

EXHIBIT I

Record of Elder Abuse, Exploitation, and Psychological Manipulation

Introduction

This exhibit details the specific tactics Lindsey Bloch used to conceal elder financial abuse, undue influence, and estate mismanagement in the case of June Bloch. By understanding these methods, it becomes clear how Lindsey systematically isolated June, manipulated legal and financial processes, and obstructed outside intervention to gain complete control over June's estate.

The evidence presented in EXHIBIT I aligns with well-documented patterns of elder financial exploitation, including concealment of assets, executor misconduct, and manipulation of estate proceedings. Lindsey's actions were not incidental but intentional—designed to obstruct oversight, eliminate challenges, and prevent Jaden Riley from intervening in June's financial and legal affairs.

This exhibit serves as a comprehensive record of the deceitful practices Lindsey employed to orchestrate the fraudulent transfer of June's property, forge an invalid will, and manipulate the probate process to her benefit.

1. Isolation and Control Over June's Finances and Estate

Lindsey systematically isolated June from external oversight, controlled her finances, and ensured that no one—especially Jaden Riley—could challenge her increasing influence over June's estate. This section outlines the specific methods Lindsey used to tighten her control, block family intervention, and conceal financial exploitation.

- A. Preventing Oversight and External Intervention
 - Unrestricted Access to June's Financial Assets
 - Lindsey had full access to June's bank accounts, credit cards, and personal financial records, allowing her to misappropriate funds without oversight.
 - June had no independent financial management, relying solely on Lindsey, which made it easy for Lindsey to use June's assets for personal gain without detection.
 - Blocking Beneficiaries from Estate Planning and Financial Decision-Making
 - Despite June telling Jaden that they were both beneficiaries, Lindsey ensured Jaden was completely cut out of all estate-related decisions.
 - Lindsey drafted a fraudulent will on September 15, 2021, replacing the valid estate plan and making herself the sole inheritor.

EXHIBIT I (Continued)

Page 2 of 6

- Jaden was deliberately kept unaware of financial transactions, bank activity, and estate proceedings to prevent her from challenging Lindsey's increasing control.
- Concealing Estate Documents and Financial Transactions
 - Lindsey never disclosed the existence of key financial documents, including property deeds, bank statements, and credit card activity, to Jaden or any other potential challenger.
 - When Jaden confronted Lindsey about probate, Lindsey ignored the inquiries and refused to provide any documents, delaying Jaden's ability to investigate and contest the fraudulent transactions.
 - By submitting an Affidavit in Lieu of Inventory in probate court, Lindsey strategically avoided listing estate assets, raising concerns that she concealed or misappropriated property.
- B. Blocking Family Members from Visiting or Speaking with June
 - Physical Isolation to Maintain Control
 - Lindsey ensured June had no meaningful outside contact, making herself the sole gatekeeper of information, medical decisions, and estate matters.
 - June and Lindsey lived next door to each other, allowing Lindsey to monitor and control June's daily activities without interference.
 - Jaden was systematically pushed out, ensuring that she did not witness June's ongoing mental deterioration firsthand.
 - Controlling Information and Communications
 - Lindsey never informed Jaden of June's declining condition, even when June was hospitalized in the ICU in early 2023.
 - When Jaden unexpectedly ran into Lindsey at a grocery store in January 2023, Lindsey dismissed June's critical condition as "just a cold," deliberately misleading Jaden and preventing any external intervention.
 - Lindsey refused to allow June to have private phone calls or visits with Jaden, further deepening June's isolation and vulnerability to undue influence.

2. Manipulating Legal and Financial Processes to Commit Fraud

Lindsey strategically manipulated legal and financial processes to ensure that June's assets were fraudulently transferred into her control while preventing any challenges from Jaden or other potential heirs. This section outlines the specific estate fraud, undue influence, and financial misconduct Lindsey engaged in.

- A. Fraudulent Estate Planning and Undue Influence
 - The 2021 Will Was Fraudulent and Invalid
 - Lindsey arranged for a new will to be drafted on September 15, 2021, which completely excluded Jaden despite June's long history of stating that both Lindsey and Jaden were her beneficiaries.

EXHIBIT I (Continued)

Page 3 of 6

- The will was executed at a time when June was suffering from advanced dementia, paranoia, and cognitive dysfunction, making her legally incapable of making sound estate planning decisions.
- June's signature on the 2021 Will is alleged to be a forgery, raising serious legal concerns about its validity.
- The law firm involved in drafting and executing the 2021 Will financially benefited from the probate process, which raises additional concerns about ethical misconduct.
- Forgery and Unauthorized Transactions
 - Lindsey executed a fraudulent Special Warranty Deed on June 9, 2021, transferring June's property at 5704 Trailridge Dr. into her own name.
 - June's cognitive impairment at this time rendered her unable to comprehend or consent to such a transaction, making this transfer legally void.
 - The signature on the Special Warranty Deed is also alleged to be a forgery, further reinforcing the fraudulent nature of this transaction.
- B. Executor Misconduct and Asset Misappropriation
 - Using the Estate for Personal Financial Gain
 - Lindsey used June's property as collateral for a \$498,000 home equity loan within six months of the fraudulent Special Warranty Deed transfer.
 - Lindsey and her husband financially benefited from this transaction at the expense of the estate, demonstrating a clear case of self-dealing.
 - In 2024, Lindsey purchased a new Volvo SUV, raising concerns about whether estate funds were misused for personal luxury purchases.
 - Failing to Act as a Fiduciary
 - As the self-appointed executor of the estate, Lindsey was legally obligated to act in the best interests of the estate and its heirs. Instead, she:
 - Never provided full transparency regarding June's assets.
 - Likely liquidated or misappropriated estate valuables.
 - Filed an Affidavit in Lieu of Inventory, preventing any outside scrutiny of missing assets.
 - Refused to provide Jaden access to estate documents, property records, or June's financial history.

3. Tactics Used to Justify and Conceal Financial Abuse

Lindsey did not just commit elder financial abuse—she actively concealed it by fabricating justifications, controlling the flow of information, and using deceptive tactics to prevent challenges. This section outlines how Lindsey covered up her actions, justified financial exploitation, and obstructed external oversight.

- A. Creating False Narratives to Justify Control

EXHIBIT I (Continued)

Page 4 of 6

- Lindsey manipulated June's perception of reality to deepen June's dependence on her.
- Lindsey likely fed June misinformation to erode trust in Jaden, convincing June that Jaden was unreliable or had abandoned her.
- By fostering distrust between June and Jaden, Lindsey ensured that June remained emotionally and financially dependent on her alone.
- Lindsey positioned herself as June's sole protector and caregiver, when in reality, she was ensuring June remained isolated from alternative sources of support.
- B. Misrepresenting Her Role as Caregiver
 - Lindsey portrayed herself as a devoted and self-sacrificing daughter, ensuring that no one questioned her financial control over June.
 - In reality, Lindsey neglected June's medical needs, allowed her health to deteriorate, and failed to provide necessary palliative or hospice care.
 - Lindsey justified taking full control over June's finances by claiming she was "managing things" for her mother while actively using June's assets for personal gain.
 - By convincing others that she was the responsible and loving caregiver, Lindsey made it more difficult for external parties to scrutinize her actions.
- C. Withholding Key Probate and Funeral Information
 - Lindsey never informed Jaden about June's declining health, even when June was hospitalized in the ICU.
 - Jaden had no idea that her aunt was dying because Lindsey deliberately withheld this information.
 - When Lindsey ran into Jaden at a grocery store in January 2023, she dismissed June's condition as "just a cold," when in reality, June was in a pre-terminal state.
 - Lindsey delayed informing Jaden about June's death until the day after it happened.
 - This was a calculated decision, ensuring that Jaden had no opportunity to say goodbye, attend to June's medical needs, or challenge Lindsey's estate control.
 - Lindsey concealed the existence of probate proceedings, preventing Jaden from exercising her legal rights.
 - Jaden only discovered that probate had been filed through her own independent research.
 - When confronted, Lindsey refused to provide probate details, ignored inquiries, and used silence and manipulation to prevent Jaden from contesting the fraudulent estate filings.

4. Summary of Financial Exploitation and Misconduct

Lindsey Bloch's actions align with established patterns of elder financial abuse, undue influence, and estate fraud. Her calculated control over June's finances, estate, and legal decisions

EXHIBIT I (Continued)

Page 5 of 6

resulted in the systematic misappropriation of assets and the execution of fraudulent legal documents.

- Lindsey isolated June from family members, ensuring no one could witness or stop the financial abuse.
- Lindsey used undue influence to forge and execute an invalid will and real estate transfers while June was mentally incapacitated.
- Lindsey misused her authority as executor to hide assets, liquidate valuables, and personally profit from the estate.
- Lindsey deliberately withheld financial information from Jaden, preventing transparency and oversight.
- Lindsey engaged in fraudulent transactions, including a home equity loan and unauthorized property transfer to herself and her husband.
- Legal Action Recommended

EXHIBIT I (Continued)
Page 6 of 6

CERTIFICATE OF ACCURACY

I certify that the attached document, marked Exhibit I, 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.

A handwritten signature in black ink, appearing to read 'JADEN ALEXANDRA RILEY', with a stylized, cursive-like script.

JADEN ALEXANDRA RILEY
Petitioner, Pro Se