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**Subject:** FORMAL NOTICE & FINAL DEMAND (Sept 17): Failure to Accommodate & Bad Faith Refusal - Acct Restricted [HART]  
**From:** Eric Jones <eric@recovery-compass.org>  
**To:** Leatha Goldstein <leatha.goldstein@chase.com>, "Valerie R. Brooks" <Valerie.R.Brooks@chase.com>  
**Cc:** Logan Hughes <lughes@rameyflock.com>, Steve Spitzer <sspitzer@rameyflock.com>, Kathy Hart <kathyandkent1947@gmail.com>  
**Bcc:** Nuha Sayegh <nuha@recovery-compass.org>  
**Date Sent:** Tuesday, September 16, 2025 8:51:35 PM GMT-07:00  
**Date Received:** Tuesday, September 16, 2025 8:51:35 PM GMT-07:00  
**Attachments:** K-4\_Transcript\_2025-09-15.pdf, K-4a\_Hart\_Authorization\_2025-09-15.mp3, K-4b\_Hart\_Facility\_Prohibition\_2025-09-15.mp3

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

# Exhibit K-4: Transcript of Telephone Call

Parties: Eric Jones and Kathy Hart

Date: September 15, 2025

Time: 3:20 PM

File: SEPT 15\_Call to Kathy at Grande Center regarding Chase Bank

## Key Evidentiary Segments for Audio Export:

- **Exhibit K-4a (Authorization Audio):** This clip contains Ms. Hart's explicit authorization for Chase to rely on the POA, her request for remote verification, and confirmation that an in-person visit is medically impracticable.
  - **Start Time:** 38:27
  - **End Time:** 39:52
- **Exhibit K-4b (Facility Prohibition Audio):** This clip contains Ms. Hart's confirmation that her medical rehabilitation facility prohibits her from leaving the premises, making an in-person bank visit impossible.
  - **Start Time:** 31:06
  - **End Time:** 31:27

## Full Call Transcript

**Eric Jones [01:19]:** I'm the Power of Attorney, medical power of attorney for Kathy, Kathleen Ann Hart. I'm trying to reach Kathy Kathleen Hart.

**Kathy Hart [05:06]:** Kathy, yes. Hi, Eric. I was on the phone with Lisa. Lisa couldn't get through. She finally called me a few minutes ago.

**Eric Jones [05:16]:** Who's Lisa?

**Kathy Hart [05:20]:** Lisa at the bank.

**Eric Jones [05:22]:** Oh, Lisa. Lisa, yeah, yeah, yeah, good.

**Kathy Hart [05:26]:** She gave me what information she had, but it's still extremely confusing to me. She gave me... just a second let me see if I could look. I didn't have any paper to write on, so I had to grab scratch. I have 5900 in the checking account that goes to my checkbook. Now that's good news because if I had to pick something, I could. However, while she was on the phone, now I'm in bed. I'm in so much pain, I can hardly talk. But I was looking in my purse for my checkbook, and I can't find it. Now, I know it's here because they came with it. So, I can't get out of the bed to walk over to the places in the room that it might be. But if I confirm tomorrow... she did say that there's \$900 in it, and so that made me feel like at least I can write a check if I have to to Amy or something like that. Now, a couple other things. She gave me the name of the investigator that works for Chase. Is there a way to keep that warm for at all? I have to take this call. Okay. Thank you, dear. Well, you're going to be gone. Okay. Well,

okay, okay, thanks. Okay. Gave me the name of the investigator. I'm going to give it to you, not that he's going to talk to you, but it's Christopher Salinas.

**Eric Jones [07:18]:** Yeah, I know I've talked to him.

**Kathy Hart [07:20]:** Okay, you got that. Now another thing that made no sense to me. She was looking through my account, and she said there was a \$2,300 payment made to somebody or something called Alfred. A-L-F-R-E-D. Alfredo. Who did I owe \$2,300 to?

**Eric Jones [08:09]:** Yeah, I don't know.

**Kathy Hart [08:12]:** Okay, you would know if it was something.

**Eric Jones [08:15]:** Yeah, it could. I mean, I have all the receipts of what I've done. So you know, if there's any charges by me, that would be a lot. I haven't done anything over... I mean, yeah. But I was trying to see, just to get a feel for what is possible in my account. Because I was partially blocked at some point, you know, the joint account. I never, ever had access to your checking account.

**Kathy Hart [08:53]:** So was that with a debit card?

**Eric Jones [08:55]:** Yeah.

**Kathy Hart [08:56]:** I'm looking at that... Lisa said to me that that \$2,300 Alfred payment was made on my debit card.

**Eric Jones [09:12]:** It was made on your debit card and it went through?

**Kathy Hart [09:16]:** And it went through. What was it? Why? I'm scared.

**Eric Jones [09:28]:** No, no, let me confirm, because if it's Alfred, because there was something I was trying to do, Kathy, to get access, because no one was moving on the intelligence front. No one was, no one has really been doing shit. I just gave Steve Spitzer and Logan Hughes an earful at your law firm.

**Kathy Hart [09:55]:** Lesley could fucking skip the country before these people get on it.

**Eric Jones [09:59]:** I know. I just told them. I said it's been a month now, gentlemen, what the fuck have you guys been doing on a progress report?

**Kathy Hart [10:05]:** Immediately, and I want to know what you're doing to go after her.

**Eric Jones [10:09]:** Yeah, yeah. And I'm copying you on all the emails, you'll have them. You know Amy's visiting you this week. You know that, right?

**Kathy Hart [10:20]:** Yeah. Oh, good. But go ahead with the lawyer.

**Eric Jones [10:24]:** Okay, so this is what I just sent to Steve. I'll read it to you. I said, "Steve, Logan, thank you for your message this morning. I need to be very clear. Advising me to take Kathy in person to a branch is not a viable or legally appropriate strategy. Why that advice fails: Medical reality, Kathy is post-surgical, largely immobile and confined to rehab. She cannot appear in person. This was confirmed again in my call with her on September 12. The POA purpose, the Texas statutory durable POA exists for exactly this situation. Elder abuse protection, forcing a bedridden elder to appear at a branch is discriminatory under ADA accommodation principles and exposes Chase to elder abuse liability." And I said, "Steve, I already did wait."

**Kathy Hart [11:16]:** Stop, stop, stop. The person you're talking to now, is this a Chase person or a lawyer?

**Eric Jones [11:22]:** Your lawyers. Your lawyers.

**Kathy Hart [11:24]:** Okay, because they need to get their ass moving.

**Eric Jones [11:26]:** God damn right. I'm done talking to Chase. It's just a fucking loop over loop over loop. And Lisa calls me to call you, and it's like, just do something. And so, this is what I demanded from your lawyers today. This is what I said. I said, "What I need from counsel by close of business today: One, Service Confirmation. Confirm that the demand, POA, ADA packet was served on Chase corporate legal, Registered Agent and the Elder Protection Unit. Two, Statement Demand. Send Chase a written demand for a refusal statement, identifying specific statutory grounds for non-acceptance. Three, TRO Readiness. Finalize the temporary restraining order package and be prepared to file immediately upon non-compliance." And then four, "Timeline and Accountability. Identify who at your office is drafting and who will file, with a concrete deadline." And I said, "I want a progress report on what you guys have been doing over the last month, because I'm the only one working on this."

**Kathy Hart [12:31]:** Yeah, exactly right. Exactly right. Well, I forgot the phrase, but if you're working for a law firm, and you are faking billable hours, that's against the law. And I don't remember the phrase, but there's a word for it, and it puts the fear of God in every lawyer if you bring it up.

**Eric Jones [13:26]:** Well this. So this is what we're going to have to do, Kathy. I'm going to give them their phone number, because what they're doing is they're not saying it, but they're not moving because I'm not the client.

**Kathy Hart [13:40]:** How many times do we have to tell them I got a telephone and I can't get out of bed? I know how much clearer to make it to them.

**Eric Jones [13:47]:** I'm trying to do all the work I can, but they won't move a lot of times

because you're the client.

**Kathy Hart [13:54]:** Well, fuck them. They better make sure that you're the power of attorney.

**Eric Jones [13:59]:** Oh, they know that.

**Kathy Hart [14:02]:** Technically, they should be able to do whatever they need to do.

**Eric Jones [14:05]:** Yeah, they just need to hear from the client. So, I'm going to give you the number, okay, and you just do it when you can, and just don't hold back.

**Kathy Hart [14:13]:** Okay, stop, stop talking. What is their name again?

**Eric Jones [14:19]:** So the name of the law firm is Ramey & Flock. R-A-M-E-Y. And then Flock, F-L-O-C-K.

**Kathy Hart [14:44]:** Okay. Well, just a second, I gotta write down attorney. Okay, go ahead.

**Eric Jones [14:57]:** You want to talk to Steve Spitzer, because he's the one that's going to make things happen.

**Kathy Hart [15:02]:** Steve Spitzer. Okay, I'm writing that down. Yeah, got it.

**Eric Jones [15:08]:** And I met with Steve for an hour in August, and everything seemed okay, but it's been a month now, and we've got no progress report.

**Kathy Hart [15:18]:** Yeah, this is unacceptable. I'm not joking when I say she can skip the country.

**Eric Jones [15:25]:** I know. Once you hang up with me, call them and just give them an earful. It's six o'clock, that's okay. Have it documented. Just leave a voicemail. Doesn't matter.

**Kathy Hart [15:42]:** Okay, what do I say to them?

**Eric Jones [15:45]:** Well, I'm going to give you the phone number first. It's 903-597-3301.

**Kathy Hart [16:14]:** Okay.

**Eric Jones [16:14]:** And I'm going to call the nurse station there and have them come over to you and give you a phone.

**Kathy Hart [16:22]:** I've got a phone.

**Eric Jones [16:26]:** Do you want me to call the nurse station and tell them to give you anything else? Because it seems like they're not really giving you a lot of attention over there.

**Kathy Hart [16:31]:** No, they don't, Eric, and when you do, they retaliate. If you act like you're

asking for too much... for example, Amy brought my CPAP machine to me, finally. Okay, great. But then when I asked if someone could help me hook it up, one person told me, "Well, only the doctor can authorize it." Well, I don't have a doctor appointment for 10 more days. Then somebody told me that it could be hooked up, but they didn't know who would hook it up. And then somebody told me they weren't aware of any oxygen source... you gotta have the machine that makes the oxygen in the room with you. They had no clue how to tell me to get one of those.

**Eric Jones [17:32]:** No, I'm gonna call your surgeon. I'm gonna call Russell and tell him to fucking start doing his job.

**Kathy Hart [17:39]:** Well, all he's going to do is retaliate.

**Eric Jones [17:42]:** No. I mean, I'm not playing games with them. I have the law on our hands, and I know they're breaking the law.

**Kathy Hart [17:50]:** It was only about an hour and a half ago that Taylor called me from Russell's office. Taylor is his little gopher girl who thinks that she's God's gift to the medical community... she fashions herself the keeper of the gate. So you don't want to piss her off. She's all I got between me and Russell, and she's got a real touchy ego. But I was able to say to her a couple of hours ago that you, Eric, are my power of attorney, and that you, Eric, are the one and only person she should talk to.

**Eric Jones [18:48]:** Okay, good.

**Kathy Hart [18:49]:** So I did get that much in, so she should have no problem talking to you. I'm just saying don't piss her off.

**Eric Jones [20:01]:** I'll figure out how to handle them.

**Kathy Hart [20:07]:** Just trying to think if there's anything else. Let's see... Lisa, that's the attorney I gotta call him when I hang up... the checking account. And whoever this Alfred is. I don't know who the hell that is. Lisa didn't know either.

**Eric Jones [20:27]:** Okay, if it was around the time I was there, there was a time... because I was locked out of my account and I couldn't connect my Wells Fargo, so I tried to get an intelligent software so I could look at what these numbers that were coming into your house, your incoming numbers...

**Kathy Hart [20:47]:** Maybe that was it.

**Eric Jones [20:48]:** Yeah, so it could be that. I don't know if it went through. It may have been attempted.

**Kathy Hart [21:05]:** Stop, stop. One of the things she said, that's Lisa... She said that you and

I still have a joint account, and it has \$24,500. What she didn't say, and I didn't think to ask her, was, do we have access? I don't know if it's a frozen thing or not.

**Eric Jones [21:35]:** Yeah, it's frozen.

**Kathy Hart [21:36]:** Then she said, I have a frozen savings account for \$5,038, but it's frozen. Okay, so there's 30 grand right there that we can't get to.

**Eric Jones [21:55]:** Well, don't worry, Kathy, I already paid Amy with my own account from Wells Fargo. Nothing bad is gonna happen. Okay, I'm gonna make sure that... don't worry. I got the lawn guys. I got everybody.

**Kathy Hart [22:08]:** Okay, good, good, good. And of course, we'll straighten all this money stuff out when I get...

**Eric Jones [22:12]:** Yeah. Don't worry about that for now. But I need to ask you some questions, because what they're doing at Chase right now, this is violating so many laws. It's crazy. They're saying the only way we can unfreeze it... Lisa told me she knows that the joint account is frozen, and she told me on Friday, "Kathy's gonna have to come in here herself." And I said, "That's impossible, Lisa." And she said, "I don't know. You're gonna have to talk to Salinas." And I was like, "Well, I'm not gonna have to talk to make an impossible thing happen." This is a medical emergency. Are you telling me that you guys aren't gonna do... And so they're just playing this little game. And why, I don't know, but we're going to follow everyone's advice in Texas and get out of there and go to a local Austin Bank.

**Kathy Hart [23:09]:** Of course, right. Absolutely. I just gotta get out of here. And like I said, that Taylor girl told me that my next appointment with the doctor isn't for 10 more days, so that right there tells me I'm stuck here 10 more days. And then today, I tried to ask the physical therapist, "What do I have to do to get out of here?" I mean, what are the parameters? And then I got the double talk about, well, you know, we PTs have to put our two cents in, and then the doctor has to... well, the doctor never sees me, so he can't put his two cents in. And she says it's a whole conglomeration of a whole bunch of different people and their opinion on whether or not you can take care of yourself when you get home. I don't even know if I can count on Amy's help when I go home. You know, she can't be there with me all the time. I don't know if I'll be able to get in and out of bed or any of that stuff. Nobody tells me.

**Eric Jones [24:20]:** Yeah, I already took care of that. If Amy can't do it, she's got a couple other people that can. So there's a solution for any scenario.

**Kathy Hart [24:30]:** Somebody can come help me if I need it? But I don't want to stay in this place a minute longer than I have to.

**Eric Jones [24:37]:** Yeah, I know. Do you like Amy?

**Kathy Hart [24:43]:** Oh yes, she's lovely. Now here's another topic. I was afraid to say too much on the telephone. Did you bring me some pain pills? How strong are they? And can I get Amy to bring me some without her knowing what she's doing?

**Eric Jones [25:00]:** Oh, yeah...

**Kathy Hart [25:02]:** In other words, without her knowing that that's what you're bringing me. I can just say they're such and such a pill or whatever.

**Eric Jones [25:17]:** When the sheriff came, I had to... because I thought maybe Lesley was behind her having the sheriff, because he demanded to come in the house. So when I saw his car, I had to get rid of them, because I thought that they might use that to say that you're...

**Kathy Hart [25:42]:** I can see that.

**Eric Jones [25:44]:** So I played it safe, and so I'm gonna have to just bring them back when I come again, because I didn't want Lesley getting any advantage in the case.

**Kathy Hart [25:52]:** Oh yeah, no, I understand. I just thought maybe... I know there are times when, like, I was supposed to be able to have pain meds every six hours. Well, sometimes I have to wait 12, 14 hours to get it. I lay here, and right now, I've been in more pain today than I've been in in a week. As you can tell I can't even talk, and they're giving me number 10 hydrocodone. Probably what you had wasn't any better, but at least I would know that if they're making me wait 8, 10, 12 hours, I could have taken one of yours. But that's okay. You did what you needed to do at the time. I understand.

**Eric Jones [26:47]:** Yeah, I'll bring it next time. I just didn't want to... I don't know Texas very well.

**Kathy Hart [26:53]:** No, we don't want to hand Lesley any ammunition, and I certainly wouldn't want to hand her any ammunition that was against you. So what did he do when he came in? Did he just stand there and look around?

**Eric Jones [27:12]:** Well, I think Lesley had some kind of influence with the deputies, because the first time I talked to one over the phone, they said, "Well, sir, you know, I've heard some stories..." like they were pushing back on my story, saying that it's Kathy's fault.

**Kathy Hart [27:28]:** Oh my God, of course.

**Eric Jones [27:30]:** And I said, "Who the fuck has gotten to this guy's head?"

**Kathy Hart [27:35]:** She's CIA, so she showed just what to say.

**Eric Jones [27:39]:** Yeah. And so it was actually good that they came in person, because they were probably starting to wonder, "Who the hell is this guy, Eric Jones, coming in from

California, thinking he's boss?" And so I said, "Oh yeah, come on in." And then, you know, saw the dogs, and I kind of tried to put on charm, show him your power of attorney. And he was smiling and laughing by the end of it. And I could tell he was like, "Okay, this guy's legit." So that helped a lot. That helped a lot.

**Kathy Hart [28:16]:** Yes, good deal.

**Eric Jones [28:18]:** So for me to advance this goddamn thing with Chase, I'm gonna have to ask you some questions, Kathy, right now. It's recorded. So it's gonna sound like I'm a robot, but I just need it on the phone, okay? So I can start advancing and then working on your lawyers. Okay, so do you consent to record this call so it can be used with the bank, the court and regulators to protect your health, safety and finances?

**Kathy Hart [28:44]:** Yes. I do.

**Eric Jones [28:46]:** Okay. How are you feeling after surgery, and what limitations make appearing at a bank medically impracticable today?

**Kathy Hart [28:51]:** The main thing is, I've had two back surgeries to fix five broken vertebrae in my spine. I'm bedridden. I'm recently allowed to get up every day or every other day for about 30 to 40 minutes for a supervised physical therapy. But so far, the physical therapy extent has been to lift weights with my hands. The most strenuous thing I've been allowed to do is to stand up with the physical therapist walking directly behind me with a strap tied around my rib cage so that if I do happen to fall, he can catch me. I have to walk with a walker and my wheelchair has to be pulled behind me as I walk. The physical therapist pulls the wheelchair behind me and he holds the strap around my rib cage with his other hand. I only can go like 75 feet with all that help, and then I have to stop and either go back to bed or I have to rest for 20 minutes to go another, say, 50 feet. It's always with the restrictions of the strap around my ribs, the wheelchair behind my legs being pulled by the physical therapist. So needless to say, I hope one can glean from that that there is absolutely no way I can get out of my hospital bed and stand up to go anywhere, get in a car, meet with somebody. It's not possible.

**Eric Jones [31:06]:** And even if you wanted to, would they even allow you?

**Kathy Hart [31:10]:** No, they wouldn't. Oh, heavens, no. That would be out of the realm of my care that they've prescribed for me. So no, I wouldn't be allowed to do that. That's an excellent point, Eric. I wouldn't be allowed to do that anyway. And the pain, the pain is another prohibitive factor. The pain is so intense and I'm on a very restrictive pain regimen, I would not be able to be afforded enough pain medication to get me through a session like that. No way.

**Eric Jones [31:52]:** And we set up a joint account at Chase Bank primarily for security, because your other account was having a lot of fraud happen, right? Lesley and whoever else. And then we set up the joint account so I had access to money for anything related to my

responsibilities as power of attorney, medical power of attorney and taking care of you, right? What is the risk of me not having funds to go about my duties as power of attorney and your caretaker?

**Kathy Hart [32:26]:** Well, for one thing, the person that has been at least temporarily hired as a caregiver to my physical home, not me, but the home that I live in... I would risk bills not being paid, and therefore I could have my lawn, garbage, water, you know, those things cut off. It also means I can't write a check to the lady that's helping look after my house. So she can't buy dog food, cat food. She can't take care of my animals. And those are my children.

**Eric Jones [33:35]:** Yeah, I know. I know, Kathy, I'm gonna make sure they are.

**Kathy Hart [33:41]:** I know. I'm trying not to lose it here, but I've got to be able to have you, Eric Jones, have access to my money. I have no problem with you having access to all my money to take care of all the things that I need taken care of. And then the other thing, I need to have the ability to write a check on my checking account. I need to pay the lady that's looking after things, and so forth. To be cut off with no money is just... it's not working.

**Eric Jones [34:22]:** And so at what date from today would care for you stop if no funds are released and there's no access to money?

**Kathy Hart [34:34]:** Well, I don't know the date, but I can tell you that I think I've run out of Medicare days already. I don't know that to be a fact. But I have a secondary insurance and I don't know how many days are allotted through them. If my Medicare days have run out, then that means I'm staying here on the graces of my secondary insurance. But I don't know how many days I have with them. What would happen is when that secondary insurance runs out, they're going to send me home. They're not going to keep me here for free.

**Eric Jones [35:50]:** So if I don't have access to funds to pay your caretaker, Amy, or to care for your dog, what date would this become a problem for you?

**Kathy Hart [36:08]:** I don't know, hon, because I have to know when my secondary insurance days run out. I have an appointment to see a Physician's Assistant at Dr. Russell's office on the 25th of September. So I'm just assuming that the powers that be have figured out that I can stay here till the 25th. Now what happens after I go see this PA... he might say, "Gee, you're not doing that well, Mrs. Hart, I want you to stay another month," or he might say, "You're doing really well, Mrs. Hart, let's have you go home next week." I don't know what he's going to say. Because what if he says, "We need to keep you another month"? I can't even have the rehab place bill me personally and write them a check out of my own personal money, because everything's frozen. So they'd be sending me home with no ability to pay for a caretaker, no ability to get out of bed, no ability to go to the store to buy food for myself. They'd be paralyzing me.

**Eric Jones [38:06]:** So I need you to confirm you signed a Texas statutory, durable power of

attorney, naming Eric B. Jones, have not revoked it, and want him handling banking now. Correct?

**Kathy Hart [38:19]:** Yes, that's correct.

**Eric Jones [38:20]:** Okay, this is for bank-ready authorization, so please read this aloud and just repeat after me.

**Kathy Hart [38:27]:** Okay.

**Eric Jones [38:30]:** I authorize JP Morgan Chase...

**Kathy Hart [38:34]:** I authorize JP Morgan Chase...

**Eric Jones [38:38]:** ...to rely on my POA...

**Kathy Hart [38:42]:** ...to rely on my POA...

**Eric Jones [38:44]:** ...without requiring an in-person visit...

**Kathy Hart [38:50]:** ...without requiring an in-person visit...

**Eric Jones [38:54]:** ...to call me for remote verification...

**Kathy Hart [38:59]:** ...call me for remote verification...

**Eric Jones [39:02]:** ...and to speak with my agent...

**Kathy Hart [39:06]:** ...and to speak with my agent...

**Eric Jones [39:08]:** ...to complete any verification.

**Kathy Hart [39:12]:** ...to complete any verification.

**Eric Jones [39:15]:** In-person is medically impracticable.

**Kathy Hart [39:21]:** In-person is medically impracticable.

**Eric Jones [39:28]:** And then one last thing. "I need access restored to pay caregivers and purchase essentials."

**Kathy Hart [39:37]:** Okay, say that again.

**Eric Jones [39:39]:** I need access restored...

**Kathy Hart [39:43]:** I need access restored...

**Eric Jones [39:44]:** ...to pay caregivers...

**Kathy Hart [39:47]:** ...to pay caregivers...

**Eric Jones [39:49]:** ...and purchase essentials.

**Kathy Hart [39:52]:** ...and purchase essentials. Okay, good.

**Eric Jones [39:56]:** Yeah, that's the basic. And then a couple more. Which accounts are needed for care and living expenses, and is the joint care account restricted?

**Kathy Hart [40:14]:** I don't know the answer to that question. The reason I don't know is because, still to this minute, I am completely confused as to how many accounts I have, how much money is in each one, and which ones they've frozen. So my overall answer is yes, I want all of my accounts accessible to me. I'm not in a position to go, "Oh, I can do without that one." No, I want my money available.

**Eric Jones [41:12]:** And are you okay with moving your money to Austin Bank so you can have access to it immediately?

**Kathy Hart [41:22]:** I would, as long as you, Eric, as my power of attorney, feel that it's done in a proper fashion and one that is good for me. If Chase isn't going to make my money available, I have to think about my livelihood and my pets, and if moving the money means I had to do it, then I gotta do it.

**Eric Jones [41:51]:** Okay, great. And then just two more. Do you authorize us to request and share a short provider letter confirming in-person banking is medically impracticable and accommodations are needed?

**Kathy Hart [42:10]:** Does that basically say that I'm willing to give them a piece of paper that says I can't get to the bank?

**Eric Jones [42:17]:** Yeah, that's what it means.

**Kathy Hart [42:19]:** Yeah, of course. I'll tell anybody I can't get there.

**Eric Jones [42:32]:** Yeah, and then the final one. Anything else urgent—missed bills, prescriptions, or essentials—that should be documented for the court right now?

**Kathy Hart [42:40]:** I just... it's a very sweeping question, so I'll just answer it this way. I need access to any and all money that is in any Chase account. I need Chase to be fully cooperative and active, very, very active and aggressive. That's the word. I want them to be very aggressive in two ways. One is to protect me from Lesley Johnson, and two is to cooperate with my attorney, my power of attorney, and anyone else that can expedite clearing this matter up.

**Eric Jones [43:36]:** And do you feel that Chase has been effective in addressing the issue with Lesley and unauthorized use of your account?

**Kathy Hart [43:47]:** No. No, because no one has ever said to me since this started, "Here's what we're doing. Here's what we've done. Here's what we're going to do. Here's how we're going after her. Here's how we're protecting you, Mrs. Hart, from her." Nothing. No one has said one word to me in regard to Lesley and how they are protecting me from her going forward or prosecuting her. Nobody's telling me, "Are you going to prosecute her? How are you going to do it?" Nothing. Chase has done only one thing, and that is freeze my account and leave me paralyzed with no way to get by.

**Eric Jones [44:53]:** And so now it is September 15, and when was the first time you made Chase aware of problems?

**Kathy Hart [45:02]:** Oh, God, I have no clue. It was before I came to the hospital. And I came to the hospital on the 15th [of August]. They would know that. Remember when I met with Jeffrey?

**Eric Jones [45:21]:** Yeah, we were together on August 14. Was that the first time you had complained to them about Lesley and the accounts?

**Kathy Hart [45:28]:** I don't know.

**Eric Jones [45:29]:** Okay, that's it. Kathy, I'm gonna take care of this for you, but I just need you to call Steve after we get off. Even a voicemail.

**Kathy Hart [45:39]:** Okay, I got his number. I will do that. Oh, God, sorry to be such a whiner. I feel like my back and my legs have been attacked with a blowtorch.

**Eric Jones [45:59]:** Well, just know that I'm fighting for you, Kathy.

**Kathy Hart [46:05]:** If I didn't have you... Eric, I still lay here every day trying to understand how Lesley could do this to me. What did I do to deserve this?

**Eric Jones [46:21]:** Well, we'll visit her in jail one day.

**Kathy Hart [46:24]:** She literally tried to kill me. But like we've said, who's going after her? Cops, lawyers? Is somebody making her life miserable? Can't somebody freeze her accounts and see how she likes that? It's like nobody's doing anything to her.

**Eric Jones [46:50]:** Well, just leave that on the voicemail to Steve right now and tell him, "What progress have you made? It's been a month."

**Kathy Hart [47:02]:** If he needed more money... see, I gotta be able to pay him too.

**Eric Jones [47:06]:** Oh, no, I'll take care of it, Kathy. When we get this figured out, you can

send me a check if need be. Not right now, we're fine. I'm gonna take care of things. Don't worry about that.

**Kathy Hart [47:24]:** Okay, thanks. How are things coming with your sisters?

**Eric Jones [47:28]:** I'm filing a temporary restraining order to freeze their accounts and to take action today. Today's the day. Their dinner is going to be interrupted.

**Kathy Hart [47:44]:** Oh, that's so great. So that'll mean they can't go buy groceries either.

**Eric Jones [47:48]:** Yeah, a lot of things aren't going to be happening. It's silence, and then all of a sudden, what I'm about to do in about 20 minutes is drop this nuclear bomb. It's going to require them to do like 10 different things, and it's just going to overwhelm them. And when people are overwhelmed, they never make great decisions.

**Kathy Hart [48:46]:** No, they don't. That's true.

**Eric Jones [48:49]:** It's just like when you put a spotlight on cockroaches in the kitchen, they just run into each other. That's what's about to happen.

**Kathy Hart [48:58]:** Well, what is it that they're going to have to do?

**Eric Jones [49:02]:** Well, their accounts are going to be frozen. They're going to have 24 hours to send me my mom's real phone. My dad's going to have to send me a letter.

**Kathy Hart [49:12]:** Won't they just erase it? Just delete the stuff?

**Eric Jones [49:16]:** Doesn't matter. They're not going to be able to send me the phone. My dad's gonna have to send me \$24,000 immediately in 24 hours, and they're gonna have to be in court in Los Angeles County Superior Court within 24 hours.

**Kathy Hart [49:39]:** Oh, wow. Where's your dad gonna get 24 grand?

**Eric Jones [49:45]:** Oh, he's a millionaire. He's just cheap.

**Kathy Hart [49:53]:** Why doesn't he give the girls the money?

**Eric Jones [49:57]:** I sent him and Susie a letter. I said, "You know, it's weird, Dad, that you're taking so much interest in being fair and making sure your daughters get money when you're not going to leave them any money in your own trust. Why don't you spend more time focusing on what you do with your money than Mom's money?"

**Kathy Hart [50:12]:** I'll bet they don't even know that. I dropped that little bombshell on them too.

**Eric Jones [50:20]:** Yeah, I've been leaving little landmines all over the place.

**Kathy Hart [50:23]:** Good for you. Good for you.

**Eric Jones [50:27]:** Yeah, I'm getting my revenge. And I'm using the same tactics with you, in your case.

**Kathy Hart [50:37]:** You're going to have to open a separate business. I'm serious. Eric's agency will come after these people for you. We'll do the work nobody seems to want to do.

**Eric Jones [50:52]:** The lawyers don't do shit. They do the bare minimum.

**Kathy Hart [50:56]:** And what they do, they pass off to these little legal assistant people. They're not fucking lawyers.

**Eric Jones [51:16]:** I'll let you know what the reaction is from your sisters. I'll keep you updated. It's been a while since we've had any updates in this case.

**Kathy Hart [51:26]:** I know I've just been such a whiner, but I just feel like I'm up against a brick wall here.

**Eric Jones [51:32]:** You're gonna get a good update the next time I call you.

**Kathy Hart [51:38]:** Okay, wonderful. Well, as soon as we hang up, I'll call Ramey & Flock. Steve Spitzer.

**Eric Jones [51:48]:** Yeah, don't hold back.

**Kathy Hart [51:52]:** I will.

**Eric Jones [51:56]:** Call again. Leave 10 messages if you have to.

**Kathy Hart [51:59]:** "Steve, I want you to call me and tell me what the hell is going on." Is that the thrust of it?

**Eric Jones [52:02]:** Just say as much as you want, and if they cut you off, leave another message. You're the client. Be very clear about the objective of your voicemail. Don't give them any chance of being able to say, "Oh, she's obviously out of it." You're calm, collected. You don't have dementia. But you're concerned that they're not doing their job. What's the progress over a month? You can say, "My understanding from my lead advocate, my power of attorney, Eric Jones, is that there's no progress so far. What's going on?" That's going to get him going.

**Kathy Hart [52:58]:** Okay. Yeah, excellent. You can get them disbarred if you can prove that a lawyer has been pretending to do work for you, but they never did any of it. They lose their

license over it. Amy brought my iPad so maybe I can Google it. I'm glad you guys got along.

**Eric Jones [53:39]:** Oh yeah. She's different, but I like her.

**Kathy Hart [53:41]:** She's really nice and everything, and she certainly seems conscientious. One thing I didn't find out until today was she thought that Pebbles is an indoor cat, and she's never let her out of the house. No, she's an in-and-out cat.

**Eric Jones [54:08]:** I told her that, but I'll tell her again.

**Kathy Hart [54:12]:** Tell her again. She said, "Oh no, Eric said she's an indoor cat." And she hides. I said, "Well, that's because she doesn't know you." And she said, "Well, she hid from Eric too." I said, "Well, she didn't know Eric either."

**Eric Jones [54:30]:** Yeah, I told her that I knew she wanted to get out. I showed her how to do it. So I'll talk to her again.

**Kathy Hart [54:41]:** Well tell her again. I reminded her. I said, "Look, when you go over, open the door and leave it open. Do the things you want to do. You've got to give her access to the outside without you being there. If you're there, she's going to stay hidden."

**Eric Jones [55:20]:** Don't worry, I got Amy in line. She's a good one. I know you don't like dealing with women.

**Kathy Hart [55:29]:** I like dealing with competent women. Most of my bosses have been women. Never had a problem ever. It's when you start swinging around that arrogance crap or you start trying to fuck me over, I'm going to come after you.

**Eric Jones [55:50]:** You don't have to worry about that with Amy.

**Kathy Hart [55:54]:** Oh gosh no, heavens no. She's good. She's a keeper.

**Eric Jones [56:00]:** Okay, Kathy, I'm thinking about you, and I'm gonna connect with you later in the week.

**Kathy Hart [56:04]:** Okay, thanks a million. All right. Call Steve.

**Eric Jones [56:08]:** Okay. Bye.