



# Virginia State Bar

*An agency of the Supreme Court of Virginia*

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## VSB Complaint

Send in this form if you have concerns about a lawyer's conduct. Your complaint might result in discipline to the lawyer. If you are seeking other remedies against the lawyer, you may need to seek legal advice from a lawyer in private practice. Also, the bar may require your further involvement in an investigation by asking you to be interviewed by a bar investigator and/or to participate at a hearing.

You cannot include attachments with this online form, but you can email them with your full name, mailing address, email address, and telephone number to [webintake@vsb.org](mailto:webintake@vsb.org).

**Do not send us links to online file sharing sites unless we ask you to do so.** You may submit up to 50 pages including the Complaint Form or letter of explanation including any attachments or exhibits.

Please DO NOT send original documents to the Virginia State Bar. Preserve all original documents until your complaint has been resolved. In addition, please redact personally identifying information such as Social Security numbers, date of birth, driver's license numbers, etc. All documents will be destroyed in keeping with the bar's records and destruction policies.

### Your Name:

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**Prefix**

**First Name**

## Lawyer's Address:

### Lawyer's Law Firm

CUCINELLI GEIGER, PC

### Lawyer's Address

4084 University Dr #202;

### Lawyer's City

FAIRFAX

### Lawyer's State

VA

### Lawyer's Zip

22030

## Please Answer the following questions:

1. Have you or a member of your family contacted us about this lawyer before? *(If not, leave the checkbox below blank.)*

Yes

### Outcome of Previous Complaint

2. Have you filed a complaint or legal action about this matter anywhere else? *(If not, please leave the checkbox below blank.)*

Yes

If yes, please state when you made the complaint and the outcome of that complaint.

### Outcome of Complaint Filed Elsewhere

3. Describe your relationship to the lawyer who is the subject of your complaint by choosing from the following:

## Relationship To Lawyer

(None)



If Other, please explain:

## Relationship To Lawyer Other

CARY CUCINELLI HAS DETRIMENTALLY BEEN MY MOM'S CONSERVATOR SINCE JULY 2020

4. What is the nature of your legal case? When was the lawyer employed or appointed to represent you? How much money, if any, was the lawyer paid to represent you?

## Nature Of Case

PROPER DENTAL AND MEDICAL CARE SINCE MAY 2022 UNWELLNESS REPORTED BY LYNN KAY-(MYSELF) FINANCIAL EXPLOITATION AND ELDER CRUELTY AND THREATS AGAINST OUR LIFE AND WELL-BEING SINCE 2020

"THIS HAS BEEN A PREDATORY CONSERVATORSHIP SEEKING PHYSICAL INCAPACITATION SINCE 2022 BY DOCUMENTED DEPRIVATION OF CARE ALMOST KILLING MY MOM 3 DOCUMENTED TIMES AND LEAVING MY MOM GRAVELY INJURED AS A RESULT

5. Is your concern only that you think the lawyer charged you too much? *(If yes, you should contact the VSB at (804) 775-9425 for information on fee dispute resolution, If no, please leave the checkbox below blank.)*

Yes

*If yes, you should contact the bar at (804) 775-9425 for information on fee dispute resolution.*

6. Have you read the brochure describing the Virginia State Bar's attorney disciplinary process? *(If no, leave the checkbox below blank.)*

Yes

**Lawyer's Actions complained of:**

CONTEMPT OF COURT ORDERED TERMS, MATERIALLY BREACHING THE GUARDIANSHIP CONTRACT OF 2020, FINANCIAL EXPLOITATION AND ELDER CRUELTY AND THREATS AGAINST OUR LIFE AND WELL-BEING SINCE 2020 CARY CUCINELLI CONSERVATORSHIP DETRIMENTALLY BEGINNING.

“THIS HAS BEEN A PREDATORY CONSERVATORSHIP SEEKING PHYSICAL INCAPACITATION SINCE 2022 BY DOCUMENTED DEPRIVATION OF CARE ALMOST KILLING MY MOM 3 DOCUMENTED TIMES AND LEAVING MY MOM GRAVELY INJURED EACH TIME AS A DIRECT RESULT AND WITH WRITTEN AND PHYSICAL THREATS THREATENING MOM’S AND MY LIFE-AS FIDUCIARY HAS COMMITTED AND SUPPORTED AND CONCEALED THESE CRIMES-(2022-2025)-ONGOING CRIMINAL CONCEALMENT

18.2-369-B-ELDER CRUELTY-(NEGLECT, ABUSE, ABANDONMENT, ISOLATION AND IMPRISONMENT, INSTEAD OF PROVIDING CARE AND TREATMENT)

18.2-18-AIDING AND ABETTING AND CONCEALMENT

18.2-47-ABDUCTION/KIDNAPPING AGAINST WILL AND AGAINST BEST INTERESTS-(WHILE DEFYING DOCTORS ORDERS TO PROVIDE CARE AND TREATMENT AND DENYING ALL BASIC DENTAL AND MEDICAL CARE) AND CONCEALING ELDER CRUELTY CRIMES OF DEPRIVATION OF CARE

18.2-460-OBSTRUCTING JUSTICE-(LYING TO AND MISLEADING ALL AUTHORITIES AND TO THE COURT)

63.2-1606-MANDATED REPORTERS FAILING TO EVER REPORT AND DIRECTLY AND DELIBERATELY CONCEALING ALL OF THE CRIMES FOR 3 YEARS SINCE JUNE 2022

THIS INVOLVES ALSO PHILIP KAPUSTA-(SON) AND NOW 7 LAWYERS-(5 FIDUCIARIES AND 2 REPRESENTING LAWYERS OF GEORGE W. DODGE-(GUARDIAN)-STEPHEN HALL-(KING CAMPBELL) AND PHILIP KAPUSTA-(SON)-JUSTIN BERGER-(HALE BALL)

ALSO INVOLVES 3 CARE MANAGEMENT COMPANIES-(PREMIER PLANNING CARE, DOC TALKER AND ELDER TREE) JEANNE BLUE AND DR. ALAN DAPPEN. ALL NAMED PERSONS HAVE KNOWINGLY AND WILLFULLY BEEN DIRECTLY INVOLVED COLLECTIVELY SINCE 2022 IN THESE CRIMES LISTED-(LIZ SHIFFLETT-PREMIER PLANNING CARE MANAGEMENT BEGAN THE NEGLIGENT ELDER CARE IN MAY 2022-UNWELLNESS REPORTED) AND IGNORED. SHE LIED IN THE 6/30/22 COURT FILED SECRETIVE REPORT AND INFORMED CARY CUCINELLI AND THEN DOING NO DUE DILIGENCE, CARY CUCINELLI FILED A "SECRETIVE COURT FILED EMERGENCY PETITION TO SEEK TO CONCEAL THE CARE MANAGER AND CONSERVATORS NEGLECT AND REVOKING MY GUARDIANSHIP FOR AN EMERGENCY PETITION HEARING WITHOUT EVER NOTIFYING ME-(LYNN KAY) MY MOM'S GUARDIAN. THEN 2 DAYS AFTER THE 7/5/22 HEARING, ON 7/7/22 SHE EMAILS ME ONLY THE 7/7/22 COURT FILING ENTIRELY CONCEALING THE 6/30/22 SECRETIVE SHIFFLETT COURT FILING AND CONCEALING ALL OF THE FALSE ALLEGATIONS AGAINST ME BY \*\*NEVER PROVIDING ME WITH THE 7/5/22 EMERGENCY PETITION\*\*. AND THEN ON THE NIGHT OF 7/7/22, FOR 7 HOURS I GATHERED ALL OF THE TEXTS AS EVIDENCE AND I EMAILED THE SUMMARY OF WHAT OCCURRED AND THE EVIDENCE OF ALL OF THIS TO CUCINELLI. ALL OF THE DOCUMENTED EVIDENCE OF MY TEXTS TO SHIFFLETT REQUESTING CARE FOR MY MOM AND EMAILS EXPLAINING WHAT OCCURRED SINCE MAY 2022 UNWELLNESS AND THAT THE CARE MANAGER NEEDS TO BE REMOVED BEING DISMISSED FROM SERVING AS CARE MANAGER.

CUCINELLI NOT ONLY IGNORED THE 7/7/22-7/8/22 EMAILS AND FACTS OF CARE MANAGER NEGLECT ALMOST KILLING MY MOM SHE ALSO FAILED TO EVER INFORM THE COURT AS I REMAINED AT MY GRAVELY ILL INJURED MOM'S BEDSIDE.

I THEN WAS REMOVED AS GUARDIAN WITH "NO JUST CAUSE" AND I WAS TWICE IN WRITTEN FORM AND ALSO IN PHYSICAL FORM THREATENED MY LIFE AND MY WELL-BEING 3 TIMES ON THAT SAME DAY AND UMPTEEN MULTIPLE MORE TIMES THEREAFTER TO PRESENT DAY WHILE "THE ONGOING CRIMINAL TAKEOVER OF OUR LIVES" BEGAN ON 7/8/22".

AND WE HAVE BEEN DESTROYED FOR 3 YEARS ONLY WORSENING PROGRESSIVELY EACH DAY BECAUSE OF THE FRAUD UPON THE COURT COMMITTED BY CARY CUCINELLI AND ALL LAWYERS FILING IN SUPPORT OF THE IN JULY 2022 BASELESS AND MERITLESS EMERGENCY PETITION.

ALL FIDUCIARIES ABANDONED MY MOM IN THE VIRGINIA HOSPITAL CENTER WITHOUT MY MOM RECEIVING ANTIBIOTICS UNTIL THE 8<sup>TH</sup> DAY LEFT TO DIE. THEN MY MOM WAS SO NEGLECTED AND ABUSED SINCE MAY 2022 THAT UPON 7/14/22-HOSPITAL DISCHARGE, MY HIGHLY FUNCTIONAL HEALTHY MOM WAS LEFT UNABLE TO WALK DUE TO FIDUCIARIES NEGLECT AND ABUSE.

THERE THEN WAS BEGUN "THE 24/7 FORCED HOME INVASION FOR 327 DAYS" WITH "BOTH MY MOM AND I -24/7 STRANGERS LIVING IN OUR HOME-VIOLATING OUR RIGHTS AND OUR BEING "PSYCHOLOGICALLY SHACKLED AND SCARRED AND PHYSICALLY THREATENED IN OUR OWN HOME "IN THE MIDDLE OF THE COVID PANDEMIC" WHILE THEN MY MOM WAS FORCED TO CONSUME FDA-UNAPPROVED ANTIPSYCHOTICS AGAINST HER WILL AND QUADRUPLING HER MEDICATION TO FORCIBLY SILENCE AND DESTROY MY MOM"-SHE LOST 65 LBS DURING THAT TIME AND THEREAFTER STOPPED EATING WITH HER BEING FORCED TO DRINK "TOXIC DRUG SLUDGE"

THIS IS BEYOND SHOCKING BUT ALL TRUE AND IS DOCUMENTED WITH ALL OF THE CRIMINAL EVIDENCE

[www.wearefightingforourlives.org](http://www.wearefightingforourlives.org)

5 YEARS OF DECIMATION DONE TO OUR LIVES BECAUSE OF CARY CUCINELLI!CUCINELLI AND ALL NAMED PERSONS CONTRIBUTING TO "THE CRIMINAL TAKEOVER OF OUR LIVES" FOR ALMOST 5 YEARS OF "THE CARY CUCINELLI PREDATORY CONSERVATORSHIP" SEEKING FINANCIAL EXPLOITATION BY DEPRIVATION OF CARE "PHYSICALLY INCAPACITATING MY ONCE ENTIRELY HEALTHY AND HAPPY AND HIGHLY FUNCTIONAL MOM REDUCED TO A SCARED LITTLE GIRL FROM SEPTICEMIA BACTERIAL BLOODSTREAM INFECTION COLLECTIVELY IGNORED BY ALL PERSONS NAMED BELOW.

IN ADDITION, TO CONCEALING HER FIDUCIARY ELDER NEGLECT, SHE DELIBERATELY TERMINATED FOR 4 MONTHS MYCHART ACCESS TO ME ON 7/8/22 AGAINST COURT ORDER. DOING SO FOR DELIBERATELY CONCEALING ALL OF THE FIDUCIARIES ELDER NEGLECT CAUSING ALMOST DEMISE TO MY SUFFERING MOM.

IN ADDITION-NEVER PROVIDED ANY QUARTERLY FINANCIAL REPORTS, NEVER PAID ME ANNUAL GUARDIANSHIP SALARY, NEVER DID A REAL ESTATE APPRAISAL-(ALL COURT-ORDERED TERMS IN JULY 2020) AND FAILED TO PROTECT FROM NEGLECT AND ABUSE AND ABANDONMENT AND IMPRISONMENT IN PLACE OF PROVIDING BOTH BASIC DENTAL AND MEDICAL AND DOCTOR-ORDERED CARE AND TREATMENT.

THE DECIMATION THAT HAS OCCURRED BECAUSE OF CARY CUCINELLI HAS DESTROYED THE ESTATE, DESTROYED MY MOM AND DESTROYED MYSELF FOR 5 CONTINUAL YEARS IN JULY 2020-JULY 2025.

FOR 5 YEARS EVERY DAY HAS BEEN PROGRESIVELY WORSENERD FOR US BECAUSE OF ALL OF THE CRIMES OF ALL FIDUCIARIES FAILING TO PROVIDE BASIC DENTAL AND MEDICAL CARE SINCE MAY 2022 TO PRESENT DAY AND CONCEALING THIS TO ALL AUTHORITIES AND TO THE COURT SINCE JULY 2022-(FACTUAL DOCUMENTATION OF ALL PERSONS CRIMINAL CONCEALMENTS OF "THEIR CRIMINAL FIDUCIARIES ELDER CRUELTY CRIMES" AND THE ADDITIONAL COLLECTIVE CRIMES COMMITTED AS A DIRECT RESULT OF THESE LAWYERS AND CARE MANAGERMENTS AND BY PHILIP KAPUSTA AND REPRESENTING LAWYERS ALSO DIRECTLY INVOLVED IN ALL OF THE CRIMINAL CONCEALMENTS.

VALERIE GEIGER-(CONSERVATOR)

ELIZABETH WILDHACK-(G.A.L.)

LAURIE KIRKLAND-(MOM'S LAWYER)

LIZ SHIFFLETT-(CARE MANAGER)

SUZANNE HANAS-(PREMIER CARE PLANNING)

GEORGE W. DODGE

DR. ALAN DAPPEN

DOC TALKER-(VIENNA, VA)

JEANNE BLUE-(CARE MANAGER)

RACHELLE DORNAN-(CARE MANAGER)

ELDER TREE CARE MANAGEMENT

STEPHEN HALL-(KING CAMPBELL)

PHILIP KAPUSTA-(SON)

JUSTIN BERGER-(HALE BALL)

EVERY DAY IS WORSE BECAUSE IN JULY 2022, CARY CUCINELLI COMMITTED FRAUD UPON THE COURT BY "SECRETIVELY FILING A BASELESS AND MERITLESS EMERGENCY PETITION ALONG WITH SECRETIVE DOCUMENTS" WITH THERE BEING ABSOLUTELY NO MATERIAL DOCUMENTED FACTS EVER PRESENTED"-BEING MERELY CONJECTURAL OPINION NOT IN ANY WAY MATCHING ALL OF THE CONCEALED DOCUMENTED FACTS IN ANY WAY.

ALL OF THESE PERSONS HAVE COLLECTIVELY LIED BY OMISSION AND GONE TO GREAT LENGTHS TO ALL REMAIN SILENT AND TO CONCEAL ALL OF THEIR INVOLVEMENT IN ALL OF THE ABOVE CRIMES.

THE CRIMINAL TAKEOVER OF OUR LIVES BEGAN WITH:

DRAINING THE ESTATE-SELLING PROPERTIES LOSING MULTI-MILLIONS FROM RENTAL PROPERTIES SOLD UNNECESSARILY-(LOST MILLIONS IN TAXES AND REAL ESTATE AND RENTAL INCOME)

NEVER PAYING ME ANNUAL GUARDIANSHIP SALARY

NEVER DOING ANY DETAILED QUARTERLY FINANCIAL REPORTS TO ACCOUNT FOR EVERY PENNY SPENT

THE CRIMINAL DENIAL OF CARE TO MY MOM-(2021-ROOT CANALS WERE NEEDED FOR DOCUMENTED IN DR. CUSUMANO OFFICE VISIT REPORTD STATING SEVERE GUM DISEASE AND TEETH PAIN SUFFERED) IGNORED IN PROVIDING PROPER AND NECESSARY DENTAL AND MEDICAL CARE

THEN THE INCOMPETENCE AND COMPLETE DISREGARD TO PROVIDE CARE WHEN MY MOM WAS REPORTED BY ME TO BE SUFFERING SINCE MAY 2022 AND I DEMANDED CARE AND GIVING MY MOM THE COMPLETE EVALUATION FOR DIAGNOSTIC CARE WAS IGNORED BY THE CARE MANAGER'S CONCEALMENT OF MOM'S SUFFERING

THE NEGLIGENCE WAS FAILING TO PROVIDE DIAGNOSTIC EVALUATIONS FOR MY MOM'S SUFFERING BEING ENTIRELY DISREGARDED

6/30/22-MOM NEEDED EMERGENT CARE AND I RIGHTEOUSLY ANGRILY DEMANDED IT WHEN THE CARE MANAGER ENTIRELY WALKED AWAY DENYING THIS TO MY MOM

THEN THE CARE MANAGER LIED TO COVER HER ASS FOR CAUSING MY MOM'S ALMOST DEMISE ON 6/30/22 WITH A 6/30/22 REPORT FAILING TO STATE MATERIAL FACTS OF MOM'S PHYSICAL SUFFERINGS SINCE MAY 2022 AND NEVER CORRECTING HER REPORT WHICH WAS USED FOR THE FIDUCIARIES FILING AND SUPPORTING A "SECRETIVE EMERGENCY PETITION AND CONCEALING THIS HEARING TO ME

THEN FIDUCIARIES SECRETLY SOUGHT TO REMOVE ME FOR MY DEMANDING "PROPER MEDICAL CARE FOR MY MOM"

THE 6/30/22 CARE MANAGER'S REPORT OF LIES TO ATTEMPT TO PROTECT HERSELF BY LYING AND MISLEADING AND FAILING TO INFORM OF HER NEGLIGENCE AND THE TRUE MEDICAL FACTS OF MOM ENTERING THE HOSPITAL FOR UROSEPSIS SEPTICEMIA DESTROYING HER ORGANS AND BLOOD SYSTEM FOR UNTREATED INFECTION

THEN CONSERVATORS AND FIDUCIARIES SECRETLY SOUGHT AN EMERGENCY PETITION HEARING TO FILE "FALSE AND MISLEADING ALLEGATIONS AGAINST ME" IN A CONCEALED TO ME COURT FILING AND NEVER NOTIFIED ME IN ANY WAY AT ALL OF THIS COURT FILING

THEN 2 DAYS AFTERWARDS ON 7/7/22, I AM FINALLY NOTIFIED AND MOM IS SUFFERING SINCE MAY 2022 AND NOW IN THE HOSPITAL STILL WITHOUT RECEIVING ANTIBIOTICS SINCE FOR 8 DAYS UNTIL FINALLY RECEIVED ANTIBIOTICS ON 7/7/22.

WHEN I WAS FINALLY CONTACTED BY EMAIL, I INFORMED CARY CUCINELLI VIA MULTIPLE EMAILS OF THE CARE MANAGER NEGLIGENCE AND THE DOCUMENTED EVIDENCE OF SUCH AND THAT THE CARE MANAGER NEEDED TO BE FIRED.

THEN CARY CUCINELLI ENTIRELY IGNORED THIS AND DISREGARDS ALL EVIDENCE AND DOES NOT INFORM THE COURT OR THE AUTHORITIES AND ALLOWS "THE CONCEALED TO ME FALSE AND MISLEADING ALLEGATIONS TO REMAIN IN NOT PROPERLY WITHDRAWING THEM AND THEN BECAUSE OF THIS "MY GUARDIANSHIP WAS WRONGLY REVOKED FOR NO JUST CAUSE" WITH "ALL FIDUCIARIES AND PHILIP KAPUSTA MATERIALLY BREACHING THE 2020 COURT ORDER" BY "THEIR ALL CONCEALING THEIR SUPPORTING CRIMINAL MEDICAL ELDER NEGLIGENCE- "CRIMINAL CONCEALMENT AND LYING BY OMISSION AND FILING FALSE AND ENTIRELY MISLEADING INFORMATION AND FAILING TO WITHDRAW THE FALSE ALLEGATIONS SINCE FILED IN JULY 2022.

THEN ON 7/8/22, I RECEIVE AND EXPERIENCE 3 DOCUMENTED THREATS TO MY LIFE AND MY WELL-BEING-"2 WRITTEN AND 1 PHYSICAL INVOLVING SECURITY GUARDS AND THE THREAT OF POLICE"

THEN MOM HAS BEEN SO BADLY NEGLECTED AND ABUSED THAT SHE IS UNABLE TO WALK UPON THE 7/14/22 HOSPITAL DISCHARGE BECAUSE ALL FIDUCIARIES ENTIRELY ABANDONED MY MOM TO DIE IN THE VIRGINIA HOSPITAL CENTER WITHOUT RECEIVING ANTIBIOTICS FOR SEPTICEMIA UROSEPSIS SHUTTING DOWN MOM'S ORGANS FROM THE BLOOD TOXICITY- \*FINALLY RECEIVED ANTIBIOTICS ON 7/7/22 AND THEREAFTER UNTIL DISCHARGED.

7/9/22-RAPID RESPONSE TEAM NURSE-(SEPSIS):

7/9/22-12:12 AM

Predictive Sepsis Score: 4.69

Deterioration Index: 63.73

PULSE: 90

THEN AGAINST THE 7/8/22 COURT ORDER, THE CONSERVATOR ON 7/8/22 FURTHER CONCEALS CRIMINAL EVIDENCE OF THE FIDUCIARIES ELDER NEGLECT AND ABUSE FOR 4 MONTHS WHILE MOM AND I ON 7/14/22 HAD A CRIMINAL PHYSICAL TAKEOVER OF OUR LIVES

327 DAYS IN OUR HOME BEING PSYCHOLOGICALLY SHACKLED AND THREATENED BY "THE 24/7 FORCED HOME INVASION" VIOLATING BOTH OF OUR RIGHTS IN OUR OWN HOME BY ALL FIDUCIARIES CRIMINAL CONCEALMENT OF THEIR ELDER NEGLECT CONCEALED.

THEN I AM DENIED MY GUARDIANSHIP REAPPOINTMENT DUE TO THE CONCEALMENT OF THE FALSE ALLEGATIONS AND THE CONCEALMENT OF ALL OF THE MEDICAL RECORDS WHICH ALONG WITH TEXTS AND EMAILS AND NESTCAM VIDEO ALL DISPROVES ALL FALSE AND MISLEADING ALLEGATIONS AGAINST ME

THEN I AM MADE CO-GUARDIAN WITH NO SALARY AND NO POWER AND MOM AND I ARE STILL THREATENED AS ALL FIDUCIARIES DENY ALL DENTAL AND ALL MEDICAL CARE FOR MY MOM WHILE SHE IS AGAIN DOCUMENTED REPORTED BY ME TO BE CONTINUALLY PHYSICALLY SUFFERING AND BEGGING FOR HELP-\*\*ALL INFORMED FIDUCIARIES DEFYING DR. CUSUMANO'S WRITTEN OFFICE VISIT RECORDS STATING "QUARTERLY DENTAL VISITS FOR CLEANINGS".

THEN MOM WORSENS PROGRESSIVELY AFTER RECOVERING FROM 3 OCCURRENCES OF SEPTICEMIA AND RECEIVING ANTIBIOTICS AND ALMOST FULLY RECOVERING WITH THE ANTIBIOTICS.

DENIED ARE DENTAL CLEANINGS AND DENTAL X-RAYS, DIAGNOSTIC LAB TESTING, HEMATOLOGIST, UROLOGIST, BLOOD CULTURE, IRON TESTING, ULTRASOUNDS MONITORING AND BLOOD AND URINE CULTURES AND IRON AND VITAMINS.

ALL FIDUCIARIES SIMPLY DID NOT CARE AND DID EVERYTHING THEY COULD TO NOT ONLY KNOWINGLY DENY CARE BUT TO ALSO CONTINUE TO CONCEAL THESE CRIMES AND FAIL AS MANDATED REPORTERS TO REPORT THIS DENIAL OF CARE AND THEN BY LYING BY OMISSION AND FURTHER FALSE ALLEGATIONS AGAINST ME THEN FRAUDULENTLY REMOVED ME AS CO-GUARDIAN FOR MY ONCE AGAIN STRONGLY DEMANDING AND BEGGING FOR CARE FOR MY MOM AND THIS ALL BEING DENIED.

ON 1/17/23 WHEN I WAS REMOVED, IT HAD ALREADY BEEN 3 MONTHS THAT IN WRITTEN FORM MY REQUESTING DENTAL CARE FOR MY PHYSICALLY SUFFERING MOM AND RECEIVING NONE.

THIS FRAUDULENCE WAS THE SAME PATTERN IN 2022 WITH ALL OF THE CONCEALMENTS AND LIES BY FIDUCIARIES AND THE SAME DENIAL OF BASIC DENTAL AND MEDICAL CARE FOR MY MOM.

DURING THIS TIME, ON 1/28/23, MY MOM'S PLATELETS AND BLOODCELLS DESTRUCTION BEGAN IN NOVEMBER 2022 AFTER HER LABS ON 10/24/22 WERE AS HEALTHY AS HER 60 YEAR OLD DAUGHTER AND THIS WAS AFTER MOM HAD DOCUMENTEDLY SUFFERED SEPTICEMIA 3 TIMES WITHIN 5 MONTHS AND WAS RECOVERING AFTER ANTIBIOTICS.

ON 5/8/23, MOM'S PHYSICAL SUFFERINGS AND MY BEGGING FOR DENTAL AND MEDICAL HELP IGNORED FOR 7 MONTHS-(10/10/22-5/8/23 WITH MOM SUFFERING DENTAL GUM ABSCESS SEPTICEMIA CAUSING UROSEPSIS AGAIN FINALLY DIAGNOSED ON 5/8/23 AND ALL FIDUCIARIES WERE DOCUMENTEDLY INFORMED THAT DR. CUSUMANO HAD ORDERED SEDATION DENTAL

AND COMPREHENSIVE EVALUATION AND FOLLOWUP TREATMENT FOR THE DENTAL GUM ABSCESS ON 5/8/23 DIAGNOSED AND MY MOM WAS ONLY GIVEN ANTIBIOTICS.

MOM STILL HADN'T RECEIVED A DENTAL CLEANING SINCE 9/20/22 AND HADN'T RECEIVED DENTAL X-RAYS SINCE 3/2/22 AND THIS WAS AGAIN DENIED TO MY MOM UNTIL 8/1/24. AND THE VERY NEXT DAY MY MOM NEEDED TO BE REVIVED BY 911 PARAMEDICS ON 8/2/24 WITH MY MOM "BEGGING TO GO HOME" IN THE HOSPITAL RECORDS. AND THE COLDNESS AND CRUELTY OF ALL FIDUCIARIES DENYING MY MOM HER HOME AND SAFETY AND HEALTH IS BEYOND EVIL FOR MY MOM PHYSICALLY SUFFERING FIDUCIARIES ELDER CRUELTY CRIMES SINCE MAY 2022 IGNORING PHYSICAL UNWELLNESS.

ON 5/11/23-MY MOM WAS DIAGNOSED BY HEMATOLOGIST LAB DRAWS HAVING "22 GROSSLY ABNORMAL LABS AND 5 BLOOD DISORDERS" AND GIVEN IRON SUPPLEMENTS AND COQ10 AND MOM WAS DENIED MY REQUEST FOR MOM RECEIVING A REQUESTED IRON INFUSION FOR RESTORATION ON 5/27/23.

ON 5/24/23 MY LIFE AND WELL-BEING AGAIN THREATENED BY WRITTEN THREAT FOR MY BEING DEMANDED TO MOVE OUT OF MY OWN CHILDHOOD HOME BECAUSE I CONTINUED TO INFORM THIS WAS CRIMINAL ELDER NEGLECT DENIALS OF CARE AS ON 5/22/23 IT WAS ONCE AGAIN STATED THAT MY MOM WOULD RECEIVE NO FURTHER DIAGNOSTIC TESTINGS OR TREATMENT.

THEN ON 5/29/23, REQUESTED WAS THE ORDERED BY DR. CUSUMANO DENTAL CARE AND MOM WAS DENIED THIS FOR ANOTHER 451 DAYS-(10/10/22-5/8/23-8/1/24) WHILE SUFFERING CONTINUAL PLATELETS AND BLOODCELLS DESTRUCTION FROM CONTINUAL SEPTICEMIA DENTAL GUM ABSCESS ENTIRELY IGNORED SINCE OCTOBER 2022.

THEN ON 6/6/23 MY MOM BY "PRIVATE ARMED GUARDS WITH GUNS" WAS "CRIMINALLY ABDUCTED AND KIDNAPPED FROM OUR HOME FOR ALL FIDUCIARIES TO FURTHER SEEK TO ATTEMPT TO CONCEAL ALL OF THEIR COLLECTIVE ONGOING ELDER CRUELTY CRIMES CAUSING GRAVE INJURIES TO MY MOM FROM ALL DENIED BASIC DENTAL AND MEDICAL CARE (SINCE MAY 2022 BEGINNING).

THEN MY MOM WAS IMMEDIATELY DENIED THE IRON SUPPLEMENTS AND THE COQ10 SUPPLEMENTS THAT WAS ORDERED FOR HER ON 5/22/23 AND WAS GIVEN FDA-UNAPPROVED ANTIPSYCHOTICS TO FORCIBLY DETAIN AND SILENCE MY MOM AGAINST HER WILL BEING "MEDICALLY ABANDONED AND IMPRISONED AND ISOLATED, INSTEAD OF MY MOM BEING PROVIDED BASIC DENTAL AND MEDICAL CARE.

THEN MY MOM WAS SO BADLY LEFT MEDICALLY ABANDONED THAT FURTHER DESTRUCTION OF BLOODCELLS AND PLATELETS AND BONE MARROW AND IMMUNE SYSTEM OCCURRED.

ON 9/29/23, MY MOM'S LEGS BUCKLED FROM "DRUG-INDUCED LYMPHEDEMA" AND SHE FELL FACE 1<sup>ST</sup> CAUSING CONCUSSIONAL AND DEEP BLACK EYE ORBITAL INJURIES BECAUSE SHE WAS GIVEN FDA-UNAPPROVED ANTIPSYCHOTICS NOT FOR ELDERLY AND NOT FOR CARDIAC PATIENTS BLACK-BOXED WARNING AT RISK OF DEATH OF HEART ATTACK AND STROKE AND THEY SIMPLY DID NOT CARE AND HAD SIGNED A "DO NOT RECESSITATE ORDER" ON MY ONCE ENTIRELY HEALTHY AND HAPPY AND HIGHLY FUNCTIONAL THRIVING MOM.

THE 9/29/23 EMERGENCY ROOM VISIT REVEALED DEVASTATING DECREASE IN LAB VALUES AND NONE OF THE FIDUCIARIES CARED.

ON 10/12/23 AND 10/26/23 AND 11/19/23 FURTHER DECREASE IN LAB VALUES IGNORED SUFFERING SEPTICEMIA IGNORED DESTROYING HER ONCE ENTIRELY HEALTHY BLOODCELLS AND PLATELETS.

I THEN WAS ABLE TO FIND A FAMILY LAWYER WHO CARED AND I FILED AN EMERGENCY PETITION TO SEEK TO REMOVE THE FIDUCIARIES AND ALL FIDUCIARIES CONCEALED THE HORRIFIC ELDER CRUELTY NEGLECT AND ABUSE AS MANDATED REPORTERS LYING BY OMISSION OF ALL OF THEIR COLLECTIVE CRIMINAL CONCEALMENT BY ALL NAMED FIDUCIARIES AND THEY ALL "CRIMINALLY CONCEALED" THIS IN THE COURT HEARING.

WITHIN 1 MONTH, AGAIN AGAINST COURT ORDER THEN THE MYCHART ACCESS WAS TERMINATED BY GEORGE W. DODGE TO CONTINUE TO CRIMINALLY CONCEAL THAT MY MOM WAS FINALLY DIAGNOSED SINCE NOVEMBER 2022-(PLATELETS AND BLOODCELLS AND IMMUNE

SYSTEM AND BONE MARROW DESTRUCTION") HAVING BLOOD CANCER-MYELODYSPLASTIC SYNDROME WHICH WAS DIRECTLY CRIMINALLY CAUSED BY IGNORING SEPTICEMIA SINCE OCTOBER 2022 REPORTED MOM NEEDING MEDICAL AND DENTAL CARE BEING DENIED. AND ONLY LYNN KAY HAD CARED AND RESEARCHED ALL OF THE ABNORMAL LAB RESULTS AND "MEDICALLY ASTUTELY" STATED VIA DOCUMENTED TEXT TO RACHELLE DORNAN THAT "MYELODYSPLASTIC SYNDROME NEEDED TO BE RULED OUT". BUT NO ONE LISTENED TO ME 2 YEARS AGO. I WAS THE ONLY ONE TO "MEDICALLY ASTUTELY" STATE MOM'S LIKELY DIAGNOSIS BEFORE ANY DOCTOR DID 9 MONTHS LATER.

THEN GEORGE W. DODGE HIRES A "CRIMINAL LAWYER" AND A LAWSUIT AGAINST ME FOR REMOVING MY COURT-ORDERED RIGHT TO HAVE ANY MEDICAL AND HEALTH INFORMATION OF MY MOM AND TO EVER SEE MY MOM WAS EMAILED TO ME ON 3/5/24-2 MONTHS AFTER THE 1/4/24 EMERGENCY PETITION WITH MY INFORMING THE COURT OF THE CRIMINAL ELDER NEGLECT. AND 1 MONTH AFTER GEORGE W. DODGE ONCE AGAIN IN CONTEMPT OF COURT ORDER IN DEFYING THE ORDERED TERMS, TERMINATED MY ACCESS TO MYCHART ACCESS. THIS OCCURRED TO "CRIMINALLY CONCEAL THE DIAGNOSIS BY DR. DAPPEN ON 2/9/25 FAXING TO DR. ERSHLER STATING HIS "MEDICAL INCOMPETENCY" STATING "4-5 MONTHS PANCYTOPENIA AND MYELODYSPLASTIC SYNDROME".

THEY ALL SIMPLY DID NOT CARE THAT THE "DEPRIVATION OF CARE TO MY MOM" IN HER NOT EVER RECEIVING ANY OF "THE PROPER DENTAL AND MEDICAL STANDARDS OF CARE AND DEFYING 6 DOCTORS ORDERS SIMPLY DID NOT MATTER" AS MY MOM WAS SIMPLY UNIMPORTANT TO ALL OF THEM AS MY MOM WAS CONSIDERED TO BE UNIMPORTANT IN BEING AS "DISPOSABLE TRASH" AND JUST A PAYCHECK FOR FINANCIAL EXPLOITATION TO ABANDON AND IMPRISON AND MEDICATE AND DECIMATE AND SUFFER AND CAUSE TO DIE!"

THIS SHOCKING AND COLD AND CRUEL INHUMANE DISREGARD FOR MY MOM'S LIFE IS BEYOND CRIMINAL, IT IS "PURE EVIL BY ALL NAMED SOCIOPATHS".

AND MY ALREADY INFORMING THE POLICE AND ADULT PROTECTIVE SERVICES IN JUNE 2023 AND OCTOBER 2023 AND 6 MORE TIMES THEREAFTER FOR A TOTAL OF 8 TIMES TO THE POLICE AND 8 TIMES TO A.P.S. AND ALL AUTHORITIES ALSO FAILED TO EVER CARE AND FAILED TO EVER INVESTIGATE ANY OF THIS AND FAILED TO ARREST THESE CRIMINALS DESTROYING BOTH OF OUR ONCE-ENTIRELY PERFECT LIVES.

MOM AND I PREVIOUSLY THRIVED AND LIVED TOGETHER AT MY MOM'S REQUEST FOR MY SACRIFICING MY HOME IN CALIFORNIA AFTER 21 YEARS TO MOVE HOME TO LIVE WITH AND HELP MY MOM SINCE 2006.

AND SO MUCH MORE FIDUCIARY CRIMINAL MALFEASANCE HAS LED TO TODAY.

INCLUDING CONTINUAL FRAUD UPON THE COURT BY ALL NAMED PERSONS FILING KNOWINGLY FALSE AND MISLEADING BASELESS AND MERITLESS COURT FILINGS IN FURTHER SEEKING TO CONCEAL ALL NAMED PERSONS COLLECTIVELY HIDING ALL OF THEIR INVOLVEMENT IN "ELDER CRUELTY CRIMES"-(2022-2025 TO PRESENT DAY.

## Lawyer Actions Complained of

18.2-18-AIDING AND ABETTING AND CONCEALMENT

18.2-47-ABDUCTION/KIDNAPPING AGAINST WILL AND AGAINST BEST INTERESTS-(WHILE DEFYING DOCTORS ORDERS TO PROVIDE CARE AND TREATMENT AND DENYING ALL BASIC DENTAL AND MEDICAL CARE) AND CONCEALING ELDER CRUELTY CRIMES OF DEPRIVATION OF CARE

18.2-460-OBSTRUCTING JUSTICE-(LYING TO AND MISLEADING ALL AUTHORITIES AND TO THE COURT)

63.2-1606-MANDATED REPORTERS FAILING TO EVER REPORT AND DIRECTLY AND DELIBERATELY CONCEALING ALL OF THE CRIMES FOR 3 YEARS SINCE JUNE 2022

## List the names, addresses, and phone numbers of persons who might be able to give additional information about your complaint:

### Names Additional Information

THIS INVOLVES ALSO PHILIP KAPISTA-(SON) AND NOW 7 LAWYERS-(5 FIDUCIARIES AND 2 REPRESENTING LAWYERS OF GEORGE W. DODGE-(GUARDIAN)-STEPHEN HALL-(KING CAMPBELL) AND

## Form Must Be Signed and Dated

By providing your name and date below you are signing the form.

### Signature

LYNN KAY

### Date

6/3/2025



2HN75

Type the code from the image

For additional assistance, please call the Complaint Line during regular business hours, (804) 775-0570. Monday through Friday 8:15 a.m. to 4:45 p.m. Closed on state and federal holidays.

Please click **SUBMIT FORM** only one time. A "Thank you for your submission." confirmation will appear on this page once it has processed.

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## Contact Numbers

All Departments (804) 775-0500

Voice/TTY 711 or (800) 828-1120



## Office Hours

Mon thru Fri 8:15am to 4:45pm

(excluding holidays)

The Clerk's Office does not accept filings after 4:45pm

## Address and Directions

111 East Main Street, Suite 700  
Richmond, Virginia 23219-0026

DIRECTIONS

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