

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF CLACKAMAS

KAREN VALDEZ,) Case No.:
)
Plaintiff,) COMPLAINT
vs.)
) ORS 21.135(1), (2)(G)– FILING FEE \$265.00
DAVID HENKES, Trustee of the Rita Henkes)
Trust,)
)
Defendant.)

1.

Comes now Plaintiff Karen Valdez, by and through her attorney David L. Carlson and does allege as follows:

2.

Plaintiff resides in Woodburn and is a resident of Marion County, Oregon. On information and belief, Plaintiff is a beneficiary under the Rita Henkes Trust (herein after “the Trust”).

3.

Defendant David Henkes resides in Canby, Clackamas County, Oregon, and is the sole Trustee of the Trust.

4.

On information and belief, the Trust has several bank accounts which the Defendant has solely managed. Defendant has never provided a Trust Reporting to Plaintiff, nor produced any Trust bank account records.

5.

On or about, October 25, 2018, pursuant to ORS 130.710, Plaintiff requested that Defendant furnish a copy of the Trust, a Trust Report showing the current assets of the trust, bank statements and other documentation relating to Defendant’s administration of the Trust.

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6.

As of the date of this filing, Defendant has refused to provide Plaintiff with any of the requested documentation.

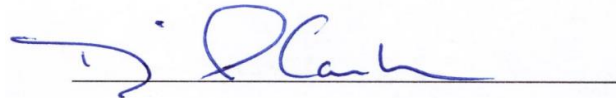
7.

Pursuant to ORS 130.710(2) Plaintiff is entitled to a copy of the Trust

WHEREFORE, Plaintiff demands judgment against the defendant:

1. That Defendant produce a copy of the Trust to Plaintiff;
2. Awarding Plaintiff with attorney fees and costs incurred herein.

Dated: March 21, 2019



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