

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Chris Johnson Hamer (SBN 105752) STOKES, HAMER, KIRK & EADS, LLP 381 Bayside Road, Ste. A Arcata, California 95521 TELEPHONE NO.: 707-822-1771 FAX NO. (Optional): 707-822-1901 E-MAIL ADDRESS (Optional): chris@shkklaw.com ATTORNEY FOR (Name): ROYCE MENDONCA, Petitioner	FOR COURT USE ONLY <p style="color: red; font-weight: bold;">You're going to love this one ! Read down</p>
SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT STREET ADDRESS: 825 Fifth Street MAILING ADDRESS: CITY AND ZIP CODE: Eureka, CA 95501 BRANCH NAME:	CASE NUMBER: PR2100162
TEMPORARY CONSERVATORSHIP OF (Name): BARBARA LYNN KELLER <div style="text-align: right;">CONSERVATEE</div>	HEARING DATE: 09/02/2021 DEPT: 2:15 p.m. TIME: 6
PETITION FOR APPOINTMENT OF TEMPORARY CONSERVATOR <input checked="" type="checkbox"/> Person <input checked="" type="checkbox"/> Estate <input checked="" type="checkbox"/> Person and Estate	

1. Petitioner (name each): requests that

- a. (Name): **ROYCE MENDONCA** Legal name is Roland Royce Mendonca, Jr.
 (Address and telephone number): 8320 Tail Race Drive, Roseville, CA 95747 916-532-5913
 be appointed temporary conservator of the PERSON of the proposed conservatee and Letters issue upon qualification.
- b. (Name): ROYCE MENDONCA
 (Address and telephone number): 8320 Tail Race Drive, Roseville, CA 95747 916-532-5913
 be appointed temporary conservator of the ESTATE of the proposed conservatee and Letters issue upon qualification.
- c. (1) bond not be required because petition is for a temporary conservatorship of the person only.
 (2) bond not be required for the reasons stated in attachment 1c.
 (3) \$ 193,170.54 bond be fixed. It will be furnished by an admitted surety insurer or as otherwise provided by law.
 (Specify reasons in attachment 1c if the amount is different from maximum required by Probate Code section 2320 and Cal. Rules of Court, rule 7.207(c).)
 (4) \$ in deposits in a blocked account be allowed. Receipts will be filed.
 (Specify institution and location):
- d. a request for an exception to notice of the hearing on this petition for good cause is filed with this petition.
 e. the powers specified in Attachment 1e be granted in addition to the powers provided by law.
 f. other orders be granted (specify in attachment 1f).

2. The proposed conservatee is (name): **BARBARA LYNN KELLER**
 Current address: 7111 Wonner Way Citrus Heights, CA 95621
 Current telephone no.: 916-730-9642

3. The proposed conservatee requires a temporary conservator to provide for temporary care, maintenance, and support
 protect property from loss or injury because (facts are specified in attachment 3 as follows):

It is necessary to place the proposed conservatee in an appropriate facility in order to provide her with care. It is not possible to pay for the proposed conservatee's food, medicine, medical care, housing, etc., without Letters of Conservatorship.

Royce placed Barbara into an assisted care facility on 8/26/21 - the court had NOT granted him that authority - he is asking for authority here so he and his attorney are well aware that he did NOT have that authority on 8/26/21. GC-111

TEMPORARY CONSERVATORSHIP OF (Name): BARBARA LYNN KELLER	CASE NUMBER: PR2100162
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4. Temporary conservatorship is required
- a. pending the hearing on the petition for appointment of a general conservator.
 - b. pending the appeal under Probate Code section 1301.
 - c. during the suspension of powers of the conservator.
5. Character and estimated value of the property of the estate (complete if a temporary conservatorship of the estate or the person and estate is requested):
- | | |
|---|----------------------|
| a. Personal property: | \$ 141,500.00 |
| b. Annual gross income from all sources, including real and personal property, wages, pensions, and public benefits: | \$ 14,405.04 |
| c. Additional amount for cost of recovery on the bond, calculated as required under Cal. Rules of Court, rule 7.207(c): | \$ <u>37,265.41</u> |
| d. Total: | \$ <u>193,170.45</u> |

6. Petitioner requests authority to change the proposed conservatee's residence during the temporary conservatorship
- a. Petitioner proposes to change the residence of the proposed conservatee to (address):
Sunrise of Carmichael, 5451 Fair Oaks Blvd., Carmichael, CA 95608, or another facility providing comparable care.

The proposed conservatee will suffer irreparable harm if his or her residence is not changed as requested and no means less restrictive of the proposed conservatee's liberty will suffice to prevent the harm because (reasons are specified in attachment 6a as follows):

She suffers from Alzheimer's Disease and requires placement in a locked perimeter memory unit. The facility in question is close to the proposed conservator's personal residence and the residence of the proposed conservatee's sister-in-law.

Royce and Attorney Hamer signed this form on 8/24/21 declaring that Barbara suffers from Alzheimer's - yet they had Barbara sign a legal nomination form drawn up by Royce's attorney on 8/25/21.

- b. The proposed conservatee must be removed from the State of California to permit the performance of the following nonpsychiatric medical treatment essential to the proposed conservatee's physical survival. The proposed conservatee consents to this medical treatment. (Facts and place of treatment are specified in attachment 6b as follows):

7. Petitioner is a professional fiduciary
- a. Petitioner holds license no. (specify): _____ from the Professional Fiduciaries Bureau of the Department of Consumer Affairs issued or last renewed on (specify later date of initial issuance or renewal): _____
 - b. Petitioner was requested to file this petition by (name): _____
 - c. The circumstances leading to petitioner's engagement to file this petition are described in attachment 7c.
 - d. Petitioner had: (1) No relationship to the proposed conservatee, his or her family, or his or her friends before engagement to file this petition.
(2) A relationship to the proposed conservatee, his or her family, or his or her friends before engagement to file this petition. That relationship is described in attachment 7d. the Petition for Appointment of Probate Conservator (form GC-310) filed with this petition or an attachment to that petition (specify attachment to general petition): _____

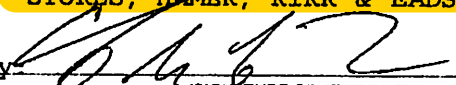
TEMPORARY CONSERVATORSHIP OF (Name): BARBARA LYNN KELLER	CASE NUMBER. PR2100162
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8. Petitioner's contact with persons named in *Petition for Appointment of Probate Conservator*
- a. Petitioner is the proposed conservatee. (If this item is selected, go to item 9.)
 - b. Petitioner is not the proposed conservatee. All persons other than the proposed conservatee named in the *Petition for Appointment of Probate Conservator* filed with this petition:
 - (1) Have been found and contacted. All will be given notice of the hearing on this petition.
 - (2) Have not been found or have not been contacted. Efforts to find the persons who have not been found and the reasons why any person cannot be contacted are described in one or more declarations under penalty of perjury attached to this petition as attachment 8b. (Attachment 8b is not a request for a good cause exception to notice. See Prob. Code, § 2250(e) and rule 7.1062 of the Cal. Rules of Court.)
 - c. Petitioner is not the proposed conservatee. Facts showing the preferences of the proposed conservatee concerning the appointment of any temporary conservator, and the appointment of the temporary conservator proposed in this petition, or why it was not feasible to ascertain those preferences, are specified in one or more declarations attached to this petition as attachment 8c.
9. Petitioner is informed and believes that the proposed conservatee
- a. will attend the hearing.
 - b. is able but unwilling to attend the hearing, does not wish to contest the establishment of a conservatorship, does not object to the proposed conservator, and does not prefer that another person act as conservator.
 - c. is unable to attend the hearing because of medical inability. An affidavit or certificate of a licensed medical practitioner or an accredited religious practitioner is affixed as attachment 9c.
 - d. is not the petitioner, is out of state, and will not attend the hearing.
10. Filed with this petition is a proposed *Order Appointing Court Investigator* (form GC-330).
11. All attachments to this form are incorporated by this reference as though placed here in this form. There are 2 pages attached to this form.

STOKES, HAMER, KIRK & EADS, LLP

Date: August 24, 2021

*(Signature of all petitioners also required (Prob. Code, § 1020).)

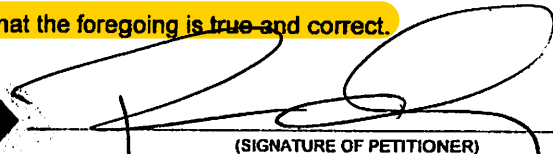
By:  _____
 (SIGNATURE OF ATTORNEY*)

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: August 24, 2021

ROYCE MENDONCA

 (TYPE OR PRINT NAME)

 _____
 (SIGNATURE OF PETITIONER)

 (TYPE OR PRINT NAME)

 (SIGNATURE OF PETITIONER)

Keep reading down - it just gets better

Attachment 3 to Petition for Appointment of Temporary Conservator

The proposed conservatee needs to be placed in a locked perimeter facility and provided care as soon as possible. She suffers from memory loss and Alzheimer's Disease, is unable to care for herself or to handle her own financial affairs. It is necessary for the proposed conservator to begin managing her financial affairs, as well as paying for the facility in which she is to be housed and cared for, as soon as possible. and yet they had Barbara sign a "legal nomination" document the day AFTER they signed this.

In addition, the proposed conservatee's community property estate, owned with her husband, Ronald Keller, is at risk of loss. The proposed conservatee's daughter, Sharon Wolff, is petitioning for conservatorship of both Ronald's estate and the proposed conservatee's estate. Petitioner is informed and believes and thereon alleges that, because of the bad relationship between Sharon Wolff and Ronald Keller, Sharon Wolff will take and use the entire community property estate for the benefit of Barbara Keller and not for the benefit and care of Barbara's husband, Ronald.

Royce and his attorney have quite literally documented Ron's delusional thinking and submitted it to the court as if it was true - under penalty of perjury of course. Every professional who has had contact with Barbara and Ron has recognized the severity of Ron's delusions which are in no way based in reality. Ron's probable Parkinson's related dementia has become very pronounced and anyone who has had a loved one with this disease can tell you how scary it is to see your family member going through this.

The cognitive assessment done by Dr. Andrew Levine after meeting with Ron and Barbara in their home on 6/25/21 stated: "he (Ron) stated that his in-laws, Sharon and Shawna, were sneaking into the home at night to watch them sleep, and then bragging about it. He stated that he had the locks replaced. He stated that he and Barbara had barricaded the door with furniture prior to the locks being installed. He is worried that the in-laws will commit him and Barbara to a care facility."

"Mr. Keller demonstrated cognitive impairment across almost all domains evaluated. He appeared to be bradykinetic, which may be due to medications or perhaps an underlying neurological condition. His cognitive profile is suggestive of fronto-striatal dysfunction. Together, these results suggests a Parkinson's related disorder, or perhaps cerebrovascular pathology. Neurological consultation is recommended for further diagnostic clarification and to inform treatment options."

Ron enjoyed spending his 80th birthday at Sharon and Steve's home (Aug. 2020) as they hosted a "Pandemic Party" just to make sure that this special milestone in his life got the celebration it deserved despite everything else that had been taken from all us from the pandemic. Ron had two full plates of Sharon's world-famous Swedish meatballs and she made sure to send them home with leftovers. Ron has enjoyed Sharon's cooking for years.

Royce and his attorney might know some of this stuff if they weren't complete and total STRANGERS!

Attachment 8(c) to Petition for Temporary Conservatorship

BARBARA LYNN KELLER

Barbara Lynn Keller has nominated Royce Mendonca to be the conservator of her person and estate.
Barbara does not want anyone other than Royce to be her conservator.

This one is very interesting.

This attachment was signed by Royce and Attorney Hamer on August 24, 2021

They had Barbara sign their "legal nomination" document on August 25, 2021

Is that lazy fraud or what! Seriously folks

Attorney Hamer obviously must have been supremely confident no one - certainly not the court - would scrutinize a single paper that she filed. Simply having the paper in the case file sufficed for the Humboldt County Superior Court. Whether that paper is legal or not is just not a concern in Humboldt when you're trying to take custody of vulnerable adults, invalidate their wills and all of their documented wishes and take their estate.