

1 **JEAN KASEM, PRO SE**

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4 **PLAINTIFF, PRO SE**

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7 **UNITED STATES DISTRICT COURT FOR THE**
8
9 **WESTERN DISTRICT OF WASHINGTON**

10 **JEAN KASEM, as surviving spouse and**
11 **Personal Representative of the**
12 **ESTATE of CASEY KASEM, Deceased,**
13 **Plaintiff,**

CASE NO:
COMPLAINT FOR PERSONAL
INJURIES - WRONGFUL DEATH;
NEGLIGENCE AND FRAUD

14 vs.

[Amount in controversy exceeds
\$75,000.00]

15 **Kerri Helen Kasem, an individual; Mike Kasem,**
16 **an individual; Jamil Anis Aboulhosn, an**
17 **individual; Julie Kasem Aboulhosn, an**
18 **individual; Troy L. Martin, an individual;**
19 **CATHOLIC HEALTH INITIATIVES, a**
20 **Colorado corporation, d/b/a St Anthony**
21 **Hospital and DOES 1 through 99, inclusive**

DEMAND FOR JURY TRIAL

22 **Defendants.**

23 _____/
24 **COMES NOW,** Plaintiff, **JEAN KASEM,** in her capacity as Personal Representative of
25 the **ESTATE of CASEY KASEM,** Deceased, and for causes of action against the above named
26 Defendants, and each of them, states and alleges as follows:

27 **I. PARTIES AND JURISDICTION**

28 1.1 Plaintiff, **JEAN KASEM,** has been appointed the Personal Representative of the
ESTATE of CASEY KASEM, Deceased. Plaintiff brings this action on behalf of the Estate for the
survival claim and wrongful death of Casey Kasem, Deceased in the State of Washington on June
15, 2014, pursuant to RCW 4.20 *et seq.*, and 28 US Civil Code Section 1332.

1 drowsiness and impairs judgement.

2 2. Defendants, Julie Kasem Aboulhosn, husband Jamil Anis Aboulhosn, Defendants
3 Kerri Helen Kasem and Mike Kasem, who are the only named individuals in the 2007 DPA to act
4 as Casey Kasem’s agents, then actively concealed their fraudulent document for 6 years, never
5 exercising it for its’ purported intentional use for Casey Kasem’s healthcare.

6 3. Defendants then surfaced with the 2007 DPA in October of 2013 and began a
7 malicious and fraudulent media assault to prejudice Casey Kasem, (Plaintiff) Jean Kasem and
8 daughter Liberty.

9 4. Defendants also made numerous false allegations to the Los Angeles Adult Protective
10 Services (“LA APS”) and the Police (“LAPD”), misusing both public agencies.

11 5. LA APS and LAPD representatives were incessantly called by Defendants numerous
12 times and dispatched to Plaintiff’s Los Angeles residence numerous times. Both agencies
13 investigated the numerous false reports made by Defendants and never found any evidence of
14 Defendants’ fraudulent allegations. It was clear that Defendants were misusing these public services
15 as a form of extreme harassment, media exploitation and prejudicial publicity against Plaintiff for
16 their guardianship scheme of Casey Kasem.

17 6. Defendants then committed Fraud upon the Court by knowingly filing their
18 fraudulent 2007 DPA for their first guardianship attempt of Casey Kasem.

19 7. The first guardianship attempt was then filed ex parte in the Los Angeles Superior
20 Court, Case No. BP-145805, and the first hearing was on October 15, 2013.

21 8. On November 19, 2013, after an invasive and extensive court investigation,
22 Defendants’ petition for guardianship of Casey Kasem was “denied for no good cause” by the Hon.
23 Lesley Green, as it was found that Casey Kasem was receiving “excellent care”, and that the
24 Advance Health Care Directive (that Casey Kasem’s attorneys prepared) and that Casey Kasem
25 signed in 2011 (in the presence of his attorneys), exclusively designated Jean Kasem, his wife, as
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1 his sole exclusive agent for health care decisions, and governed.

2 9. LASC, Case No. BP-145805, was officially “denied with prejudice” and put to an
3 end on January 14, 2014 by the Hon. Lesley Green. Case closed.

4 10. Four (4) months later in May, 2014, Defendants began the same assault with the same
5 pattern of malicious conduct, against Plaintiff’s family.

6 11. Defendants began to make numerous false reports to the LA APS, the LAPD and
7 were again misusing these public services as a form of extreme harassment, media exploitation and
8 prejudicial publicity against Plaintiff and initiated their second, Homicidal Guardianship of Casey
9 Kasem.

10 12. A second fraudulent petition for guardianship of Casey Kasem was then filed ex parte
11 in the Los Angeles Superior Court, Case No. BP-151879, before a different Judge (Daniel Murphy)
12 and without conducting any court investigation to find the “clear and convincing evidence” required
13 to appoint a “temporary” guardian by a Judge, a “temporary” guardianship of Plaintiff’s husband
14 Casey Kasem, issued within 5 minutes into the first hearing on May 12, 2014, while Plaintiff was
15 with her husband Casey Kasem and their daughter Liberty, in Washington State.

16 17
18 13. Judge Murphy showed no deference to the prior ruling by Judge Lesley Green, who
19 “denied” the first fraudulent petition “for no good cause” on November 19, 2013 and finally “denied
20 with prejudice” on January 14, 2014.

21 14. On May 13, 2014, Washington Sheriffs unexpectedly arrived at Plaintiff’s host
22 family’s residence in Silverdale, WA, as another false report was made by Defendants. Defendants’
23 close contact, Sasha Lala, (who works for the Los Angeles APS) dispatched the Washington Sheriffs
24 to the residence where Plaintiff and Casey Kasem were staying.

25 15. After Defendants knew of this location in Silverdale, WA, Defendants proceeded to
26 file a false missing person report of Casey Kasem, causing a needless nationwide manhunt.

27 16. On May 14, 2014, LA APS, Sasha Lala, contacted Jennifer Rixe of the Washington
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1 Adult Protective Services (“WA APS”) and WA APS and WA Sheriffs unexpectedly arrived at the
2 host family’s residence again.

3 17. WA APS and WA Sheriffs found no evidence of the Defendants’ fraudulent
4 allegations.

5 18. LA APS, Sasha Lala, still requested that Washington State Sheriffs forcefully
6 transport Casey Kasem against his will to the ER at Harrison Medical, which was a block away from
7 the Plaintiff’s host family’s residence. The Washington State Sheriffs found no valid reason to
8 forcefully transport Casey Kasem to the ER.
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10 19. On May 15, 2014, WA Deputy Sheriff, Scott Wilson, held a press conference and
11 informed the public that Casey Kasem was not a missing person, doing fine and closed their
12 investigation (which was induced by Defendants making another false APS and Police report).

13 20. Plaintiff then immediately sought legal representation for Casey Kasem and herself.
14 Plaintiff hired Washington attorneys Joel Paget, Roger Sherrard and Gerald Treacy to defend
15 Plaintiff and her husband, Casey Kasem.
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17 21. On May 21, 2014, Plaintiff’s daughter Liberty, Casey Kasem’s PCP, Dr. Donald
18 Sharman, their attorneys Roger Sherrard and Gerald Treacy, all held a press conference at Liberty
19 Lake in Poulsbo, WA to quell the media frenzy that had been initiated once again by Defendants.

20 22. On May 22, 2014, the court appointed attorney in Los Angeles, Sam Ingham (the
21 same one from both the first and second Guardianship scam proceedings) called and threatened
22 Plaintiff and Casey Kasem’s attorneys, Sherrard and Treacy, to cease representing Casey Kasem.

23 23. Casey Kasem had his own legal representation in Washington State and the Los
24 Angeles court appointed attorney Sam Ingham, (who threatened Casey Kasem’s Washington State
25 attorneys), deprived Casey Kasem of his Constitutional and Natural Rights to Due Process of Law,
26 leaving Casey Kasem unrepresented by counsel in the State of Washington. Sam Ingham never even
27 flew to Washington State to defend his so-called client.
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1 24. On May 23, 2014, Defendants fraudulently obtained California ‘temporary’
2 Guardianship papers were registered in Washington State through the UAGPPJ Act, which was
3 apparently the very first out-of-state “temporary” Guardianship registered in Washington, through
4 this Act. Defendants then filed for a hearing in Washington State.

5 25. On May 30, 2014, at the first hearing in Kitsap County Superior Court, Case No. 14-
6 4-00374-8, Defendant Kerri Helen Kasem persuaded Judge Jennifer Forbes to allow for a supposed
7 “independent medical evaluation” of Casey Kasem to take place at a hospital, rather than agreeing
8 for an independent Doctor to make a house call.

9 26. On June 1, 2014, Defendant Kerri Helen Kasem arrived at Plaintiff’s host family’s
10 residence to pick up Casey Kasem and took him to a hospital far away and in a different county,
11 when there was a hospital one block away (Harrison Medical) from Plaintiff’s host family’s
12 residence, which is also owned and operated by the same medical group, CHI Franciscan. Defendant
13 Kerri Helen Kasem was supposed to return Casey Kasem back to his wife, Plaintiff, Jean Kasem,
14 after the supposed medical evaluation.

15 27. Casey Kasem was accompanied by his own PCP, Dr. Donald Sharman, to St Anthony
16 Hospital for the supposed medical evaluation. Dr. Joseph Regimbal was the doctor who examined
17 Casey Kasem on June 1, 2014.

18 28. Approximately 4 hours after the supposed medical evaluation of Casey Kasem had
19 concluded at St Anthony Hospital, Casey Kasem was cleared by Dr. Joseph Regimbal to return to
20 the care he was receiving. Dr. Joseph Regimbal included in his report, “His [Casey Kasem’s] current
21 care plan and management in his current home has been appropriate today, Dr. Sharman’s
22 recommendations and availability have been excellent and timely”.

23 29. Defendant, Kerri Helen Kasem never returned Casey Kasem after the June 1, 2014
24 evaluation. Instead, Defendant, Kerri Helen Kasem kept Casey Kasem entrapped in St Anthony
25 Hospital, when there was “no medical basis for doing so”. Casey Kasem was then kept at St
26 Anthony Hospital for an unauthorized “overnight observation”.

1 30. On June 2, 2014, at the second hearing in KCSC, Case No. 14-4-00374-8, after Judge
2 Jennifer Forbes read Dr. Joseph Regimbal's medical evaluation report of Casey Kasem on court
3 transcript and found no compelling reason to keep him in the hospital, Judge Forbes authorized that
4 Casey Kasem be returned back to his wife (Plaintiff) after Casey Kasem's PCP, Dr. Donald
5 Sharman, also agreed with the Doctor at St Anthony Hospital that it was safe to do so.

6 31. Shortly after the second court hearing of June 2, 2014, Casey Kasem's PCP, Dr.
7 Sharman and Plaintiff, Jean Kasem, called St. Anthony Hospital and spoke with Dr. Ramon Basa.

8 32. Dr. Ramon Basa informed Dr. Sharman and Plaintiff Jean Kasem, that "Casey
9 Kasem's medical evaluation had concluded and his overnight observation went well, he is
10 discharged and you can come pick him up".

11 33. Plaintiff Jean Kasem went to St Anthony Hospital with Casey Kasem's Nurse Shasta
12 Bartelheim and one of her Washington State attorneys, Steven Olsen, with medical transport and met
13 Dr. Sharman at the hospital.

14 34. On the afternoon of June 2, 2014, when Plaintiff Jean Kasem, Nurse Shasta
15 Bartelheim, and one of Plaintiff's Washington State attorneys, Steven Olsen all arrived at St
16 Anthony Hospital, Casey Kasem's discharge was being deliberately delayed.

17 35. After quite some time, Dr. Ramon Basa, a St Anthony Hospital administrator,
18 Washington State attorney Scott Winship, all entered the room where Plaintiff and Nurse Shasta
19 Bartelheim, and one of Plaintiff's Washington State attorneys, Steven Olsen were all waiting.

20 36. Dr. Ramon Basa was all of sudden saying that Casey Kasem would not be discharged.

21 37. Dr. Sharman asked Dr. Basa why they were keeping Casey Kasem in St. Anthony
22 Hospital and Dr. Basa could not explain to Dr. Sharman why he changed his mind.

23 38. Plaintiff proceeded to put her lead Washington attorney Joel Paget on speaker phone.

24 39. Washington State attorney Scott Winship yelled at Plaintiff's Washington state
25 attorney Joel Paget, "Casey is not leaving the hospital period!" and hung up on Plaintiff's
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1 Washington attorney, Joel Paget.

2 40. The next day, Plaintiff was informed that Defendants, using their fraudulent 2007
3 DPA, unilaterally and immediately began withholding Casey Kasem's hydration, nutrition and all
4 proactive medical care.

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6 41. On June 4, 2014, Plaintiff Jean Kasem and her [their] daughter Liberty tried to see
7 her husband, and Liberty's father, Casey Kasem at St Anthony Hospital and without explanation,
8 were told that they [Plaintiff Jean Kasem and Liberty] were banned from entering the hospital.

9 42. On June 6, 2014, Plaintiff Jean Kasem and her daughter Liberty were called to St
10 Anthony Hospital. When they arrived, they were met by Nurse John Reeder, who informed them that
11 they "had already begun the process" of withdrawing and withholding Casey Kasem's hydration,
12 nutrition and all proactive medical care, without any consent from Plaintiff Jean Kasem, and without
13 authorization by WA Judge Jennifer Forbes.

14 43. That late Friday evening, Plaintiff Jean Kasem and daughter Liberty were only
15 permitted approximately 5 minutes to see Casey Kasem, Plaintiff's husband of 35 years and
16 Liberty's father, before they were quickly escorted out of Casey Kasem's room and out of the
17 hospital chapel.

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19 44. Plaintiff Jean Kasem and Liberty never saw Casey Kasem alive again.

20 **WHEREFORE**, the Plaintiff prays for judgment against the Defendants, jointly and
21 severally, as follows:

22 1. For all damages sustained by the plaintiff, including the Estate, in amounts proven
23 at trial, including without limitation, all past and future economic and non-economic damages
24 allowed by RCW 4.20 *et seq.* and the common law; including the loss of the accumulation of
25 income, incurred medical, funeral, and burial expenses, loss of consortium, destruction of the
26 spousal relationship, and the conscious pain, suffering, anxiety and fear of impending death
27 experienced by the decedent;

UNITED STATES DISTRICT COURT

for the

Western District of Washington

JEAN KASEM, as surviving spouse and Personal Representative of the Estate of CASEY KASEM, Deceased

Plaintiff(s)

v.

Kerri Helen Kasem; Mike Kasem; Jamil Anis Aboushosn, Julie Kasem Aboulhosn; Troy Martin; Catholic Health Initiatives, a Colorado corporation and Does 1-99 inclusive

Defendant(s)

Civil Action No. C17-5461DWC

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) Kerri Helen Kasem, 5100 Tobias Avenue, Sherman Oaks, CA 91403 (818) 605-9090
Mike Kasem, Andrew Road, 4th floor, Singapore 299939, Tel: + (65) 8468 2884
Jamil Anis Aboulhosn, 9438 Bianca Ave., Northridge, CA 91325, (310) 291-2058
Julie Kasem Aboulhosn, 9438 Bianca Avenue, Northridge, CA 91325, (310) 383-4603
Troy L. Martin, 20715 Tomlee Ave, Torrance, CA 90503, (310) 259-2323
Catholic Health Initiatives, a Colorado corporation, d/b/a St Anthony Hospital, 198 Inverness Drive West Englewood, CO 80112, Tel: (303) 298-9100

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

JEAN KASEM, AS SURVIVING SPOUSE AND PERSONAL REPRESENTATIVE OF THE ESTATE OF CASEY KASEM, DECEASED
PLAINTIFF IN PRO SE, [Redacted]

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: 06/15/2017

Signature of Clerk or Deputy Clerk

