

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING COUNTY

In the Estate of:)
DENNY DOUGLAS TITUS)
Deceased)
_____)

No. 16-4-04845-2 SEA

EXPERT WITNESS
DECLARATION OF
SAM SUGAR, M.D.

I, SAM SUGAR, am of legal age and competent to testify to the matters below, and hereby declare as follows:

- Declarant. I am a Board-Certified Specialist in Internal Medicine licensed to Practice Medicine in all its branches holding Florida License ME 81368 and a Fellow of The American College of Physicians with 4 decades of direct clinical experience. I am the Founder and President of Americans Against Abusive Probate Guardianship (AAAPG), a national 501c3 organization designed to help expose the crisis of elder abuse and exploitation occurring in our country's State guardianship systems. I reside in Fort Lauderdale, FL. My phone number is (855) 913 5337 ext. 101.
- Professional Background. I received my MD in 1972 from the Abraham Lincoln College of Medicine at the University of Illinois, Chicago. I achieved certification as a specialist in internal medicine from the American Board of Internal Medicine and was

1 distinguished as a fellow of the American College of Physicians. I have served as the
2 Director for Managed Care at Evanston/Northwestern Healthcare, and have taught at
3 both Northwestern University's Feinberg School of Medicine, and the Chicago School
4 of Medicine. I am a Court Officer as a Notary in the State of Florida Certificate
5 GG257329.

6
7 • Guardianship and Probate Fraud (GPF) Expert Witness Qualifications. As a result of
8 over 8 years of personal exposure to irregularities in a guardianship and probate case
9 involving my own family, and after discovering other people who also experienced the
10 same pattern of irregularities in other guardianship and probate cases, a pattern of fraud
11 and criminal activity became increasingly clear. Over a period of several years, in
12 addition to my own direct experience with GPF, I have extensively interacted with
13 attorneys, advocates, academics, victims, media and other experts on the subject of
14 GPF. Under Federal Court Rule 702, I am qualified as an expert witness.

15
16 • Establishment of Americans Against Abusive Probate Guardianship (AAAPG). After
17 several years of exposure to dozens of Florida based cases involving guardianship and
18 probate fraud ("GPF"), in 2013, I founded AAAPG, which is a national organization
19 designed to help expose the corruption and failures of our country's State based
20 guardianship systems. It is now the largest organization in the United States dedicated
21 to GPF. We have 1200 members, and I have been consulted on many hundreds of cases
22 across the country, including several in King County, Washington. In relation to the
23 organization, its mandate, and specific cases, I have been interviewed and quoted by
24 local and national media on dozens of occasions. I also curate the www.aaapg.net
25 website and the probatewarriors group site.

26
27 • Authorship of the Subject Standard Reference Book. I am the author of the #1 Amazon
28 best-selling book on the subject of GPF, *Guardianships and the Elderly: The Perfect*
29 *Crime*, which was published in 2018 by SquareOne Publishers of NY.

1
2 • The King County, Washington Probate Court System. Over the past 4 years, I have
3 been in direct phone and email contact with victims and advocates residing in the State
4 of Washington, and have repeatedly interacted with them in relation to specific cases
5 that have been, or are being adjudicated in King County, Washington courts. Based on
6 a clear pattern of GPF that has emerged in King County, it is my considered expert
7 opinion that the probate courts of King County, all of which are participating agents of
8 the State of Washington and its Supreme Court, as well as other parties in collusion
9 with the state agents, have created, profited from and are perpetuating an organized
10 crime type racket as defined by US RICO statutes. It is also my opinion that the degree
11 of corruption observed not only warrants but demands the federal criminal investigation
12 which has resulted from local federal criminal complaints. It is my intention, and that
13 of my organization, to support the federal investigation of the probate courts of King
14 County and related GPF participants.

15
16 • Guardianship and Probate Case of D. Douglas Titus. After review, it is my considered
17 opinion that the guardianship and probate case of D. Douglas Titus is a model example
18 of the GPF "playbook", which cries out to be brought to national attention. Of the
19 countless GPF cases I have knowledge of, I am not aware of any case of GPF that is
20 more revealing and obvious than the Titus case.

21
22 • Specific Issues with the Titus Case. Among the facts unique to the Titus case is the
23 fact that the late Mr. Titus was a respected practicing attorney in good standing who
24 actually practiced guardianship and probate law, argued a variety of complex law cases
25 daily, was not cognitively impaired, and yet the Court imposed a guardian ad litem in
26 the absence of any reasonable or legitimate finding of incapacity. More remarkable is
27 the fact that Mr. Titus was represented by his and his business partner's legal team
28 including retired Washington State Supreme Court Justice Richard Sanders, former
29 U.S. Attorney Mike McKay, and five other highly qualified attorneys, and yet not one

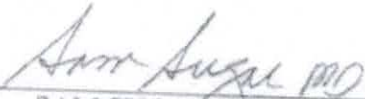
1 incontrovertible argument or legal right was recognized or even entertained by the
2 Court at any point in the case.

3
4 • Titus' Guardian Ad Litem. Most disturbing in the Titus case are the actions of Titus'
5 guardian ad litem, attorney Emily R. Hansen. Included among Ms. Hansen's actions
6 which were at all times opposite to Mr. Titus' interests are: the fact that Ms. Hansen's
7 past criminal conviction permanently disqualified her as even a candidate for guardian
8 ad litem or guardian; her absence of certification; her failure to disclose her conflict of
9 interest with Commissioner Henry Judson; her appointment by Judson to the Titus case
10 out of rotation; Ms. Hansen's illegal obtainment of a TRO against Titus' business
11 partner without legal basis and without Mr. Titus' consent; her open collusion with
12 Assistant Attorneys General Diane Dorsey and Jennifer Boharski to oppose Mr. Titus'
13 interests; Ms. Hansen's legal actions which denied Mr. Titus' right to counsel; dozens
14 of intentional misrepresentations to the court in both writing and oral argument; and
15 finally Ms. Hansen's indefensible actions which prevented Mr. Titus' kidney
16 transplant, resulting in his death within three months.

17
18 This statement is made under the penalty of perjury under the laws of the State of
19 Washington.

20
21 Dated: October 4, 2018

22
23 Place of Signing: Hollywood, FL 33312

24
25 
26 SAM SUGAR, M.D.