

December 19, 2021

Honorable Timothy Canning  
Humboldt County Superior Court  
825 Fifth Street  
Eureka, CA 95501

Re: Conservatorship of Barbara Keller (PR2100162)

Dear Judge Canning:

I received your RULING AND ORDER APPOINTING CONSERVATOR, filed Dec. 13, 2021, where you gave the conservatorship of my mother, Barbara L. Keller, entirely to Royce Mendonca. The ruling did not include an acknowledgement of some pertinent facts, contained in the existing court record, that I would respectfully ask you to consider further:

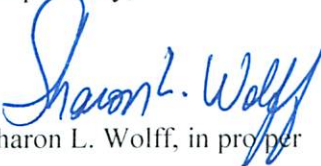
- Barbara and spouse Ronald Keller (PR2100161) documented their wishes years ago, when they both had the legal capacity to make an informed choice – this documentation was attached to the original petition filed June 21, 2021.
  - April 17, 2003 Last Will & Testament – Barbara L. Keller (attachment 5c(2)c)
  - April 17, 2003 Last Will & Testament – Ronald W. Keller (attachment 5c(2)b)
  - May 15, 2017 The Keller 2017 Trust – Ronald & Barbara Keller (attachment 5c(2)a)
- June 25, 2021 Dr. Andrew Levine, Ph.D. of North Coast Neuropsychology conducted a cognitive assessment of Barbara and Ronald Keller in their Fortuna home at the request of APS Social Worker Alma Barba (report completed July 8, 2021).
  - “Diagnosis – Major Neurocognitive Disorder – most likely cause is Alzheimer’s disease, considering progressive nature since at least 2014, severe encoding deficit and lack of insight”
  - Alma testified (9/30/21) to this court that she communicated all of this information to Ronald Keller’s family – sister Diane Mendonca and nephew Royce Mendonca – they were informed of Barbara and Ronald’s cognitive state from the beginning of the APS involvement
- July 22, 2021 GC-335 Capacity Declaration and GC-335A Major Neurocognitive Disorder Attachment to Capacity Declaration were signed by Barbara Keller’s medical provider – declaring the proposed conservatee does not have the capacity to give informed consent.
- July 23, 2021 Court appointed investigator Samantha Wahl recommended counsel should be appointed for the proposed conservatee(s) – **to this date, no one has been appointed to safeguard the civil rights of the either proposed conservatee.**

- August 17, 2021 Amended Petition for Appointment of Temporary Conservator which included the 7/22/21 signed GC-335 and GC-335A Judicial Council forms are filed in this matter (GC-111 Attachment 3a).
  - Ronald Keller and Barbara Keller were served, via certified mail, at Diane Mendonca's residence (7111 Wonner Way Citrus Heights, CA 95621) by North Coast Legal Services
  - Diane Mendonca and Royce Mendonca are not related to Barbara Keller and were not a declared interested party in this matter at the time
- August 25, 2021 Royce Mendonca secures Barbara Keller's signature on a NOMINATION BY CONSERVATOR OF HER PERSON AND ESTATE for BARBARA KELLER at Diane Mendonca's residence (7111 Wonner Way Citrus Heights, CA 95621)
  - The legal nomination document was drawn by Attorney Chris Johnson Hamer and submitted to this court under Penalty of Perjury, filed August 26, 2021

**The ruling and order issued only acknowledges the existence of that NOMINATION document, signed a month after Barbara Keller's medical providers declared her incapable of giving informed consent, and does not take notice of any of the cited documentation provided by myself.** The documentation provided clearly establishes the long standing intents of wishes of Barbara and Ronald Keller prior to the Alzheimer's and dementia robbing them both of their mental faculties.

I respectfully request you to reconsider the ruling and order, filed Dec. 13, 2021, based on a re-examination of the documentation provided in this matter and cited above. **These are all straight forward dates and facts that have been well-documented and provided to this court – there is no dispute over the documentation – it has simply been ignored completely.**

Respectfully,

  
Sharon L. Wolff, in proper

Cc: Chris Johnson Hamer by email to: [chris@shkklaw.com](mailto:chris@shkklaw.com)

**RECEIVED**

**DEC 20 2021 AR**

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF HUMBOLDT**