmail.com

Copied from Robyn's text Sunday December 19th:

Mom wants to see you on Christmas Eve for lunch to exchange gifts. She'll be at Donna's and Scott's on Christmas Day. Does noon 11am-1pm on Christmas Eve work for you? Take her to lunch or I can order lunch for you guys at the Anaheim house? We're heading to San Diego after that. If lunch doesn't work she can do breakfast as well. If you're working Christmas Eve let me know and I'll arrange for you to be able to see her in the evening from 7-9pm but during the day is easier. Just want to make sure see sees you if you want to see her. Instead of Christmas Eve, another option instead if you wanted to see mom on Christmas we can meet in Canyon Lake area. We'll get a hotel there since you can't come to Donna's or Scott's house. Noon - 2pm? That would just be a lot of moving around for mom on Christmas but want to make it easy for you as well. Please let me know as soon as possible so we can plan where we need to be and if we need a hotel room there.

Robyn,

In response to the text you sent above on Sunday December 19th, let's do Christmas Eve from 7:00-9:00pm. Would you also please let me know when you can make mom available for a few days and what her schedule is until January 12th.

Sincerely,
Kimberly

On Dec 20, 2021, at 8:34 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Mom
Date: Dec 8, 2021 at 9:49:35 PM
To: Robyn Friedman vgsfun@hotmail.com

Robyn,

Yes, 5:00 on Monday is fine. I did not receive a text from you, please use 714-450-2061.

On Dec 8, 2021, at 6:08 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

I've reached out via text today but haven't heard back. We were told this, this afternoon, from James.

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Robyn,

Although I disagree with the decision, I would like to make this transition as smooth as

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Sincerely,
Kimberly

Kimberly Jones
Re: Mom
Dec 13, 2021 at 8:58:51 AM
Robyn Friedman

Hi Robyn,

My understanding was that James had communicated the following to Michelson last week. Mom has no immediate health needs or appointments and her health condition is good right now. With what's been going on in the last few days, she has had a couple bouts of diarrhea and is vocal regarding her thoughts and feelings. I called/texted Donna asking her to talk to mom because I thought it would be helpful.

Regarding scheduled appointments, she doesn't have anything until January 5th and that's with her cardiologist for a follow up at UCI at 10 o'clock. I will give you a list of all of her pending appointments, medication and the other things that you had asked for.

I intend to move out of the Verde Street house as soon as possible, I estimate it's gonna take at least 30 days to find a place and get moved. The spare room which is my office that I work in, I can move into the garage. My room is the master bedroom, I'm asking that these two areas are off limits to anyone until I've moved. I will give you a list of her

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Documents
Date: Dec 29, 2021 at 11:21:27 AM
To: Maria Parra-Sandoval Ext. 1526
mparra@lacs.n.org, James Beckstrom
jbeckstrom@maclaw.com

Maria and James,

I forwarded the document email (3) to Robyn today, she said she had not received them.

Sincerely,
Kimberly

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requesting documents that we needed by Friday. Which you've completely ignored. At Mom's expense. We'd like to be able to talk to Mom (multiple of us together have planned this already) and make it easier for her as well, but unless you start answering questions we intend to talk to her together on Monday evening, in person. Since we have no reliable information to make plans on for her yet without you answering some of the basic questions. So please cooperate and respond to all of the questions asked in the email and turn over all documents and information forthwith. If we don't even know when you plan on moving out, and you won't give any information about Mom to us that we've requested, it makes it difficult to discuss the situation with Mom. Although that will happen in person on Monday, with or without your input about your plans and all the things we requested. Don't think for a minute that if you continue to make this intentionally harder for mom, as you have already this week by ignoring the requests for documents and information, that that won't be a problem. You will not be able to harm mom for your own ego anymore. Your attorney, in writing, has said you were sent the list of questions and documents and you've contributed NO ANSWERS YET. Yet you want someone to talk to Mom and make it easier when we have zero idea what your plans are. Please answer the questions and turn

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Date: December 14, 2021 at 11:18:12 AM PST

To: Donna Cell <donnamsimmons@hotmail.com>, Robyn Friedman <vgfun@hotmail.com>

Subject: Mom

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Subject: Fwd: Mom

Donna and Robyn,

I sent the last email from my work email on accident so here it is again.

Sincerely,
Kimberly

From: Kimberly Jones
kimberly@elderactioncenter.com
Subject: Walmart
Date: Dec 17, 2021 at 12:23:17 PM
To: Robyn Friedman vgsfun@hotmail.com

Robyn,

Below is a voicemail I received from Walmart pharmacy. I'm happy to let you know ahead of time if I have guest at the house. In addition there are not any weapons and we've never used any type of security cameras/audio in or outside the house. Mom saw her breast doctor, Doctor Shirley (702-243-7200 ext. 27228) prior to moving to California and she usually does 6 month follow up appointments. If you ask her Primary, Doctor Rodriguez to give you a referral I'm sure he will recommend a good one here in Orange County.

I'd like to take mom to lunch or dinner on Saturday or Sunday, please let me know if she's available and which day works for her.

Sincerely,
Kimberly

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Re: Tuesday at 10:00
Date: Dec 21, 2021 at 8:05:29 AM
To: Robyn Friedman vgsfun@hotmail.com

Copied from Robyn's text Sunday December 19th:

Mom wants to see you on Christmas Eve for lunch to exchange gifts. She'll be at Donna's and Scott's on Christmas Day. Does noon 11am-1pm on Christmas Eve work for you? Take her to lunch or I can order lunch for you guys at the Anaheim house? We're heading to San Diego after that. If lunch doesn't work she can do breakfast as well. If you're working Christmas Eve let me know and I'll arrange for you to be able to see her in the evening from 7-9pm but during the day is easier. Just want to make sure see sees you if you want to see her. Instead of Christmas Eve, another option instead if you wanted to see mom on Christmas we can meet in Canyon Lake area. We'll get a hotel there since you can't come to Donna's or Scott's house. Noon - 2pm? That would just be a lot of moving around for mom on Christmas but want to make it easy for you as well. Please let me know as soon as possible so we can plan where we need to be and if we need a hotel room there.

Robyn,

In response to the text you sent above on Sunday December 19th, let's do Christmas Eve from 7:00-9:00pm. Would you also please let me know when you can make mom available for a few days and what her schedule is until January 12th.

Sincerely,
Kimberly

On Dec 20, 2021, at 8:34 PM, Robyn Friedman
<vgsfun@hotmail.com> wrote:

Got it.

From: Kimberly Jones <flyonthewall2you@gmail.com>
Sent: Monday, December 20, 2021 7:55 PM
To: Robyn Friedman <vgsfun@hotmail.com>
Subject: Tuesday at 10:00

Robyn,

Tomorrow at 10:00 I'm moving the heavy status out of the garage and will have people at the house for 3-4 hours.

Sincerely,
Kimberly

9 Messages
< Back Amended First A... ^ v

On Sep 14, 2021, at 8:31 AM,
James A. Beckstrom
<jbeckstrom@maclaw.com>
wrote:

Kimberly,
I need all the supporting bank statement to
submit to the Court—any statements (including
credit cards) for the period of the accounting.

You also need to provide all the statements for
the year 2020 (the year after the accounting we
provided) to Teodora, so that can be started.



**MARQUIS AURBACH
COFFING**

James A. Beckstrom, Esq.

10001 Park Run Drive

Las Vegas, NV 89145

t | 702.207.6081

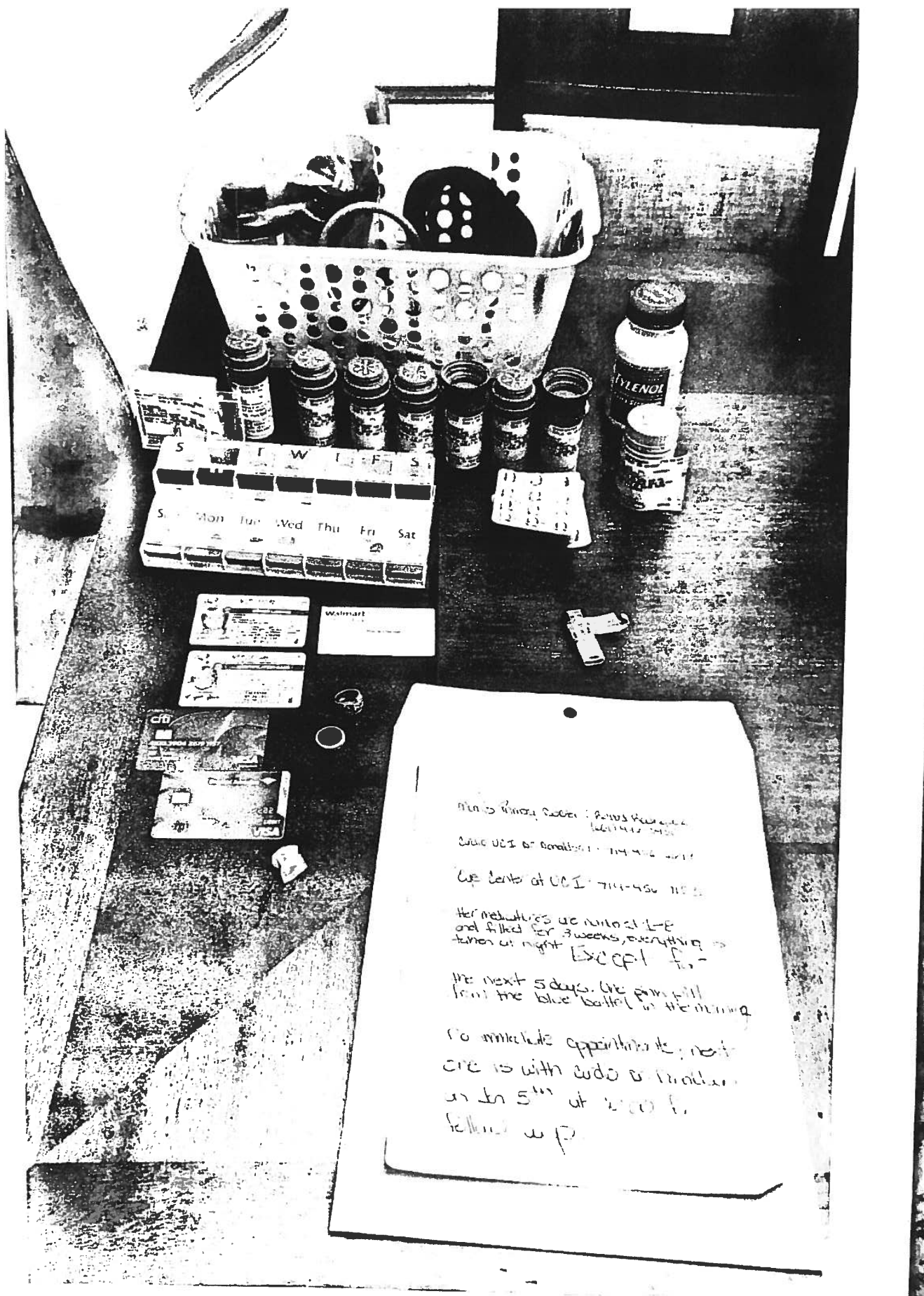
f | 702.382.5816

jbeckstrom@maclaw.com

maclaw.com



Read



Min's Primary Care: 714-450-1111

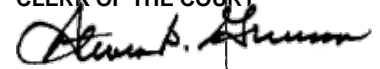
Udo UCI or Bonadina: 714-450-1111

Udo UCI or Bonadina: 714-450-1111

Her medications are minimal & E
and filled for 3 weeks, everything is
taken at night Except for -

the next 5 days. We give pill
from the blue bottle in the morning

No immediate appointments; next
one is with Udo or Bonadina
on 5th at 1:00 p.
followed up.



Kimberly Jones
18543 Yorba Linda Blvd #146
Yorba Linda, Ca 92886
714 450-2061
flyonthewall2you@gmail.com

DISTRICT COURT
CLARK COUNTY, NEVADA

IN THE MATTER OF THE GUARDIANSHIP OF THE
PERSON IN A STATE OF:

Case No.: G-19-052263-A

KATHLEEN JUNE JONES,

AN ADULT PROTECTED PERSON.

vs.

RESPONSE TO FINDINGS OF FACTS AND
CONCLUSIONS OF LAW AND ORDER
REGARDING VISITATION, FIRST ANNUAL
ACCOUNTING, GUARDIANS FEES, CARETAKING
FEES, ATTORNEY FEES AND COST AND
REMOVAL OF THE GUARDIAN

KIMBERLY JONES,

DEFENDANT,

-I offer the court apology as I now understand that they are missing important documents of account and cost that were not supplied by my attorney. I was not informed of the issues that the court had with me or of hearings that I was not in attendance. This was brought to my attention with assistance from Rick black of CEAR. I will continue to be transparent with the court forensic investigator and supply any and all documents needed.

Page 5 line 8: regarding a dramatic reverse in course., I nor my mother never wanted or intended to restrict visitation by proposing A specific schedule. Maria Sandoval Perez, my mom's attorney from legal aid of Southern Nevada asked my mom what day she would like to visit if she had to have scheduled visit in my mom's and Friday.

RESPONSE TO FINDINGS OF FACTS AND CONCLUSIONS OF LAW AND ORDER REGARDING
VISITATION, FIRST ANNUAL ACCOUNTING, GUARDIANS FEES, CARETAKING FEES, ATTORNEY
FEES AND COST AND REMOVAL OF THE GUARDIAN - I

1 Page 6 line 1: I was not informed that the court ordered parties to submit proposed witness list
2 exhibit list, etc.

3
4 Page 8 Line 27: I agree with Scott that the proposed visitation schedule is inconsistent with my
5 mom's previous attitude towards visitation communication as it was never intended to be a restrictive schedule
6 meaning restricting visitation and calls to a two hour period on Friday.

7
8 Page 8 line 16: Samantha came over to the house and saw my mom on August 16, 2021. See text
9

10 Page 14 line 5: regarding Donna's desire that I facilitate communication by having my mom call
11 her. It is absurd to think that an adult child cannot or will not pick up the phone and called their mother.
12

13 Page 14 line 15: donald's not feel safe seeing my mom at the house if Dean is there. See text from
14 July 8 two days after the evidentiary hearing where Donna said she was in the neighborhood and was gonna stop by
15 and drop some things off for my mom. No mention of Dean or of being At the house of concern for safety she was
16 simply in the neighborhood and wanted to drop some clothes off that she had bought for my mom.
17

18 Page 14 line 27: donna does not believe the protected persons propose schedule was created or
19 drafted by her mother. I agree with that statement it was not created by my mom as it was never intended to be a
20 restrictive schedule specifically not allowing family members to call or visit at any other time than Friday for two
21 hours.
22

23 Page 15 line 13: donna test friends that she would like to stop by your mothers house at any time
24 which she did on July 8 as shown by the text.
25

26 Page 15 line 20 Kimberly agreed to Robyn's visitation schedule Wednesdays and every other
27 Saturday. Yes I did agree to it as did my mother and she tried it out for 2 to 3 weeks and then said she didn't want to
28
RESPONSE TO FINDINGS OF FACTS AND CONCLUSIONS OF LAW AND ORDER REGARDING
VISITATION, FIRST ANNUAL ACCOUNTING, GUARDIANS FEES, CARETAKING FEES, ATTORNEY
FEES AND COST AND REMOVAL OF THE GUARDIAN - 2

1 do it because she was retired and she would prefer if Robyn just called her if she wanted to come over and go do
2 something.

3
4 Page 16 Line 24: my mother was never expected to manage your own schedule and execute plans
5 without my assistance. Robyn just wanted a set visitation schedule to suit her own needs and daily schedule as she
6 has a toddler.

7
8 Page 18 line 21: I do believe that my mom wants to communicate and visit with all of her family
9 members and always has. My mom nor myself never intended to restrict visitation in communication to a two hour
10 period on Fridays Which is clearly how The petition entered by my mom's legal aid attorney was interpreted.

11
12 I was not informed or aware of the accounting hearing on August 9. C email from my attorney
13 related to accounting documents. I was made aware of the specific accounting issues three weeks ago.

14
15
16 Page 27 line 45: I never opposed a request from any family member for communication and
17 contact with a protective person and testimony from my family supports that.

18
19 Page 28 line 12: A protective person may receive phone calls and have visitors, I agree with that
20 and my mom and I have always been open to phone calls and visitors however as reported in testimony from my
21 family members they did not call or request visits there for visits and phone calls or never denied.

22
23 Page 30 Line 24: The Guardian and protected person propose a visitation schedule that would
24 allow family members to visit and call the protective person during it to our window one time a week, this was never
25 the intent as stated earlier my mother was asked by her attorney if she had to have a visitation schedule what day
26 would you want it.

27
28 RESPONSE TO FINDINGS OF FACTS AND CONCLUSIONS OF LAW AND ORDER REGARDING
VISITATION, FIRST ANNUAL ACCOUNTING, GUARDIANS FEES, CARETAKING FEES, ATTORNEY
FEES AND COST AND REMOVAL OF THE GUARDIAN - 3

1 Page 31 line 2: of course the guardian and protective person failed to meet the statutory
2 requirements that would allow the court to restrict communication with the protective person because I nor my
3 mother never intended to restrict communication to a two hour period once a week.

4
5 Page 31 Line 45: I never filed a petition for order restricting communication visitation or
6 interaction between a protected person and relative And that was never the intent or desire of my mother when her
7 attorney asked her if she had to have a visitation schedule what day she wanted it.

8
9 Page 32 line 5: of course the request restrict communication does not contain affidavit or
10 declaration executed by the protected person, of course my mothers attorney failed to present evidence or testimony
11 through independent statements but unrelated parties nor were there witnesses because my mother nor I never
12 intended to have Visitation restricted to a two hour period on Fridays.

13
14 Page 32 line 13: I never believed that I was restricting interaction between protective person and
15 her relatives based upon my mom's wishes and therefore I never filed a petition with the court within 10 days of the
16 restriction pursuant to an RS 159.332(2). I have always been in support of family members calling and visiting my
17 mom and look forward to more of that interaction when we moved from Las Vegas to California In April 2021.

18
19 DATED: 11/24/2022

20
21 
22 KIMBERLY JONES
23
24
25
26
27

28 RESPONSE TO FINDINGS OF FACTS AND CONCLUSIONS OF LAW AND ORDER REGARDING
VISITATION, FIRST ANNUAL ACCOUNTING, GUARDIANS FEES, CARETAKING FEES, ATTORNEY
FEES AND COST AND REMOVAL OF THE GUARDIAN - 4

* Received emails related to accounting
on January 11th from prior attorney. Attachments
included filings, hearings and accounting reviews
that I was unaware of.

1 of 3

12:54

LTE

< Mailboxes All Inboxes

Edit

RE: Report Request

no-reply@efilingm... 1/11/22 >

Notification of Service for Case:...

Nicole Payne Hap... 1/11/22 >

Final ESMHL email

James A. Beckstro... 1/11/22 >

2 of 2 emails regarding accounti...

James A. Beckstro... 1/11/22 >

1 of 2 emails regarding accounti...

Evelyn Brown 1/11/22 >

Online course modules link for...

Keli Piet James As... 1/11/22 >

[External] Case File [IWOV-i...

Microsoft 365 1/11/22 >

Your subscription keeps getting...

Updated Just Now
2:03 PM Unread

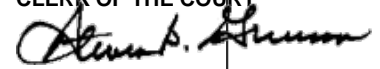
Supporting documents for petition to restri...

From: Kimberly Jones flyonthewall2you@gmail.com
Subject: Case File
Date: Jan 11, 2022 at 3:12:18 PM
To: James Beckstrom jbeckstrom@maclaw.com

James,

I am without words regarding not not receiving notification from you of ALL of the filings and hearings that have occurred since April, for gods sake you didn't even attend some of them. The two emails you sent this morning were eye opening, why the he'll haven't you been emailing me them the entire time? Completely blown away.

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Kimberly Jones
18543 Yorba Linda Blvd #146
Yorba Linda, Ca 92886
714 450-2061
flyonthewall2you@gmail.com

DISTRICT COURT
CLARK COUNTY, NEVEDA

THE MATTER OF GUARDIANSHIP OF THE
PERSON AND A STATE OF:

KATHLEEN JUNE JONES,
AN ADULT PROTECTED PERSON,

vs.

KIMBERLY JONES,
DEFENDANT

Case No.: G-19-052263-A

DEPARTMENT B

RESPONSE TO PETITION TO RESTRICT
VISITATION, COMMUNICATION AND
INTERACTION WITH A PROTECTIVE PERSON
KATHLEEN JUNE JONES

I have had a supervised visitation company in Orange County for the past 7 years. Besides the accusations being completely false as proven in supporting documents if The petition is granted and I am required supervise visitation I will no longer be able to own a supervisor visitation company as it is prohibited of the court. In addition I have a masters in Gerontology and work daily with older adults with my company Elder Action Center, the result of an order being granted restricting communication and visitation will prevent me from working completely.

Petition to Restrict Visitation and Interaction:

Page 1 line22: I do not pose a threat to the safety and well-being of my mother nor does Dean. I have been a full-time caregiver for the past three years without a single concerned expressed by anyone

RESPONSE TO PETITION TO RESTRICT VISITATION, COMMUNICATION AND INTERACTION WITH A
PROTECTIVE PERSON KATHLEEN JUNE JONES - I

1 mother. During that same mediation session the judge saw Dean pushing my mom and record room and made a
2 comment regarding how they look like they got along pretty good.

3
4 Page 2 line 5: Dean turned his audio on his phone when he was walking up to his car that morning
5 in case Robyn approached him as she is known to do. Dean was getting some papers in the garage and set his phone
6 down on the shelf and forgot it then got his car and left. when asked that Robyn gave Dean's phone back she refused
7 however was later encouraged to do so by the police.

8
9 Page 3 item number 6: on December 24, 2021 I sent a text message to Robyn telling her that I
10 audio recorded hard for my own safety. We have literally had to resort to this because neither Dean or I engage her.

11
12 Page 2 line 20: I think it's significant to point out that for the petition Dean calmly walked out of
13 the garage.

14
15 Page 3 Line 5: The entire situation at the bank was total induced chaos by Robyn. Robyn made
16 accusations I was recording her and I did show The bank employee my phone voluntarily in order to get Robyn to
17 stop being accusatory. Again I did not engage her verbally. I also had a friend with me at the bank who can act as a
18 witness in this regard.

19
20 It is also important to note that I scheduled the appointment at the bank in order to get off of the
21 account, two of them, one established 15 to 20 years ago Prior to my moms dig of Alzheimer's however Robyn
22 refused to allow my mom to even sign her name as an ex in order for that to happen in carried on with bank
23 employees stating how she was going to sue them.

24
25 Page 3 line 11: " Guardian stated she believed Kimberly was probably still recording, possibly
26 with another device the Guardian was not comfortable Kimberly recording and asked if the bank could ask Kimberly

27
28 RESPONSE TO PETITION TO RESTRICT VISITATION, COMMUNICATION AND INTERACTION WITH A
PROTECTIVE PERSON KATHLEEN JUNE JONES - 2

1 to leave her bag somewhere else“, The statement alone shows the dramatic lengths that Robyn will go to attempt to
2 discredit me. It also shows that I walked away which is what we have resorted to doing in order not to engage.

3
4 Page 4 Line 16: it states that Robyn and my mom have been staying in a hotel for their own safety.
5 The statement is just not true Robyn did not spend one night at the Anaheim house since her arrival on December
6 10, 2021. Again, Robyn is trying to concoct a lie and realizes that she cannot do it because I am recording And not
7 engaging. I think it's important to note that during all of this Robyn did not call or text me and let me know that she
8 was going to come over and was obviously not concerned about her safety.

9
10 Page 3 line 5: I have never told Robyn that I have considerations of secretly recording for the
11 purposes of writing or making until all type documentary.

12
13 Page 4 line item 11: Audio recording when in Robinson present is absolutely necessary because of
14 the wild accusations that she makes. Regarding the expectation of privacy Robyn had been told directly by me via
15 text multiple times before that I have to record for my own safety and security of false accusations.

16 Page 5
17 Kimberly Jones and or Dean Loggans are stalking and or harassing guardian, protective person in
18 those nearby:

19
20 This entire section is untrue and the attached text messages clearly show my time and date that this
21 did not happen. The picture and text message that is used exhibit 1 from the evening of December 24 when Dean, in
22 order to prevent an altercation with Robyn chose to wait for me down the street, is the same thread used to support
23 petitioners fabricated event on January 6, exhibit 3.

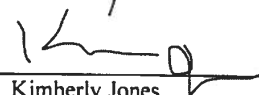
24
25 Page 5 Line 12: I live in the Anaheim house, it should come as no surprise to Robyn that I will be
26 there. Robyn believes that this is an indication that the house is being watched and monitored in someway that she's
27 not aware of which is absolutely absurd, exhausting and not good for all involved especially my mom.

28 RESPONSE TO PETITION TO RESTRICT VISITATION, COMMUNICATION AND INTERACTION WITH A
PROTECTIVE PERSON KATHLEEN JUNE JONES - 3

1
2 Page 5 Line 15: I am in no way shape or form attempting to track my mom's location. When
3 dealing with Robyn things that are absolutely normal and customary such as having location on a Apple Watch is
4 completely skewed into accusations of being watched and monitored. I am happy that Robyn is spending time with
5 her mom however I expected the litigation to decrease not increase. In order to accommodate Robyn and protect
6 himself from false accusations, Dean, will not even be in the same environment or space as Robyn and is being
7 accused of "Watching the house". I am placed in an equally susceptible position of Robyn's false accusations due to
8 my education and business related to older adults.

9
10 At what point does all of this stop it's absolutely insane, costly and damaging to everybody
11 involved. We have lived in this house for six months and Dean has been welcome and interactions have been
12 nonproblematic.

13
14 Dated: 1/26/2022

15
16 
17 Kimberly Jones

18
19
20
21
22
23
24
25
26
27
28 RESPONSE TO PETITION TO RESTRICT VISITATION, COMMUNICATION AND INTERACTION WITH A
PROTECTIVE PERSON KATHLEEN JUNE JONES - 4

From: James A. Beckstrom <jbeckstrom@maclaw.com>
Date: Wednesday, December 8, 2021 at 4:16 PM
To: John Michaelson <john@Michaelsonlaw.com>, Ammon Francom <Ammon@Michaelsonlaw.com>
Cc: 'Maria Parra-Sandoval' <MParra@lacs.org>
Subject: RE: Kathleen June Jones

Kimberly tried to contact Robyn. Please have her communicate directly with her sister. I have also forwarded this e-mail to Kimberly.

We are in the process of withdrawing from the case.

It should come of no surprise that June is safe and happy at the Anaheim property. Kimberly wants an orderly transition and will continue to care for June until Robyn is ready. I hope you include June's attorney in this discussion on transition of care. She is copied to keep her in the loop.

If Robyn will speak with Kimberly, they could work all of these items out. I am not getting involved in negotiations involving "what June wants to eat" or what "TV shows she likes." I am a lawyer not a babysitter. They can coordinate times, transitions, move-out, and production of any documents in an orderly manner. Kimberly is ready and willing to facilitate an orderly transition.



James A. Beckstrom, Esq.
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jbeckstrom@maclaw.com
maclaw.com



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DO NOT read, copy or disseminate this communication unless you are the intended addressee. This e-mail communication contains confidential and/or privileged information intended only for the addressee. If you have received this communication in error, please call us (collect) immediately at (702) 382-6711 and ask to speak to the sender of the communication. Also please e-mail the sender and notify the sender immediately that you have received the communication in error. Thank you. Marquis Aurbach Coffing - Attorneys at Law

From: John Michaelson <john@Michaelsonlaw.com>
Sent: Wednesday, December 8, 2021 12:13 PM
To: James A. Beckstrom <jbeckstrom@maclaw.com>; Ammon Francom <Ammon@Michaelsonlaw.com>
Subject: [External] Kathleen June Jones

James,

As you're likely aware, the Court appointed Robyn as successor guardian in Monday's order. Accordingly, we're reaching out to you about coordinating the transition. We're filing our

necessary guardianship documents starting today to initiate the transition. Robyn will arrive at the Anaheim home on Monday.

In the meantime, and until we are notified otherwise, our understanding is that Kim will continue to provide physical care. If not, please let us know immediately as we have lined up independent care if needed until Monday evening when Robyn arrives. We intend to continue with any outside in-home care providers already scheduled if they are willing and honor any other social or medical appointments we are made aware of. If Kim has alternate suggestions to make the transition easier for June, please let us know immediately.

Please let Kim know that Robyn intends to begin the eviction process immediately unless Kim intends to move out quickly. Robyn further intends that the third bedroom will be used by the care providers and/or Robyn when she is there. Additionally, let Kim know that Dean is not welcome to stay in the Anaheim property past Sunday evening because he is not a tenant.

Additionally, we need the following information, documents, and items from Kim by this Friday by 10 a.m. to smooth the transition:

1. All of June's identifications including passport;
2. List of June's doctors including addresses, phone numbers, identification of what each doctor is for, and the issues that the doctor is currently treating June for;
3. List of upcoming doctor appointments;
4. List of June's medications including what the medications are for;
5. The actual medications themselves, *i.e.*, bottles, etc.;
6. Contact information for any caregivers currently providing care to June;
7. Schedule for any caregivers along with how much each caregiver is paid and how those payments are made;
8. Copy of June's medical records;
9. All of June's insurance and government benefits information;
10. Keys and garage fobs to the Anaheim property;
11. List of all utilities including account numbers and balances;
12. Copy of the homeowner's insurance policy on the Anaheim property along with the most recent statements;
13. Statements for June's financial accounts including all bank accounts and credit cards;
14. A list of June's friends that she stays in contact with including contact information;
15. List of all the foods that June likes and doesn't like to eat;
16. List of all medical and personal hygiene supplies June uses and the brands/types;
17. List of June's clothing sizes;

18. List of June's favorite TV shows;
19. List of activities and traditions June currently enjoys and participates in;
20. List of any entertainment June enjoys or other groups she's a part of;
21. List of the doctors June saw in Nevada, including contact info;
22. List of June's upcoming social appointments;
23. Any upcoming travel that had been planned for June;
24. June's passwords to online accounts including financial accounts, utilities accounts, and doctor portal accounts;
25. Safety deposit box information and keys; and
26. Copy of June's Last Will and Testament.

Additionally, the Guardian's Acknowledgment of Duties and Responsibilities filed today has a list of information that Robyn is responsible for. We incorporate that information into this letter and ask for Kim to assist in transitioning that information to Robyn.

It is imperative that we know immediately if Kim is able to continue to care for June through Monday. We also ask you to forward this email to Kim.

Please let me know when you are available to discuss. We'd like to move quickly to ensure that June is well taken care of.

John P. Michaelson, Esq.
MICHAELSON & ASSOCIATES, LTD.
john@michaelsonlaw.com
www.michaelsonlaw.com
Tel. (702) 731-2333
Fax. (702) 731-2337

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2200 Paseo Verde Parkway, Suite 160
Henderson, Nevada 89052
*Please send correspondence to Henderson address

Downtown Summerlin
1980 Festival Plaza Drive, Suite 300
Las Vegas, Nevada, 89135

Reno
5470 Kietzke Lane, Suite 300
Reno, Nevada 89511

1 36. All interactions with Dean are captured on cell phone video. To preclude Kimberly's
2 denial that there was no one hiding in the garage on the morning of December 14, 2021, Robyn
3 provides the following screen shot from the cell phone video she took showing Dean in the garage
4 with his Corvette right after the locksmith opened the door:



16 37. Either Kimberly lied about not having a key to the garage, or Dean had been locked in the
17 garage for an unknown amount of time.

~~18~~
~~19~~
~~20~~
21 38. Moreover, Robyn found a cell phone that was actively recording in the garage. After Dean
22 left in his Corvette, Robyn began taking a video inventory of the contents of the garage. She
23 opened a cabinet and found an Apple iPhone. The iPhone had a voice recording app open and the
24 app was actively recording and had been recording for 55 minutes. Robyn later confirmed that
25 the phone belongs to Dean. Again, Robyn captured all of this in cell phone videos and
photographs. Robyn is unsure if there are any other recording devices around the Anaheim
Property. Robyn is further perplexed why Dean was in the garage (after Kimberly told Robyn that
it was locked and Kimberly didn't have a key) and why he felt a need to leave his iPhone behind

New iMessage

Cancel

To: Robyn Friedman

Thu, Jan 6, 3:07 PM

We just came by the
Anaheim house so
mom could see you.
You went straight into
your room and locked
the door. Mom then
tried to call you and you
didn't pick up. Heading
to Donna's now.

Don't be silly Robyn I
have it all on audio tape.

Delivered

Maybe next time at
least say hi to her.



iMessage



New iMessage

Cancel

To: Robyn Friedman

Maybe next time at
least say hi to her.

Good, that'll show what
happened.

I don't on any recording
of me without my
knowledge. For me or
Mom.

I don't agree to any
recording of me without
my knowledge. For me
or Mom.

Nor have I ever. This is
horrible. No one can be
around you when you



iMessage



New iMessage

Cancel

To: Robyn Friedman

horrible. No one can be around you when you secretly record things. It's not ok. It's also likely completely illegal.

Your recordings are causing stress and confusion constantly to mom. She sees you doing it as well at times. Why do you insist on making things so hard for her and causing her to have to endure that every time she's around you?



iMessage



New iMessage

Cancel

To: Robyn Friedman

Fri, Dec 24, 7:16 PM

I'll be back at the house in five minutes, mom usually goes to bed around 7 o'clock and she's tired we can make tamales some other time.

Whatever you'd like. I left the house at 7:10pm. Would you like me to come back and get her early?

She already had dinner, also, right before we



iMessage



New iMessage

Cancel

To: Robyn Friedman

also, right before we arrived.

I'm literally right down the street as Perry just picked up the van.

Also, she's been staying up until 9pm lately. It seems to reduce the number of times she gets up in the middle of the night significantly.

Robyn you were at the house when I walked in with mom at 7:25. I don't care if you stay if



iMessage



New iMessage

Cancel

To: Robyn Friedman

you go, mom said she was tired so we came home, I'm not gonna keep her out for my own benefit. When you dropped her off you said not to let her go in her room and go to sleep and I know that you guys are going to hotel so if you stay here and wait for Perry or if you go to the hotel either way mom was tired so I brought her back what I'm saying is she doesn't have to stay here till 9 o'clock



iMessage



New iMessage

Cancel

To: Robyn Friedman

she doesn't have to
stay here till 9 o'clock

You're taking nonsense.
We drove away at 7:11.
Have ticket receipts
from Perry and Amp
and I at the light show
at Angel Stadium before
7:25pm. We are also
NOT staying at a hotel.
Amp and Perry just left
to drive to San Diego
and they will stay down
there. Mom and I are
driving back to Donna's
again and staying there.
As you were told. I'm



iMessage



New iMessage

Cancel

To: Robyn Friedman

As you were told. I'm sorry you couldn't sneak Dean in. Perry saw him drive by at 7:05 or so. We have proof. You said you wouldn't bring him by without telling us, first. Did he just drive by to intimidate us? Show that he can show up whoever he wants. It's very nerve wracking when you say you'll tell us if he's going to come by and you don't and he drives by anyways.



iMessage



New iMessage

Cancel

To: Robyn Friedman

Now you're just trying to Backstep Robyn, I have it on audio on my phone you saying that you were going to stay at the house while Perry went to look at Christmas lights. When I have guest over I will let you know, I volunteered to do that to protect myself and guests from you.



iMessage



Supporting documents petition to the street

1 message

Kimberly Jones <kimberly@elderactioncenter.com>

Mon, Jan 24, 2022 at 9:38 AM

To: Sentrex Bonnie Anderson <bonnie@sentrexdocuments.com>

Page 3 line 1:

Shortly after the December 14th issue and the unnecessary stress and self-imposed chaos from Robyn's allegation of Dean "hiding" in the garage then taking his phone and not giving it back until encouraged to do so by police. On December 24th Robyn was supposed to drop my mother off and pick her back up in two hours from 7 PM to 9 PM however she decided that she was going to stay at the house and wouldn't leave to let me visit with my mom privately so my mom and I went for a drive and then came back approximately 20 minutes later.

Robin Hood simply drop my mom off and left there wouldn't have been an issue. However once I told her that I was recording for my own safety she realize that she was caught in a lie.

 **Petition to restrict visitation supporting documents.pdf**
1283K



864

Mom



from James.

Kimberly wants an orderly transition and will continue to care for June until Robyn is ready.

Can you confirm you are ok caring for Mom until 5pm on Monday, when I arrive and that you've received the other longer email with lots of questions and requests?

Thanks,

Robyn

From: Kimberly Jones

[<flyonthewall2you@gmail.com>](mailto:flyonthewall2you@gmail.com)

Sent: Wednesday, December 8, 2021 7:17 AM

To: Robyn Friedman [<vgsfun@hotmail.com>](mailto:vgsfun@hotmail.com)

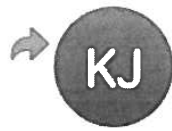
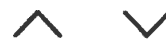
Subject: Mom

Robyn,

Although I disagree with the decision, I would like to make this transition as smooth as possible for mom. Would you please let me know what you intend to do regarding her care and living arrangement. In addition, if you need to contact me please use 714-450-2061.

Sincerely,
Kimberly





Kimberly Jones 12/8/21

To: Robyn Friedman >

Re: Mom

Robyn,

Yes, 5:00 on Monday is fine. I did not receive a text from you, please use 714-450-2061.

On Dec 8, 2021, at 6:08 PM,
Robyn Friedman
<vgsfun@hotmail.com> wrote:

I've reached out via text today but haven't heard back. We were told this, this afternoon, from James.

Kimberly wants an orderly transition and will continue to care for June until Robyn is ready.

Can you confirm the transition for June with Kimberly?



New iMessage

Cancel

To: Donna

Woven Décor,...

loveseat.com

They have pads for 1\$

Sun, Dec 12, 8:52 AM

It sounded like you were sleeping when you answered, call me when you wake up. I wanted to see if you'd be able to come by here or call mom and talk to her about what's going on so she's more prepared.

Delivered



iMessage



New iMessage

Cancel

To: Robyn Friedman

Thu, Jan 6, 3:07 PM

We just came by the
Anaheim house so
mom could see you.
You went straight into
your room and locked
the door. Mom then
tried to call you and you
didn't pick up. Heading
to Donna's now.

Don't be silly Robyn I
have it all on audio tape.

Delivered

Maybe next time at
least say hi to her.



iMessage



New iMessage

Cancel

To: Robyn Friedman

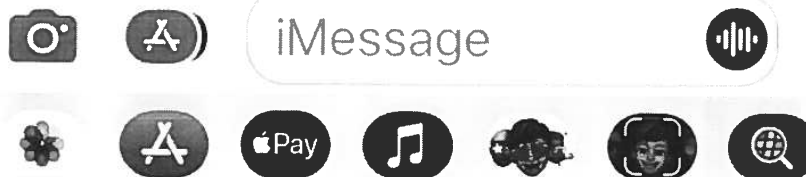
least say hi to her.

Good, that'll show what happened.

I don't on any recording of me without my knowledge. For me or Mom.

I don't agree to any recording of me without my knowledge. For me or Mom.

Nor have I ever. This is horrible. No one can be around you when you secretly record things.



New iMessage

Cancel

To: Robyn Friedman

It's not ok. It's also likely completely illegal.

Your recordings are causing stress and confusion constantly to mom. She sees you doing it as well at times. Why do you insist on making things so hard for her and causing her to have to endure that every time she's around you?

Thu, Jan 6, 8:54 PM

The audio recording



iMessage



New iMessage

Cancel

To: Robyn Friedman

The audio recording
you just said you made
includes confidential
legal conversation.
Since you recorded me
apparently while I was
on the phone without
my knowledge.
Intending to record my
legal conversations
seems REALLY bad.
Like even worse. Please
stop. This is the second
time you've left a
recording device or just
straight up recorded
legal conversations.



iMessage



New iMessage

Cancel

To: Robyn Friedman

Fri, Dec 24, 7:16 PM

I'll be back at the house in five minutes, mom usually goes to bed around 7 o'clock and she's tired we can make tamales some other time.

Whatever you'd like. I left the house at 7:10pm. Would you like me to come back and get her early?

She already had dinner, also, right before we



iMessage



New iMessage

Cancel

To: Robyn Friedman

arrived.

I'm literally right down
the street as Perry just
picked up the van.

Also, she's been staying
up until 9pm lately. It
seems to reduce the
number of times she
gets up in the middle of
the night significantly.

Robyn you were at the
house when I walked in
with mom at 7:25. I
don't care if you stay if
you go, mom said she



iMessage



New iMessage

Cancel

To: Robyn Friedman

was tired so we came home, I'm not gonna keep her out for my own benefit. When you dropped her off you said not to let her go in her room and go to sleep and I know that you guys are going to hotel so if you stay here and wait for Perry or if you go to the hotel either way mom was tired so I brought her back what I'm saying is she doesn't have to stay here till 9 o'clock



iMessage



New iMessage

Cancel

To: Robyn Friedman

You're taking nonsense.
We drove away at 7:11.
Have ticket receipts
from Perry and Amp
and I at the light show
at Angel Stadium before
7:25pm. We are also
NOT staying at a hotel.
Amp and Perry just left
to drive to San Diego
and they will stay down
there. Mom and I are
driving back to Donna's
again and staying there.
As you were told. I'm
sorry you couldn't
sneak Dean in. Perry



iMessage



New iMessage

Cancel

To: Robyn Friedman

saw him drive by at
7:05 or so. We have
proof. You said you
wouldn't bring him by
without telling us, first.
Did he just drive by to
intimidate us? Show
that he can show up
whoever he wants. It's
very nerve wracking
when you say you'll tell
us if he's going to come
by and you don't and he
drives by anyways.

Now you're just trying
to Backstep Robyn, I
have it on audio on my



iMessage



New iMessage

Cancel

To: Robyn Friedman

phone you saying that you were going to stay at the house while Perry went to look at Christmas lights. When I have guest over I will let you know, I volunteered to do that to protect myself and guests from you.



iMessage



New iMessage

Cancel

To: Robyn Friedman

to protect my son and
guests from you.



8:12 PM

Just found Dean hiding
around the corner
again.

8:12 PM



iMessage



New iMessage

Cancel

To: Robyn Friedman

Just found Dean hiding
around the corner
again.



Message



New iMessage

Cancel

To: Robyn Friedman

Stuff like this is why everyone is afraid to be around either of you. SUPER CREEPY. He's on the street behind Mom's house where he can TOTALLY see mom's house. That's so unsettling.

Jesus, Kim. Did you just say you have an audio recording of me on purpose without my knowledge???? You're insane and that's illegal.



iMessage





Donna >



Thu, Jun 10, 9:48 AM

Ok well i'm in the area
and I bought her a
bathingsuit but she
didn't like it. I got it from
target and I have
receipt but no tags on it.
Do you want me to
bring it by real quick
and you can see if you
can return it without the
tags only receipt? Also
I got her blue Jean
Bermuda shirts size 18
will those fit?

We aren't home we're in
La Habra. If the shorts
are stretchy type waste



iMessage



James A. Beckstrom, Esq.
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Las Vegas, NV 89145
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f | 702 362 5414
Beckstrom@Beckstrom.com
maclean.com



6:55 AM LTE



Donna

Thu, Jun 10, 9:48 AM

Ok well i'm in the area
and I bought her a
bathingsuit but she
didn't like it. I got it from
target and I have
receipt but no tags on it.
Do you want me to
bring it by real quick
and you can see if you
can return it without the
tags only receipt? Also
I got her blue Jean
Bermuda shirts size 18
will those fit?

We aren't home were in
La Habra. If the shorts
are stretchy type waste



From: Kimberly Jones kjonthewall2you@gmail.com
Subject: Re: Mom
Date: Dec 8, 2021 at 9:49:35 PM
To: Robyn Friedman vgstun@hotmail.com

Robyn,

Yes, 5:00 on Monday is fine. I did not receive a text from you,
please use [714-450-2061](tel:714-450-2061)