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FOR THE WESTERN DISTRICT OF WASHINGTON

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WESTERN DISTRICT OF WASHINGTON
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CASE NO.

JAYAKRISHNAN K. NAIR,
JAYAKUMAR A. NAIR,
RAJAKUMARI SUSHEELKUMAR,
SUKANYA SUSHEEL,

Plaintiffs,

v.

CHANNA COPELAND, as Guardian of the
Person of Omana Thankamma, Incapacitated,

DEPARTMENT OF SOCIAL & HEALTH
SERVICES, a State of Washington agency,

HARBORVIEW MEDICAL CENTER,
per se and as the parent organization of
PARAMOUNT NURSING HOME,

JOHN DOE #1 *a.k.a.* "ROGER", in
Individual and Official Capacity as
Administrator at PARAMOUNT NURSING,

JOHN DOE #2 *a.k.a.* "TEDLAW", in
Individual and Official Capacity as Nurse at
PARAMOUNT NURSING HOME,

Dr. ANDREW HAHN, in Individual and
Official Capacity as Omana's Physician at
HARBORVIEW MEDICAL CENTER,

JANE DOE #3 *a.k.a.* "MASUMI", in
Individual and Official Capacity as Nurse at
HARBORVIEW MEDICAL CENTER,

RANDY WILSON, in Individual and Official
Capacity as APS Investigator for DSHS

CITY OF SNOQUALMIE,

MOLINA HEALTHCARE INC., *et al.*

Defendants.

EX PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER

&

COMPLAINT FOR SPECIFIC
PERFORMANCE, DECLARATORY
AND INJUNCTIVE RELIEF, AND
DAMAGES

JURY TRIAL REQUESTED

COMPLAINT

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I. SYNOPSIS

1. OMANA AMMA THANKAMMA [hereinafter, "Omana"], aged 77 years, is a citizen of India, who was incapacitated from two massive strokes while visiting her only son JAYAKRISHNAN NAIR [hereinafter, "Jay"] in 2014 on a B1/B2 Visa valid until Feb, 2022. She has since been paralyzed nearly completely in the body except for limited movement of right hand, and her speech has been affected by Dysarthria, (language understanding not affected) which means she can only be understood very well by speakers of her native Malayalam that are also familiar with her condition.
2. She also requires feeding through a PEG tube, and a catheter bag for incontinence. Nevertheless, she is cognitively quite alert, able to hold a natural and engaging conversation in Malayalam, answer general knowledge questions and even able to do fairly advanced arithmetic calculations by mind - all fascinating abilities she has demonstrated to several physicians including psychologist Dr. Janice Edwards during a recent Court-ordered formal Psychiatric Evaluation, and to Dr. ANDREW HAHN, the physician treating her at Harborview Hospital, whom she also greets by name.
3. She also told Dr. Edwards that she loves her son very much, and that she was only living to be able to spend every waking moment with her son at her home where she enjoys stayingIn her report, Dr. Edwards states that Omana very well understands the guardianship proceedings. Omana also answered general knowledge and math questions, such as "previous President of America", how much is "fifty times eleven".

4. RAJAKUMARI SUSHEELKUMAR [hereinafter, "Raji"], a resident and citizen of India aged 58 years, is Omana's step daughter whom she had adopted when Raji was three months old. JAYAKUMAR NAIR, a resident and citizen of India, aged 67 is Omana's only surviving sibling. SUKANYA SUSHEEL [hereinafter, "Sukanya"] is a resident and citizen of India, aged 26 years, and the only grandchild of Omana. Together with Jay, these Plaintiffs empanel to speak for ALL the nearest and dearest relatives, family and Next Friends of Omana currently alive (hereinafter, "Family").
5. After her first Stroke that paralyzed her waist down, she needed fulltime assistance. So Jay quit his day job as a senior software program manager to take care of his mother at home, as she did not qualify for any state assistance as a "non-resident alien". Wherefore in lieu he had obtained and maintained private insurance "Silver Plan" for his mother through MOLINA HEALTHCARE INC [hereafter, "Molina"].
6. He depended on his rental real estate business for cash flow and also worked from home as a biotech entrepreneur (as the chief operating officer of Ratner Biomedical Inc., a startup that has exclusive license agreements with the World's top-ranked biotech research institute, the Johns Hopkins University, and also owns very valuable intellectual property including US and European GRANTED Patent Applications), so as to be Omana's primary caregiver as a most dutiful and loving son. In August 2016 she suffered a second Cerebellar Stroke, while summer vacationing with Family in Las Vegas, that has since required her to receive nutrition through a PEG feeding and a urinary catheter, requiring total care that he was unable to provide all by himself.

7. Therefore Jay, as well as the social workers and director at Dignity Health-St.Rose Dominican Hospital, where Omana she had been admitted for over three months following the stroke, contacted Molina and requested her to be placed in a qualified skilled nursing facility near their home in Washington state when she was ready to be released in October 2017. However, Molina refused the request stating that her coverage did not allow SNF placement. Instead Molina only arranged a medical flight that dropped off Omana, PEG tube and all, at Jay's home in Washington state.

8. Her long-time doctor and PCP in the United States, Dr. Seema Diddee, who also understands her language Malayalam, had told Jay that it could be unsafe for her to fly in a commercial airline, and so Omana needs a chartered medical flight to return to India. Sustaining on rental income from his real estate business ("Omana Homes LLC"), as his biotech income was on stasis due to his physical unavailability, Jay had also realized that Omana needed his personal care and attention to survive, and that it was in his mother's best interest to remain in the United States with him at his home.

9. Therefore Jay had no other option but to hire a respite live-in caregiver (a certified CNA named Ashley Redican) and ALSO a maid to be his live-in assistants to help take care of his mother, while also continuing to personally taking care of her and providing possible medical treatment as well as therapy services from Providence Healthcare. This included speech therapy from a Malayalam speaking speech therapist Dinesh Kannada, whose yeoman service has been instrumental in Omana regaining much of her speech in Malayalam back and even able to sing songs.

10. Jay had also petitioned the United States Citizenship and Immigration Services ("USCIS") earlier to extend Omana's return date on I-94 on medical grounds, which had been temporarily approved. Jay has done everything humanly possible to not only take THE best care of his mother but also to keep her stay legal in United States.

11. Omana was making a spectacular recovery through visiting speech, occupational and physical therapies (each up to three times a week), social interactions and visiting Hindu Temples, and lovingly engaging with family in India through regular phone conversations. She was as happy as she could have been and living a meaningful life, always eager to love and be loved by all her kith and kin, and surrounded by an ambience that she could enjoy and be comfortable in, such as access to Malayalam Channels, interacting with neighbors, friends and their children, going on trails and trips to social gatherings that kept her intellectually stimulated and emotionally fit.

12. Above all, Omana is a DEVOUT Hindu. She is very insistent on her prayers and "PUJA" twice a day for which she depends on her Family. She always loves to hear religious hymns and chants when going to sleep. She has her powered bed at home surrounded with idols and pictures of various Hindu Gods and Goddesses.

13. Omana enjoyed her evenings feeding bunnies in the serene backyard of the home her son had meticulously optimized for her happiness and peace, by installing ramps, Hoyer lifts, 24x7 video monitoring etc. An ambience of love, advanced care and luxury was created so Omana's care could be held at or above a "Gold Standard".

14. This is also attested by the simple fact that when Molina dropped her off at home, she was not expected to survive for more than a few days, and she has since had made a near spectacular recovery at home. A detailed examination of records proves that not only Omana NEVER had any harm, even by negligence, happen to her ever under Jay's care, but ALSO the fact she was medically FAR better than expected prognosis.
15. Omana's thitherto healthy emotional state, being loved and mollycoddled, pampered with everything she wants that money can buy, as well as getting the best therapies, treatment, constant leg massages and Botox injections to alleviate her cramps and keep her terrible neuropathic pain under control, is WHY she has survived.
16. Omana is a very social person; has been active in Kerala Association of Washington and enjoys organizing and attending cultural events and dinner parties. She hates solitude, wants to be taken to Temples to pray almost every day, and also loves to go on nature trails and neighborhood parks on her custom wheelchair as she likes to watch children play and to feed bunnies. These are the ONLY reasons for her to even want to live, in her own words on video testimony. She was clinically diagnosed with Depression post Second Stroke from losing her limited function, and the Family was therefore devoted to making sure she would not lose hope and the will to live.
17. On March 12, 2018, after Jay stepped out in the morning during his off hours from caregiving, the respite caregiver Ashley Redican CNA initiated Omana's PEG tube feeding, and stepped out on an errand, leaving Omana with the maid Alexandria Hall.

18. She noticed that the PEG tube feeding was slowing to a halt, and thought it may be a good idea to blend the food so it will flow easier. Finding the blender at home to be inoperational, she went to a neighbor to borrow a blender, all on her own volition.

19. The neighbor called Snoqualmie Police for a welfare check on Omana, and Officer Fischbeck, an agent employed by the CITY OF SNOQUALMIE (hereafter, "City") who responded, knocked on the door and spoke with Ms. Hall, and then with Jay on the phone. Jay called her CNA Ms. Redican, who was responsible for the morning shift and Omana's feeding, and she said she was already near home after running to get some gas. She could not believe what she was hearing as she states that she had just left home a few minutes ago with a reasonable adult with considerable experience working with seniors and seen Omana happy and safe, watching TV.

20. Her feeding had already been started and gone through about half (after her morning medications were completed prior), and the clog was due to a small lump that formed in her food, which is quite common to occur when using the vegan & organic DIETITIAN APPROVED Liquid Hope (R) PEG Food packets that son special ordered as they have a low Glycemic Index, thus requiring less insulin injections.

21. Despite both Ashley's and Jay's vehement insistence that Omana was 100% safe, and absolutely no harm was done by a few minutes disruption of her feeding, City police took Omana to Swedish Medical Center in Issaquah, where she was evaluated by Dr. Nayak and released later that night with Jay and Ashley. The Doctor's report clearly

- shows not only that she was VERY well taken care of, but also that the caregivers were quite knowledgeable about her care requirements, and that she was well hydrated and stable vitals for her baseline from the condition she was presented in.
22. Omana had been happily staying at home watching TV, and went into panic mode seeing cops and pleaded to not take her from her home in every way she could. Yet her pleas were ignored by Officer Fischbeck, presumably as he couldn't understand her language or her condition. He was not qualified enough to realize Omana's slight interruption of feeding routine did not constitute any imminent threat and that (as proved by glucose and hydration levels at Hospital) she was well fed and doing good.
23. Moreover, the Police Report was rife with nonsensical errors, such as Officer Fischbeck believing Omana's age as 99 instead of 76, and mistaking her urine bag as "*Colostomy bag lying on the floor*" (where urine bags are supposed to be placed according to practice), and incorrectly noting that her prescription was missing a page. Officer Fischbeck was unfortunately not educated enough to understand what he was looking at, or what he should be looking for. His "report" reeks incompetence and level of ignorance unacceptable for a weapon-carrying Law Enforcement Officer.
24. Based on this trivial "incident", City of Snoqualmie charged Jay with "Abandonment of a Dependent person in the Third Degree" in the Issaquah Municipal Court. Soon after, DSHS through Asst. Att. Gen. Ms. Jennifer Boharski petitioned King County Superior Court and obtained a Vulnerable Adult Protection Order against Jay barring

him from removing Omana from any facility (albeit there are no other restrictions). The Complaint included several factual misrepresentations and baseless fabrications used to deceive Commissioner Judson that Omana was not receiving adequate care at Home she loved and wanted to stay in. After Jay pointed them out in his response, Ms. Boharsky openly admitted in Court that "errors were made" and apologized.

25. This VAPO also enabled DSHS to force Jay to accept a negotiated settlement bringing in a third party Guardian, CHANNA COPELAND [hereinafter, Channa] in return for (1) facilitating Omana's US naturalization, (2) access to Jay by keeping Omana within 25 miles of his house in Redmond, Washington State, and (3) assuring to respect Omana's Family's wishes on her Code status and important medical decisions such as POLST Code Status, and (4) continuing her care at the same level.
26. All these conditions to accept a Guardian were accepted by DSHS representative Assistant Attorney General Jennifer Boharski in her email communications with Jay and Omana's then-counsels Greg McBroom and Charles Diesen, who had suggested to Jay that accepting the state guardianship could be a blessing in disguise, as he could offload the terribly exorbitant medical expenses for defraying out of pocket to take care of his mother at home, also enable resurrecting his full-time career on stasis.
27. Soon after the Settlement was approved by King County Superior Court, Jay met Channa at a Starbucks with his lawyer present and handed over all of Omana's documents (including Indian Passport) to her and requested to start the naturalization.

28. However, Channa placed Omana, without informing the Family, at a Nursing / Shelter Home for homeless named "Paramount Nursing Home" [hereinafter, "Paramount"] that is ranked the ABSOLUTE worst nursing home in Washington, & OFFICIALLY listed as needing "Special Focus" from inspectors for routine abuses and criminal negligence, and not equipped or trained to take care of someone like Omana that needs total care. Online reviews show this place is a Nightmare.
29. They removed the urinary catheter from Omana as they did not know how to handle it, and put her on diapers, which are always constantly soiled because of her incontinence. This has led to Omana contacting deadly (entirely preventable) infections and UTIs, requiring five emergency hospitalizations at Harborview that Family initiated after repeatedly finding Omana covered in vomit and in fever often when they visited. Despite palpating with high fever, and unresponsive, Paramount never transferred Omana to a Hospital until Family had to most vehemently insist.
30. Their program's website clearly states they can only accommodate transient short-term patients lacking housing, and those that need long-term stable care do not qualify. Omana is a stable, long-term patient whose Family owns several houses and even a real estate company (in her name nonetheless) and therefore the OPPOSITE of Homeless. Channa was very aware that it would be fatal to consign Omana there.
31. Paramount is also in the bottom 0.01% nationwide according to multiple official and online sources. "It is free, you get what you pay for", Channa told Jay, at their initial

- meeting in the presence of his then-attorney Greg McBroom, and also that she would not consider placing "one of her dogs there for a day", a barely nuanced racial insult. Jay pleaded with Channa to accelerate her citizenship so she can return home with Medicaid benefits, or go to a Skilled Nursing Facility qualified to take care of her.
32. When the Family contacted Channa to request to move Omana from Paramount, she emailed that "Omana is not doing good at Paramount" and that she knows "Omana loves you and wants to be home", and therefore that she would return Omana to Jay's custody at home if ONLY he can provide her with six months of caregiving costs upfront. She was not willing to obey the court order to apply for Omana's citizenship, which would qualify her for Medicaid benefits and therefore placement in SNF or to receive qualified care at home, and which was the ONLY reason for her guardianship.
33. Channa then found a "Final Solution" to the problem of Omana not having a place that she can go to that is qualified to treat her, or any funds from DSHS after they cut off Omana's only financial support Jay. Unfortunately her choice was to COPY EVIL directly from Hitler when confronted with the "Jewish Problem", as Channa found Omana to be a liability not worth caring for or spending the time for Citizenship etc.
34. Therefore Channa responded by contacting Omana's Family in India, namely the Plaintiffs Sukanya, Raji and Jayakumar, and asked for their permission to end Omana's life. Channa demonstrated a level of psychopathic evil, ignorance and cluelessness that was truly unfathomable - she had refused to meet with Omana even

once in the presence of ANY one of her close friends, family, or Speech Therapist Dinesh Kannada, so Omana could talk to her and express her concerns or wishes.

35. On another occasion Omana had mentioned that somebody claiming as her "guardian" tried starting a conversation using a translator in Malay, and she could understand their English better than the Malay as Malay has linguistically no similarity to Malayalam., Now a person that does not know which language her ward speaks has unilaterally decided that Omana 's life is not worth living, despite Omana herself pleading to her in recorded videos in English to respect her wishes to live and to love and be loved by her Family and be returned Home so she can spend the most time with Jay and Raji.

36. Please note this case is to be distinguished from prior cases where the ward was in vegetative state, but here Omana is cognizant, loves her family and living with them. Channa's only reason for her conspiring with Paramount for forcing her death is there is no money to be had from DSHS. She stated that Family must **"put up the money for six months to care for Omana at home, or let her die"**.

37. The Family was beyond petrified and horrified at this most atrociously vile, diabolical and fiendish suggestion. Although they unanimously pleaded with her to let Omana live, Channa most cruelly and savagely replied in emails and phone calls, in the most condescending language, declaring to Family that **"I am now the Head of your Family,Jay's and your opinions to let Omana live are just that, opinions, and they**

don't matter.....I have done a ton of research on Hinduism and based on that I believe Omana would not want to live with a feeding tube....he wants to keep her alive because it suits some of his purpose or to get her money from ancestral wealth....".

38. Jay responded to Channa saying that by laws in India, he would be the sole natural heir of his mother if she had any "ancestral wealth" at all there, and so if that were the case he would have wanted his mother to die sooner to accelerate the inheritance.
39. Yet this was of no avail as Channa also closed Jay's bank account with about \$10,500 (this Bank of America account had absolutely nothing to do with Omana other than having added her name for facilitating a real estate transaction about 12 years ago, in which Jay GIFTED Omana a home). Jay proved to Channa that 100% of the money belonged to him and was just transferred from another account, and that those were earmarked for critical legal expenses that could have a devastating effect to Omana Homes LLC if not paid timely. However Channa appropriated Jay's money under the color of law; abusing the provisions to act on Omana's behalf to her own detriment.
40. Channa unilaterally changed Omana's POSLT CODE to NO RESUSCITATION, despite staunch and vehement opposition from Omana and all members of Family. Channa's stated intent is to dispatch Omana off at the earliest without bothering with her US citizenship application, in violation of the settlement with DSHS for accepting this farcical charade of a completely clueless "Guardian" that they wanted to appoint.

41. Omana found Paramount to be absolute "Unimaginable Hell" in her own recorded words, and has been yearning in tears to be taken back home so she can resume her joyful life at her safe haven that she has become emotionally attached to. She found a lonely life extremely torturous. She had been incredibly missing her friends, religious & social life, pets, everything that made her care to live for despite paralysis.

42. Guardian Channa has let her Molina insurance lapse for nonpayment after taking over from Jay, as he no longer had her financial responsibility. Moreover, Channa was not available to give consent for her critical care appointments, including the follow-up to her right eye cataract surgery at Dr. Philip Chen's office, or for her Botox injection for her legs at Dr. Julie Hodapp's office. Omana's right eye suffered loss of vision and complications from lack of care. She has also been suffering excruciating leg cramps.

43. Jay found his mother to be grossly neglected at Paramount everyday as he visited (daily for at least three hours per Omana's loving request / demand), drenched in vomit and stool and neglected for hours in the most unhygienic and reprehensible conditions. She was not receiving any leg massages, regular stretching exercises, or the Botox injections that are critical for her keeping her legs from cramping up in excruciating pain, or even repositioning, leading to her developing serious bed sores and skin breakage and weeping in extreme pain throughout her waking hours and calling for Jay and Raji as loudly as she could. Moreover, every time that anybody from the Family visited at Paramount, Omana's legs were always kept in the cramped fetal position she dreads, which causes her to constantly moan in pain as she is unable

- to stretch them on her own, despite her physiotherapists' recommendation to keep her legs stretched with pillows always. She has a large collection of special order wedge pillows at home for this purpose. Jay tried to educate the "caregivers" at Paramount many times on this but to no avail.
44. To stop her from crying in pain, Dr. Tran at Paramount started her on a precarious muscle relaxant drug with dangerous side-effects named Dantrolene Sodium, which caused severe vomiting and passing out against her wish to be alert and conscious.
45. Her lips showed signs of sexual abuse (she is rendered catatonic from Dantrolene, a dangerous drug that was started at Paramount despite known side effects) at a shelter overflowing with criminals and drug addicts. He reported her pitiable condition (with pictures) to Channa via emails, but she forward them indiscreetly to an administrator there named "Roger", named in this complaint as JOHN DOE #1 a.k.a. "Roger".
46. To prove her neglect to Channa, Jay started a live streaming session from her laptop near her bed and texted the link to Channa so she could see with her own eyes that Omana's condition, as she had refused to come out and meet in person with Family. Omana was not getting repositioned at all (let alone every 2 hours as needed to prevent her from developing bed sores), or cleaned up for hours after a bowel movement (calling light ON for hours). Despite this direct evidence, Channa betrayed Jay's trust by having Roger remove the laptop: Omana's only source of entertainment.

47. On the next day (02/16/19) when Jay visited his mother as usual, Roger confronted him and advised he had been trespassed for HIPAA violations for taking photos to report his mother's neglect and abuse at Paramount. As Jay stood flabbergasted, Roger called Seattle Police to escort him out. Jay was excruciatingly painfully not allowed to be with his mother on her possibly last birthday (02/23) later that week.

48. Omana's Family and Friends also had to cancel a birthday party that they had elaborately arranged at home to cheer Omana up (she is clinically diagnosed with Depression from the Strokes that disabled her) as Channa cruelly refused to let Omana leave Paramount or to let her take part in her birthday celebrations (as Omana had been most eagerly looking forward to for months.) Omana has been inconsolable ever after this incident and traumatized from being in complete isolation for weeks.

49. Channa once again contacted Omana's family in India, including Sukanya, Jayakumar and Raji, and told them that she did not think Omana's life should be preserved. Plaintiffs again requested Channa for at least an initial meeting with Omana in the presence of her speech therapist Dinesh so she can have a chance to meet at least once and get to know her "guardian" and speak with her directly to convince her of her desire to live. But to-date Channa has refused to meet with Omana even ONCE in the presence of a qualified Malayalam interpreter who is familiar with her slur from Dysarthria, (Omana's slurred speech that cannot be made out through a Malayalam phone interpreter), though she claims Omana is in a vegetative state (Omana is more alert than Channa in some ways as a matter of fact), and wants to MURDER her.

50. Omana's two phones by her bedside that she used to call her family and friends in India, and her Dell Inspiron laptop for YouTube videos and music were confiscated. Omana has since been deprived of all ways to contact family without even the ability to listen to religious hymns on the Internet, as she loves to do during waking hours.
51. Channa used the money she stole from Jay as ransom as he was allowed to resume his visitations after two weeks only in return for dropping the issue of the bank account. He was afraid she would not help him if he reported this theft. However, again on May 7 when visiting Omana at Paramount, he questioned the inappropriate touching of his mother's breast ("for checking temperature") by an African-American Male "nurse" around 50 years old named "TEDLAW" (aka JOHN DOE #2), when he inserted his bare hands underneath Omana's gown instead of using a thermometer. Tedlaw assaulted, shoved and injured Jay, and held him under false arrest under the pretext that Jay had tried to record Tedlaw's voice with his phone without permission.
52. Although Jay was released by Paramount from illegal confinement after in custody about an hour, his visitations were again stopped. He was dragged across the floor in front of several inmates and staff, and suffered painful bruises in neck and shoulders. Jay was scared to report the matter to police, so he filed a complaint via American Civil Liberties Union's website on May 20, 2019 detailing their suffering and abuse.
53. On 05/26/2019, a relative Kavesh Sharma had visited Omana at Paramount to see in horror she was lying unresponsive and covered in vomit that had seeped through the

bed linens and dried. Based on his insistence, the nursing staff called Paramedics that again took her to ER at Harborview, where it was found Omana had contracted serious and recurring infection (Extended Spectrum Beta Laminase) that only spreads in unhygienic conditions such as overpopulated nursing home and prison conditions.

54. By now convinced the so-called "guardian" was aiding and abetting Omana's murder through criminal neglect at Paramount, Raji and Jay, co-signed by all members of Family, sent detailed joint complaints with about 60 attachments on May 31, 2019 describing their mother's plight, urging for action to save her life by moving her to a safe facility immediately, and to investigate the conspiracy to murder her through willful neglect and deliberate withholding of life-saving medication such as Insulin, to the Defendants' representatives/ agents CEO of Harborview Dr. Paul Ramsey, Secretary for DSHS Ms. Cheryl Strange, the Senior Director for Fraud and Accountability Mr. Steve Lowe, *et al.* Unfortunately it had the OPPOSITE effect as they not only failed to provide any protection for Omana, two weeks AFTER these letters were postmarked, Omana had to be rescued from Paramount with a burnt hand.

55. In addition, Family also notified the Indian Consulate General Mr. Sanjay Panda, the United States Senators from Washington Ms. Patty Murray and Ms. Maria Cantwell, Washington LTC Ombudsman Patricia Hunter, American Civil Liberties Union Seattle Chapter Chair Ms. Michelle Storms, Human Rights Watch Group Director Mr. Arvind Ganesan, The Hon. Minister for External Affairs in the Cabinet of Indian Prime Minister Narendra Modi, Sri. S. Jayashankar, among others.

56. Thereafter, Channa agreed to let Raji take Omana home, based on Family's pressure to publish her story on local Indian newspapers and by showing a copy of the ACLU complaint. Raji flew in from India based on this assurance and went to meet Omana at Paramount on June 12.
57. Raji saw Omana was covered in dry vomit, delirious and left to die, with high fever. Upon removing linen covering her left hand, she screamed as Omana's left hand had scalded with what appeared to be terrible burn marks from piping hot water: huge sacs of pulp had formed in her paralyzed body and Omana was mumbling "vedana" (pain in malayalam). Despite Raji's insistence, Paramount staff refused to call paramedics or take her to hospital as the guardian had asked her to be "left to die."
58. Nearly about an hour later, Raji was able to get the Paramedics called, who said Omana's sugar was close to 400, and that she was very close to death, a sentiment echoed by the doctors at Harborview ER and burn center. She was stabilized with Insulin. Raji reported her mother's attempted murder to Seattle police.
59. About two weeks later, Raji and Jay was visiting Omana as usual daily at Harborview on July 5, when a nurse named Masumi came inside Omana's room, and handed over a letter from management acknowledging Raji's complaint to CEO Ramsey. She left without further incident. About 15 minutes later, Dr. Andrew Hahn came to the room, and Omana greeted him and passed her alertness test. Dr. Hahn told her children there was a floating substance found in her food after Raji left the previous night on July 4.

60. Raji and Jay expressed the disappointment that such a suspicious substance was "thrown away" without sending to any lab test, against protocol and in violation of RCW 7.34.053(1), and urged Dr. Hahn to investigate, that Dr. Hahn agreed to do. After about 30 minutes, Jay left Raji with Omana in her room for the rest of day.
61. A few minutes after Jay left, Masumi returned to the room and removed her from her mother's room with the assistance of Harborview Security, and she was forced to spend over five hours under false arrest in a room near the lobby. When Jay returned in the night to collect his sister, he was also escorted out by Harborview Security.
62. Two days later, Dr. Andrew Hahn called Raji and Jay, and said that they would not be allowed to visit their mother for at least two weeks. He said he was aware they were innocent and that Omana cannot survive without her children, but that he was forced to follow directions from Harborview Risk Management that has asked to keep Omana in isolation. He also admitted that the false information that had been given to Seattle Police to derail the police investigation of Omana's hand injuries, such as the lie that it was an allergic reaction when it was likely bullous inflammation (bullous diabetorum) caused due to the neglect at Paramount from lack of insulin injections.
63. Dr. Hahn also admitted that Ms. Heather Barr, detective from Seattle PD, was deceived with another lie that Omana had a disease like MRSA, and that it was only a smokescreen to cover up Paramount's murder attempt. Ms. Barr had told Jay earlier that Omana's high glucose was due to infection, when truth was intentional neglect.

64. Two weeks later Family tried to contact Dr. Hahn and Harborview but were ignored. Dr. Hahn did not reply to the requests to investigate the foreign substance in her food or to let her children meet their mother. Family tried to meet Omana at a scheduled follow-up to her eye surgery that had been pending for months, and also learnt from the eye clinic that she has never had a follow up visit despite the vascularization and other complications that had developed in her eye from the surgery and loss of vision.
65. She was forced to miss that appointment as well, and the guardian ignored all of her family and friends' efforts to get any information about her as retaliation for the complaints that the family had sent to about a dozen authorities.
66. On 7/31 Family sent her and Harborview official demand letters demanding for the Family to meet with Omana and ascertain her condition, on or before August 5th. While Channa is yet to respond as of the date of filing of this complaint,
67. Harborview's only response was "we are aware she has a guardian" and to point to Channa. To date it has been well over a month since Family or Omana has had any contact with each other. Omana is clinically diagnosed with depression, and susceptible to panic attacks. She can only communicate in Malayalam and describes as "fish out of water" when not with Family.
68. As Omana has no insurance or Medicaid, Channa wants to appropriate the \$10,500 she has stolen from Jay and soft-murder Omana through isolation at Harborview, who

in turn want to encourage it to prevent a testimony implicating their staff at their subsidiary Paramount for aggravated crimes of sexual and medical battery, and attempted murder.

69. Dr. Andrew Hahn, Channa and Masumi, as well as Harborview "Risk Management" are well aware that Omana is liable to have another stroke if she is kept in isolation and distress, and Channa has even admitted in emails she understands Omana's deep desire to be home and with Family and how much it would crush her to be otherwise.

OMANA'S EXTRA-JUDICIAL EXECUTION IS CURRENTLY IN PROGRESS
AND CAN ONLY BE STOPPED BY THIS COURT THROUGH CRITICALLY
URGENT ACTION. A LOVING MOTHER HAS BEEN KEPT IN SOLITARY
CONFINEMENT FOR OVER A MONTH ILLEGALLY ONLY FOR THE
CRIMINAL AND INHUMAN PURPOSE OF CAUSING HER MORTAL ANXIETY
AND ACCELERATING HER DEATH, AS CHANNA HAS NO FINANCIAL
MOTIVATION TO KEEP OMANA, WHO HAS NO INSURANCE OR FUNDS,
ALIVE. SHE HAS BEEN DENIED A CHANCE TO PROVIDE A TESTIMONY OF
HER SEXUAL ABUSE AND INTENTIONAL NEGLECT AT PARAMOUNT.
AS AN INDIAN CITIZEN VISITING USA, OMANA HAS A RIGHT TO RETURN
TO HER COUNTRY, SO HER SOLITARY CONFINEMENT IN USA IS NOT ONLY
UNETHICAL BUT ALSO ILLEGAL & A BLATANT VIOLATION OF BILATERAL
TREATIES BETWEEN TWO MAJOR NATIONS. OMANA PRAYS TO BE
ALLOWED TO RETURN HOME EITHER TO JAY (USA) OR RAJI (INDIA) &
ALSO THOSE WHO CONSPIRED TO MURDER HER BE BROUGHT TO JUSTICE.

II. JURISDICTION AND VENUE

1. This action arises under the United States Constitution, particularly the First and Fourteenth Amendments, and under federal law, specifically, Title 42 U.S.C. § 1983, and § 2000cc et seq. This Honorable Federal Court has BOTH Diversity AND Federal Question Jurisdiction on this matter. All Plaintiffs are citizens of India. The claims in question *in toto* is of magnitudes higher than \$75,000.

This court has jurisdiction over:

- a) civil claims arising under the United States Constitution and federal law pursuant to 28 U.S.C. § 1331, 29 U.S.C. § 794, 42 U.S.C. § 1983, and 42 U.S.C. § 12101 et seq.;
- b) Over claims that Omana was not provided medical treatment necessary to sustain her life pursuant to P.L. # 109-3, enacted by the Congress and signed into law by President George W. Bush at 1:15 a.m. on March 21, 2005;
- c) Over Plaintiff's prayer for preliminary and permanent injunctive relief and damages under F.R.C.P. 65(a);
- d) Over Plaintiff's prayer for declaratory relief under Title 28 U.S.C. § 2201;
- e) Over claims of discrimination based on race, color, and national origin-Title VI of the Civil Rights Act of 1964.
- f) Over claims of violation of Religious Land Use and Institutionalized Persons Act (RLUIPA), Omana's Freedom to Exercise of Religion, and the Racketeer Influenced and Corrupt Organizations Act of 1970 (RICO), through

involuntary redistribution of Omana's assets *a la* a defrauded enterprise.

- g) Over claims of violating the Civil Rights Act of 1866, 42 U.S.C. § 1983.
- h) Over ensuring safe passage of Omana back to her home country of India pursuant to the international travel agreements and treaties signed between the sovereign nations of United States of America and Republic of India, and embedded in the strong & friendly diplomatic bilateral relations, originally signed circa 1948 between President Eisenhower and Prime Minister Jawaharlal Nehru; and continued to be reaffirmed and fostered in the recent meeting between President Trump and Prime Minister Narendra Modi.
- i) Over claims of violating International Law: As a visitor not charged with any crime, Omana has the right to return to her home in India, as guaranteed by the terms of issuance of her B1/B2 Visa. United States is therefore responsible for DSHS holding her hostage illegally against her's or her Family's wishes. For all practical purposes she is in US Custody by being disallowed to return.
- j) Over claims of Fundamental human rights violations: By holding her in isolation while in custody of United States, torture of an elderly disabled sick woman is being committed. Omana's solitary confinement is unconstitutional.

- 2. Venue is proper under 28 U.S.C. § 1391 in the Western District of Washington because this claim arose therein. Each and all of the acts alleged herein were done by the Defendants under the color and pretense of state law, statutes, ordinances, regulations, or customs.

III. PARTIES

III.A. Plaintiffs

1. Jayakrishnan K. Nair, is the only surviving biological child(from among three after the early deaths of his two elder siblings from natural causes) of Omana, a citizen of India and a permanent resident of the USA domiciled in the state of Washington. She is especially close to Jay and the mother & son have a profound & inseparable bond.
 2. Jayakumar A. Nair, is the only surviving sibling of Omana, and a citizen of India.
 3. Rajakumari Susheelkumar, is the only step-daughter of Omana, and a citizen of India. She routinely visits Omana in the USA every year (since her disability) to help Jay to take care of their mother together staying at Jay's home for a few months.
 4. Sukanya Susheel, is the only granddaughter of Omana, and a citizen of India.
- Plaintiffs [1-4] constitute and represent all known closest family of Omana.

*--The following Plaintiff seeks to Joinder post-filing, as currently it is only a matter of hours before she dies from an inevitable stroke as the Defendants desire, and there is not enough time for the family to find an attorney as **saving her life is first priority.**---*

5. Omana Thankamma, an Indian citizen visiting USA individually and on behalf of her Indian estate, is incapacitated and so appearing through her Family and Next Friends.

III. B. Defendants

1. Channa Copeland, is a natural person domiciled in the State of Washington.
2. Department of Social & Health Services, is a public administrative agency of the State of Washington, and responsible for the hiring and conduct of its so-called "Adult Protection Services" department and its officials and representatives.
3. Harborview Medical Center, is a Hospital that also controls Paramount Nursing Home as a subsidiary, and is responsible for the conduct of all its medical staff.
4. John Doe #1, a.k.a. "Roger", is an African-American man, aged in the 50s, who by best information and belief was employed as an Administrator at Paramount Nursing Home, as of 05/17/2019. Further details are unknown until Discovery.
5. John Doe #2, a.k.a. "Tedlaw", is an African-American man, aged in the 50s, who by best information and belief was employed as a Nurse at Paramount Nursing Home, as of 05/17/2019. Further details of this individual are unknown until Discovery.
6. Dr. Andrew Hahn, is a Board Certified Internal Medicine Physician employed by Harborview, who has treated (or still treating) Omana at the hospital, over several months. At the Plaintiff's most recent meeting with Omana, Dr. Hahn acknowledged ,

that Omana has a cogent and active mind, and that medically she NEEDs the constant love and mental stimulation of her Family's presence for survival as she is clinically depressed and could likely suffer a fatal stroke if she suffers anguish from isolation.

7. Jane Doe #3, a.k.a. "Masumi", is an Asian-American woman, aged likely in the 50s, who by best information and belief was employed as a Nurse at Harborview Medical Center, as of 06/05/2019. Further details are unknown until Discovery.
8. Randy Wilson, is an investigator for Adult Protection Services Unit for DSHS who filed a false complaint against Jay and lied under penalty of perjury to deceive Hon. Commissioner Judson and obtain a VAPO restraining Jay from "removing from any facility". He also abused his power to influence Prosecutor to delay proceedings and Providence Healthcare to stop sending therapists to Omana.
9. City of Snoqualmie, is an incorporated municipality and public entity responsible for hiring and conduct of its public officials, including City Police and City Prosecutor.
10. Molina Healthcare Inc., is a "Fortune 500, multi-state healthcare organization" that Jay purchased his mother's health insurance from. Their denial of the strong request from social workers at St. Rose Dominican Hospital in Las Vegas, post her Stroke, for Omana's placement in a Skilled Nursing Facility, despite needing total care including a catheter and PEG tube, resulted in Jay having to provide care for Omana himself at home through hiring two live-in helpers, the ROOT CAUSE of this matter.

III.C. Agency and Concert of Action

1. At all times herein mentioned, Defendants, and each of them, hereinabove, were the agents, servants, employees, partners, aiders and abettors, co-conspirators, and/or joint venturers of each of the other Defendants named herein and were at all times operating and acting within the purpose and scope of said agency, service, employment, partnership, enterprise, conspiracy, and/or joint venture, and each Defendant has ratified and approved the acts of each of the remaining Defendants.

2. Each of the Defendants aided and abetted, encouraged, and rendered substantial assistance to the other Defendants in breaching their obligations to Plaintiffs, as alleged herein. In taking action to aid and abet and substantially assist the commission of these wrongful acts and other wrongdoings complained of, as alleged herein, each of the Defendants acted with an awareness of his/her/its primary wrongdoing and realized that his/her/its conduct would substantially assist the accomplishment of the wrongful conduct, wrongful goals, and wrongdoing.

3. This Court also has jurisdiction over all other claims pursuant to 28 U.S.C. § 1367 because all of the claims arise from a common nucleus of operative facts that are so intertwined that they cannot be reasonably separated.

IV. STATEMENT OF FACTS

IV.A. CONTEXT & BACKGROUND

1. Jay is a biotech and real estate entrepreneur based in Seattle since 2003 [Ex: D01] and the only surviving son out of three of Mrs. Omana Thankamma (77), who was born in a poor family in Kerala, India and had worked as an accountant in a public utility company there for 35 years as a single mother after the early death of her husband, to bring up Jay and Raji (a girl baby had she adopted at 3 months old).
2. She is especially close to her son [Ex:P2], a fact known and acknowledged by all, including Channa in her submissions to Court [Ex: D02] where she says: "There is no doubt that there is a distinct bond between mother and son. Mr. Nair is the last of her biological children, there is an adopted daughter in India. I do not doubt that she would prefer to be home with her son.", and in several other emails where she acknowledges the love Omana has for her only remaining child and how much he means to her.: "I understand Omana loves you very deeply, I have sons too".
3. Omana had retired in 1995 and her only income (other than her children's support) is a small pension of about \$300 per month (about INR 20,000) from her retirement. Raji works as a senior officer for a leading newspaper in India named Mathrubhumi, (www.mathrubhumi.com) and holds a 10-year US visa, which she uses to visit her family in US every year as much as possible, and to help Jay take care of Omana.

4. After completing Bachelors in Electronics Engineering from University of Kerala, Jay came to the United States to pursue my Masters in Computer Engineering from University of Massachusetts-Amherst in Aug 2001. He also received a research assistant position on NASA space applications, along with a full tuition waiver due to outstanding merit from an invention for use by paralysis patients that he applied a patent for, and a 99 percentile record GRE score, and various other academic honors and achievements including the nomination for a coveted President's medal. So he quit his job at IBM Global Services in Bangalore, India and accepted the offer to become a research student in USA working on advanced NASA space applications.

5. As Omana had long retired by then and living by herself in India (step sister Raji was married) Jay invited her to visit him in the States, as he already had enough income to support her while a student from the scholarship. So she obtained a visitor visa and first came to US in Feb 2002 and stayed with him in his student housing.

6. After graduating Masters with a full 4.0 GPA, and as one of World's only about 11,000 Erdos #2 (or below) elite Mathematicians, Jay was recruited to Microsoft in 2003, and so he relocated with his mother from Boston to Seattle in July 2003. Jay was fast tracked to become a legal permanent resident in 2008 through Microsoft sponsorship under the EB-2 merit category, and soon also became a real estate investor owning five homes in the eastside. He also completed an MBA *summa cum laude* from University of Washington-Seattle, and was leading a team of 26 engineers at Microsoft at age 27.

7. Omana has since been staying six months with Jay in USA EVERY YEAR SINCE 2002 (as the max her I-94 allowed per visit on her 10 year multiple entry visa, which was renewed for another 10 years in 2012 [Ex: D25]) and the other six months living alone by herself in India (waiting out half a year in solitude before returning to be with Jay. She continued this pattern for EVERY year since 2002 until 2014, until could no longer return to India any more as she was paralyzed waist down from a massive stroke and needed fulltime care, which meant Jay had to quit his job in IT and become a fulltime primary caregiver for his mother since 2014.

8. Omana had also needed a triple bypass surgery in New Jersey [Ex: D03] at Atlanticare while visiting Jay in 2012, which he defrayed out of pocket as she did not qualify as a visitor for Medicaid benefits [Ex: D10]. Until the recent events starting at Paramount in Feb 16 2019, Omana in the last 6 years had to be admitted as an inpatient for various critical medical conditions at Atlanticare Hospital in Pomona, NJ for 3 months; Dignity Health St. Rose Dominican Hospital in Las Vegas NV for 4 months; PRS Hospital in Thiruvananthapuram, India for about 8 months and Harborview for about 6 months - for a total of nearly two years as an inpatient, during ALL of which time, every single day, Jay has been diligently by her bedside and defraying all the exorbitant medical costs, and nobody had any complaints.

9. No qualified careprovider had EVER complained about Jay or his behavior during all these stays until he first complained about his mother's abject neglect at Paramount.

10. Omana learnt in 2007 that a new community of cottage homes optimized for retirement living was opening next to Jay's home in 6706 Quigley Ave SE in Snoqualmie Ridge, and expressed her desire to live in a home close to him when he starts a family. As she had no income and no savings to purchase the home, Jay gave her the money to buy this dream home through a transfer from a HELOC on the equity in his home in Quigley Ave. Jay held Omana's Durable Power of Attorney, and she was also his dependent on tax statements for several years since 2003.

11. She bought this cottage home (6813 SE Gove ST Snoqualmie WA 98065) with the \$208k transferred from Jay's Countrywide Home Equity account to their joint Bank of America account in 2007, and one year she later transferred it back to his name in 2008 for ease of taking care of it along with the rest of his real estate (his real estate business is named Omana Homes LLC) while she spent her six months in India. The reason why Omana did it this way was only because, as a retirement community, Cottages at Heights offered a hefty discount for senior buyers over the age of 60 and there was a requirement in PSA the original buyer cannot transfer deed for one year.

12. After her disability, as a single man supporting her, Jay had no other option but to quit his IT job and become her full-time caretaker at home while also working from home (being a biotech entrepreneur, investor and software professional gave him the option to telecommute) and also rely on his income from rentals and investments [Ex:D04]. He held a federally declared net worth of \$4.3 Million as of April 03, 2017. Jay takes pride in being extremely knowledgeable about all aspects of his

mother's care, as have been observed by almost all her doctors, as also attested by Dr. Nayak in [Ex: D05]. Omana adores her son, and he loves her more than his life.

13. Jay wrote to USCIS in May 2014, four weeks before her I-94 expired for her most recent entry to the States on January 2014, that his mother is medically unstable to return to India and requested an extension to her return date. Her application was supported by letters from her primary care physician Dr. Palanati [Ex:D06] and also her neurologist Dr. Hong [Ex:D07]. USCIS sent them an acknowledgment. Jaysimply could not have simply put his paralyzed mom on an airplane and said goodbye when she is no longer able to live by herself in her home country.

14. Since then Jay has been taking care of his beloved mother at home as her PRIMARY CAREGIVER, and she has, as always since his starting to earn, been living under Jay's expense as his 1040 Tax dependent [Ex_tax1617]. Her only source of income as aforementioned is a small pension from the job in Kerala State Electricity Board in India, that she receives in her bank account in India. As a visitor she was not eligible for any sort of help from DSHS or Medicaid [Ex:], so Jay has been spending several thousands of dollars a month out of his pocket for her expensive private insurance (Molina) and for all her private therapies and medications and in-home nursing visits. She has received diligent and gold-standard care at home, as ALL her treating physicians in USA in all states they lived in since 2002 (WA, NJ, MA and NV) would certify. Moreover, she has been CONTENTED and AT PEACE to be home. Jay was also her Power of Attorney[Ex: D] and always tried to do his best for Omana.

15. Jay customized his home heavily [Ex: P4] to make it her happy sanctuary with a wheelchair accessible huge backyard backing to a permanent greenbelt that she can feed bunnies. He purchased a Hoyer lift, custom wheelchair, power hospital bed, and every other equipment to give her a private heaven loved by family and getting the best medical care possible. She has lived with Jay as happy and as best taken care of as possibly could be, as she is ALWAYS the first to emphasize [Ex: D08], which also includes a YouTube video plea from her to Judge Schubert to let her return home.

16. In August 2016 she suffered a second stroke [Ex:D09] while she and Jay were summer vacationing in Las Vegas, which paralyzed her body completely except for limited motion on her right hand. She also lost her ability to chew, and now required feeding through a PEG tube. Amazingly, she still retains her mental faculties, and is still able to hold deeply meaningful conversations and even do advanced arithmetic by mind, as she keeps demonstrating to everyone around her each day. However, due to her Dysarthria and language barrier of only being able to speak Malayalam and no English, she has trouble communicating with anyone that does NOT speak her language OR is not familiar with her slurred speech.

17. She became clinically diagnosed with depression and suicidal after the second stroke. Her family has been giving her exceptionally strong emotional support that she has really depended on, and therefore she needs to stay in constant close contact with them to be able to even retain the will survive in this debilitated condition, as they are the only people she trusts and will talk to freely in this condition.

18. She has had bad experiences of trying to talk to strangers like Channa through phone interpreters so simply chooses to withdraw herself when one of family, friends or at least her speech therapist is not present. However, she can hold a deep conversation [Ex:D26] and enunciate complex concepts articulately through Family or Dinesh.
19. Following this she required 24x7 TOTAL care as can be seen from [Ex:D09], but despite the best efforts of the social workers at the hospital, her insurance Molina refused to pay for her care at a Skilled Nursing Facility, stating her plan did not allow long term care. So after returning with her to WA after spending four months in a hospital in Nevada, he decided to hire an additional experienced and certified live-in caregiver as a RESPITE CAREGIVER and to join his household consisting of Omana and alive-in housekeeper at his six bedroom house in Snoqualmie Ridge.
20. Jay found Ms. Ashley Redican, who has extensive experience [Es: D11] as a certified caregiver [Ex: D12] taking care of stroke victims at several well established nursing homes such as Mary Martha Memory care, Liberty Ridge Rehab Care etc. It was agreed Jay would be doing both the evening shift as well as night shift from 3pm-9am, and working on his businesses from 9am-3pm, while Ms. Redican would do only the morning shift from 9am- 3pm.
21. This is in addition to another certified CNA [Ex: D13] Karina Conspicion [Ex:D14] visiting the home three times a week for half a day each for additional help in bathing, pedicure, manicure, skin conditioning and other routines that she enjoys.

22. She also had physical therapy, speech therapy and occupational therapy at home from Provident Health Services three times a week in addition to all the care and love in the world. She enjoyed watching her favorite shows, speaking with family and spending time with friends. She was on a miraculous path to recovery from the stroke.

IV. B. AN ENTIRELY TRIVIAL "INCIDENT"

23. On March 12 2018, after Jay had stepped out of the home to go to Redmond in the morning around 9am, Ms. Redican gave my mom her morning medications and started Ms. Thankamma's PEG tube feeding as usual, and stepped out for a personal errand, leaving her with the maid Ms. Alexandria Hall. She noticed that the tube had got clogged around half way through the feeding, and contacted me by text. Jay called Ashley and requested her to return home immediately to complete the feeding. He also advised Alexandria through texts [Ex:D15] that both he and Ashley were on the way back home and therefore to divert her attention to housekeeping tasks until Ashley and I returned and took care of completing Omana's feeding.

24. Desirous of helping Omana, Alexandria however still went to a neighbor to borrow a blender, as she thought blending the food might help to get it through the feeding line. This was not necessary or advised, just an idea she thought on her own. After talking with Ms. Hall this good Samaritan neighbor apparently requested a welfare check for Omana to make sure she is ok and has received adequate care and food that morning. So an officer was dispatched to check on Omana from Snoqualmie Police.

25. While Jay was driving back home, he was called on his cell by Officer Fischbeck from Snoqualmie Police Department. He advised that he was there to check my mother is doing ok because he got a call from the neighbor her feeding had been interrupted and that he was going to ask her to be taken to Hospital. Jay advised him that her nurse Ashley and he as the primary caregiver were both on their way back, and that it was unnecessary as she was not in any risk or danger but to no avail.
26. When Jay reached home, the cop was already talking with Ashley, and Omana had been taken to Issaquah Swedish Hospital. Ashley and Jay rushed there to meet with Dr. Nayak, who wrote on her detailed medical report [Ex:D05] that she has been very well taken care of, her skin shows no signs of breakage, she was at her normal baseline and the son Jay is very knowledgeable about her care.
27. Dr. Nayak furthermore outright refused Officer Fischbeck's request to hold her in the hospital until Adult Protection Services (APS) investigated the incident as he determined it was in her best interest to be allowed to return home. Dr. Nayak sent her home with Jay and Ashley immediately and they thought that was the end of it. Furthermore, Jay also sent an email to the officer [Ex:D16] that clearly outlined all the facts of the matter and even thanked him for coming out.
28. However weeks later Jay got a mail for an arraignment on a criminal charge of Abandonment of a Dependant person in the third degree, from the Issaquah Municipal Court. He was absolutely shocked and so was Ashley, and she made a

statement [Ex:D17] exonerating Jay and showing that she was home (along with Ms. Hall) when I left in the morning. Therefore it is easy to see that to charge someone with a crime of "reckless abandonment", when the facts are clear that when he left her at home that morning there was a licensed and certified caregiver present at home [Ex:D12], along with another adult who also had experience working in nursing home facilities around seniors [Ex:D18], is of course blatantly malicious abuse of power.

29. Furthermore, the police report [Ex: D19] is full of absolutely nonsensical, pathetically comical and amateurish errors, unbecoming of a professional LEO. The report states Omana is 99 years old, when the fact is she is a young 76 who still has no grey hair [Ex: P2], and continues with other baseless and silly "allegations", including one that the cop found her "Colostomy bag" unattached and lying under the bed; laughable nonsense given that she NEVER had a colostomy. Instead what he was referring to was the urine bag that was supposed to be kept under the bed(!)

30. The police report is nothing more than a scary reflection of the pathetically low hiring standards for small town officers and their frightening power incommensurate with their intellect as not even a child could write such blatant and obvious rubbish. She had been terribly startled by the cop's intrusion at her bed while happily watching her favorite show clean in bed and nearly died from the stress. She had literally pleaded with the cop and the paramedics as much as she possibly could in tears to not take her from her beloved home, which she has been pleading to all [Ex:D08] since that date.

31. On the basis of this completely and utterly meaningless "police report", DSHS's Adult Protection Services took Omana into custody and kept her in Harborview hospital, while they also obtained a "Vulnerable Adult Protection Order" against Jay through which he was prevented from removing her from the hospital [Ex: D20] although there are no other restrictions. Hon. Commissioner Judson was deceived with several easily provable lies and misrepresentations in the APS petition [D:21] as can be seen from Jay's Pro Se response [D:22] to the petition.

32. After this VAPO had Omana in tears desperately wanting to come home from APS custody, Jay hired attorneys Mr. Charles Diesen and Mr. Greg McBroom. They told him that to reverse the VAPO and to get back her custodianship will be a very expensive legal battle, and instead offered to negotiate a settlement that would instead actually be helpful. Mr. Diesen personally met with Omana to confirm her alertness.

33. These are the key assurances Family wished to accept an outside guardian:

- a) Her legal status: Omana was awaiting determination from USCIS on her I-94 extension following the request to extend her visit on medical reasons. Once she became legal and qualified for Medicare the huge financial burden of having to pay for a live-in caregiver and private insurance and in-home therapies etc can be lifted off Jay's shoulders so he can resume his fulltime IT career.
- b) Unrestricted Ability for Family, especially Jay, to see her anytime she liked by placing her at a skilled nursing facility within a 25 miles radius from his home.

- c) that all her important care decisions will rest with family (such as POLST code)
- d) she can visit home whenever she wants and son can take her to attend Temples for regular religious ceremonies and attending Malayalee cultural occasions,
- e) Of course, all the above was predicated on the most important condition that her care should be held at the same gold standard as she has always been kept at home, as certified by Dr. Nayak's and other physicians' reports, and she should continue all the therapies (especially Speech and physiotherapy) and medical care as before, such as her Botox pain injection regimen for preventing cramps, scheduled post-surgery eye care to prevent loss of vision on right eye etc.

34. Ms. Jennifer Boharski representing the DSHS and Jay's attorneys Mr. Charles Diesen and Mr. McBroom negotiated [Ex:D28] and agreed on all the above key points, and the settlement was approved by Court [Ex: D23]. Therefore the family accepted DSHS to bring in a third party guardian (Channa) in exchange for all the above demands, in lieu of spending tens of thousands in legal fees to throw out the APS allegation predicated on a nonsensical police report that alleges the son "abandoned" the mom with two adults he hired to take care of his mother, both with lots of nursing home experience and one of them even a DSHS certified CNA [Ex: D24, D12, D18].

35. The baseless "abandonment" charge was entered into a Stipulation Of Continuance and dismissed by July 11 2019 [Ex: D27] as the Prosecutor requested Jay's criminal attorney Mr. John Rongerude to avoid a trial. Jay heavily opposed her request and insisted on a trial, to show the people of the city of Issaquah the dubious prosecutorial

standards for harassing a sick old mother who loves her son and desperately wants to stay home she considers her heavenly sanctuary. If Jay can be "prosecuted" for this "crime", then nobody in society is safe from such vulgar abuse of power.

36. Furthermore, Ms. Amy P. Swanson, director at Providence Rehabilitation Services (that had been sending therapists to our home since her stroke and have completed over a hundred or so successful sessions of physiotherapy, speech therapy and occupational therapy at home), was contacted by Mr. Randy Wilson from DSHS/APS with a weird illegal request to stop sending therapists to our home. Her regular therapy sessions that had been keeping her healthy and on a path to successful rehabilitation (she had already gained almost all of her speech in her native tongue Malayalam back, as the speech therapist that I had engaged Mr. Dinesh Kannada is the ONLY licensed therapist in the area that speaks her language; and due to his yeoman service she could speak again for a while as he can attest) were stopped abruptly for no reason based on this DSHS request.

37. DSHS Petition [Ex:D21] for the VAPO [Ex:D20] alleges that when the police and paramedics arrived to take Omana from home, they found her *"lying in the floor in a pile of excreta and there was a strong stench of urine inside the home"*. On the contrary, the referenced police report [Ex:D19], although childishly silly otherwise, at least does acknowledge that "I found Omana Thankamma laying on a futon...Omana's bedding appeared FRESH" . Jay's response [Ex:D22] pointed this out along with about 10 other factual inaccuracies/ lies in the petition. On her opening oral brief to

Commissioner Judson, Ms. Boharski readily accepted on record that errors were made and that the above allegation was a lie that Mr. Wilson had misrepresented, (as he had used boilerplate templates to malign Jay) and that Omana was indeed found clean and fresh in her bed when the paramedics arrived to take her to the hospital.

38. To put things into perspective, Ms. Boharski has therefore admitted that the Department had MISREPRESENTED THE CASE AGAINST JAY NAIR. Such a lot of pivotal falsifications is not an error, but obviously DELIBERATE AND WILFUL. Her statement ON RECORD is ample proof that Mr. Randy Wilson has committed the crime of perjury by maliciously using FABRICATED allegations from some templates. It is still a huge mystery how or why Hon. Commissioner Judson inexplicably failed to bring sanctions against Mr. Wilson and DSHS for knowingly submitting false evidence.

39. The questions that need to be asked are: How is it possible to "mistakenly" copy paste SEVERAL wrong allegations from the wrong file (as claimed) and present it to a venerable court KNOWINGLY accusing an innocent man of neglecting his mother when he has done his absolute best to keep his mother clean and safe? How can such a deliberate action any conceivably be only an error? Although Ms. Boharski "apologized" to the court, it is afraid Commissioner has unfortunately failed to take the appropriate legal action, as a simple apology does nothing to correct Mr. Wilson's obvious pattern of devious corruption for framing an innocent man that loves his mother more than his own life. Mr. Wilson and rest of DSHS's legal team

(specifically one Ms. Christine Glenn's blatant lies in her pleadings) have made this case into a total circus through diabolical lies made with impunity.

40. The truly sadistic motivations for Mr. Wilson and Ms. Glenn for their criminal actions of most contemptuously misrepresenting facts to a venerable Court, for savagely harassing a paralyzed lady that just wants to be left alone at her home (that she calls her lovely sanctuary in video [Ex:D08] and to take her away from her family lovingly trying to take the best possible care of her (paying astronomical medical and qualified private caregiving costs out of pocket), are quite unclear. It could be racial discrimination, xenophobia, "power tripping" or quite simply, the pathetic need to "justify" their fat paychecks when they have absolutely nothing productive to do but to warm chairs at taxpayer expense, have too much time to kill and reports to fill on their job activity. They need to prop up "stats" that vindicate their salaries to their bosses that they helped "n number" of "vulnerable adults" when the sad reality is the said adults see these DSHS agents as monsters prying them from family and their "efforts to protect them" as evil persecution.

41. Jay's criminal lawyer Mr. John Rongerude persuaded him that as the Prosecutor was "playing games to keep the case open for as long as Mr. Wilson wanted, without any legal merit" and not willing to schedule a trial for at least 3 months, it made absolutely NO logical sense to NOT accept a Stipulation of Continuance (SOC) for dismissal after three months. Clearly it would only be a Pyrrhic Victory to return to court for a mock trial that the prosecutor acknowledges she has no chance to win, as

Ms>Moberly was willing to dismiss the case (and it was, on July 11) after the SAME length of time (3 months) before it could go to trial anyway.

42. In other words, the only reason to NOT accept the SOC would be if I had to be foolhardy enough to insist to spend the time and expense, for my lawyer and I to come back after three months to do a mock trial, to prove my innocence to 12 random strangers and for absolutely no other reason whatsoever. By the same logical reasoning, she could have charged Jay with the assassination of JFK and he would have still been forced to accept the same SOC, which he did as he had no other choice despite repeatedly asking for a quick trial.

43. There was absolutely no legal or logical reason for this obviously facetious and baseless case to have remained open for 17 months other than the pressure from Mr. Wilson on Ms. Moberly. She kept an utterly frivolous case open as NOTHING more than a BLUFF for facilitating DSHS in getting Omana a guardianship, by using circular logic to deceive Courts. The SOC was completed and the case was dismissed eventually on July 11, 2019, and hence its trail of destruction is unwarranted.

44. No reasonable person can have any doubt that if this absolutely frivolous "case" went to a trial with this trumped up "evidence", the cop and the prosecutor are fully aware they would only manage to embarrass themselves for maliciously and deliberately abusing power to harass a quadriplegic and her innocent loving family, to destroy the life of a high standing erudite executive and to tarnish his social and professional

reputation, and above all to keep a quadriplegic from the happiness and contentment of being with her family at home that is her only motivation to live in her locked-in pitiful condition.

45. The only complaint against Jay in the DSHS complaint is that he failed to hire adequately qualified caregivers to care for his mother. This is not true, as he was himself the primary stay-at-home caregiver since her stroke. Therefore all he needed was to hire a respite person when he needed to step out from caregiving. For this he subscribed to and advertised in nationally syndicated Job boards such as care.com [Ex:D45], from where most of the established nursing homes also do their hiring. Both his mother's helpers (Ashley and Karina) were certified CNAs [Ex: D12, D13, D14, D11]. In addition, even the live-in housekeepers he had hired for cleaning jobs at his home were experienced in senior care [Ex:D18]
46. It is simply beyond absurd that any "Prosecutor" would fail to dismiss a case for "abandonment" when there is a signed statement from a qualified caregiver that she and another adult were present at home when Jay left in the morning [Ex:D17] of the non-incident. Knowing this, the Prosecutor purposely delayed the trial for more than a year on the request of Mr. Wilson, as the incident was on March 12 2018 and the three months SOC was ONLY entered in April 10 2019. All this while they were just waiting for Omana to die so the guardianship would be moot and unnecessarily dragging this matter while Omana and her innocent family have suffered, and is continuing to suffer, for no reason or fault of their own.

IV.C.CONFIRMATION BIAS, HUMILIATIONS AND HEARTACHES

47. After DSHS initiated this guardianship action and placed Omana under their custody in Harborview medical center, there was a sudden and seismic change in the way that Jay was received at the hospital when he visited Omana. Although the DSHS Complaint does not make any allegations against Jay other than failure to hire qualified caregivers, Jay was unnecessarily targeted for humiliating discrimination at Harborview. After the case was initiated, Jay could not visit his mother without having a staff member supervising his visits and demanding to keep the curtains open. Even hugging and kissing his mother were "reported" causing him severe heartache.
48. Omana had spent nearly 24 months in hospital in the preceding 6 years, during all of which time Jay was by her side everyday for several hours each, in addition to paying for all the costs. Nobody ever made any complaint, until the DSHS maligned his reputation with a Guardianship for his mother, which also disgraced his standing in Society as a successful entrepreneur and thought leader in his area of tech expertise.
49. At his first meeting with the newly appointed Guardian (with my attorney also present), Jay handed over to Channa all of Omana's legal documents and Indian passport [Ex:D25] and told her he doesn't have any more left. Ms. Copeland mentioned that Omana has to be released from Harborview soon she is medically stable and needs to go to a nursing home. However, as her status as a visiting alien did not qualify for Medicaid or any state assistance [Ex:D10], she did not have any

placement in any facility and therefore Channa did not know what to do with her until she got the citizenship as she had nowhere to go and no insurance (Jay had stopped paying her Molina private insurance after the court order relieving him of all her responsibilities and appointing a guardian, who let it lapse for nonpayment).

50. On the early morning of December 25, 2018, Jay received a call from Paramount that Omana had been taken to Harborview Emergency Room as her vitals had declined overnight. Extremely worried, he went to ER only to be told that under the notes in their system, he would have to wait to get any information about his mother who was admitted in critical care until her Guardian approved the release of the information to him. As it was Christmas Day, Channa did not respond or return to calls for several hours, during which Jay had to wait in panic not knowing his mother's condition.
51. On several occasions since, Harborview and Paramount have violated Jay's rights to visit his mother, despite there being no legal restrictions from the VAPO [Ex:D20] on Jay other than disallowing him from removing Omana from a facility, they have found it fit to impose additional unwarranted humiliating restrictions for no reason other than their misunderstanding of the nature of the Guardianship proceedings. Kissing his sick dying mother on the cheek, as is his natural right as a son, was crassly questioned, as was hugging his mother which became "leaning his elbow on her chest". Such malicious colorations have caused incredible distress to Omana and her Family, and maligned their social reputation as erudite, upstanding members. Jay has never been convicted of any offence in any court (other than some traffic tickets).

IV.D. OMANA'S OFFICIAL STATUS: "ALIEN LESS THAN A DOG"

52. She said the only place she could put Omana in until she got the citizenship application approved from USCIS on the basis of the court order, and thereby qualifying her for any insurance or benefits and placing at a facility trained to take care of her, would be at a shelter for the homeless where she would be bunched with the discards and desolates in all stages of illness and infectious diseases. Her only choice other than to take her home with her was a short-term respite that Harborview operates [Ex:D28] where the patients with no insurance and too weak to be thrown to the streets are sent, and it is called Paramount Shelter Home. This place has no arrangements or facilities [D42] to take in someone like Omana who needs total care and PEG tube feeding etc, and there is not a single other patient in her state of total care with PEG and Catheter admitted there. Ms. Copeland cautioned that she has been there in the past and was terribly shocked at how poorly run down the place was and total lack of hygiene. Furthermore, she met none of the admission criteria and was in need of care they can't provide per their own website. Omana is a long term stable patient needing ongoing therapies, and not a homeless.

53. She then declared, in the presence of Mr. McBroom VERBATIM these words: " This is not a place I would keep any one of my dogs in even for a day. It is so terribly filthy it is traumatic to even visit". This was an insulting reference to Omana and Jay's national origin- with the racial slur of "slumdog" being associated with people of Indian origin as the same way "n**r" has been historically associated with blacks.

54. Jay had never heard of this place but based on this caution from her guardian I pleaded with her to expedite the citizenship application so she can return home with the benefits or go to a proper nursing facility qualified to treat a patient like her, and to keep her at Harborview until the Medicaid will allow her to have the proper care at a facility or can restart visits at home. Jay pleaded with her to not place his mother at a shelter for homeless when he is an investor that owns 5 homes in the area.

55. She said the issue was that DSHS had no funding for her though they had jumped the gun to take ownership of Omana's care in the settlement. They apparently never had any other situation like this in history and assumed Omana was a citizen and would have the same state benefits as any other sick old woman in her situation. So now Omana was in limbo and no funding and no qualified care and nowhere to go to, but ALSO not allowed to return to her family and home where she has been getting qualified care for several years since her strokes. They apparently did not realize that Jay was the branch supporting her, and cutting me off was same as letting her die.

56. After Channa realized there was no further money to be made from Omana as DSHS has no funding for her , and nor does she have any Medicaid and the private insurance Molina her son carried was made to lapse, she sees Omana as a burden to get rid of. Therefore she has aided and abetted Paramount's neglect and the ongoing soft murder through intentional infliction of emotional distress by Harborview Medical Center's Risk Management, who has already prevented her testimony and obstructed justice through the fraudulent concealment of her injuries at Paramount to law enforcement

IV.E.ABUSE & EXTREME NEGLECT AT PARAMOUNT SHELTER HOME

57. A few days later when Jay visited her at Harborview he was advised she had already been shifted to Paramount Shelter home. Ms. Copeland had never communicated with him about the move and despite her own caution she moved her to this homeless shelter; as apparently she had no other option other than to take her own home in Pierce (where she had no place for Omana) or to put her in a homeless shelter (which she chose to do) despite knowing what the conditions are there first hand and she cannot survive there. She knew very well that Paramount as a homeless shelter is not equipped [Ex:D42] to provide Omana's long term advanced care needs like Catheter and PEG tube feeding, therapies etc and that she would be at serious mortal risk.

58. This "facility" [Ex: D46] is officially ranked THE worst not only in the state of Washington, but also among the worst, even among the less than 1% of facilities nationwide that are categorized under "Special Focus Facilities" by Federal Govt. This place is the "Auschwitz of Seattle" with a long history of human rights abuses, rapes and sexual exploitation, and planned murders of patients they no longer want to care for, as a shelter for homeless. That this murderous facility is still open despite such a past is a matter of intense shame for every person that calls Seattle home.

59. From the first visit it became apparent Paramount was a hell hole shelter that would put even a SQUALID horror prison cell to shame and that Ms. Copeland was NOT exaggerating one bit in her statements about the place - anyone taking a tour can be

convinced themselves. Patients with no insurance and no money are regularly dumped there to die, in the filthiest conditions imaginable as can be seen from some of the pictures and videos Family have taken care of her: ALWAYS BATHING IN HER OWN VOMIT AND STOOL AND NEGLECTED FOR HOURS.

60. She would cling on to Jay's hand every time he visits and beg to take her back home as she was in terrible trauma and nobody answered her desperate calls for help for hours until someone from Family visited and either cleaned her up themselves or requested the staff for help (which would take more hours). On many occasions after getting no help, Jay and other Family members like Kavesh Sharma have had to call the head nurse at Paramount (one Pauline) and take pictures of her neglect in front of her and with her duty nurse's acknowledgment of neglect in front of witnesses.

61. Omana too has given several detailed video testimonies of her neglect and abuse in Malayalam, and have been continuously pleading to be allowed to go home. Ms. Copeland is a terribly evil hypocrite that does not consider my mother as even worthy of being considered a human being, in other words she is less than a dog to her.

62. To compensate for her crying loudly and screaming from leg pain, due to not receiving her scheduled Botox injections and lack of stretching exercises that kept her cramps at check, the charge Doctor Dr. Tran at Paramount had prescribed a dangerous Muscle Relaxant named Dantrolene Sodium, that introduced severe vomiting in her as a side effect. Upon reviewing her changed medical chart it was obvious the reason for her nausea and vomiting was this drug, as another drug from

the same class of muscle relaxants, named Baclofen, had been tried on her immediately after the stroke in 2016 to alleviate her leg pain from cramps from the stroke. However it had to be replaced with the Botox injections in her thighs every six months for a localized anesthetic solution due to similar side effects. Jay informed this to the charge nurse at Paramount and to Channa [Ex:] but to no avail and she had continued to get this drug DESPITE ALWAYS BEING COVERED IN HER VOMIT NEARLY 24X7 as in [Ex:P1].

63. Omana has been on an expensive Botox injection regimen every six months at Harborview to keep her legs from stiffening and avoid the severe pains from the contractures. This also helps with her legs massage that she gets at home every day and her stretching exercises to prevent muscle atrophy. Omana was taken to Dr. Julie Hodapp MD, her neurologist, for a regularly scheduled Botox injection on March 21, but her Guardian was not available to answer the call when Dr. Hodapp's office called her for legal consent for the procedure. Therefore she had to be taken back without getting this critical injection that numbs her pain. Thus Omana has stopped getting the Botox injections, the physical therapy sessions (of which she used to get regular three sessions every week at home from Providence Home Health), stretching exercises and sitting in the wheelchair as she was now 24x7 lying in bed in isolation.

64. Naturally she has developed incredible pain in her legs and developed severe skin breakage and constantly weeping in intolerable pain. Despite multiple requests, the staff always keeps her legs in a contracted, fetal position without keeping several

pillows in between her feet and lower back for keeping them stretched as was always did at home [Ex:P4]. She never receives oral care at Paramount and her mouth always smells like rotten tuna.

65. At home Omana had been on a carefully controlled diet of specially ordered organic Liquid Hope (R), that controlled her sugar naturally so she did not need insulin injections regularly. At the shelter, she is being force fed regular store bought Glucerna (R) meal replacement shakes that are heavy on sugar and injected with huge volumes of insulin to compensate for the abnormal sugar spikes. She has developed severe side effects on her body and skin due to this and her a1c has gone up from a healthy 5.2 at home to a nearly fatal 8.2, requiring her to be treated for lactic acidosis at Harboriew as her organs had been damaged from lack of medication and insulin. Medically, she went from thriving after stroke to a near mortal state from severe neglect, and was only saved by God's grace by timely intervention of Raji from India.

IV. F. TRESPASSED BY ROGER FOR WHISTLEBLOWING a.k.a "HIPAA"

66. On Feb 16 2019, Jay visited Omana at Paramount to find as usual that she was covered in her vomit and neglected for hours. Jay had had enough of trying to get help from the staff as this was a systemic problem and my mother was steadily declining and dying in front of his eyes each day. So he took a picture and reported it to her guardian Ms. Copeland on the same day [Ex:D29]. In the same email he also explained to her about Dantrolene and why it must be replaced with Botox injections as she had been on previously and had worked for her. Ms Copeland responded [Ex:D30] saying that she had forwarded the message to Paramount, although Jay worried it would be indiscreet to expose him as a whistleblower.
67. On the very next day, as Jay visited the facility in the morning and was cuddling with my mother as usual, with two of the nursing staff also in the room, a black male in his 50s, identifying as administrator Roger, approached Jay and asked him to hand over his phone. When Jay remonstrated that he could not hand over his device with personal information, he was told I was in violation of HIPAA for taking photos inside the facility. Jay replied that he had a right to take the pictures of his mother's abuse and neglect and politely denied Roger's request to hand over his phone.
68. Roger threatened that Jay will "not be there for long". As Jay continued his visit, a couple of Seattle PD officers came to the room in about half an hour and asked hime to leave as Roger had trespassed hime from the premises. Jay was flabbergasted, my

mother was in total shock and trying to plead with the cops to leave me and that she cannot survive without seeing me, as I was getting escorted out of the facility. I sent an update to Ms. Copeland [Ex:D31].

69. Omana's family and friends had organized a large birthday party for her at home, and this was an event she has been looking forward to as we were afraid this could be her final one. So they had made elaborate arrangements and got a large crowd of everyone of her local friends, as they had done also in the previous years. But Channa psychopathically denied permission Omana to attend her birthday party or her family to celebrate with her, which meant they were forced to cancel her birthday party at the very last minute much to the extreme chagrin, disappointment and embarrassment of all her friends who could not meet her or give her their birthday gifts. Omana also could not be (still cannot be) reached by phone so she has less rights than a prisoner.

70. Omana had two Motorola Moto mobile phones with her that she can use to call him or Raji anytime and to keep in touch with her friends and family. There were two so one could be charging while other is with her. Both of them were confiscated from her, and her Chai teapot was confiscated also. She has been denied all means of communicating with family. She has also denied use of a laptop and on one day Jay left a youtube video playing for her, only to find out the laptop was confiscated also. She has been turned forcefully into a vegetable state though she is a living, talking human being with aspirations, hopes and dreams to live with family and to love and be loved. It is hard to imagine a more crucifying evil possible to a quadriplegic.

IV.G. MISSING BANK OF AMERICA ACCOUNT WITH ABOUT \$10,500

71. As Ms. Copeland was "negotiating" Jay's terms for returning to see his mother, he noticed that his primary account with Bank of America, (that he had opened 17 years ago and used for his salary from Microsoft, rental income, businesses and all other personal transactions and had nothing to do with Omana other than that he had added her as a joint account holder to facilitate the payment of the expenses on her behalf that he was taking care of), was wiped out on Feb 21,2019 along with the balance of about \$10,500. He had just credited that account with a wire for about \$10,000 from another account he owned individually, to pay for the legal fees for a critical matter on his real estate portfolio.

72. He checked with Ms. Copeland who admitted that she stole the money from his account using her mandate to act on Omana's behalf and closed Jay's personal bank account [Ex:D32] that contained all his bill pays for my businesses and rentals.

73. Jay sent her proof of the wire that credited the money [Ex: D33] and also explained in excellent detail that Omana had been his 1040 dependant on tax returns [Ex: D37. Ex: D38] for over a decade and that he was also her durable power of attorney [D34] at the time of any previous transactions he had handled from her bank accounts for her maintenance and medical expenses, as well as the wire transfers from Indian accounts for the same purpose. Jay showed Channa paper trails [D35] on the several hundreds of thousands of dollars he has spent out of his pocket for his mother, whose only

source of income is a paltry pension from Indian Government that is insufficient even for her co-pays.

74. Despite proof [Ex:D34, D35], she refused to return Jay's money and used the cash as a bargaining chip to let him have access to my mother. Jay suffered losses over \$300,000 due to this theft from Channa as he was unable to meet a critical deadline for his real estate. Furthermore, he is a 67% owner of a biotech startup that has a NPV valuation of \$294 million [D36], and the harassment and extreme distress from Channa has derailed his career and made him miss critical milestones from stress.

75. As part of her speech therapy, Mr. Dinesh Kannada [Ex:D40] would regularly massage her neck during his three visits per week, and speak to her in Malayalam about her history. He also gives her tea by mouth as that is a cultural custom she has grown up with, and she is addicted to having Chai every day twice all her life.

76. After the stroke she has had a Modified Barium Swallow Test, which evaluated her risk of aspiration when given thin liquids by mouth. Much to her relief her swallowing of liquids was not affected which meant she could still have her beloved chai every day, as she has been getting at home every day at home from Jay as well as from Dinesh Kannada. Drinking Chai also therapeutically helps with reducing her neck spasms, in addition to the obvious boost to morale from a comforting action.

77. After transferring to Paramount, Jay has also met with an in-house speech therapist

Yekaterina Vinokurova, who evaluated her and said that although she does not speak Malayalam and will not be continuing her speech therapy sessions at Paramount, she also agreed it is important to continue giving her chai tea by mouth [Ex:D41].

Accordingly she shared the access codes to Jay for the staff area with the refrigerator to keep milk, and the microwave to boil the chai in. During his regular visits for three hours Jay had been giving her chai tea everyday at Paramount, but other than the Chai she lost all the other services from Dinesh (such as neck massages) and so her speech declined. She also lost physiotherapy and occupational therapy that she had at home, and all the years of expensive, effortful rehabilitation was callously discarded.

78. On May 6, 2019, yet once again Jay found Omana bathed in her feces and had been left for hours when he visited [Ex:P1]. She had been calling for help for hours and no one responded, the call light had been on for hours. Jay went to the nursing station and asked for help, and patiently waited in the room for about two FURTHER hours. At this point he lost his patience at my mother's plight, who has been lying in a large pool of stool for over FIVE hours so much so it had soaked through the bed and become dry. So he went back to the nursing station, asked her charge nurse Ms. Pauline to come over and bear witness to her plight, and took a picture in FRONT of Ms. Pauline and asked her to acknowledge the neglect and bear witness to her state.

79. Ms. Pauline officially admitted the severe neglect on record in presence of witnesses and said she will talk with her aides to clean her soon and to be more responsible in answering the call light. Five hours is not acceptable to change soiled diapers.

80. Omana's skin has torn off from the severe neglect of being left in fecal matter for hours. She has developed very painful pressure sores and severe bed sores in a short time since going to Paramount, due to not being turned often and repositioned. She is often left in a dreaded cramped fetal posture with legs folded to her butt causing her to scream incessantly in agony and keep calling my name asking for help [Ex:P1]. Her abuse and neglect is beyond traumatically evil.

81. Her diapers are changed by mostly black male nurses recently immigrated from African nations (a peculiar demographic for the staff at this shelter), which is beyond traumatic for her as she is a very private woman, and she has said in videos that until they started her on Dantrolene, she could not sleep at night at Paramount due to fear that she would be molested. The harrowing time at Paramount has been the most scariest in her entire life according to Omana's own video testimony in Malayalam.

82. Their stated intent is to keep her in isolation until the stress and cortisol levels cause the vitals such as BP and glucose to shoot up, and when coupled with lack of insulin, it would surely damage her organs and cause her death from a stroke or cardiac failure. This is a clean modus operandi for murder as the Defendants are well aware she cannot survive in isolation and so distressing her to accelerate her organ failure. Her charts prove that any time she has been kept in isolation, she suffers from very high glucose levels (upwards of 350) consistently from the panic attacks and nervous breakdown from inability to communicate (she can only communicate with Dinesh, Jay, Raji or five other people close to her). So she wants to call for help but cannot.

IV.H.SEXUAL BATTERY AND FALSE ARREST BY TEDLAW

83. On the next day, May 7 2019, Jay visited her later than usual (normally he visits from 5pm-8pm) around 7:55pm, and had just walked in the room with her daily chai when he was accosted by another black male named TEDLAW and identified as her charge nurse for that night. He seemed to be on a guided premeditated mission to rile Jay and confront him for no reason as he appeared hostile from the get go though Jay was most warm, friendly and polite.

84. He told Jay that he was not allowed to give her anything by mouth after noticing he had Chai with him as usual as she was "NPO". Jay responded that he was just following her speech therapist's instructions to give thin liquids and comfort foods, and assured that he would not give her the Chai until he has again checked with the in-house speech therapist at Paramount Ms. Yekaternia Vinokurova (who had evaluated Omana upon admission and also gave Jay access to the staff area with refrigerator to keep the milk for Chai) the next day in the morning. He then told Jay he was not allowed to touch her or kiss her. Jay was exasperated, but not wanting to create a friction he told Tedlaw he will obey everything he said.

85. Omana had told Jay she was running a fever and felt nauseous. Jay relayed to Tedlaw that he feared Omana might be running a temperature. Jay expected him to check her temperature with a thermometer, as is protocol. Tedlaw instead put his hand underneath her gown over her breast and started fondling her over the nipple with an

evil grin looking at Jay, to rile Jay up into a confrontation as they did not want him visiting Omana everyday and documenting her constant neglect by taking pictures and videos. So Channa and Paramount had decided to abuse the guardianship to stop his visits and documentation of neglect by making up baseless excuses.

86. No other patient there had regular visitors that spent three hours a day there and took pictures, and no other patient there needed total care with PEG and Catheter. Because the facility was not trained in how to handle her catheter, they removed her urinary catheter altogether and put her on diapers, while her incontinence means that the appropriate medical solution to keep her dry is to use a catheter. Due to this change (the only reason for which is lack of qualified care at Paramount) she has been regularly getting infected since admission to Paramount and needed **FIVE** intensive care admissions in a coma state for serious viral infections that could have been completely avoided with proper hygiene and a Catheter as she had at home.

87. Jay protested and told Tedlaw that his way of "checking her temperature" is entirely inappropriate as nobody but a pervert checks a lady's temperature by fondling her breasts. Omana looked at Jay helplessly in agony and he firmly asked him to take off his hand, upon which he told Jay that the time was five minutes past 8pm, and the visiting hours was only until 8pm. He asked Jay to leave immediately before he calls police. Jay told him that according to Federal law, he had the right to visit Omana anytime if she wanted his presence. He then took out my phone camera and asked Omana to say whether or not she wanted me to stay, to which she said "yes" on video.

Then Jay requested Tedlaw to either give me a notice in writing to leave, or to allow him to record his command to leave my mom when she wanted me to remain, which was against their rights. Jay also intended to record a victim statement from Omana of her sexual abuse that he had just witnessed, in Malayalam and in her own words.

88. Mr. Tedlaw suddenly turned violent and tried to grab the phone from Jay's hands. He physically assaulted Jay and pinned him to the wall, burying his elbow into his chest. My face and arms were bruised. Several other staff and patients including Omana witnessed this and she started yelling in panic asking someone to save Jay. Being paralyzed she was helpless and in most extreme panic at seeing her son hurt. One of the other staff members intervened and asked Tedlaw if he was insane, as he pulled him away from Jay. Tedlaw replied that he was holding Jay under arrest for recording within the facility and for asking to record his voice.

89. Jay told Peter (the receptionist at Paramount that witnessed Tedlaw's vicious attack and his bruises) and other staff members and all the other inmates watching that he had not started any recording of his voice or video until for his own safety as Tedlaw has abused his mother and assaulted him, and even so only after showing him the phone and advising that he was starting to record for his own safety, and that of my mother, as was his right. Therefore there was no legal reason to hold Jay hostage and it was a false arrest. Jay's shoulders, neck and hands were hurting and badly bruised.

90. The staff then contacted somebody (apparently the head of the legal department) at

Paramount and narrated the incident, and asked what to do with Jay who was being held a hostage. This legal counsel apparently told them that they were the ones violating the law by holding him illegally and to let him go immediately. Jay was released from custody from Paramount and again told he cannot visit his mother.

91. Jay's birthday was on the next day (May 09) and of course May 12 was mother's day, the two most important days in a year Omana and Jay pamper each other with love, but were not allowed to even contact each other, for no legal reason. Jay sent a detailed complaint to American Civil Liberties Union [Appendix B] and hired a lawyer Chris Henderson, who was able to let Jay resume his visits after 10 days.

92. On 05/26/2019, a relative Kavesh Sharma had visited Omana at Paramount to see in horror she was lying unresponsive and covered in vomit that had seeped through the bed linens and dried. [Ex: D43]. Based on his insistence, Omana was taken to ER at Harborview for a fifth time, where it was again found Omana had contracted serious and recurring infection (Extended Spectrum Beta Laminase) that only spreads in unhygienic conditions such as overpopulated nursing home and prison conditions.

93. By now convinced the so-called "guardian" was aiding and abetting Omana's murder through criminal neglect at Paramount, Raji and Jay, co-signed by all members of Family, sent detailed joint complaints with about 60 attachments on May 31, 2019 describing their mother's plight, urging for action to save her life by moving her to a safe facility immediately, and to investigate the conspiracy to murder her through

willful neglect and deliberate withholding of life-saving medication such as Insulin,
to the Defendants' representatives/ agents CEO of Harborview Dr. Paul Ramsey,
Secretary for DSHS Ms. Cheryl Strange, the Senior Director for Fraud and
Accountability Mr. Steve Lowe, *et al.* Unfortunately it had the OPPOSITE effect as
they not only failed to provide any protection for Omana, two weeks AFTER these
letters were postmarked, Omana had to be rescued from Paramount with a burnt hand.

94. In addition, Family also notified the Indian Consulate General Mr. Sanjay Panda, the
United States Senators from Washington Ms. Patty Murray and Ms. Maria Cantwell,
Washington LTC Ombudsman Patricia Hunter, American Civil Liberties Union
Seattle Chapter Chair Ms. Michelle Storms, Human Rights Watch Group Director
Mr. Arvind Ganesan, The Hon. Minister for External Affairs in the Cabinet of Indian
Prime Minister Narendra Modi, Sri. S. Jayashankar, among others.

70. About two weeks since this incident when Omana was released back to Paramount
after being temporarily stabilized with Insulin at Harborview and antibiotics for
infections, Roger and Channa decided to hold her in complete isolation from ALL her
family and friends, under the pretext that one of Roger's assistants at Paramout had
secretly spied on Jay and Kavesh while they visited Omana at Harborview
Emergency Room and "seen" them give her a couple of mouthfuls of Chai Tea to
drink, although it was part of her daily routine at home for two years as recommended
by her speech therapists, as she had safely passed the Modified Barium Swallow Test.

71. Speech Therapist Mr. Dinesh Kannada, as well as in-house Speech Therapist at Paramount Ms. Yekaterina Vinokurova, had both told Jay that in order to prevent the advancement of her Dysphagia, and to keep cramps from developing in her neck muscles, it is important for her to receive warm thin liquids. Furthermore, Dinesh had demonstrated to Family how to safely feed her Chai, Omana's favorite drink that she is addicted to since her childhood, and Yekaterina had provided the access codes to the Staff area so Jay can use the refrigerator to store milk and microwave for Chai.
72. Through the help of the complaints and involvement of Indo-American community leaders, such as the President of FOKANA (www.fokana.org) and (formerly of) Indo-American Chamber of Commerce Mr. Madhavan B. Nair, Channa allowed one local friend, Mr. Hariprasad Manilava to visit and affirm Omana was alive at Paramount, where he also mentioned she was close to death from panic attacks and anxiety, and in severe psychological trauma from the isolation and inability to communicate.
73. Based on his report of her pitiable state, the Family reached an agreement with Channa that Raji would fly in from India immediately and be allowed to take Omana to Jay's home from Paramount, so she and Jay can take care of her at home for the next six months. Family had even been forced to threaten to go public with Omana's true story of isolation, neglect and abuse, in order to get this agreement, and Raji even threatened to publish a story on Channa's illegal murder attempt on Indian newspaper Mathrubhumi (www.mathrubhumi.com), one of India's oldest and most circulated.

IV.I. BURNED HAND & MURDER ATTEMPT COMPLAINT

74. Thus Raji immediately booked emergency tickets from India and went to meet Omana at Paramount on June 13. The sight she saw cuddled her blood - her mother was in a state of delirium, shaking with high fever, covered in vomit and completely unresponsive. Her hand was covered in cloth, and upon removing it, Raji screamed loudly for minutes and nearly fainted - her paralyzed left hand had been scalded completely and full of sacks of pulp, similar to scalding injuries from piping hot water. Omana was in so much pain she could not even move or open her eyes to recognize her daughter that had come from India. A quadriplegic was being BURNT ALIVE, and disallowed medicines against all minimum tenets of ethics/ humanity.
75. Raji ran to the nursing station to ask for help, but was told they has been instructed to let her die as the guardian did not want her to be taken to Emergency Room or resuscitated. Raji was in total shock and disbelief that she would have to helplessly watch her mother's planned death, although she was a conscious individual that wanted to live and enjoyed her life. She was taken from a happy and loving home.
76. Omana has done nothing wrong to deserve capital punishment other than not being a citizen of USA that could have made her eligible for Medicaid benefits and precluded all the above drama about alleged unqualified caregivers that DSHS abused to separate her from her Family, despite the most intense protests from Omana herself. Channa did not respond to Raji's urgent calls for help and the Staff would not call

ambulance without Channa's approval to get her medical attention. So Raji was in total nervous panic watching her die without medical intervention, in high fever.

77. After about an hour, Raji was finally able to insist on getting the Paramedics called. When they checked Omana's blood glucose, they were shocked - it was close to 400 - proving she has not received any insulin. Paramedics rushed her to the Harborview Medical Center (that owns Paramount as a subsidiary) and saved her life, as was confirmed by the doctors at ER who said she had been at the very brink of death and only MINUTES away from death. She was stabilized with insulin and treated at the Burn ICU for several days for the burn injuries in her hand. She regained full consciousness and was able to recognize Jay and Raji after about a day at Burn ICU.
78. Raji and Jay informed the Washington LTC Ombudsman Ms. Patricia Hunter about the condition Raji found her mother in, along with several pictures of her burnt hand, and demanded an investigation. However, Ms. Pam Rago representing the DSHS, that "investigated" this issue refused to take testimony from the Victim Omana through someone familiar with her Dysarthria, such as her speech therapist Dinesh Kannada, or to even take a testimony from Jay.
79. The only conversation the "investigator" had was with Raji, from which it was clear they were only doing a perfunctory investigation to protect Channa and their own self interests in having installed this "murderer" as her guardian. Their questions were even geared towards pointing fingers at family instead of seeking justice for Omana,

80. Convinced they would not get justice for their mother from DSHS, Raji and Jay on the third of July filed a complaint with Seattle Police to investigate the conspiracy to murder Omana, coordinated and conspired by her "guardian" and the administrator Roger at Paramount. She had been left without any medication or care, covered in dried vomit as found by family and reported to Channa numerous times, yet the Guardian's only action was to help Paramount trespass ALL visitors for Omana for obvious reasons. Omana is a fighter, that is only reason she could survive so long.
81. Despite the court order to apply for Omana's US citizenship, Channa has not even initiated any step after several months, clearly showing she does not believe Omana needs citizenship as she plans to "finish her off and wash her off her hands" than deal with a messy citizenship application. She has been MOST EVIL to Omana. This is in DIRECT Contempt of Court and the settlement with DSHS that allowed her in at the first place, as otherwise Jay and the rest of Omana's family would have contested the appointment of a Guardian and fought HARD to retain her custody.
82. Channa has [Ex:D46] always been unambiguous about making her murderous desire to dispatch Omana off very clear to everyone, and has even tried to justify her murder attempts via harassing calls to Sukanya that "I believe it is better for Omana to die than artificially live using Feeding tube". Sukanya and rest of Family are traumatized.
83. This is despite the fact Channa is fully aware, both from Certified Psychologist Dr. Janice Edwards' recent evaluation (in which she reported that "Omana is able to hold

a conversation, loves her son and wants to live with him at her home, is able to understand the Court proceedings on her guardianship and has answered general knowledge and math questions") AND Omana's own humble youtube video pleas to the guardian to listen to her plight at least once and to save her life, proving that Omana is a fully cogent individual that WANTS to live, and is perhaps MORE capable than her Channa's ownself in many mental pursuits including arithmetic. Channa knows isolation is an inculpable method to murder a depressed quadriplegic.

84. As a matter of fact Omana has even humbly challenged Channa (in a desperate effort to try to prove her fundamental right to live as an innocent human being) on a test of mental calculations such as addition of many two-digit numbers. Channa's only response has been to condemn her to death. Omana requires the company of her Family even more than Oxygen to survive. Channa has abused, and is continuing her abuse, her powers to cause intentional infliction of emotional distress on all Family.

85. Omana is in the custody of a person that OPENLY SAYS SHEWANTS to murder her ward badly, despite Omana's own pleas to let her live happily with her loved ones. Omana has tried to convey this in every way possible; and even Channa has blatantly acknowledged this in emails: "I know your mother loves and needs you". She has even unilaterally changed Omana's POLST status to "NO RESUSCITATION" [Ex: D44] despite staunch and vehement opposition from all Family and video pleas from Omana herself pleading with Channa to kindly let her live in tears. Taking the life of a human that WANTS to live is the quintessential DEFINITION of MURDER.

IV.J. MASSIVE COVER-UP EFORTS AT HARBORVIEW

86. Ms. Heather Barr, a detective from Seattle Police Department, contacted Raji and Jay to investigate their complaint. Ms. Barr mentioned several shocking details about her conversations with Harborview and Channa, including that (a) Harborview had told her that the burn on her hand was an “allergic reaction on her skin and not a thermal burn”, and that (b) the reason her glucose levels were so elevated, as well as showing symptoms of heavy fever, were due to Omana having an infection that would make “MRSA virus look like child’s play”. (These are her verbatim words.) Ms. Barr, like Ms. Rago, also refused to take a testimony of the victim despite Omana WANTING to talk to police and give evidence of her abuse and neglect through an interpreter that is familiar with her Dysarthria, such as Dinesh or any of her close friends or Family.
87. Raji and Jay visited their mother everyday at Harborview for more than two weeks from June 13 to July 5 after they saved her from what can only be called as her "state-sanctioned execution", and every day Jay would leave Raji in the morning to be with their mother for the day until he returned to collect his sister in the evening.
88. Two days after filing the police complaint, as usual on July 5th, while the siblings were spending quality time with Omana, a nurse that identified herself as “MASUMI” (a.k.a. Jane Doe #3) came to the room and gave Raji an acknowledgment letter from Harborview Management stating that they had received Raji’s written complaint from May 31, and that they would be investigating.

IV.K. SOLITARY CONFINEMENT AND ONGOING MURDER

89. Raji graciously accepted the letter as Masumi left without incident. A few minutes later as Omana was enjoying time with her children, Dr. Andrew Hahn came into the room and was greeted by name "Hello, Dr. Andrew" by Omana who also answered Dr. Hahn's question to add 27 and 18 instantly as "forty five".
90. Dr. Hahn then said that the previous night, after Jay and Raji had left, the duty nurse Leah (who had greeted them on their way out to watch Independence Day Fireworks the previous night and also had greeted them warmly that same morning before she let them into Omana's room). had noticed there was something floating in her food, and that it was discarded, which neither Leah nor Masumi had mentioned anything about for several hours until then.
91. Both Omana's children immediately protested to Dr. Hahn in person (and also by emails) that this could be a continuation of the murder attempt as many of staff nurses are shared between Harborview and Paramount and there were many those that do not want Omana to be able to provide a testimony of her abuse.
92. Therefore they immediately formally [Ex:D47] asked him to conduct a very detailed investigation to identify the source of the unknown object and to hold the person who threw away the substance, instead of sending for lab testing per protocol, to be reported to police as that was a serious dereliction of duty per RCW 74.34.053(2)..

93. It also sounded very fishy and suspicious that someone would make such as report but throw away the evidence, and still most warmly welcome the children into patients room that morning. The timing of this "alleged incident" after Raji had filed a police complaint, seemed to reconfirm the suspicion that this was nothing more than a planned conspiracy and coordinated effort by the Risk Management at Harborview, in collusion with Channa, to deflect blame and invent some excuse to stop their visits.

94. After Jay left Raji with their mother for the day on July 5th, a few minutes later Masumi came back to the room and asked Raji to leave, stating that Guardian had again asked to stop all visits from her both children, and so Raji was forced to spend the whole rest of day at the lobby. That night when Jay came to collect his sister, the Seattle Police was called and both children were escorted out and asked to not return.

95. Two days later, Dr. Andrew Hahn called Raji and Jay and said they are not allowed for two weeks. Dr. Hahn also confirmed several other details that were horrifying: he said the information given to Seattle Police Detective Ms. Barr was a complete LIE: that Omana was NOT suffering from any acute infection (as Barr was told to remove the culpability of her condition at Paramount, a subsidiary owned by Harborview) and that her sugar spikes at Paramount were not due to a MRSA like infection, as the police was told. Omana's tests such as A1C (which changed from a healthy 5.6 at home to a mortally high 8.2 at Paramount) and Venous Lactate indicated she was not getting life saving medications such as insulin as part of her planned "soft" murder.

96. Furthermore, he also confirmed that Ms. Barr's investigation of Omana's attempted murder was obstructed with another LIE: that the ghastly burn on Omana's hand were the result of some allergic reaction – when the fact is that Omana does NOT suffer from any allergies as her medical chart confirms. The true details of her burn are being hidden from police for suspicious reasons to obstruct justice, as inflammation could also be from very high glucose levels. Harborview's Risk Management Office had directed its Physicians & staff to LIE to Police to deliberately misguide / sabotage a criminal investigation.

97. The criminal case of "abandonment" against Jay was dismissed by the City of Snoqualmie on July 11, 2019. On the day Jay stepped out, there was a CERTIFIED CNA on her shift, along with another adult at the home, and there were sworn statements from them corroborating this, and yet the City failed to timely dismiss a baseless case despite KNOWING Jay is innocent of the alleged crime of "abandoning" his mother at his home when two others had already testified they were present when he had left in the morning.

98. The only reason this FRIVOLOUS CASE remained open for so long had been the unethical and illegal pressure on the Prosecutor Ms. Lynn Moberly thitherto from DSHS agent Mr. Randy Wilson, as Ms. Moberly has herself admitted in Issaquah Municipal Court. But for this abandonment case having been open for so long, Jay would have never had to surrender the guardianship for Omana. After waiting for two weeks per Dr. Hahn's directive, but not getting any response from him, Family tried

to contact the Hospital and the guardian to know the condition and status of Omana, but were ignored. They were denied any information on her whereabouts or aliveness.

99. On 7/26/2019 Jay and Raji sent a Demand Letter [Exhibit C] announcing the commencement of this Federal Court action, via email and certified priority mail, to preserve evidence and also asking to arrange meeting with their mother by 8/5/2019, but the guardian has not responded yet. A representative of Harborview, named Ms. Kathleen Flaherty, responded in acknowledgment of the letter, but otherwise only mentioned : "We understand she HAS a guardian" and did not provide any other information. When Jay asked in reply if the use of present tense "has" meant their mother was still alive, Ms. Flaherty refused to respond to his question or provide any information to the Family about Omana, even whether she is alive or not. This cruel situation has caused inexpressible distress & anguish and required professional therapy for Family. Knowing one's mother is calling for you to save her life in agony but to be helpless to get to her side is a fate no child should have to endure.

100. Omana's family has had no contact or response about Omana for over 40 days as of date of filing of this petition. Guardian is deeply vengeful at Jay and Family about the complaints they made about her with various exalted offices, while Harborview wants to keep the Family in the dark to protect their liability for her injuries at Paramount (a wholly-owned subsidiary). So they are colluding to keep Omana, who suffers from depression and is known to be vulnerable to panic attacks), in isolation with no contact allowed with any member of family or friends, only for the criminal purpose

of accelerating her death in the most horrendous and horrible way possible, and to silence her before she has a chance to provide a proper testimony of her abuse.

101. She must be constantly crying out for her children from her bed, as Omana has herself said she cannot survive without their love and cuddling, which is her only motivation to exist despite her disabilities. She is presumably being held in isolation at an undisclosed location, without any knowledge or contact with any friends or family, until she dies from stress - which is the only purpose for her solitary confinement and murder using the cruel and unusual way of agonizing a Clinically Depressed patient.

102. Despite the Plaintiffs documenting and promptly providing all the detailed evidence of her abuse and neglect at Paramount, the defendants have not only failed to give her protection, but also aided and abetted her murder through withholding of critical medication such as Insulin, as can be seen plainly from her steeply declining vitals within a short period at Paramount.

103. Even after her daughter had to fly in from India to timely save her mother from certain death (as confirmed by the paramedics and ER doctors on 6/13), the defendants are still continuing their fiendish agenda of (softly) killing her with legal impunity by abusing her depression to induce fatal panic attacks and anxiety. The so-called medical professionals at Harborview, Dr. Andrew Hahn and Masumi, have obstructed justice by deflecting the blame and derailing the criminal investigation of her hand injuries via deliberately providing false information to Law Enforcement.

IV. L.RETALIATION AND THE NAIR FAMILY'S SHOCKING JEREMIAD

95. Omana was very happily and contentedly staying at home with excellent care and must return home expediently. She has suffered a disastrous decline in health, from being hale and healthy at a loving home to being repeatedly infected and held in isolation at a shelter for the homeless where she has nobody to communicate with and has been left to die. She has already been diagnosed with depression from stroke, and these last five months in Paramount has made her further lose all interest to live.
96. She has not had any therapy sessions or Botox injections or qualified care, and is forced to lay helplessly in her excreta and vomit for five to six hours every day until her son comes, and in the last 12 days even that too has been taken from her. It is hard to imagine any worse evil possible to a human that what has been done to my mom. Her skin has been torn severely from pressure sores and diaper rashes from not being cleaned up for hours after a bowel movement.
97. She was already found unresponsive FIVE times when Family visited, and each time they had to go through a lot of hoops just to get her into hospital (even while she is unconscious and in critical condition) as the staff thought she should be left to die per Channa's and Roger's instructions to them. So they would wait *ad infinitum* till they get approval from her Guardian to take her to a hospital, even when she is palpitating with a 104 degrees fever and unresponsive and literally in a coma.

98. Each of these occasions she was diagnosed with advanced Beta Lactamase Urinary Tract Infection that are typical of severe neglect in nursing home facilities. She is running a continuous drug resistance infection from Extended Spectrum Beta Lactamase infection, also called the Nursing Home infection due to its heavy recurrence rate at poorly maintained nursing homes with terrible hygiene. She contracted Lactic Acidosis, a serious condition from the lack of care at Paramount.
99. Omana is a HUMAN BEING, and although she has overstayed her I-94 due to disability it does not make her worse than a dog as her so-called Guardian considers her to be (and she is continuing to keep her at a place she would not let her dog stay for a day). Only reason she is at a shelter is because she is neither eligible for proper care as a citizen who would be placed at a proper nursing facility equipped with trained staff with knowledge of Catheter, PEG tube etc, nor allowed to return home. She is an "alien", so she does not qualify for medicaid, but the laws apply to her in the same way to citizens. So she can neither go home nor qualify to get proper care, which is the very definition of a pathetically failed legal system.
100. The Homeless Shelter had removed her catheter forcing her to be soaked in urine all the time 24x7. She was being kept in solitary confinement and allowed NO contact with family or outside world, and left to die in her vomit and excreta. Family was/is still not allowed to visit in the fear of documenting her pathetic condition and murder, while her so-called guardian keeps sending them several harassing emails [Ex:D48] about ending her life ONLY because there isn't funding for her insurance.

101. As a matter of fact it is not clear if she is even alive or not at this point. She cannot speak English and cannot communicate without Jay or Raji or her speech therapist Dinesh, the only three people who can understand her slurred speech in Malayalam (affected by her Dysarthria) well. Her children are more essential for her existence than even pills or Oxygen, as their love, kisses and cuddling is what keeps her going. She has repeatedly stated this on video and to everyone that knows her.
102. As the phone rings each time Family expects the worst as it is actually surprising if she has not been murdered by them already. She is incredibly dependant on Family's emotional support and keeping her in isolation, in deep distress and agony, is the same as depriving her of air.
103. The only reason for Family being trespassed from the facility was the whistleblowing of her abuse and neglect, due to which they do not like Family visiting Omana every day. By every conceivable metric, Jay has been an IDEAL son who did everything humanly possible to take the best care of his beloved *Amma* at his home with TWO live-ins to assist with her caregiving and the very best gold standard of medical care with regular home visits from speech, physio and occupational therapists three times.
104. Her full time care team included two CNAs (Ashley and Karina) and two maids (Alexandria Hall and Jennifer Gallagos) in addition to Jay sacrificing his fulltime career and working from home as primary caregiver, all in the luxury of a huge six bedroom mansion in the Snoqualmie Ridge golf course community. From there she

has been forcibly taken into solitary incarceration with no one to talk to that understands her language, no contact with family, denied all her simple pleasures like her favorite shows or even a cup of tea, neglected to die in pile of her own feces and vomit, and sexually abused by perverted intimidating men that she is scared out of her life of and she wants to escape from so badly. This is state tyranny at its worst.

105. She repeatedly calls this place as hell on videos and pleads to be returned home in every way she possibly can despite her language barrier and Dysarthria. as can be seen from her declaration to court [Ex:D08] and video pleas. The amount of pain and losses Omana and her innocent family have had to go through due to the incompetence & psychopathic abuse of power by DSHS, Channa, Roger, Tedlaw and Harborview Risk Management is sheer insanity. These power-tripping monsters have outrageously treated the Nair Family worse than slaves or even farm animals, with absolute contempt for their civil rights, despite all of them being completely innocent.

V. CAUSES OF ACTION

FIRST CAUSE OF ACTION

VIOLATION OF FOURTEENTH AMENDMENT: COUNT ONE

DUE PROCESS RIGHT TO A FAIR AND IMPARTIAL TRIAL

1. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
2. Omana's extrajudicial execution is being carried out without any due process. She is a citizen of India that wants to go back to her home country if she cannot stay with her son at home. She never agreed to being held in isolation in the United States, a country to which she has no ties (other than through Jay), whose language she does not understand, and whose legal system has no jurisdiction to hold her hostage against her wishes to return to India when she has no criminal matters pending before any court in the US.
3. The familial separation of Raji and Jay from their mother and the illegal sanctions on the Nair family have not had any due process allowed by law to protect their rights.
4. Once her guardian became an advocate for accelerating Omana's death and a cohort to withholding her medicines, she could no longer purport to act as being her surrogate, as Omana herself has never mentioned or shown any desire to stop living. Therefore Channa's actions on Omana's behalf in denying her insulin or family visitations, which are both clinically known to be ESSENTIAL for her survival, is a violation of Omana's fourteenth amendment due process rights.
5. Plaintiffs have suffered irreparable harm and are fearing even the loss of life.

SECOND CAUSE OF ACTION

VIOLATION OF FOURTEENTH AMENDMENT: COUNT TWO

PROCEDURAL DUE PROCESS RIGHTS

6. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
7. Omana's extrajudicial execution is being carried out without any due process
8. DSHS violated Family's procedural due process rights by offering a settlement on the guardianship that was only designed to lure him to accept losing control of his mother.
9. A proceeding for the purpose of obtaining state authority on Omana (that could subject her to be withheld of insulin, pain medication, therapies and even familial association, as have all happened here) is a proceeding of authorization to deprive her of her life, liberty and property as Omana depends on Family for emotional wellbeing and financial support.
10. Omana is very close, dear and near to Jay and Raji, and any action that affects her life, liberty and property, by corollary, also affect Jay and other Family members directly.
11. Family was not afforded the fourteen amendment procedural due process rights in these critical proceedings, as they never had a chance to express their side to a Court of Law.
12. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of finances, property and status.

THIRD CAUSE OF ACTION

VIOLATION OF FOURTEENTH AMENDMENT: COUNT THREE

RIGHT TO EQUAL PROTECTION OF THE LAW

13. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
14. Plaintiffs have not been afforded equal protection of the law – Omana would have never been in this situation if she had the same status as a US Citizen and Medicaid coverage.
15. Jay, Omana and the rest of Family's national origin, race and religion are being discriminated against, causing severe losses of property and potentially life.
16. Jay and Omana have repeatedly been humiliated as "slumdogs" by Channa, a racial insult. This entire episode should be seen as a hate crime by abusive monsters put in positions of power despite having very little by way of education or compassion.
17. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of finances, property and status.

FOURTH CAUSE OF ACTION

VIOLATION OF FOURTEENTH AMENDMENT: COUNT FOUR

**DUE PROCESS RIGHT TO SUBSTITUTED DECISION BASED ON CLEAR
AND CONVINCING EVIDENCE STANDARD**

18. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
19. Channa had a duty to taking substituted decision based on clear and convincing evidence, but the decision she took were never the ones Omana would have taken for herself.
20. Therefore she has violated the clear and convincing standard for substituted decision making. As a matter of fact, Channa's decisions are the exact OPPOSITE of what Omana would have wanted for herself on POLST etc, as Omana herself declares herein.
21. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of finances, property and status.

FIFTH CAUSE OF ACTION

VIOLATION OF FOURTEENTH AMENDMENT: COUNT FIVE

SUBSTANTIVE DUE PROCESS RIGHTS

22. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
23. DSHS violated Family's procedural due process rights by offering a settlement on the guardianship that was only designed to lure him to accept losing control of his mother.
24. A proceeding for the purpose of obtaining state authority on Omana is a proceeding of authorization to deprive her of her life, liberty and property as Omana depends on Family for emotional wellbeing and financial support.
25. Omana was not afforded her fourteen amendment procedural due process rights in these critical proceedings, as she never had a chance to express her own opinions to Court.
26. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of finances, property and status.

SIXTH CAUSE OF ACTION

DEPRIVATION OF FEDERAL CIVIL RIGHTS (42 U.S.C.§1983)

27. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

28. The Defendants actions intentionally violated the Plaintiff's Federal Civil Rights, repeatedly and wantonly causing severe distress, damage and near death.

29. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of finances, property and status.

30. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

SEVENTH CAUSE OF ACTION

THE FREE EXERCISE OF RELIGION CLAUSE

31. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
32. Omana wants to place Sindhur / Kumkum (red saffron) on her forehead every day after prayer, a ritual she has followed for over 75 years like millions of other Hindu women. On couple of occasions that Raji and Jay adhered to her religious custom per her request, they were reported for "making her face red". Subsequently this had to be stopped.
33. Omana loves to hear Sanskrit hymns, but two laptops that Jay had placed by her bedside, one each in Paramount and Harborview, were confiscated, leading her to be devoid of any form of religious activity after also stopping her routine Temple visits with Jay.
34. All the above have not only interfered, but completely stopped Omana's ability to (not just freely) exercise Hindu religion in any sort of way at all despite her staunch devotion.
35. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of finances, property and status.

EIGHTH CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

36. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
37. The Defendants actions intentionally inflicted severe emotional distress on Plaintiffs.
38. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.
39. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

NINTH CAUSE OF ACTION

RECKLESS INFLICTION OF EMOTIONAL DISTRESS

40. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

41. The Defendants actions recklessly inflicted severe emotional distress onto Plaintiffs.

42. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

43. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

TENTH CAUSE OF ACTION

LOSS OF CONSORTIUM

44. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
45. The Defendants actions has denied the right of Plaintiffs to be with Omana during her last remaining days to give her love, warmth and comfort as she so much desires from her children. Plaintiffs have been devastated that it has been over 41 days since they had any contact with Omana, and are deeply fearful for her life.
46. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.
47. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

ELEVENTH CAUSE OF ACTION

CONSPIRACY

48. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
49. The Defendants engaged in criminal conspiracy to commit murder of an innocent human being, helpless and paralyzed, and entrusted to their care, by depriving her of most critical medication including insulin, with a view to damage her internal organs.
50. Defendants agreed to violate the plaintiffs' rights in the manner described above. Further, defendants made an agreement to attempt to cover up the alleged murder attempt, by lying to Detective Ms. Heather Barr on the true nature of Omana's Hand injuries.
51. Defendants engaged in nefarious conspiracy to deprive Plaintiff's federal civil rights and even the constitutional rights to life and property.
52. Plaintiffs were deeply injured and even faces death as a result of Defendants' Conspiracy.
53. All the above, but not limited to the above, confirm the Defendants engaged in devious criminal conspiracy (a) first to attempt to murder Omana through intentional neglect and withholding of lifesaving medicines and Insulin, and after she was saved by her daughter from this evil plan, (b) to cover-up the events at Paramount and misdirect the investigation from Ms. Pam Rago and Ms. Heather Barr.
54. Plaintiff's fiendish conspiracy has caused serious damages, emotional distress, physical and mental harm, pain and suffering to Jay and his family.

TWELFTH CAUSE OF ACTION

THE REHABILITATION ACT OF 1973,

29 U.S.C. § 710 et seq.

55. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following
56. Section 504 of the Rehabilitation act of 1973, 29 U.S.C. § 794, prohibits discrimination against an “otherwise qualified” handicapped individual, solely by reason of his or her handicap, under any program or activity receiving federal financial assistance. Hospitals and hospices that accept Medicare and Medicaid funding are subject to the Act.
57. Defendant Harborview Medical Center and its subsidiary Paramount Nursing Home are subject to the Act because they both receive federal funding.
58. The aforesaid acts and omissions of the defendants have violated Omana’s right to rehabilitations under the Act, and caused Family irreparable harm.
59. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

THIRTEENTH CAUSE OF ACTION

VIOLATION OF EIGHTH AMENDMENT:

PROHIBITION AGAINST CRUEL AND UNUSUAL PUNISHMENT

60. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
61. The Defendants action amounts to Cruel and Unusual Punishment for Omana and all her Family members, as they are helplessly agonizing over their mother's cruel murder.
62. All the above, but not limited to the above, confirm the Defendants are intentionally continuing to torture the Plaintiffs in violation of cruel and unusual punishment, as they are being denied their natural right to cherish the precious last moments of their beloved mother Omana, and has thereby caused serious damages, emotional distress, physical and mental harm, pain and suffering to the Family, who, as of the date of this Complaint filing do not know of Omana's whereabouts, condition, or even whether she is alive.
63. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her

FOURTEENTH CAUSE OF ACTION

FALSE IMPRISONMENT

64. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
65. All the above, but not limited to the above, confirm the Defendants engaged in falsely imprisoning Jay& Raji, and are continuing to falsely imprison Omana, and has thereby caused serious damages, emotional distress, physical and mental harm, pain and suffering to the Family. Jay and Raji as of the date of this Complaint filing do not know of Omana's whereabouts, condition, or even whether she is alive.
66. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FIFTEENTH CAUSE OF ACTION
VIOLATIONS OF RACKETEER INFLUENCED & CORRUPT
ORGANIZATIONS ACT OF 1970 (RICO§ 1962)

67. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
68. Omana's estate is under the full control of a guardian that does not have her best interests at heart. Therefore the estate in a situation similar to a racketeer influenced organization that is under the influence of a corrupt fiduciary.
69. The acts of RICO apply in full to protect Omana's estate both in USA and in India from being purloined and embezzled from this unsolicited and imposed "guardianship".
70. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

SIXTEENTH CAUSE OF ACTION

AGGRAVATED SEXUAL BATTERY

72. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

73. Tedlaw's actions of fondling Omana's breast for "checking her temperature" is sexual battery, as Omana confirms directly that she was harassed by his unwanted contact.

74. Omana has had her lips broken in signs of sexual predation, and has been rendered catatonic through abuse of Dantrolene, a muscle relaxant, that makes her catatonic.

75. Omana is a disabled individual, which makes this incident an aggravated sexual battery.

76. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

77. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

SEVENTEENTH CAUSE OF ACTION

DEFAMATION *Per Se*

78. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

79. The Defendants including through its agents as set forth above, conspired to, and in fact, did negligently, recklessly, and intentionally cause excessive and unsolicited publication of defamation, of and concerning Plaintiff, to third persons, who had no need or desire to know. Those third person(s) to whom these Defendant published this defamation are believed to include, but are not limited to, other agents and employees of Defendant, and each of them, Bank of America employees including one Nicole Hale with whom Channa is understood to have a private conversation defaming Jay, and the community, all of whom are known to Defendant, and each of them, but unknown at this time to Plaintiff.

80. These internal memos, publications and oral communications were outrageous, negligent, reckless, intentional, and maliciously published and republished and reported and re-reported by Defendant, and each of them. Plaintiff is informed and believes that the negligent, reckless, and intentional publications by Defendant, and each of them, were and continue to be, foreseeably published and republished by Defendant, their agents and employees, recipients, and in the community. Plaintiffs hereby seek damages for these publications and all foreseeable republications discovered up to the time of trial

EIGHTEENTH CAUSE OF ACTION

VIOLATION OF SIXTH AMENDMENT: RIGHT TO SPEEDY TRIAL

81. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

82. The case for "abandonment" against Jay was held open for nearly 17 months despite having absolutely no substance on which a trial could have even been contemplated, which the Prosecutor herself acknowledged with a Stipulation of Continuance that ran out before a trial could be scheduled anyway. This was an open statement that the case against Jay had no merit, yet the Prosecutor decided to not let him get a speedy trial.

83. The Prosecutor has violated Jay's sixth amendment right to a speedy trial, and such violation has caused irreparable and irreversible harm to both Jay and Omana.

84. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

NINETEENTH CAUSE OF ACTION

MALICIOUS PROSECUTION (RCW 4.24.350)

85. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
86. The City of Snoqualmie, through its agent prosecutor Ms. Lynn Moberly, maliciously prosecuted Jay when they knew he was innocent of the crime of abandonment of a dependent person in the third degree, as confirmed by the statements from two adults.
87. All the above, but not limited to the above, confirm the Defendants engaged in Malicious Prosecution, and has caused serious damages, emotional distress, physical and mental harm, pain and suffering to Jay and his family.
88. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

TWENTIETH CAUSE OF ACTION

ABUSE OF PROCESS

89. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

90. All the above, but not limited to the above, *res ipsa loquitur* confirm the Defendants engaged in several counts of abuse of process with malicious intent, and has caused and are continuing to cause as of date, serious damages, emotional distress, physical and mental harm, pain, suffering, mental agony, loss of finances, property and status.

91. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

TWENTY-FIRST CAUSE OF ACTION
BREACH OF CONTRACT AND BREACH OF IMPLIED
COVENANT OF GOOD FAITH AND FAIR DEALING

92. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

SETTLEMENT NEGOTIATIONS: PROMISES AND ASSURANCES FROM
DSHS FOR LURING FAMILY INTO ACCEPTING A GUARDIAN

93. By engaging in written and verbal negotiations with Plaintiff's lawyers Greg McBroom and Charles Diesen about accepting responsibility for Omana's care through a path of Citizenship and Medicaid, and thereafter including the phrase that Guardian will be responsible to obtain Citizenship for Omana in the Settlement Order, DSHS formed a Contract and Implied Covenant with Jay and Family that Omana will receive full Citizenship and Medicaid benefits through accepting their offer to place a Guardian.

94. DSHS also promised and assured Family will have constant unrestricted access to Omana, and included that she will be placed in a facility within 25 miles of son Jay's home in Redmond.

95. DSHS also promised and assured Family that all of Omana's important medical decisions, including POLST Code status, will rest with Family.

COMPLAINT

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96. DSHS also promised and assured Family that Omana will have the opportunity to visit Hindu Temples (extremely important for her religious beliefs), visit social functions and potlucks with son to meet friends, family and neighbors, and to visit periodically and spend time at Home as much as she desires when nostalgia hits her. She enjoys attending programs scheduled by Kerala Association of Washington, such as Onam Festival or Christmas celebrations.
97. Omana had made it clear to the Family negotiating on her behalf that these were the only conditions under which she could even survive, and therefore nothing less be accepted with DSHS in the negotiations to reach a Settlement that allows a stranger as Guardian.
98. Had any one of the aforementioned demands been not allowed by Ms. Boharski, Omana would have never accepted a settlement, and instead the family would have done legal battle to prove to the Court that she does not need a guardian when she has two highly educated and devoted adult children, either of whom are capable to be her guardian.
99. However, based on the above promises and assurances from DSHS in accepting Family's demands through their lawyers Diesen and McBroom, Family made the nearly fatal mistake of trusting DSHS's integrity and accepting a Settlement approved by Court.
100. DSHS failed to fund Omana's care plan and has left her new guardian Channa with the same situation as Jay, and Omana has since lost her insurance, medical treatment and therapies. The family is being kept without access in fear of documenting her neglect.

None of the promised benefits such as US citizenship have even been initiated, let alone delivered. DSHS and the Guardian have failed to perform the terms and conditions of the agreement fairly and in good faith, or in refraining from doing acts that would deprive the Plaintiffs from the benefits of the agreement, such as visiting Omana at a facility within 25 miles of the Plaintiff's address in Redmond. It is obvious to any reasonable person that the intention behind the clause is to provide unrestricted access to Omana - clearly, what is the purpose of keeping her within 25 miles of home if the children do not have access?

CLASSIC "BAIT AND SWITCH"

What has happened since then is EXACTLY THE OPPOSITE :

101. Channa has not even initiated Omana's US citizenship application as-of-date, despite Jay almost immediately meeting with her and handing over all Omana's documents and repeated follow-ups and requests from Family to expedite the application so Omana can get Medicaid benefits to return Home or to go to a qualified Skilled Nursing Facility before she is tortured to death at Paramount.
102. Omana has not received even bare minimum medical care at Paramount, no followup to her eye surgeries, no Botox injections for her pain management, no speech therapy, no occupational therapy, no physical therapy, etc. Her care did not just suffer, it disappeared. She was literally condemned to extrajudicial execution.
103. She was taken from a happy and loving home and left to die with homeless ex-

convicts and drug addicts, neglected in her own excreta and sexually abused, and once Family raised complaints about her standard of care, to be inhumanely executed .through stopping access to ALL well wishers and friends, not just family, and letting her die always covered in her own feces and vomit, and without receiving insulin or any critical care medication.

104. Her Guardian has endorsed her murder through criminal negligence - withholding all life-critical medications and let her die. Every single time, five in total that the paramedics arrived on the utmost insistence of Family, including Jay, Raji and Kavesh Sharma, and checked Omana's vitals at Paramount, her blood glucose was at or near 400, which is clear proof she was deprived of life saving insulin to let her organs become damaged and accelerate her death. Her a1c and other vitals have regressed dramatically while there.

105. Having no place to keep Omana, Channa decided to MURDER her in cohort with administration at Paramount, specifically two individuals Roger and Tedlaw. The plan was to let her organs get internally damaged by withholding all medications including insulin. The only aspect they cared to make sure was a Post Mortem would not show any foul play, and conspire to her murder appear from natural causes.

106. After son was blocked from accessing the "facility" to check up on his mother's abject neglect and murder going on, Raji flew in as an emergency from India. She went to Paramount to see that her mother was at the brink of death in a coma, her hand was

scalded and burnt, she was delirious and unresponsive.

107. When she called the staff to call ambulance, she was told the Guardian did not want Omana to receive any medical treatment and were to instructed to allow Omana to "pass away peacefully" and that she would be in a "better place soon" and to pray for her soul, when she is a stable long term patient that wants to live and has several good years of happy & blissful life left in her with good care and love from Family.

WHEREFORE, PLAINTIFF ALLEGE:

108. Defendants intentionally and materially breached the Guardianship Settlement Agreement reached between Jay's lawyers and DSHS that has allowed Channa's charade.

109. The Settlement was reached after lengthy negotiations, and formed a contract and implied covenant that the DSHS entered in bad faith, and no intention to follow through. Defendant's betrayal and breach has caused inexplicable pain and losses for Plaintiffs.

TWENTY-SECOND CAUSE OF ACTION

UNJUST ENRICHMENT

110. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

111. Defendants unjustly enriched from the Plaintiffs.

112. Channa's pernicious guardianship "services" has not been anything but a nightmare for Plaintiffs, yet have unduly benefitted her and her attorney at the expense of Omana and Family. She has stolen Jay's money and tried to use it against him and Omana.

113. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

114. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

TWENTY-THIRD CAUSE OF ACTION

COMMON LAW FALSE LIGHT

115. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

116. Defendants have published information, as well as conveyed misinformation to several third parties that show Raji and Jay in a False Light despite being dutiful, loving children who have done everything possible under the circumstances for their mother. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

117. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

TWENTY-FOURTH CAUSE OF ACTION

BAD FAITH INSURANCE

118. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
119. Molina's issuance of the Silver Plan was in bad faith as they denied placement for Omana at a Skilled Nursing Facility, which could have prevented this whole matter ab initio.
120. The social workers at both St. Rose and Harborview had insisted on a SNF placement but Molina maintained they can only provide limited in-home services despite Jay paying over a \$1000 a month to maintain her private insurance until the guardian took over.
121. Omana has a PEG tube and Catheter, and Molina was aware she needed full time care.
122. Molina's lack of providing appropriate coverage has caused severe health issues, regression and losses for Omana that could have been prevented with proper coverage.
123. All the above, but not limited to the above, confirm the Defendants Molina Healthcare Inc. issued a health insurance plan ("Molina Silver Plan") in bad faith to Omana, and caused serious damages, emotional distress, physical and mental harm, pain and suffering to Omana and her Family.

TWENTY-FIFTH CAUSE OF ACTION
MEDICAL MALPRACTICE (RCW 4.16.350)

124. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
125. Tedlaw committed Medical Malpractice by sexually assaulting Omana in the front of Jay, and by colluding with Channa to murder her through damaging her internal organs by withholding insulin and other critical medication necessary for survival.
126. Roger committed Medical Malpractice by colluding with Channa to murder Omana through damaging her internal organs by withholding insulin and other critical medication necessary for survival, and through inflicting emotional distress from solitary confinement, removing all sources of mental stimulation such as laptops and phones etc.
127. Dr. Andrew Hahn committed Medical Malpractice by acting to the contrary of Omana's best interests, which he acknowledged was to have routine visits from children for her emotional stability, yet by colluding with Channa and Harborview Risk Management to cause his patient incredible emotional trauma that he knew could be fatal as she is a clinically depressed patient prone to severe panic attacks and anxiety.
128. Dr. Hahn also committed medical malpractice by aiding and abetting the criminal cover-up effort organized by Harborview "Risk Management" to obstruct Justice by deflecting blame on the police investigation on Omana's injuries, and by not disclosing the truth about her burn injuries to Detective Heather Barr of Seattle Police Department.
129. Dr. Hahn committed medical malpractice by not investigating or reporting why an apparent foreign object found on his patient's food was not preserved for lab tests.

COMPLAINT

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130. It is a crime per Washington RCW 74.34.053 (1) to NOT report such an event or to fail to such actions to safeguard his patient. If a foreign object was indeed found, Dr. Hahn owed a duty of care to preserve the specimen and investigate for poisonous content.
131. Masumi committed medical malpractice by aiding and abetting the criminal cover-up effort organized by Harborview "Risk Management" to obstruct Justice by deflecting blame on the police investigation on Omana's injuries, and by not disclosing the truth about her burn injuries to Detective Heather Barr of Seattle Police Department.
132. Masumi committed medical malpractice by causing severe emotional distress to Omana by asking Raji to leave the room while she was providing her emotional support needed to treat her depression as psychologist Dr. Edwards has recognized.
133. Masumi committed medical malpractice by not investigating or following through on why an apparent "foreign object" found on Omana's food was not preserved for lab tests.
134. Defendants neglected Omana's care and nearly caused her death and has already caused terrible and irreversible regression in her recuperation and general health.
135. Omana's a1c jumped from 5.6 at home to 8.2 at Paramount, proving she never or almost never received lifesaving insulin. All her vitals had declined while in Paramount.
136. All the above, but not limited to the above, confirm the Defendants committed Medical Malpractice on Omana, and has caused her serious damages, emotional distress, physical and mental harm, pain and suffering.

TWENTY-SIXTH CAUSE OF ACTION
TORTIOUS INTENTIONAL INTERFERENCE

137. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated hereand further allege the following :

138. Defendants defamed, purloined from and tortuously interfered with Jay's businesses, real estate and personal finances, to detrimental effect and caused severe losses.

139. All the above, but not limited to the above, confirm the Defendants made intentional tortious interference with the Plaintiffs' livelihood and conduct of businesses, and caused serious damages, emotional distress, physical and mental harm, pain and suffering.

140. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

TWENTY-SEVENTH CAUSE OF ACTION

MUNICIPAL AND SUPERVISORY LIABILITY

141. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

142. City of Snoqualmie has the municipal and supervisory liability on the competence of their officers they arm with deadly weapons and send to the streets. Officer Fischbeck could not tell a 99 year old from a 76 year old stroke victim, or an urine bag from a Colostomy bag. His ignorance and confusion has caused a chain reaction that led to severe losses of all dimensions - wealth, health, reputation, peace of mind etc for the Defendants which could have been entirely avoided by a well trained officer

143. .City of Snoqualmie has municipal and supervisory liability for the discriminatory and malicious prosecution by Prosecutor Lynn Moberly who failed to dismiss the case against Jay Nair for "reckless abandonment" despite evidence that two adults, including one certified CNA, were present at the time Mr. Nair had left the building that day.

144. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

TWENTY-EIGHTH CAUSE OF ACTION

VIOLATION OF NATURAL LAW &

FUNDAMENTAL HUMAN RIGHTS

145. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
146. Defendant's actions violate the fundamental tenets of society and human conscience. An old sick quadriplegic helpless woman in her last days is being held against her wish in solitary confinement, despite her longing to see her children and be at her home. This is evil by its very DEFINITION, and it does not take any laws or statutes to determine so, as even animals can recognize a dying mother's wish to be loved.
147. All the above, but not limited to the above, confirm the Defendants intentionally violated Plaintiffs' fundamental human rights, and caused serious damages, emotional distress, physical and mental harm, damages, pain and suffering.
148. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

TWENTY-NINTH CAUSE OF ACTION
VIOLATION OF INTERNATIONAL LAW
OMANA'S RIGHT OF RETURN TO HOME COUNTRY
(1948 Universal Declaration of Human Rights, 1966 International Covenant on Civil
and Political Rights, and the 1948 Fourth Geneva Convention)

149. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

150. Both the United States of America, as well as Republic of India, are ratifying Parties to the following International Conventions / Treatises that were signed since the formation of Independent India in 1947:

- a) 1948 Universal Declaration of Human Rights,
- b) 1966 International Covenant on Civil and Political Rights, and the
- c) 1948 Fourth Geneva Convention

151. The above conventions and treatises do not allow Omana to be detained against her wish, and the wish of her Family, in a Foreign state simply for a reason that an unforeseen medical disability has unfortunately interfered with hers and her Family's original plans for her repatriation. The Foreign State instead has an obligation by treaty to arrange safe passage of the victim to her home country on humanitarian grounds.

152. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

COMPLAINT

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THIRTIETH CAUSE OF ACTION

VIOLATION OF INDO-AMERICAN BILATERAL TREATIES

OMANA'S RIGHT OF RETURN PER TERMS OF B1/B2 VISA

1. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following:
2. Circa 1948, the newly formed sovereign Republic of India and the United States had established formal diplomatic missions and ties with each other, signed by then US President E. Eisenhower and Indian Prime Minister J. Nehru, during the latter's first historic visit. These friendly bilateral ties have been (and are still) going on strong as have been reaffirmed by various interim heads of states, and also by Indian PM Narendra Modi's recent visit with President Trump.
3. This has allowed citizens for either country to apply for visas and travel to the other without fear of discrimination or illegal detention. The terms of Omana's B1-B2 visitor visa, issued by the United States, and valid until February 2022, allows her the legal right to return to her home country.
4. Omana is not wanted in a criminal proceeding in any courts in the US, and has no desire to be in this country EXCEPT for her profound love for Jay and her motherly desire to spend her last days with him being happy, joyful, peaceful, cuddled and adored; therefore Omana's hostage taking (and ongoing solitary confinement) by the

Defendants is in violation of the bilateral agreements between the world's largest and greatest democracies. Omana's right to travel to her homeland cannot be impeded.

5. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

6. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-FIRST CAUSE OF ACTION
NEGLIGENT HIRING AND RETENTION

153. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
154. City of Snoqualmie had a duty of care in hiring police officers with deadly weapons, yet they hired Officer Fischbeck that cannot tell a stroke victim from a 99 year old, or a Colostomy bag from a Urine bag.
155. Harborview had a duty of care in hiring nurses that do not predate on vulnerable patients. However, they hired Tedlaw that sexually and medically battered Omana.
156. Harborview hired the medical staff that followed Channa's illegal orders to withhold insulin, familial attachment for emotional stability and medical treatment to Omana despite knowing that is a violation of their Hippocrates Oath.
157. All the above, but not limited to the above, confirm the Defendants made Negligent Hiring and Retention Decisions, and caused Plaintiffs serious damages, emotional distress, physical and mental harm, pain and suffering.

THIRTY-SECOND CAUSE OF ACTION

RESPONDEAT SUPERIOR

158. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
159. Defendants Harborview Medical Center are the employers for Defendants Roger, Tedlaw, Masumi and Dr. Hahn, and therefore responsible for their professional conduct.
160. Upon all available information and the best belief, Defendants Roger, Tedlaw, Masumi and Dr. Hahn, along with the so-called "Risk Management Team" and Ms. Kathleen Flaherty, have committed and (as of date are still committing) numerous counts of violations of law, including, but not limited to conspiracy, intentional and reckless infliction of emotional distress, fraudulent concealment, sexual and medical battery, medical malpractice, defamation, negligence, federal civil rights violations etc.
161. Defendants City of Snoqualmie are the employers for Officer Fischbeck and Prosecutor Lynn Moberly, and responsible for their professional conduct.
162. Defendants DSHS are employers for APS Investigators Randy Wilson, Rebekah Hoefs, and Pamela Rago and responsible for their professional conduct.
163. Upon all available information and the best belief, Defendants or their employees / agents have committed and (as of date are still committing) numerous counts of violations of law, including, but not limited to conspiracy, malicious prosecution, abuse of process, intentional and reckless infliction of emotional distress, fraudulent concealment, defamation, negligence, constitutional and federal civil rights violations, false promise, violation of Omana' religious rights and Indo-US travel treaties etc.

164. All the above, but not limited to the above, confirm the Defendants' professional failures at their respective workplace(s) and/or in professional capacities have caused serious damages, emotional distress, physical and mental harm, pain and suffering for the Plaintiffs; which their corresponding employers are *in vicem* jointly responsible for.

165. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-THIRD CAUSE OF ACTION
VIOLATION OF CODE OF FEDERAL REGULATIONS,
AND FEDERAL COMMON LAW

166. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
167. All the above, but not limited to the above, confirm the Defendants' malicious actions violated Code of Federal Regulations and Common Law, and caused serious damages, emotional distress, physical and mental harm, pain and suffering to the Plaintiffs.
168. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.
169. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-FOURTH CAUSE OF ACTION

CONSTRUCTIVE FRAUD

170. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

171. The actions by Harborview Risk Management to invent a cover story and use it for obstructing justice by misdirecting Seattle Police Department detective Ms. Heather Barr's investigation, is manifest constructive fraud.

172. They gained an unfair advantage by having Ms. Barr exonerate their staff members of serious crimes they were being investigated for at the behest of Raji and Jay's complaint.

173. They intended to gain such advantage when they proposed this scheme to Dr. Andrew Hahn, Masumi and Channa

174. All the above, but not limited to the above, confirm the Defendants engaged in devious constructive fraud, and has caused Plaintiffs serious damages, emotional distress, physical and mental harm, pain and suffering.

175. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-FIFTH CAUSE OF ACTION

FRAUD: FALSE PROMISE

176. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
177. Dr. Hahn promised Raji and Jay to investigate the issue of the foreign substance and to get back to them within two weeks, while he knew all along this was nothing more than a cover-up story to keep Omana in isolation per Risk Management's instructions.
178. He never intended to call back Raji or Jay or conduct any bonafide investigation, as can be surmised from his lack of response to their communications after two weeks.
179. DSHS never intended to provide Omana with citizenship despite their promise to do so in return for an amiable settlement with Jay allowing an external guardian.
180. Channa never intended to apply for Omana's US citizenship despite the Court order.
181. All the above, but not limited to the above, confirm the Defendants made False Promises they never intended to follow through with the Plaintiffs, and caused serious damages, emotional distress, physical and mental harm, pain and suffering.
182. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-SIXTH CAUSE OF ACTION

MEDICAL BATTERY

183. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
184. Tedlaw was Omana's nurse at Paramount Nursing Home.
185. To check a patient's temperature, a nurse is medically trained to use a thermometer, NOT groping with bare hands under the gown of a female patient as her son is watching.
186. Tedlaw's inappropriate touching of Omana's breasts for no medical reason or purpose is medical battery, in addition to also being sexual aggravated battery.
187. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.
188. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-SEVENTH CAUSE OF ACTION

LACK OF INFORMED CONSENT

189. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

190. Omana never consented to anyone at any time to be kept in isolation, or for her life saving treatments including insulin, Botox injections and rehabilitation therapies, to be abruptly stopped and thereby to place her at undue mortal risk.

191. All the above, but not limited to the above, confirm the Defendants violated Omana's constitutional rights despite lack of an informed consent, and caused serious damages, emotional distress, physical and mental harm, pain and suffering.

192. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

193. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-EIGHTH CAUSE OF ACTION

BREACH OF FIDUCIARY DUTY

194. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

195. Channa undertook a fiduciary duty to Omana's estate when she accepted her guardianship. She further had access to \$10,500 that she had marshalled from Jay's personal account. Despite this, Channa did not move Omana to a safe facility, or use the funds in a way appropriate for Omana or her estate, instead causing severe losses due to her mismanagement and lack of understanding of the facts of the situation.

196. Wherefore Channa breached her duty of fiduciary care to Omana and her estate.

197. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

198. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

THIRTY-NINTH CAUSE OF ACTION

WILFUL MISCONDUCT

199. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

200. The Defendants actions were jointly and severally malicious, racially motivated, sadistic, served no legitimate purpose at times other than self-aggrandization at the expense of Plaintiffs; and made a complete mockery of Washington State's legal system by abusing the color of law to inflict terrible pain and suffering on an innocent quadriplegic and her family. All the afore categorically confirm Wilful Misconduct.

201. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

202. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FOURTIETH CAUSE OF ACTION

CONVERSION

203. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

204. Plaintiff's two Dell laptops, two Motorola phones, an electric teakettle, other personal items and memorabilia including invaluable family albums that Omana cherishes are in Defendants' custody from Conversion.

205. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

206. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FOURTY FIRST CAUSE OF ACTION

ELDER ABUSE

207. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

208. Omana, aged 77, is an elder person.

209. The Defendants' actions form the very definition of Elder Abuse. *Res ipsa loquitur.*

210. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

211. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FOURTY SECOND CAUSE OF ACTION

ASSAULT

212. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

213. On May 7, 2019, Tedlaw assaulted and injured Jay on his hand, neck and shoulders.

214. The battery was witnessed by Omana, her roommate and several other staff at Paramount, who rushed to help Jay and but for their efforts, Tedlaw would have inflicted more heinous injury on Jay. He was dragged across the floor and pushed on to the wall.

215. On June 5, 2019, Masumi and Harborview Security assaulted Raji by forcefully removing her from near her mother's bedside and confining her to a room for 5 hours.

216. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

217. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FOURTY THIRD CAUSE OF ACTION

FOURTH AMENDMENT: UNREASONABLE SEARCHES AND SEIZURES

218. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

219. Defendants confiscation of Plaintiff's two Dell laptops, two Motorola phones, other personal property such as electronic equipment, electric teapot, family albums, personal memorabilia and clothing etc, constitute unreasonable searches and seizures, which the fourth amendment protects against.

220. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

221. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FORTY-FOURTH CAUSE OF ACTION

FRAUDULENT CONCEALMENT

222. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
223. Harborview, Dr. Andrew Hahn and Masumi obstructed justice and caused deliberate harm to their patient Omana by fraudulently concealing the true facts about her hand injury, which they knew were caused due to Paramount's intentional neglect and lack of care. Her burn injuries are consistent from inflammation from high blood sugar levels and reduced circulation from lack of regular positioning. A medical expert cannot miss this.
224. However, they reenacted an alternate hyperbole that Risk Management conceived and trained them *a la* nincompoops devoid of an iota of conscience, that framed Omana's daughter Raji with using chemicals cause Omana's burn to fraudulently conceal the truth of her injuries from law enforcement; and also attempted to trivialize her failing vitals from Paramount to a nonexistent infection, instead of revealing that those were only because she was not getting any medication or insulin at Paramount -as verified by her glucose getting re-stabilized at Harborview through regular medication and insulin.
225. All the above, but not limited to the above, confirm the Defendants engaged in fraudulent concealment, and has caused serious damages, emotional distress, physical and mental harm, pain and suffering.

FORTY-FIFTH CAUSE OF ACTION

NEGLIGENCE *Res ipsa loquitur*

226. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

227. Defendants DSHS, Channa and Harborview committed Negligence *Res ipsa loquitur* as these actions were from a privileged entity abusing its power, which could NOT have been done by anyone else without the said power.

228. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

229. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FORTY-SIXTH CAUSE OF ACTION

NEGLIGENCE

230. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

231. Defendants Channa, Roger, Tedlaw, Masumi and Dr. Hahn all have or had a duty of care towards Omana; either as her guardian or as a member of her care team at Harborview or Paramount, or as an administrator of her institution.

232. Defendants violated that duty of care negligently, which caused, and is continuing to cause as of date, great physical and mental health, and has placed her at mortal risk.

233. Defendants are continuing to neglect their duty towards Omana despite being intimated of their breach of care through multiple communications from Family.

234. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

235. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FORTY SEVENTH CAUSE OF ACTION
VIOLATION OF RELIGIOUS LAND USE AND
INSTITUTIONALIZED PERSONS ACT (RLUIPA)

236. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

237. Paramount Nursing Home and Harborview Hospital are institutions, as defined in section 2 of the Civil Rights of Institutionalized Persons Act (42 U.S.C. 1997), as incorporated by reference in RLUIPA (42 U.S.C. 2000cc-1).

238. Harborview and Paramount are programs or activities that receive Federal financial assistance, and is thus a person acting under color of Federal law for purposes of 42 U.S.C. § 2000cc et seq.

239. Omana is a person residing in or confined to an institution, as defined in section 2 of the Civil Rights of Institutionalized Persons Act (42 U.S.C. 1997), as incorporated by reference in RLUIPA (42 U.S.C. 2000cc-1).

240. Defendants action placing Omana in Solitary Confinement, and deprived of her wishes to hear Hindu Sanskrit religious Hymns, and visit Temples with her son, imposes a substantial burden on Omana's free exercise of religion.

241. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of property and status.

FOURTY EIGHTH CAUSE OF ACTION

BATTERY

242. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

243. On May 7, 2019, Tedlaw assaulted and injured Jay on his hand, neck and shoulders.

244. The battery was witnessed by Omana, her roommate and several other staff at Paramount, who rushed to help Jay and but for their efforts, Tedlaw would have inflicted more heinous injury on Jay. He was dragged across the floor and pushed on to the wall.

245. As a result of this battery Jay has suffered incredible harm, pain, suffering, mental agony, loss of property and status.

246. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

FOURTY-NINTH CAUSE OF ACTION
THE AMERICANS WITH DISABILITIES ACT

247. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :

248. The Americans with Disabilities Act (ADA), 42 U.S.C. § 12101 et seq., provides that necessary and appropriate rehabilitation services and physical/motor skill therapy may not be denied a substantially disabled patient in the United States. However, all of Omana's physical, occupational and speech therapies had been abruptly stopped. She was receiving up to three visits of each at home from Providence Health Services, but after being placed under guardianship she has not had any meaningful therapy sessions at all.

249. Moreover, the pertinent federal regulations for implementation of the ADA specifically provide that “[n]othing in the Act or this part authorizes the representative or guardian of an individual with a disability to decline food, water, medical treatment, or medical services for that individual.” (cf. 28 C.F.R. Ch. 1, Subpart B, § 35.130.)

250. Defendants' failure and unwillingness to provide Omana with qualified care and therapies at a Skilled Nursing Facility, and stopping her critical medications such as insulin, and changing her POLST code etc. are blatant violations of the above provisions in the ADA.

251. The failure and refusal of defendant Channa Copeland, acting under the color of state law, to furnish Omana with necessary and appropriate speech and motor skills therapy, rehabilitation service, and the basic essential medical services, and her demand that she be deprived of insulin, resuscitation, intubation and critical care, violate Family's rights under ADA and constitute unlawful discrimination against Omana because of disability.

FIFTIETH CAUSE OF ACTION

**RACIAL DISCRIMINATION IN VIOLATION OF Section 504 of the
Rehabilitation Act of 1973; Title II of the Americans with Disabilities Act of
1990; TITLE VII OF CIVIL RIGHTS ACT OF 1964; 42 U.S.C. 2000c; et seq.**

252. Plaintiffs incorporate by reference all paragraphs in Sections 1-IV as if fully restated here and further allege the following :
253. Plaintiffs have been discriminated against, based on their race and religion, and have suffered incredible harm, pain, suffering, loss of property and status.
254. As a result of this Plaintiffs have suffered, and are continuing to suffer as of date, incredible harm, pain, suffering, mental agony, loss of finances, property and status.
255. Plaintiffs reserve the right to amend this complaint to include further facts and details expounding on this allegation, but are filing this prematurely for the sake of expediently saving Omana's life, as she has been held in isolation for 41 days with a view to increase her stress from solitary confinement at an unknown location with no access to anyone who can understand or communicate with her, thereby intentionally emotionally devastating her, elevating her cortisol & glucose levels, inevitably leading to a stroke or other organ failure and premature death per the Defendants' stated wish to get rid of her.

VI. PRAYER FOR RELIEF

Plaintiffs, wherefore and hereby in unison in humble genuflection, pray to this Honorable Court to act in its most benevolent expedient urgency possible to save the innocent life of a clinically Depressed quadriplegic, before she succumbs to the most severe distress from complete isolation and deprivation of all mental stimulation such as religious activities, which upon belief and information is being intentionally placed on her to illegally cut short her life; as she has become a stateless burden to this so-called "guardian" trying to dispose her off. Wherefore the Venerable Court is prayed for:

(A) An Immediate Ex Parte Temporary Restraining Order :

1. Enjoining and Restraining Defendants and/or their representatives/ agents from violating Omana's Federal rights to receive unrestricted visits by all her Family and Friends, including her son Jay foremost, for as long as she desires;
2. That Omana be immediately moved to a safe facility (within 25 miles of Jay's home per the Guardianship Settlement Agreement approved by Hon. King County Superior Court), that does not have a conflict of interest on her life, outside of Harborview (or its affiliates or subordinates) that is a named Defendant in this matter;
3. That all her care and therapies from Providence Home Health be restored as *status quo ante* before DSHS took her into custody, and that she shall receive care for her right eye from complications from cataract surgery, and Botox injections for leg pain;

4. That the Federal Bureau of Investigations -Seattle Office ("FBI") shall conduct a new, fair and thorough investigation on:

- a) the conspiracy behind Omana's attempted planned murder from lack of critical medication or insulin at Paramount;
- b) her burn injuries on left hand on 6/13/2019;
- c) the organized illegal coverup efforts ongoing at Harborview, to obstruct justice and to deflect blame in an egregious attempt to avoid liability;
- d) assaults, battery and false arrests perpetrated on Jay, Raji and Omana;
- e) unjust misappropriation of Omana's and Jay's assets (such as laptops, cell phones, and a Bank of America checking account with \$10,500);
- f) malicious abuses of power as discriminatory & racially motivated hate crimes,
- g) the many abominable, blatantly baseless and mutually contradictory lies filed by Defendants in King County Superior Court under penalty of Perjury;

5. That the FBI shall immediately procure a testimony from Omana, in the presence of at least one person familiar with her Dysarthria, such as her speech therapist Dinesh Kannada, and record her victim statement on the abuse, pain, distress, severe panic attacks from isolation, and neglect she suffered through a Malayalam interpreter.

[P.S. Such psychopathic sadists need to be kept away from Society through arrest and prosecution in order to obviate more harm to helpless victims entrusted to their care.]

A. 1. Grounds for Application for Temporary Restraining Order

"The standard for issuing a TRO is the same as that for issuing a preliminary injunction". Walker vs County of Santa Clara 2011 WL 4344212 at *2 (N.D. Cal 2011). "A plaintiff seeking a preliminary injunction must establish that he is likely to succeed on the merits, that he is likely to suffer irreparable harm in the absence of preliminary relief, that the balance of equities tips in his favor, and that an injunction is in the public interest.". Winter vs Natural Res. Def. Council. U.S 7, 20 (2008).

"If Plaintiffs show a likelihood of irreparable injury, a preliminary injunction is appropriate"....."when a plaintiff demonstrates that serious questions going to the merits were raised and the balance of hardships tips sharply in the plaintiff's favor." Alliance for the Wild Rockies vs Cottrell, 632 F.3d 1127, 1134-35 (9th Cir. 2011).

"It is always in public interest to prevent the violation of a party's constitutional rights", Melendres v. Arpaio, 695 F. 3d 990, 1002 (9th Cir 2012). The balance of equities tips in the Plaintiff's favor for the same reason, because a TRO will enable Omana's children to save their mother's invaluable, precious life that cannot compared or pitted against anything materialistic, let alone no loss whatsoever that is even possible for the defendants from extending Omana's life.

A. 2. Need for a Temporary Restraining Order

As discussed above, Plaintiff face serious, irreversible harm of Omana's impending death from a stroke or organ failure from anxiety and panic. It would be a miracle to be able to stop it on time but it may not be too late, but there is simply no time left to save her life, and hence the expedient Pro Se application for the TRO. Her sugar levels always spike up when she is in agony and stress, as she must be without being able to communicate with her children, and not knowing why she is being held in solitary confinement.

Raji and Jay are desperate to be able to speak to their mother before she dies from this planned extrajudicial execution, which is now into it's 41st day as of date of filing where Omana has been in complete isolation. from Family. The TRO is absolutely the only hope to stop her cruel illegal murder.

(B) A Hearing for Declaratory and Injunctive Relief:

1. Requiring Specific Performance from DSHS on the Guardianship Settlement Agreement negotiated between DSHS (represented by Ms. Jennifer Boharski) and Jay (represented by Mr. Greg McBroom and Mr. Charles Diesen), and approved by Court, namely: (a) accepting financial responsibility for Omana's care through US Naturalization so she can continue to receive care at home, as lack of Medicaid/ proper coverage is this matter's root cause (b) Unrestricted access to Family as the 25 miles restriction of her placement was for the purpose of facilitating daily visits; (c) all critical care decisions such as a change in POLST code should only be made after consulting with Family, and any otherwise shall be reversed; and (d) Omana be allowed to visit home, events and Hindu temples regularly with Jay for mental health;
2. That if for any reason Court finds Omana cannot be allowed to return to live with her son at his home in USA, then to immediately terminate the unnecessary, deleterious & unconstitutional "guardianship" enforced on Omana, and to Order Molina to arrange and pay for a Medical flight, to allow safe passage for Omana back to her home country India with Raji and Jay as guaranteed by her Visa to the United States;
3. Remanding to a Jury Trial to determine monetary award for Compensatory damages including, but not limited to, lost earnings, benefits and equities on Plaintiff's multi-million dollar biotech, real-estate & software businesses, losses to their health and reputation; and damages for terrible emotional distress, pain and suffering *inter alia*;

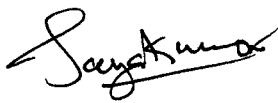
4. For the fullest Punitive Damages allowed by Law;
5. For all Civil Penalties Awardable,
6. Declaring Jay is not at fault for hiring uncertified caregivers as he had done his very absolute best under difficult circumstances to take best possible care of his mother;
7. Requiring DSHS to remove Jay's name from any public Registry for the afore reason;
8. Awarding Plaintiffs the reasonable costs and expenses of bringing this action;
9. Granting such other and further relief as this Court shall deem just and proper;
10. That this Court retain jurisdiction of this matter and supplemental jurisdiction of all closely related matters for the purpose of enforcing this Court's order on all claims.

DATED: 08/07/2019

Respectfully Submitted,



Jayakrishnan K. Nair
Son of Omana Thankamma
11031 Elliston Way NE
Redmond WA 98053
(201) 205 7500



A. Jayakumar Nair

Brother of:
Omana Thankamma

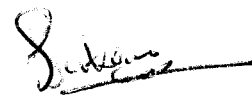
10, Laxmibai Vayojana Kendram
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Thiruvananthapuram, Kerala
India 695023



Rajakumari Susheelkumar

Daughter of:
Omana Thankamma

11031 Elliston Way NE
Redmond WA 98053
(425) 312-3205



Sukanya Susheel

Grandchild of
Omana Thankamma

MOOKAMBIKA, WSRA-189,
Chottupura Street, WEST FORT
Thiruvananthapuram, Kerala
India 695023

COMPLAINT

Plaintiffs (*Pro Se*) US Address:
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