

Exhibit A

Chronology of Events Regarding the Abuse of My Mother under the “Guardianship” of Ms. Cukier

Date	Event
~8/1/07	<p>Ms. Cukier, selected by Ms. Benson, was appointed guardian. Linda and I objected to Mr. Moran, who did nothing. She apparently assumed the role with preconceived notions and directives given by Ms. Benson. These biases have always interfered with Ms. Cukier’s judgment in acting in the best interest of my mother, and her close relationship with Ms. Benson appears to be a conflict of interest.</p>
8/8/07	<p>I sent a letter to Ms. Cukier with 165 pages outlining my mother’s medical/living situation regarding her questionable care with Best Home Care, and information requiring follow-up concerning her assets. I never received a response.</p>
8/13/07	<p>Lack of attention to my mother’s medical needs resulted in no prescribed follow-up to a neurologist concerning her seizure due to an increased dose of aricept in combination with seroquel, no prescribed lyme test done, and no attention to her breathing – i.e., she had developed pneumonia.</p> <p>I had indicted to the clinician the problems my mother was having with this medication, but to no avail. My sister took my mother to the neurologist, and the appropriate clinician for the lyme test and pneumonia.</p>
~8/20/07	<p>My mother was admitted to the ER regarding her congestive heart failure. It appears that Best Home Care aides were not interested/trained in how to deal with a patient with congestive heart failure.</p> <p>When Ms. Cukier arrived at the ER, she indicated to me that my mother should learn to live alone without family and friends, and that Ms. Cukier would pay herself every month. She did not feel that she had to wait for court approval – she said “why should I wait.” Then she moved on without a word to me about my mother’s current situation. She appeared indifferent.</p> <p>Over the course of two years, apparently Ms. Cukier has paid herself every month in violation of SJC Rule 1:07, and without itemizing every item for which she billed; she has failed to ask for a citation for one accounting hastily presented to the court (without itemizing every item billed).</p>
9/24/07	<p>My sister took my mother for a follow-up appointment to Dr. Byrne, orthopedics. He questioned why the back support Rx (written 5/21/07) had never been filed. My mother has degenerative disc disease which results in neuropathy in her right leg and foot.</p>
10/27/07, 12/3/07	<p>Lack of Best Home Care aides’ attention to my mother’s dietary needs and fluid intake proved life threatening, resulting in four ER admissions.</p>
12/8/07, 12/14/07,	<p>Ms. Cukier was notified, but she did nothing to correct the situation.</p>

11/12/07 I sent an email to Ms. Cukier concerning BHC, my mother's care, and assets.

11/24/07 Another example of lack of attention by BHC is when my mother went for a walk without the aide's awareness of the situation.

12/06/07 A conference call was held with an outside party (MGH), Ms. Cukier, my sister, and myself in an attempt to impress upon Ms. Cukier the need for her to pay attention to my mother's medical needs and safety issues. This appears to have been an exercise in futility.

1/3/08-1/9/08 **Between 1/3/08-1/9/08**, my mother went **without** her medication for 2-3 days. My mother called the police to remove the aide from her home. Again, Ms. Cukier did nothing to correct this situation. My sister removed Best Home Care (BHC) and took over care of my mother.

1/7/08 A case manager conducted a site visit at my mother's home regarding care to be provided by family.

1/8/08 My sister again asked for input regarding accounting. Ms. Cukier was indignant.

1/11/08 Mr. Moran sent a letter to Ms. Cukier in an attempt to receive needed information to finalize my parents' accounting concerning my sister's guardianship. To date, Ms. Cukier has not responded and released the needed information.

1/9/08-2/1/08 My sister removed BHC and assumed the caregiver role.

2/08-2/09 I assisted my sister in caring for my mother, but Ms. Cukier did everything possible to harass us and impede my mother's care.

Ms. Cukier did not always send \$100/week used for food, medicine, clothing, etc., and in the beginning of 2008, she sent my mother a check made out to another client.

There was never sufficient money/week to cover these needed items, which Ms. Cukier has repeatedly declared incidentals.

Examples of missing checks:

- the week of 9/7/08
- the week of 10/12/08
- the week of 12/12/08, and non-payment of the oil bill; there was also at least one other date re: non-payment of the oil bill
- the weeks of 2/13/09 – 3/25/09

Examples of no money for medication

- 9/23/08 – my sister paid for the Rx and tried to be reimbursed.
- 12/16/08 – I had gone to a clinician several times to ask for medication; we could only purchase 11 pills.

Ms. Cukier continually harassed us over the location of care giving, alleging contempt of a non-existent court order.

When this error was pointed out to her, she then had to enact a “care plan” which it seems was intended more to accommodate Ms. Benson’s demands than my mother’s health and safety. Ms. Cukier was unwilling to exercise common sense concerning such things as weather conditions, and placed my sister and myself at risk.

Then, instead of trying to accommodate a change to this care plan, she and Ms. Benson decided to tear my mother out of her home and place her with my brother.

On 2/13/09 my mother was taken from her home twice; once at 1505 hours and then again at 1815 hours (Cyndi returned with my mother to her home, my mother tried to gain access to her home, and Cyndi ran after her repeating the extraction a second time – unspeakable torment).

My mother was subjected to this unspeakable emotional and physical distress from 2/13/09 – 3/25/09. Initially my sister and I cared for her Friday through Sunday for approximately 2 – 3 weeks, but my mother was so distraught at being torn from her home and shuffled back and forth between the homes of my sister and brother (and on occasion my cousin) (none of the home set-ups are suitable for access by an 83 year old with medical limitations). Furthermore, this arrangement was compromised because my brother’s wife did not want to provide a CORI report due to the fact that she had been required to go through counseling for, it seems, abusing my brother’s younger daughter; and it appears that Ms. Cukier chose to turn a blind eye to this issue.

My mother called crying nearly every day asking when she would be allowed to return home. She was in such distress and so highly agitated that Ms. Cukier decided to have her receive a chemical restraint, which can result in sudden heart failure and/or pulmonary infections, etc. Said chemical restraint is still in effect even though my mother returned to her home on 3/25/09. One has to watch an individual on this chemical restraint very closely as the adverse side effects of this drug are exacerbated with elevated temperatures and humid weather. This information was conveyed to the “guardian” and “case manager” but it appears said information fell on deaf ears.

On 3/15/09, my mother refused to get out of the car and return to Ron’s home. We sat in the driveway for at least two hours, but my mother wanted to go home. Ron’s wife angrily told my mother that she had to get out of the car and started to physically remove my mother from my sister’s vehicle. Others stepped in and this did not happen.

Ms. Cukier and her case manager always found fault with my sister and me concerning some aspect of care giving. However, my mother’s medical records indicate that my mother received excellent care, free of ER admissions.

10/6/08

Ms. Cukier and her case manager, it appears only paid lip service to the “low fat, low salt” dietary restrictions for my mother. They visited my

mother and brother on 10/6/08 and failed to impress upon Brad the need to follow said restrictions.

10/13/08

My mother was admitted to the Winchester **ER** regarding her congestive heart failure.

A similar situation occurred on 8/11/09. My brother Ron, who apparently has been ignoring dietary restrictions and buying foods contraindicated, purchased food items that precipitated an adverse congestive heart failure event. Said event was exacerbated by my mother apparently being forced to walk outside in humid weather.

It was only after this 8/11/09 event that this “case manager” acknowledged in an email that dietary restrictions should be followed. This is interesting because for some time my sister and I have been indicating that after weekend visits with my brother, my mother demonstrated weight gain and on occasion fecal incontinence.

This case manager is less than attentive to detail. She has provided clinicians with misinformation concerning medical information pertaining to my mother (giving the wrong dose regarding calcium supplements and lasix, indicating that my mother was currently on mega doses of vitamin D [which had occurred ~ 5 months prior to this visit], indicating that my mother did not have a thyroid scan in October, 2008 [which did occur], etc.; these actions are incomprehensible as said case manager carries my mother’s medical records with her to doctors’ visits. Perhaps she doesn’t bother to read the file.

This case manager also disseminated the fact that a clinician recommended a thyroid biopsy; however, the doctor’s notes and scan report clearly state the contrary.

2/13/09

This case manager was also instrumental in tearing my mother out of her home on 2/13/09, subjecting her to needless pain and stress, and having her given a chemical restraint.

After my mother returned home on 3/25/09, I was told/threatened that if Ms. Cukier did not perceive that I was “compliant” – i.e., not voicing concern about my mother’s health and safety, that she would tear my mother from her home again and throw her into a nursing home or assisted living.

I was threatened that I had to leave the State, and it appears that my whereabouts were being monitored (such surveillance had occurred previously).

5/10-5/16

My mother gained **3 pounds** this week; no notice given re: resultant chest pain.

6/28-7/5

My mother gained **6 pounds** this week. See email I sent.

7/20-7/25

My mother gained **2 pounds** this week and was having right leg pain and chest pain.

8/11/09

My mother continues to be put at risk as the events of 8/11/09 demonstrate. My mother is made to walk around the block without her back and leg brace and her walker. My sister and I have repeatedly indicated the need for these prescribed items. My mother is made to walk in humid weather. This activity in combination with lax adherence to dietary restrictions resulted in an **ER** admission on 8/11/09.

My mother continues to be denied a roof (“guardian” notified of the problem in 2007 and again in 2008/2009), and is forced to live in a home with documented leaks (insurance company wrote a check for internal damage in 2008). The guardian’s refusal to correct this problem places my mother’s homeowner’s policy in jeopardy, and exacerbates the water damage.

From May, 2009 to the present repeated attempts have been made to access needed documents to finalize the accounting for which my sister is responsible. Said guardian refuses to turn over the required documentation.

Said guardian refuses to comply with SJC Rule 1:07, and, it appears, continues to pay herself every month.

Said guardian has never asked for a “citation” for the limited, less than itemized accounting that was hastily submitted to the court in February, 2009.

Based upon her words and deeds, it appears that this guardian has never demonstrated such qualities as care, fiduciary responsibility, ethics, and common sense. It appears that Ms. Cukier has been self serving and more concerned about covering for her actions and accommodating the wishes/demands of Ms. Benson.

My mother deserves better treatment than what she has been subjected to for more than two years. This abuse notwithstanding, my mother is trying to survive; hopefully she will not succumb to negligence, recklessness, fiduciary irresponsibility, and apparent blatant disregard for her health and safety.

A guardian ad litem should be appointed to investigate the aforementioned problems/abuses, to represent her interests, and to advocate for her health and safety.

8/16/09

My mother gained **one pound in one day**, due it appears to “luncheon” meat, just two days after being released from the hospital.

8/28/09

My mother gained **3 pounds in one day**; no notification given by guardian/case manager.

8/30/09

My mother was **6 pounds** above her base weight.

9/1/09

When I talked with my mother she sounded **congested** – indicative of fluid in her lungs. I mentioned this on every other occasion that I made this observation. Our comments were either dismissed or excuses made.

wk of 9/6/09- 9/13

The case manager (Janet, et al) was having difficulty controlling weight gain; between 9/13 and 9/14, my mother lost **3 pounds** of fluid.

wk of 9/20/09-9/27

This case manager and aides were having the same difficulty controlling weight gain. Said case manager paid lip service to dietary restrictions, but from all indications failed to implement said restrictions. The aides were not/are not well versed in said implementation. Foods contraindicated were/are being purchased. My sister has continually stepped in to throw out said items, talk with the aides and the individual purchasing the food – apparently to no avail. Now, as of 10/29, my sister will step in to purchase the food.

wk of 10/1/09-10/4

My mother gained **4 pounds** of fluid.

wk of 10/11/09-10/18

Weight control/fluid control continued to be a problem.

10/22/09

While my mother was engaged in one of her forced walks, she complained of chest pain. An ambulance took her to Melrose-Wakefield **ER**. My mother had excess fluid compromising cardiovascular function and breathing.

My sister queried the “case manager” about the administration of lasix and said “case manager” indicated that extra lasix was given the weekend of 10/17 when in fact that did not occur. It appears that extra lasix was given the weekend of 10/10. This just underscores the fact that these “case managers” are less than attentive to crucial details that impact my mother’s life.

My sister was vigilant regarding my mother’s care while she was in the hospital because it appears that these “aides” hired by Ms. Cukier/Ms. Medow do not understand dietary restrictions.

My sister talked with medical staff and dieticians. The medical staff indicated that **blood chemistries** (e.g., glucose levels, liver enzymes, electrolytes values, etc.) **were abnormal due in part to stress** [being forced to have unfamiliar individuals in her home, being forced out of her home, etc.] and in part to increases in certain medications (increase in lisinopril caused increase in potassium levels). Clinicians were trying to adjust various medications to stabilize all parameters.

10/27/09

My mother was released from the hospital.

My sister again pointed out to Ms. Cukier(“guardian”)/Ms. Medow(“case manager”) the necessary, appropriate dietary restriction for a cardiac patient; said restrictions to this point have been loosely addressed or ignored. My sister underscored the fact that my mother must not be forced to walk outside, and that a walker must be used for any walking. My sister also reiterated that another key component for my mother’s failing health was/is the unspeakable stress perpetrated by the individuals tearing her out of her home, forcing her to endure strangers in her home, ignoring her wishes, forcing her to walk even when there were indications of congestion, etc.

10/29/09

Apparently my mother was **released too soon** from the hospital without complete titration of all of her medications. It appears that the “case manager” gave my mother an **extra dose of lasix** because of **fluid accumulation and “shortness of breath.”**

My mother was transported to the hospital.

During these hospital stays Ms. Cukier et al have their “aides” stay with my mother, who is now on a **one liter fluid restriction**. The “aide” who covers from 1600 hrs-2100 hrs apparently **does not realize that food contains water/fluid** (and it appears that the “case manager” has not educated these aides regarding dietary and fluid restrictions). Said aide gave my mother jello and a little soup which put my mother 200 ml over the 1000 ml restriction. Fortunately my sister caught this; and a nurse found an extra jello and it was removed. My sister again had to instruct this aide in the importance of these dietary/fluid restrictions.

Still Ms. Cukier/Ms. Medow were having their “aides” order my mother’s meals in the hospital.

It appears that my sister’s instructions regarding dietary/fluid restricts fell on deaf ears and she went to the medical staff to have **hospital staff now order my mother’s meals**. The nursing staff instructed the kitchen in appropriate meals and oversight was conducted by both kitchen staff and nursing staff.

Ms. Cukier/Ms/ Medow apparently have considerable difficulty dealing with dietary/fluid restrictions required for a patient with my mother’s medical conditions. Giving my mother Coumadin is being discussed; this drug requires constant monitoring otherwise one can hemorrhage. Based upon their ongoing performance, my sister and I do not feel that Ms. Cukier/Ms. Medow are capable of dealing with these medical issues and the required diligence needed to monitor and care for my mother.

10/30/09-11/2

When I talked to my mother, she sounded weak, tired, and congested.

11/2/09

My mother was **released** from the hospital in the afternoon; **she went home with the aide who does not realize that food contains water.**

Ms. Medow came to my mother’s home to set up the medication tray and **indicated** to my sister that they **should have been more diligent** in controlling my mother’s weight and fluid gain. Such constant fluctuation in fluid level and increase in medication is hard on the kidneys and impacts body chemistries.

Ms. Medow spent ~ 15 minutes doing her task. The aide expressed confusion concerning medication issues. She asked some questions, but still expressed confusion to my sister when Ms. Medow left.

Based upon comments from my sister and the aides, it appears that Ms. Medow does not take the time to focus her undivided attention to instruct her aides on important issues such as medication and dietary and fluid restrictions. These aides are constantly asking my sister to explain these

issues. This failure to adequately communicate and instruct these aides continues to negatively impact my mother's health and well being.

These aides have questions concerning the medication list, the notations in the "comment" section, generic versus brand names, and listed medications spelled incorrectly versus bottled medication. They continue to ask my sister questions.

There was a new aide in the house; this situation caused my mother acute anxiety resulting in little sleep.

Ms. Cukier, et al know that my mother does not want strangers in her home and yet they persist in causing her stress which negatively impacts her health.

11/3/09 My sister indicated that aides are "charting" fluid intake, but they appear to be ignoring the fact that food contains water.

My mother was **congested** and this impacted her ability to sleep.

11/4/09 There was to be another strange aide in the house; thus, my sister spent the night.

11/5/09 It appears that Ms. Cukier/Ms. Medow/her aides do not monitor to see that my mother has enough "fiber" in her diet to facilitate a bowel movement. GI function is altered due to fluid restriction, stress, etc.

My mother was complaining about **pain**, and the aide didn't discern whether it was stomach/abdominal pain versus other pain. She didn't apparently know if my mother had a recent bowel movement. So this aide gave my mother nitroglycerin.

Later a visiting nurse came in and declared that she thought my mother was depressed, and that she was going to request medication to address that problem. This person didn't bother to assess the situation – i.e., that my mother wasn't receiving sufficient fiber, that my mother is being subjected to acute stress because of strangers in her home, that my mother was recently in the hospital due in part to adverse drug interactions, that my mother had just been given nitroglycerin for what appears to be pain related to constipation, etc.

My mother has serious medical problems that should be addressed by individuals who are diligent and who comprehend the totality of the situation in which my mother is desperately trying to survive.

11/6/09 My sister was with my mother last night. Seeing that my mother was/is continuing to have **difficulty breathing** this morning, my sister had her **transported to MGH** in Boston.

When I talked with my mother this evening, she was having difficulty breathing. I called the nursing station and requested that a nurse check her.

11/7/09

It appears that my mother is doing better. My sister indicated that it appears that my mother has lost~ ten pounds (of fluid) in ~ two weeks. Based upon her records, my sister indicated that it appears that Ms. Cukier/Ms. Medow/aides lost control of my mother's weight/fluid control starting in June, 2009.