

## **EXHIBIT J**

# **Summarized Timeline of Health Decline, Psychological Manipulation, and Elder Financial Fraud (2001-2023)**

## **Introduction**

### **Purpose and Legal Relevance**

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## **1. Comprehensive Timeline Summary of June Bloch's Health Decline (2001 - 2023)**

This section provides a chronological account of June Bloch's long-term physical and cognitive deterioration, demonstrating how her progressive decline made her increasingly vulnerable to undue influence and financial exploitation. The evidence supports that by 2021, June lacked the legal capacity to execute financial transactions or estate planning documents.

- **2001 - Early Signs of Physical Decline**
  - June was already battling multiple autoimmune disorders, including rheumatoid arthritis and psoriasis, requiring heavy steroid use.
  - Long-term steroid use contributed to bone loss, muscle atrophy, and systemic inflammation.
  - Chronic alcohol consumption further exacerbated inflammation, gut health issues, and cognitive impairment, laying the foundation for frontotemporal dementia (FTD), alcohol-related dementia (ARD), and Wernicke-Korsakoff Syndrome (WKS).

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- **2014 - Cognitive and Emotional Stability Still Present**
  - Jaden and June maintained consistent and emotionally stable communication.
  - No documented signs of significant paranoia, erratic behavior, or executive dysfunction.
- **2015 - Early Signs of Psychological and Behavioral Change**
  - December 2015: June displayed her first known instance of paranoia and emotional insecurity, asking Jaden via text:
    - "Am I being intrusive?"
    - "Are you breaking up with me?"
  - These comments were uncharacteristic of June and hint at emerging emotional dysregulation, insecurity, and the early onset of cognitive decline.
- **2016 - The First Major Cognitive and Behavioral Shifts**
  - Thanksgiving Incident (November 22-24, 2016):
    - June forgot pre-arranged Thanksgiving dinner plans, causing confusion and emotional distress for Jaden.
    - June displayed hostility, aggression, and an inability to self-reflect, behaviors commonly associated with FTD and alcohol-related cognitive impairment.
  - December 2016:
    - June and Jaden reconciled after Thanksgiving, having one of their last normal, heartfelt interactions before June's decline worsened.
- **2017 - Continued Deterioration and Emotional Fluctuations**
  - February-March 2017 (Lindsey's Wedding):
    - June insisted Jaden be involved in wedding activities, reinforcing their close bond.
    - Lindsey excluded Jaden from the family portion of the wedding, despite June advocating for her inclusion.
    - June was visibly intoxicated at the wedding, revealing an ongoing issue with alcohol dependency.
- **2018 - Escalation of Cognitive Decline and Lindsey's Isolation Tactics Begin**
  - June's text messages from this period reveal increased paranoia, erratic accusations, and memory lapses.
  - Lindsey began using June's declining state as an opportunity to isolate her from Jaden and other outside influences.
- **2019 - Lindsey's Control Over June Increases**
  - June was no longer able to make sound financial or legal decisions without external influence.

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- Lindsey became the sole financial decision-maker, cutting off external oversight.
- **2020 - The COVID-19 Lockdowns Provide the Perfect Opportunity for Isolation**
  - Lindsey used the pandemic to fully isolate June, cutting off all outside communication and preventing Jaden from seeing her in person.
  - With no external oversight, Lindsey had complete control over June's daily life, finances, and medical decisions.
- **2021 - Full Cognitive Incapacity and the Execution of Fraudulent Legal Transactions**
  - By this time, June was exhibiting clear signs of severe cognitive dysfunction, including paranoia, executive dysfunction, and memory impairment.
  - Lindsey took advantage of this incapacity to orchestrate fraudulent legal transactions, including:
    - June 9, 2021: Lindsey executed a fraudulent Special Warranty Deed, transferring June's property into her own name.
    - September 15, 2021: Lindsey arranged for a fraudulent will to be drafted, completely excluding Jaden.
    - December 27, 2021: Lindsey and Jonathan use the home acquired through the June 9, 2021, Special Warranty Deed to secure a \$498,000 Home Equity Loan (EXHIBIT K).
  - At this stage, June lacked the cognitive ability to understand or legally consent to any of these transactions.
  - Lindsey and Jonathan, as June's primary caregivers, should have placed her on palliative care sometime in 2021.
- **2022 - Pre-Terminal Stage and Complete Dependency on Lindsey**
  - June was in a state of total dependency, unable to make financial, medical, or personal decisions.
  - Lindsey continued to conceal June's condition from Jaden and other potential external observers.
  - Lindsey and Jonathan, as June's primary caregivers, should have had her on palliative care throughout 2022 and transitioned her to hospice care toward the end of the year, or at the very least, following her first occurrence of *Clostridium difficile*.
- **2023 - Death and Concealment of Estate Fraud**
  - March 17, 2023: June passed away while fully under Lindsey's control.
  - Lindsey waited until the next day to inform Jaden of June's death.
  - Lindsey immediately initiated probate proceedings and continued obstructing Jaden's access to estate information.

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**Summary:** *This timeline demonstrates that June's physical and cognitive deterioration was a long-term, well-documented process. By the time Lindsey executed the fraudulent legal transactions in 2021, June was completely incapacitated and incapable of making independent decisions.*

## 2. Timeline of Jaden Riley's Relationship with June and Lindsey (2001 - 2023)

This section documents the evolving relationship between Jaden, June, and Lindsey over the years. It highlights how Jaden and June maintained a strong familial bond until Lindsey's systematic isolation tactics began to erode that connection, ultimately cutting Jaden out of June's life and estate affairs entirely.

- **A. Early Family Dynamics and Close Bond with June**
  - From childhood through adulthood, Jaden and June maintained a deep and supportive relationship.
  - June played an active role in Jaden's upbringing, providing emotional support and stability.
  - Jaden frequently visited June, shared major life events with her, and maintained consistent communication.
  - Lindsey and Jaden, while both family members, had very different relationships with June, as Lindsey was always physically closer to her mother, while Jaden and June maintained an emotional closeness.
- **B. The Gradual Erosion of Trust and Communication (2015-2018)**
  - 2015: Jaden first notices subtle shifts in June's behavior, including insecurity and paranoia, such as her text message expressing fear of abandonment.
  - 2016: The Thanksgiving incident marks one of the first major signs that June's cognitive state was changing, with paranoia, erratic mood swings, and emotional instability becoming more noticeable.
  - 2017: Lindsey's wedding further distances Jaden from June, as Lindsey excludes Jaden despite June advocating for her involvement.
  - 2018: June's cognitive decline accelerates, and Lindsey begins actively controlling June's access to outside relationships, including her connection with Jaden.
- **C. Complete Alienation and Exclusion (2019-2023)**
  - 2019: Lindsey increases her control over June's communications, ensuring that Jaden has fewer direct interactions with June.
  - 2020-2021: The COVID-19 pandemic gives Lindsey the opportunity to fully isolate June, making it impossible for Jaden to visit or intervene.

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- 2021: Jaden is completely unaware that Lindsey has orchestrated fraudulent financial transactions and estate planning documents, cutting her out of the will.
- 2022: Lindsey withholds critical information about June's deteriorating health, preventing Jaden from providing support or intervening in June's medical care.
- 2023: Jaden is only informed of June's death the day after it happens, further demonstrating Lindsey's continued efforts to exclude her from all aspects of June's life and estate.

**Summary:** *This section establishes that Lindsey's actions were deliberate and systematic, ensuring that Jaden was completely removed from June's life and estate planning, which ultimately allowed Lindsey to execute financial fraud without opposition.*

### 3. Timeline of Lindsey Bloch's Psychological Manipulation and Financial Crimes (2001 - 2023)

This section details the timeline of Lindsey's deliberate financial manipulation, undue influence, and estate fraud, showing how she systematically gained control over June's finances and ultimately exploited her incapacitated state for personal gain.

- **A. Early Financial Control and Estate Manipulation**
  - From a young age, Lindsey positioned herself as the primary person responsible for June's affairs, gaining her trust and ensuring she had access to financial information.
  - Lindsey lived within walking distance of June for most of her life, which allowed her to monitor, control, and eventually restrict June's interactions with others.
  - June, trusting Lindsey, granted her increasing authority over financial and estate matters, not realizing that this control would later be exploited.
- **B. Undue Influence Over June's Legal and Financial Affairs (2016 - 2021)**
  - 2016-2018: Lindsey begins to actively isolate June from external family relationships, including her close bond with Jaden.
  - 2019: Lindsey gains full control over June's finances, ensuring that June had no independent management over her own assets.
  - 2020-2021: Under the pretense of helping June manage her estate, Lindsey executes multiple legal and financial actions without June's informed consent.
  - Lindsey never disclosed financial transactions to Jaden and systematically prevented external parties from reviewing June's accounts.
- **C. Execution of Estate Fraud and Financial Exploitation (2021 - 2023)**
  - June 9, 2021 – Lindsey executes a fraudulent Special Warranty Deed, transferring June's home to herself without legitimate legal capacity.

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- September 15, 2021 – Lindsey arranges for a new will, completely removing Jaden from the estate and naming herself as sole beneficiary.
- 2022-2023 – Lindsey continues concealing estate affairs, ensuring that Jaden is not informed of June's deteriorating condition or the fraudulent transactions.
- March 17, 2023 – June dies while completely under Lindsey's control.
- March 18, 2023 – Lindsey delays informing Jaden of June's death, further preventing her from intervening in estate matters.
- April 2023 – Lindsey initiates probate proceedings, using the fraudulent 2021 will to finalize her complete takeover of June's estate.

**Summary:** *This timeline supports that Lindsey's financial control over June was not incidental or unintentional—it was a calculated and deliberate process of psychological manipulation, estate fraud, and financial exploitation.*

#### 4. Key Events Supporting Claims of Elder Abuse, Fraud, and Undue Influence

This section outlines the specific events that demonstrate Lindsey Bloch's deliberate efforts to isolate, manipulate, and financially exploit June Bloch. These key events support claims of elder abuse, undue influence, estate fraud, and executor misconduct.

- **A. Isolation and Information Control**

- Lindsey ensured that June had no meaningful outside contact, making herself the sole gatekeeper of information, medical decisions, and financial affairs.
- Lindsey controlled June's communications with Jaden, ensuring that June became more emotionally dependent on Lindsey while distancing herself from Jaden.
- June's hospitalization in early 2023 was never disclosed to Jaden, depriving her of the ability to intervene or provide support.
- March 17, 2023 – June's Death: Lindsey waited until the following day to inform Jaden, ensuring that she had no role in funeral arrangements or estate matters.

- **B. Financial Exploitation and Unauthorized Transactions**

- June 9, 2021 – Special Warranty Deed: Lindsey fraudulently transferred June's home at 5704 Trailridge Drive to herself, despite June's clear history of independent property ownership.
- September 15, 2021 – Forged Will Execution: Lindsey arranged for an invalid will, cutting Jaden out of the estate.
- April 2022 – Release of Mortgage Lien: Lindsey finalized the release of the mortgage lien on June's home, eliminating outstanding debt obligations, allowing her to take full control of the asset.

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- Lindsey used June's property as collateral for a \$498,000 loan, benefiting financially while depriving the estate of its full value.
- **C. Probate and Estate Misconduct**
  - Lindsey filed the fraudulent 2021 Will in probate court and failed to disclose key estate assets, misappropriated funds, and concealed financial transactions.
  - Lindsey deliberately prevented Jaden from accessing probate filings, ensuring that she had no opportunity to contest the estate fraud in a timely manner.
  - Lindsey used estate funds for personal benefit, including the purchase of a luxury Volvo SUV in 2024, raising serious concerns about misappropriation of assets.

**Summary:** *This section demonstrates a deliberate, long-term pattern of financial fraud and elder exploitation and establishes the legal grounds for invalidating the will and property transfers.*

## 5. Conclusion and Legal Implications

This timeline provides clear and compelling evidence that Lindsey Bloch engaged in deliberate financial exploitation, elder abuse, and estate fraud in the years leading up to June Bloch's death.

- June was systematically isolated from Jaden and other outside influences, ensuring that Lindsey's control over her finances and legal decisions went unchallenged.
- Lindsey orchestrated fraudulent estate planning documents, including the September 15, 2021, Will and the June 9, 2021, Special Warranty Deed, at a time when June was cognitively incapacitated.
- Lindsey concealed financial records, misappropriated estate assets, and withheld critical probate information from Jaden, ensuring that she could finalize the fraudulent estate takeover without opposition.
- The actions Lindsey took—isolating June, manipulating financial records, forging legal documents, and obstructing probate proceedings—align with established legal definitions of undue influence, elder financial abuse, and executor misconduct.

Based on the evidence presented in this timeline, Jaden asks the court to take immediate action to:

1. Invalidate the fraudulent will and property transfers.
2. Conduct a full forensic audit of June's estate and financial records.
3. Investigate Lindsey's misuse of estate funds and pursue legal accountability.
4. Remove Lindsey as executor and appoint a neutral fiduciary to administer the estate fairly.

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5. Hold all involved parties accountable, including Lindsey, Jonathan, and the legal and financial professionals who facilitated these fraudulent transactions.

**Summary:** *This timeline serves as a foundational piece of evidence supporting Jaden Riley's legal challenge against the fraudulent estate proceedings and demonstrates the necessity of court intervention to correct the financial and legal injustices committed against June Bloch.*

### CERTIFICATE OF ACCURACY

I certify that the attached document, marked Exhibit J, is a true and correct copy of the original record, correspondence, or evidence in my possession. This exhibit is submitted to the Travis County Clerk for filing on February 12, 2025, in support of my claims in this matter; and that service upon all required parties shall be completed pursuant to the Texas Rules of Civil Procedure upon court acceptance and processing. I will comply with all instructions from the court regarding service and notification of interested parties.



**JADEN ALEXANDRA RILEY**  
Petitioner, Pro Se