

EXHIBIT #26

5. Jurisdiction and venue are proper as the amount of damages in the instant litigation stated herein meets the jurisdictional requirement and pursuant to C.R.C.P 98 (c), all Defendants presently reside or have their principal place of business in the City and County of Denver, Colorado.

6. During the period in question, Pamela Hadas was a school teacher who lived alone after moving to Boulder, Colorado to accept a teaching position.

7. After renting an apartment in Boulder, she through coincidence discovered while walking down the street from her apartment that a person she had previously had as a student many years earlier in a different State, Defendant, Thomas Miller, happened to live just down the street from her. Thomas Miller was living with Defendant, Judith Phillips and introduced Judith Phillips to Pamela Hadas as a new neighbor.

8. Since the last time Pamela Hadas had seen Thomas Miller, Thomas Miller had gone to law school and he had brought this fact to Pamela Hadas' attention.

9. Thomas Miller also impressed upon Pamela Hadas that he was actually a friend of hers and since Pamela Hadas lived all by herself in a new town, he was going to take it on himself to look after Pamela Hadas, emphasizing that he had her own best interest in mind, that Pamela Hadas could rely on Thomas Miller and that Thomas Miller would assist her, among other things, with her personal and financial affairs and the like.

10. Pamela Hadas was experiencing severe depression and other problems which were known to Defendants, Thomas Miller and Judith Phillips.

11. In light of Pamela Hadas' severe depression and weakened and fragile mental state and condition known to Defendants, Defendants intentionally and purposely undertook a course of conduct and action to take advantage of Pamela Hadas' weakened mental state and condition in order to separate Pamela Hadas from her money and assets for the financial benefit of Defendants.

12. After living and working in Boulder, Colorado for a period of time, Pamela Hadas decided she would like to buy a house in the area. As part of the purchase, Thomas Miller informed Pamela Hadas that he would assist her in such undertaking and that he needed copies of her financial records reflecting her assets and funds under the guise that he was somehow helping or assisting Pamela Hadas. Over time, Defendants did in fact obtain copies of all of Pamela Hadas' financial records and as a result, became aware of all of Pamela Hadas' assets and funds.

13. After becoming aware of Pamela Hadas' assets and funds and knowing Pamela Hadas' severe depression and weakened mental state and problems, Thomas Miller and Judith Phillips began to pressure and continued to pressure Pamela Hadas to make a series of "loans" to Defendants as well as to advance other monies on Defendants' behalf and benefit. Such loans

and advances are in excess of a principal amount of \$119,869.13 (one hundred nineteen thousand eight hundred sixty nine dollars and thirteen cents) plus interest accruing at the rate of 8% per annum. At the present time, none of the loans or advances have ever been repaid in any amount to Pamela Hadas by Defendants even though demand has been made on such loans and advances.

14. Defendants are in default on such loans and advances in an amount in excess of \$150,565.17 (one hundred fifty thousand five hundred sixty five dollars and seventeen cents), including interest.

15. As Pamela Hadas continued to sink deeper into a more severe state of depression and fragile mental state and condition, Defendants knowingly seized upon this opportunity and continued to pressure Pamela Hadas with the ultimate goal of wresting more assets and funds away from Pamela Hadas.

16. For example, Defendants convinced Pamela Hadas to sell her house down the block from Defendants in Boulder, Colorado and to purchase the house next door to Defendants' house for the purported reason that Defendants would then be better able to look after Pamela Hadas in light of her weakened mental state and condition and the fact that Pamela Hadas had no one else close by or in the area to care for her.

17. As a result of Defendants' continued insistence that Pamela Hadas needed to purchase the house next to Defendants' house for her own good and well being, Pamela Hadas did in fact purchase the house and moved in next door to Defendants.

18. After having Pamela Hadas move next door to Defendants, Defendants then unilaterally took steps to try and have Pamela Hadas committed or institutionalized for several years in an out of State facility. In other words, Defendants attempted to have Pamela Hadas basically shipped off and locked up against her will in a different State with no one to protect her from Defendants and their illegal scheme. Defendant, Thomas Miller, even bragged to people that after he was able to have Pamela Hadas institutionalized in an out of State lock-up facility, Defendants were going to rent out Pamela Hadas' house next door and Defendants were going to just take or pocket the rent money generated by Pamela Hadas' house.

19. Defendants even tried to convince Pamela Hadas to sign powers of attorney over to Defendants as to Pamela Hadas' assets and property which would give Defendants complete control over Pamela Hadas' assets and property. Namely, Defendants would then be able to sell Pamela Hadas' assets and property, to withdraw the proceeds from such sales and to even withdraw money directly from Pamela Hadas' bank and brokerage accounts.

20. At or about this time and also as part of Defendants' scheme, even though Pamela Hadas had continued to teach her classes as part of her teaching job at the school, Defendant, Thomas Miller, unilaterally and without permission or authority to do so, contacted Pamela