

From: **Eric Jones** <eric@recovery-compass.org>
Date: Tue, Sep 16, 2025 at 8:51 PM
Subject: FORMAL NOTICE & FINAL DEMAND (Sept 17): Failure to Accommodate & Bad Faith Refusal - Acct Restricted [HART]
To: Leatha Goldstein <leatha.goldstein@chase.com>, Valerie R. Brooks <Valerie.R.Brooks@chase.com>
Cc: Logan Hughes <lhughes@rameyflock.com>, Steve Spitzer <sspitzer@rameyflock.com>, Kathy Hart <kathyandkent1947@gmail.com>

To Ms. Goldstein, Ms. Brooks, and Suma (Chase Executive Office):

This is a final demand for the immediate release of funds and recognition of the lawfully executed Power of Attorney for Kathy Hart.

Your institution has repeatedly refused to honor the POA, citing a need to hear from Ms. Hart directly and requiring her to appear in person. We have now satisfied these demands with recorded, verifiable evidence from a call on September 15, 2025.

Attached, you will find:

- **Exhibit K-4a (Authorization Audio):** A recording of Ms. Hart providing her explicit, verbal authorization for Chase to rely on the POA and to use remote verification.
- **Exhibit K-4b (Facility Prohibition Audio):** A recording of Ms. Hart confirming that her licensed medical rehabilitation facility **prohibits** her from leaving the premises, rendering your demand for an in-person appearance impossible.
- **Exhibit K-4 (Transcript):** A full, certified transcript of the call providing complete context.

Your continued refusal constitutes a failure to provide reasonable accommodation under the Americans with Disabilities Act (ADA) and is a bad faith refusal under Texas Estates Code Chapter 751.

We demand immediate and full acceptance of the POA and the release of all restricted funds by 12:00 PM Central Time tomorrow, September 17, 2025.

If this matter is not fully resolved by this deadline, our legal counsel, copied on this email, is instructed to file an emergency Temporary Restraining Order (TRO) with the appropriate court under Texas Estates Code §751.212, seeking all available damages and legal fees.

Govern yourselves accordingly.

Eric B. Jones

Agent for Kathy Hart

Founder, Recovery.Compass

(626) 348-3019

3 Attachments • Scanned by Gmail

