Marc Brent Lipp

Broward County case 26013659CF10A

Compiled from supplied court exports on November 20, 2026.

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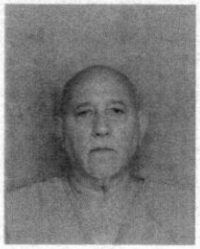
All supplied records for this case are included. Personal identifiers, private contact details and financial account information have been redacted for publication. Original document content and printed page numbers are otherwise retained.

Compilation note: The supplied Lipp arrest packet omits printed page 1 of the joint affidavit. That opening page is included here from Mundle's companion case, 26013660CF10A. The remaining records are from Lipp's supplied packet and case-detail export.

Document sources: Broward County Sheriff's Office and Broward County Clerk of Courts. This cover was added for navigation; it is not a court filing.

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Broward County Sheriff's Office



Booking Report

CIS #	502603621	BCCN #	1008842	Booking Sheet Control Date and Time	
OBTS	607403135	Print Clearance	11/17/26 16:32:36	Prints Yes	11/17/26 19:47:31
Arrest #	BS 2603621	Offense Report #	90-2609-8652	Agency	BROWARD SHERIFF'S OFFICE

Last Name First Middle: **LIPP, MARC BRENT**

SSN #: [redacted]

Race	Sex	Height	Weight	Eyes	Hair	Comp.	Age Admitted	DOB	Place of Birth	State	FDLE
W	M	509	185	BRO	BLN	LGT	64	[redacted]	CHICAGO	ILLINOIS	0

Permanent Address: [redacted]

Months of Residence: 360

Arrest Date: 11/17/26 14:30:00 Place of Arrest: [redacted] Arresting Officer: 12143 BRADLEY

Inmate Logged Date: 11/17/26 15:45:37 Inmate Log Type: FULL INTAKE Place Admitted: MAIN

Intake Comments: SP/CO/29/CH/54-17610 WC-17834

Alias Last name, First, Middle, DOB

Warrants Officer Id: bs17834

Scars,Marks,Tattoos

Tattoos: Forearm, left — CROSS

Release Date/Time | Release Reason | Release Authorized By

Charge No.	Charge Initiation Date	Statute	Warrant/Capias	Level	M.C	B. Type	Bond Amount
1	11/17/26 19:36	812.014-2a1	261047AF10	1F	Y	BOND	$75,000.00

Charges: GRAND THEFT FIRST DEGREE>$100000 OR LEO SEMI-TRLR **Comments:**

Booking Off. ID: bs20938 **County:** BROWARD **Judge:** USAN

Charge No.	Charge Initiation Date	Statute	Warrant/Capias	Level	M.C	B. Type	Bond Amount
2	11/17/26 19:37	817.535-2a	261047AF10	3F	Y	BOND	$25,000.00

Charges: FILE FALSE DOCS AGAINST REAL/PERSNL PROP - 1ST OFF **Comments:**

Booking Off. ID: bs20938 **County:** BROWARD **Judge:** USAN

Charge No.	Charge Initiation Date	Statute	Warrant/Capias	Level	M.C	B. Type	Bond Amount
3	11/17/26 19:39	825.103-2a	261047AF10	1F	Y	BOND	$75,000.00

Charges: EXPLOITATION OF ELDERLY $100,000 OR MORE **Comments:**

Booking Off. ID: bs20938 **County:** BROWARD **Judge:** USAN

* End of Report *

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sheriff.org

SHORT ARREST INFORMATION FORM

ARREST NUMBER	LAST NAME	FIRST NAME	MIDDLE NAME
	Lipp	Marc	Brent

CASE NUMBER	DATE OF BIRTH	[redacted]
90-2609-8652	[redacted]	

RACE	SEX	AGE	TIME	DATE OF ARREST	[redacted]
W	M		1430	11/17/26	

ARRESTING DEPUTY / OFFICER / AGENT	IDN#	AGENCY	DIVISION
C-Bradley	12143	BSO	CID

CHECK APPLICABLE BOXES	CAPIAS/WARRANT	COURT ORDER	BOND SURR.	OTHER
	2026- WC# 1276411			

COUNT NUMBER	OFFENSES CHARGED	CAPIAS# WARRANT# CASE#	BOND AMOUNT
1	Grand Theft 1°	261047 AF10	$75K
2	Filing False Documents	" "	$25K
3	Elderly Exploitation	" "	$75K

COMMENTS:

Operator T. Armstrong 17943

RELEASE INFORMATION:

DATE: _____

RELEASE REASON: _____

TIME: _____ **BY IDN#** _____

Det. C. [signature]

ARRESTING DEPUTY / OFFICER / AGENT SIGNATURE

Original Copy (Court) Yellow Copy (State Attorney) Blue Copy (Fingerprints) Pink Copy (Arresting Officer)

BSO DB#12 (Revised 02/08)

SP|CO|29|CH|54-17010 WC-17834

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Lipp, M

Broward County Sheriff's Office
2601 West Broward Boulevard
Fort Lauderdale, FL 33312
P. (954) 831-8100
F. (954) 797-0929

BSO - Confirmation Report

Confirmation Number: WC#2026-1276411 Date Issued: 11/17/2026 02:58 PM Issued By: Armstrong, Tywania [bs17943]
Name/Id/Org: Deputy C. Bradley / 12143 / COOPER CITY Status: Confirmed Notes: New arrest via TTY 55 pages
Number of Pages: 55

Case Number: 261047AF10 Name: Lipp , Marc
Capias Date: 11/13/2026 Type: Felony_AF DOB [redacted] Race/Gender: W / M

Additional Warrants on Confirmation:

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26-1047 AF10

ARREST WARRANT
Broward County Sheriff's Office
Case # 90-2609-008652

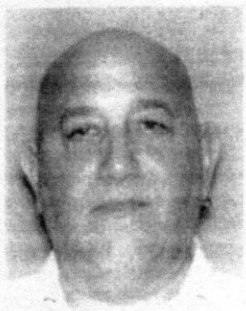
IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff, :

Vs.

WARRANT TO ARREST



NOV 17 '26 PM 1:17

MARC BRENT LIPP
[redacted]
Defendant, :

IN THE NAME OF THE STATE OF FLORIDA, TO ALL AND SINGULAR THE SHERIFFS AND CONSTABLES OF THE STATE OF FLORIDA AND/OR TO AGENTS OF THE FOLLOWING LAW ENFORCEMENT AGENCIES:

Broward County Sheriff's Office

WHEREAS, Detective Christopher Bradley, of the Broward County Sheriff's Office, County of Broward, State of Florida, has this 13th day of November, A.D. 2026, made application for an Arrest Warrant via electronic means pursuant to F.S. 901.02(3), said application being supported by the General Affidavit for an Arrest Warrant, wherein it is alleged that the Affiant has reason to believe and does believe that one **MARC BRENT LIPP (White/Male, DOB: [redacted]** did then and there:

Count I

GRAND THEFT MORE THAN $100,000 F.S. 812.014(1)(a), F.S. 812.014(1)(b), and F.S. 812.014(2)(a)

On or about August 3, 2025, and continuing through the present, Defendant 1, **FLORENCE ROSE MARIE MUNDLE**, Defendant 2, **DONNA MARIE RUDDOCK**, and Defendant 3, **MARC BRENT LIPP**, in Broward County, Florida, did knowingly obtain, use, or endeavor to obtain or use

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26-1047 AP10

the property of Donald Julian Adams, an elderly person, and, after his death on September 20, 2025, the property of the Estate of Donald Julian Adams, to wit: the real property located at [redacted] ing an approximate Just Market Value of $556,610.00, with the intent to temporarily or permanently deprive Donald Julian Adams and his Estate of a right to the property or a benefit therefrom, or to appropriate the property to their own use or to the use of a person not entitled thereto, by obtaining ownership and control of said property through a Quit Claim Deed and a Certificate of Trust to the Donald J. Adams Revocable Trust, a trust of which **FLORENCE ROSE MARIE MUNDLE** and **DONNA MARIE RUDDOCK** are the sole beneficiaries and successor co-trustees, the property having a value of $100,000 or more, contrary to Sections 812.014(1)(a), 812.014(1)(b), and 812.014(2)(a), Florida Statutes.

Count II
UNLAWFUL FILING OF FALSE DOCUMENTS OR RECORDS AGAINST PROPERTY
F.S. 817.535(2)(a)

On or about September 12, 2025, Defendant 1, **FLORENCE ROSE MARIE MUNDLE**, Defendant 2, **DONNA MARIE RUDDOCK**, and Defendant 3, **MARC BRENT LIPP**, in Broward County, Florida, with the intent to defraud Donald Julian Adams, his heirs, and his Estate, did file, direct a filer to file, or cause to be presented for filing or recording in the Official Records of Broward County an instrument containing a materially false, fictitious, or fraudulent statement or representation that purported to affect an owner's interest in real property, to wit: a Quit Claim Deed concerning [redacted] recorded as **Instrument Number 120433999**, which represented on its face (a) that it was made, executed, and acknowledged before a notary on August 3, 2025, a date that the filers and the notary have since disavowed and have twice replaced in sworn court filings, and (b) that "This deed is recorded for the purpose of reflecting Grantor's name change," when in fact the instrument purported to convey the property from Donald J. Adams individually to Donald J. Adams as Trustee of a trust that did not exist on August 3, 2025 and of which **FLORENCE ROSE MARIE MUNDLE** and **DONNA MARIE RUDDOCK** are the sole beneficiaries and successor co-trustees, contrary to Section 817.535(2)(a), Florida Statutes.

Count III
EXPLOITATION OF THE ELDERLY 100K OR MORE F.S. 825.103(2)(A)

On or about August 3, 2025, and continuing through September 20, 2025, Defendant 1, **FLORENCE ROSE MARIE MUNDLE**, Defendant 2, **DONNA MARIE RUDDOCK**, and Defendant 3, **MARC BRENT LIPP**, in Broward County, Florida, while standing in a position of trust and confidence with Donald Julian Adams, an elderly person 85 years of age, as his live-in caregiver and his caregiving contractor respectively, did knowingly obtain or use, endeavor to obtain or use, or conspire with another to obtain or use the funds, assets, or property of Donald Julian Adams, with the intent to temporarily or permanently deprive Donald Julian Adams of the use, benefit, or possession of his funds, assets, or property, or to benefit someone other than Donald Julian Adams, and while knowing or reasonably knowing that Donald Julian Adams lacked the capacity to consent, by obtaining ownership and control of his residence located at [redacted]

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26-1047 AP10

ARREST WARRANT
Broward County Sheriff's Office
Case # 90-2609-008652

[redacted] Ft. Lauderdale, Florida 33312 through a Quit Claim Deed and a Certificate of Trust to the Donald J. Adams Revocable Trust, and through the creation of a will, trust agreement, and other testamentary devise that altered the plan of distribution expressed in his prior wills, without any of the forms of authorization described in Section 825.103(1)(f), and thereafter exercising authority over the residence, maintaining, renovating, and receiving financial benefit from it, the funds, assets, or property involved having a value of $100,000 or more, contrary to Sections 825.103(1)(a), 825.103(1)(b), 825.103(1)(f), and 825.103(3)(a), Florida Statutes.

The offense set forth in the foregoing Warrant is contrary to the statute in such case made and provided, and against the peace and dignity of the State of Florida.

THE FACTS upon which the Affiant's belief is based have been stated under oath and are set out in Affiant's **GENERAL AFFIDAVIT AND APPLICATION FOR ARREST WARRANT.**

NOW THEREFORE, the facts upon which the belief of said Affiant is based as set out in said **GENERAL AFFIDAVIT AND APPLICATION FOR ARREST WARRANT** are hereby deemed sufficient to show probable cause for the issuance of an **ARREST WARRANT** in accordance with the application of said Affiant

THESE ARE, THEREFORE, to command you forthwith to arrest the said **MARC BRENT LIPP (White/Male, DOB:** [redacted] and bring him before me to be dealt with according to law.

Given under my hand and seal the 13th day of November, A.D. 2026.

THE HONORABLE JUDGE Michael Usan
JUDGE OF THE CIRCUIT COURT

CLERK OF CIRCUIT & COUNTY COURT
IN GOD WE TRUST
17TH JUDICIAL CIRCUIT
FLORIDA
BROWARD COUNTY

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26-1047 AP10

ARREST WARRANT
Broward County Sheriff's Office
Case # 90-2609-008652

RECEIVED the Warrant on the ___

Day of _____, 2026
and executed the same on the ____
Day of_____, 2026 by arresting the within-named **Defendant and having him** now before the Court

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA

Vs.

MARC BRENT LIPP (White/Male, DOB: [redacted], DEFENDANT

ARREST: _____
RETURN: _____
MILEAGE: _____
COMMITMENT: _____
RECOMMITMENT: _____
RELEASE: _____
TOTAL:_____
_____ SHERIFF

WARRANT TO ARREST

BOND as to **Count 1** is hereby fixed at $ 75,000

BOND as to **Count 2** is hereby fixed at $ 25,000

BOND as to **Count 3** is hereby fixed at $ 25,000

RETURN DATE on this Warrant to be not later than the 12 Day of NOV, 2027.

CLERK OF CIRCUIT & COUNTY COURT
IN GOD WE TRUST
17TH JUDICIAL CIRCUIT
FLORIDA
BROWARD COUNTY

THE HONORABLE Michael Usan
JUDGE OF THE CIRCUIT COURT

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REV AB 12/01/25

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ARREST AFFIDAVIT
Broward County Sheriff's Office
Case # 90-2609-008652
State of Florida v. Donna Marie Ruddock, Florence Rose Marie Mundle, & Marc Brent Lipp

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT, IN AND FOR BROWARD COUNTY, FLORIDA

STATE OF FLORIDA,

Plaintiff, :

Vs.

AFFIDAVIT TO ARREST

DONNA MARIE RUDDOCK
[redacted]
Lauderhill, Florida 33319
(Black/Female, DOB: [redacted]
SSN [redacted]

FLORENCE ROSE MARIE MUNDLE
[redacted]
Sunrise, Florida 33313
(Black/Female, DOB: [redacted]
SSN [redacted]

MARC BRENT LIPP
[redacted]
Lauderhill, Florida 33319
(White/Male, DOB [redacted]
SSN [redacted]

Defendants. :

.....:

The undersigned Affiant, Detective Christopher Bradley of the Broward County Sheriff's Office, County of Broward, State of Florida, hereby submits this affidavit and application for arrest to the Honorable Michael Usan, Judge of the Circuit Court of the Seventeenth Judicial Circuit in and for Broward County, State of Florida.

This affidavit and application is hereby electronically submitted bearing your Affiant's signature supported by oath or affirmation in compliance with F.S. 901.02(3), in which the Affiant deposes and says that beginning on or about the 13th day of November, A.D. 2026, and continuing thereafter, in the County and State aforesaid, one **DONNA MARIE RUDDOCK (Black/Female, DOB:** [redacted] **FLORENCE ROSE MARIE MUNDLE (Black/Female, DOB:** [redacted] **and MARC BRENT LIPP (White/Male, DOB:** [redacted] did then and there:

Count I
GRAND THEFT, $100,000 OR MORE
F.S. 812.014(1)(a), F.S. 812.014(1)(b), and F.S. 812.014(2)(a)

On or about August 3, 2025, and continuing through the present, Defendant 1, **FLORENCE ROSE MARIE MUNDLE**, Defendant 2, **DONNA MARIE RUDDOCK**, and Defendant 3,

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MARC BRENT LIPP, did, as principals, then and there, in Broward County, Florida, did knowingly obtain, use, or endeavor to obtain or use the property of Donald Julian Adams, an elderly person, and, after his death on September 20, 2025, the property of the Estate of Donald Julian Adams, to wit: the real property located at [redacted] Ft. Lauderdale, Florida 33312, having an approximate Just Market Value of $556,610.00, with the intent to temporarily or permanently deprive Donald Julian Adams and his Estate of a right to the property or a benefit therefrom, or to appropriate the property to their own use or to the use of a person not entitled thereto, by obtaining ownership and control of said property through a Quit Claim Deed and a Certificate of Trust to the Donald J. Adams Revocable Trust, a trust of which **FLORENCE ROSE MARIE MUNDLE** and **DONNA MARIE RUDDOCK** are the sole beneficiaries and successor co-trustees, the property having a value of $100,000 or more, contrary to Sections 812.014(1)(a), 812.014(1)(b), 812.014(2)(a), and 777.011, Florida Statutes.

Count II
UNLAWFUL FILING OF FALSE DOCUMENTS OR RECORDS AGAINST PROPERTY
F.S. 817.535(2)(a)

On or about September 12, 2025, Defendant 1, **FLORENCE ROSE MARIE MUNDLE**, Defendant 2, **DONNA MARIE RUDDOCK**, and Defendant 3, **MARC BRENT LIPP**, did, as principals, then and there, in Broward County, Florida, with the intent to defraud Donald Julian Adams, his heirs, and his Estate, did file, direct a filer to file, or cause to be presented for filing or recording in the Official Records of Broward County an instrument containing a materially false, fictitious, or fraudulent statement or representation that purported to affect an owner's interest in real property, to wit: a Quit Claim Deed concerning [redacted] Ft. Lauderdale, Florida 33312, recorded as **Instrument Number 120433999**, which represented on its face (a) that it was made, executed, and acknowledged before a notary on August 3, 2025, a date that the filers and the notary have since disavowed and have twice replaced in sworn court filings, and (b) that "This deed is recorded for the purpose of reflecting Grantor's name change," when in fact the instrument purported to convey the property from Donald J. Adams individually to Donald J. Adams as Trustee of a trust that did not exist on August 3, 2025 and of which **FLORENCE ROSE MARIE MUNDLE** and **DONNA MARIE RUDDOCK** are the sole beneficiaries and successor co-trustees, contrary to Section 817.535(2)(a), and 777.011, Florida Statutes.

Count III
EXPLOITATION OF AN ELDERLY PERSON, $100,000 OR MORE
F.S. 825.103(2)(a)

On or about August 3, 2025, and continuing through September 20, 2025, Defendant 1, **FLORENCE ROSE MARIE MUNDLE**, Defendant 2, **DONNA MARIE RUDDOCK**, and Defendant 3, **MARC BRENT LIPP,** did, as principals, then and there in Broward County, Florida, while standing in a position of trust and confidence with Donald Julian Adams, an elderly person 85 years of age, as his live-in caregiver and his caregiving contractor respectively, did knowingly obtain or use, endeavor to obtain or use, or conspire with another to obtain or use the funds, assets, or property of Donald Julian Adams, with the intent to temporarily or permanently deprive Donald Julian Adams of the use, benefit, or possession of his funds, assets, or property, or to benefit someone other than Donald Julian Adams, and while knowing or reasonably knowing that Donald

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Julian Adams lacked the capacity to consent, by obtaining ownership and control of his residence located at [redacted] Ft. Lauderdale, Florida 33312 through a Quit Claim Deed and a Certificate of Trust to the Donald J. Adams Revocable Trust, and through the creation of a Will, trust agreement, and other testamentary devise that altered the plan of distribution expressed in his prior wills, without any of the forms of authorization described in Section 825.103(1)(f), and thereafter exercising authority over the residence, maintaining, renovating, and receiving financial benefit from it, the funds, assets, or property involved having a value of $100,000 or more, contrary to Sections 825.103(1)(a), 825.103(1)(b), 825.103(1)(f), 825.103(3)(a), and 777.011, Florida Statutes.

Count IV
FRAUDULENT USE OF PERSONAL IDENTIFICATION INFORMATION OF A DECEASED PERSON
F.S. 817.568(8)(a)

On or about September 23, 2025, **DONNA MARIE RUDDOCK**, in Broward County, Florida, did willfully and fraudulently use, or possess with intent to fraudulently use, personal identification information concerning a deceased individual, to wit: the name and Wells Fargo bank account number of Donald J. Adams, who died on September 20, 2025, by negotiating Wells Fargo Check No. 5273 drawn on his account, payable to "Cash" in the amount of $5,000.00 and bearing the date October 18, 2025, into JP Morgan Chase account No. [redacted] without authorization, contrary to F.S. 817.568(8)(a).

Count V
FRAUDULENTLY OBTAINING A MOTOR VEHICLE TITLE
F.S. 319.33(1)(e)

On September 25th, 2025, Defendant 1, **FLORENCE ROSE MARIE MUNDLE**, and Defendant 2, **DONNA MARIE RUDDOCK**, did, as principals, in Broward County, Florida did then and there unlawfully procure or attempt to procure a certificate of title to a motor vehicle, Florida Title Number [redacted] Transaction Number [redacted] to-wit: the decedents Donald Adams 2011 Chevrolet Silverado, black in color, bearing Vehicle Identification Number (VIN) [redacted] knowing or having reason to believe that said motor vehicle had been stolen via a fraudulent Last Will and Testament dated August 21, 2025 for owner Donald Adams, contrary to F.S. 319.33(1)(c), F.S. 319.33(6), and 777.011. (L3).

GROUNDS FOR ISSUANCE
The following grounds constitute Affiant's reason for his belief that the laws of the State of Florida were violated as stated above and the facts establishing the grounds for this affidavit and the probable cause for believing that such facts exist are as follows:

AFFIANTS QUALIFICATIONS

- Investigated large-scale state and federal fraud cases as it relates to cellular & computer devices.
- Experience with preparation and execution of Arrest, Search, & Bank Seizure Warrants.
- Assigned to the Money Laundering Task Force for approximately four years.

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- Debriefed and participated with defendants, informants, and witnesses who had personal knowledge for my investigations.
- Your Affiant has also conducted investigations involving the use of telephone records, bills, and the use of Cellebrite software.
- Microsoft Excel for Money Laundering Investigations
- South Florida HIDTA Introduction to Money Laundering & Financial Investigations
- A.C.A.M.S certificate & Financial Crime Conference
- Advanced Vehicle Contraband Concealment
- Florida Insurance Fraud Education Training
- Money Laundering Training
- Street Crimes Training
- Crime Suppression Team Introduction Training
- CMS Field Training Program/FTD Orientation Training
- Narcotics Identification Training
- Advanced Narcotics & Dangerous Drug Training
- Auto Theft Investigations Training
- Narcotics Identification Training
- Narcotics Investigations Training
- Chainalysis – Certified Blockchain / Cryptocurrency Investigator Training
- Introduction to Criminal Investigations Training
- FBI CASTViz

Your Affiant, Detective Christopher Bradley, has been a Law Enforcement Officer in the State of Florida for over twenty-nine (29) years and has made over 1000 arrests. Your Affiant is currently a Broward Sheriff's Office Detective assigned to the Criminal Investigations Unit in Cooper City and is detached full-time to the Broward County Property Appraiser's Office Deed Fraud Task Force, handling property crimes and real estate fraud investigations. Your Affiant is also a sworn FBI Task Force Officer assigned to the South Florida Fraud Task Force, which investigates Complex Financial Crimes, Corporate Fraud, Securities/Commodities Fraud, Bankruptcy Fraud, Mass Marketing Fraud, and Insurance Fraud.

Your Affiant was previously assigned to the Broward Sheriff's Office Crime Suppression Team in Weston, investigating property crimes, organized fraud cases, tracking and arresting fugitives, and drug trafficking investigations. Your Affiant was also assigned full-time with the Strategic Investigations Division, as part of the Money Laundering Task Force (M.L.T.F.). The M.L.T.F. worked in conjunction with State and Federal Task Forces investigating financial crimes. The M.L.T.F. investigates complex criminal organizations, sophisticated financial crime cases, and large-scale money laundering operations. Your Affiant is familiar with and has participated in all the normal methods of investigation, including but not limited to visual and electronic surveillance, questioning of witnesses and victims, the execution of Search, Arrest, and bank Seizure warrants, the use of confidential informants, the utilization of undercover agents, and participation in federal grand jury with indictments.

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POLICE INVESTIGATIVE NARRATIVE

On May 30th, 1990, Donald J. Adams, a single man and military veteran with the United States Army, purchased the residence of [redacted] Ft. Lauderdale, under instrument # 90224523.

"Lot 33, of a "RESUBDIVISION" of a portion of Block 7, of LAUDERDALE ISLES NO. 2, according to the Plat thereof, as recorded in Plat Book 39, Page 20, of the Public Records of Broward County, Florida."

SATISFACTION OF MORTGAGE



On January 25, 2013, PHN Mortgage Services Corporation filed a Satisfaction of Mortgage regarding the residence of Donald J. Adams. This Satisfaction of Mortgage was regarding document # 98-506566, in book 28788, page 0033, in the office of the County Recorder of Broward County under instrument # 111284667 and recorded on January 29th, 2013.

In October of 2025, Theresa Adams reported to the Broward County Property Appraiser's Office Deed Fraud Task Force the real estate theft of her brother-in-law Donald Adams residence in Ft. Lauderdale, Broward County. William also referred to as "Bill," and Theresa Adams also referred to as "Terry" in this affidavit, along with Attorney Ryan Shrouder, assisted your Affiant by providing documents/evidence related to this theft scheme.

Donald J. Adams was born [redacted] and resided at [redacted] Fort Lauderdale, Broward County, Florida 33312. The Florida Certification of Death identifies Donald Adams as a white male and reflects that he was 85 years old when he died. The death certificate further identifies him as a United States Armed Forces veteran and that he had never married and had no surviving spouse.

The Broward County Property Appraiser's Office value in 2026 for Donald Adams' residence was $766,032.00 and was unencumbered. Donald Adams' living family included his brother, William

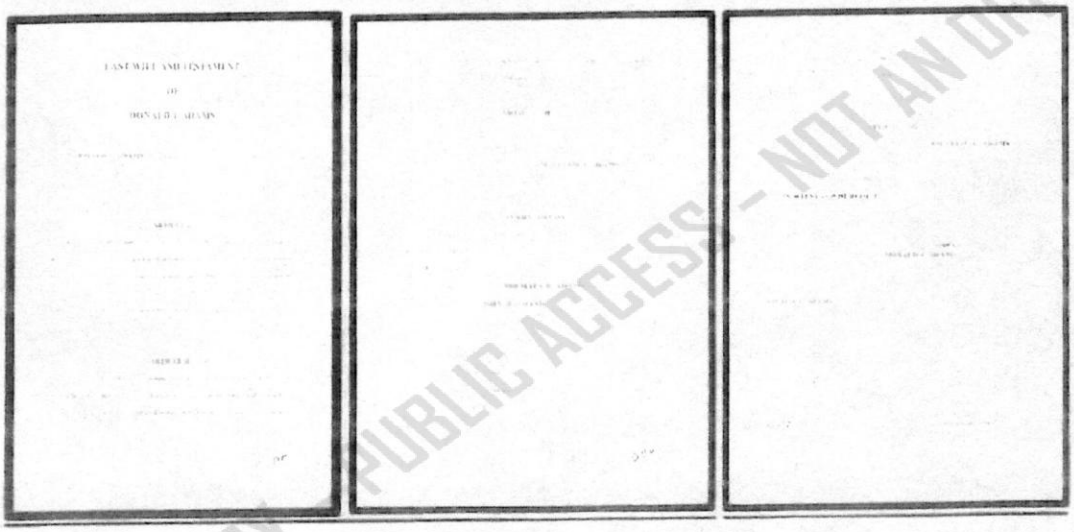
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A. Adams; William's wife, Theresa Adams; and William's sons, Michael and John Adams. Donald J. Adams had no children.

2006 LAST WILL AND TESTAMENT OF DONALD J. ADAMS

On April 13, 2006, Donald Adams executed a Last Will and Testament. The document provided that the residue of his estate would pass to his brother, William A. Adams, provided William survived him by 30 days. If William did not survive Donald Adams for the required period, the Will provided for distributions involving Theresa Adams and Donald Adams' nephews, Michael and John. William was nominated as personal representative. Thomas L. LaSalle was identified as the notary, and Edward Darragh and Debra DeForrest were identified as witnesses.

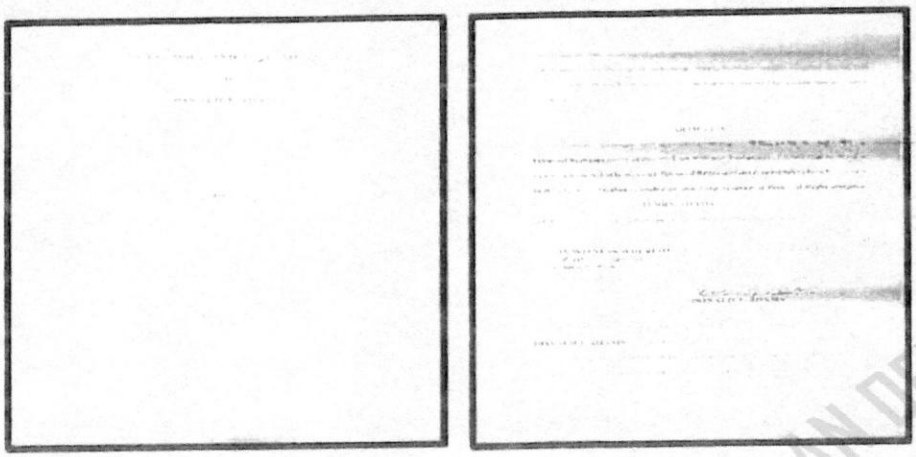


2021 LAST WILL AND TESTAMENT OF DONALD J. ADAMS

On March 13, 2021, Donald Adams reportedly executed another Will in the presence of witnesses Ellen Eckblad and Robert Eckblad, with Thomas L. LaSalle, Esq., identified as the drafting attorney and notary. According to a later filed probate petition on 10/13/2025, instrument # 120486683, the 2021 Will again provided that the residue of Donald Adams' estate would pass to William A. Adams if William survived him by 30 days. If William did not survive the required period, the residue was to pass in equal shares, per stirpes, to Theresa Adams and nephews Michael B. Adams and John B. Adams. William was nominated as personal representative, with Theresa as alternate. The Wills outlined that Thomas LaSalle was Donald Adams' longtime estate-planning attorney and college fraternity brother who prepared Donald Adams' 2006 and 2021 Wills.

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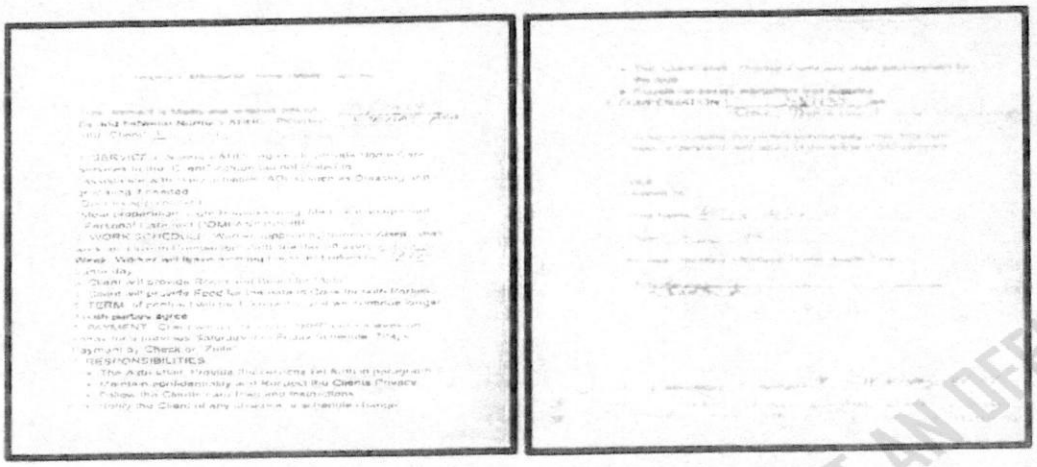
MEDICAL AND CAREGIVER HISTORY

Donald Adams suffered a cerebrovascular accident in approximately 2018/2019 and subsequently experienced health decline. Donald Adams had a history including terminal esophageal adenocarcinoma which had metastasized in March of 2025, atrial fibrillation, hypertension, prior gastrointestinal bleeding, and residual deficits from his cerebrovascular accident.

DONNA MARIE RUDDOCK and **FLORENCE ROSE MARIE MUNDLE** arrived unannounced at Donald Adams' residence in approximately April 2024 and began providing services to him without prior knowledge and approval of William and Theresa Adams. **DONNA MARIE RUDDOCK** subsequently engaged **FLORENCE ROSE MARIE MUNDLE** as Donald Adams' live-in aide. Documents including a contract and bank records link **DONNA MARIE RUDDOCK, FLORENCE ROSE MARIE MUNDLE,** and **MARC BRENT LIPP** with a home-care company known as Norma's Affordable Home Health Care, Inc. After **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** became involved in Donald Adams'care, the locks to Donald Adams residence were changed and some longtime friends experienced restricted access to him. **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** had access to Donald Adams' checks and bank account and **DONNA MARIE RUDDOCK** had access to his online banking credentials.

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Signed contract between Norma's AHHC - Donna Ruddock and Donald Adams dated 4/4/2024

MARC BRENT LIPP was identified as **DONNA MARIE RUDDOCK's** romantic partner and that both reside together at [redacted] Lauderhill, Florida 33319.

SUNBIZ – NORMA'S AFFORDABLE HOME HEALTH CARE INC.
Title / President – **DONNA MARIE RUDDOCK**
[redacted]
Lauderhill, Florida 33319
Effective date 02/10/2024

SUNBIZ – NORMA'S AFFORDABLE HOME CARE COMPANION LLC
Title / President – **DONNA MARIE RUDDOCK**
[redacted]
Lauderhill, Florida 33319
Effective date: 06/15/2026
Registered Agent: **MARC BRENT LIPP**





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EMAILS BETWEEN MARC BRENT LIPP to WILLIAM ADAMS REGARDING DONALD ADAMS

From: marc lipp [redacted]
Date: Mon, Apr 8, 2024 at 5:15 PM
Subject: Re: Donna Ruddock/ Norma's AHHC
To: William Adams [redacted]

Hi Bill, nice speaking with you. Enclosed is the contract between Norma's AHHC and Donald. The aide is a Live In so she is with Don 24/day 7days/week. With one full day off (approximately 12hrs) every other week I believe it is. She will Cook, clean, n keep Don company. If you have worries or concerns or can add any information about Don's health, please call Donna [redacted] or Marc @ [redacted] or email us is fine.

Also we changed the locks so if you could please email me your address that we can send you a set. And we changed the side door code from [redacted]

Thanks. Also: Donna told me that she got Don outside to see the eclipse. We had the special glasses for him. Donna said that the neighbors were happy to see Don and came over to say hello.

From: marc lipp [redacted]
Date: Mon, Apr 8, 2024 at 10:37 AM
Subject: Re: Donna Ruddock
To: William Adams [redacted]

Hi Bill my apologies for not responding over the weekend. We will take care of everything today Monday. Everything is under control here. Stephanie is the worker that is staying at Don's. She is there 24hrs/day and in his presence most of the waking time. We need to place the emergency key somewhere else so that the previous worker that was there before our company, doesn't have access to the entrance key. Thanks for your patience

On Fri, Jul 5, 2024 at 1:56 PM marc lipp [redacted] wrote:

Ok thanks. It's his laptop. And I don't think it's broken I think he forgot his sign in info. He thought it was [redacted] ? But it try [redacted] now first. If not I might b able to reset it now with his email. If not , the computer store around here does that. I dont think it will be more than 50-$150, if I can't reset it myself

On Fri, Jul 5, 2024 at 11:11 AM marc lipp [redacted] wrote:

Hi Bill, we are trying to fix Donald's computer. He doesn't remember his sign in info. Username and password. If you don't have that info, do you know his email address that he used for his computer? Thanks

FLORIDA DEPARTMENT OF HEALTH

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A public records request with Tracey Weatherspoon, Health Services Manager, from the Florida Department of Health of the below listed individuals yielded the following:

- **MARC BRENT LIPP** – *not linked to a facility or business.*
- **DONNA MARIE RUDDOCK** - *not linked to a facility or business.*
- **FLORENCE ROSE MARIE MUNDLE** – *Linked to Helios Home Care – file # 42962874 (Nurse Registry) as a Home Health Aide.*

Donald Adams met **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** in April 2024, approximately sixteen months before the August 2025 transfer of his unencumbered homestead, valued at $766,032.00, into a trust of which they are the sole beneficiaries and successor co-trustees. Donald Adams or his heirs received no consideration for the transfer, and **DONNA MARIE RUDDOCK** was already being paid for the caregiving services he provided. The statutory presumption of exploitation therefore applies to the transfer of the residence.

UNDUE INFLUENCE AND CIRCUMSTANCES SURROUNDING THE TRANSFER

A. Summary

Your Affiant's investigation revealed that the Quit Claim Deed bearing the date August 3, 2025, the Revocable Trust Agreement and Certificate of Trust dated August 21, 2025, the Last Will and Testament dated August 21, 2025, and the Durable Medical Power of Attorney dated August 21, 2025, were procured from Donald J. Adams, an 85-year-old U.S. Army veteran who was terminally ill, bedridden, and wholly dependent on his caregivers, by **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**, with the participation of **DONNA MARIE RUDDOCK's** romantic partner and cohabitant **MARC BRENT LIPP**, through an attorney, Alexander Karantzalis, who had never previously represented Donald Adams, and who was located and paid by **DONNA MARIE RUDDOCK**. The facts supporting this conclusion, and the witnesses and records from which your Affiant obtained them, are set out below.

B. Vulnerability of Donald J. Adams

1. Age and medical condition. Donald Adams was 85 years old when the August 2025 instruments were purportedly executed. Medical records from Broward Health Medical Center for August 21 through 29, 2025, and from the Cleveland Clinic for August 11, 2025, reviewed by your Affiant, document the following conditions in his medical history and during August 2025:

- Prior stroke (2019) with residual cognitive impairment and executive dysfunction
- Esophageal cancer, with radiation and chemotherapy from March through June 17, 2025
- Atrial fibrillation
- Hypertension and hyperlipidemia
- Acute kidney injury
- Anxiety and depression
- Habitual alcohol use and alcoholic polyneuropathy

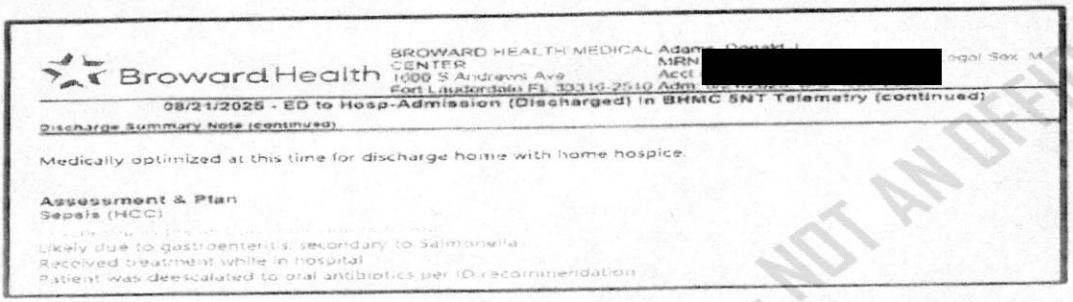
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- Severe Sepsis (on August 21, 2025)
- Malnutrition, dehydration, and severe muscle loss, with nutrition by PEG feeding tube
- Frequent falls, gait instability, and inability to ambulate

**Severe sepsis is a life-threatening medical condition that occurs when an infection triggers an overwhelming immune response that leads to dysfunction or damage in one or more vital organs such as the lungs, kidneys, heart, or liver.*



Broward Health BROWARD HEALTH MEDICAL CENTER 1600 S Andrews Ave Fort Lauderdale FL 33316-2510 MRN [redacted] Acct [redacted] Sex: M

08/21/2025 - ED to Hosp-Admission (Discharged) in BHMC 5NT Telemetry (continued)

Discharge Summary Note (continued)

Medically optimized at this time for discharge home with home hospice.

Assessment & Plan
Sepsis (HCC)

Likely due to gastroenteritis, secondary to Salmonella
Received treatment while in hospital
Patient was deescalated to oral antibiotics per ID recommendation

2. Cognitive decline. William and Theresa Adams reported to your Affiant that Stephanie Zeverino of Elder Care Solutions evaluated Donald Adams in January 2023, and recommended that Donald Adams receive assisted living services, and observed that he was struggling with activities of daily living, frequent falls, and alcohol misuse. Zeverino took Donald Adams, William Adams, and caregiver Katrice Davis on a tour of senior living facilities in 2023. Zeverino provided an emailed response to Theresa and William Adams regarding her observations of Donald Adams dated January 14th, 2026. The Broward Health records of August 23 and 24, 2025 describe Donald Adams as "confused," an "exceptionally poor historian," and able to follow one-step commands only with additional time or cues.

From: Stephanie Zeverino <stephanie@zeverinoecs.com>
Date: Wed, Jan 14, 2026, at 4:58 PM
Subject: Don Adams
To: William Adams [redacted]

Hi Terry and Bill,

I first met Don in January 2023 when I was asked to assist him in finding a suitable assisted living facility. During my home visit to assess his needs, it was clear he was struggling significantly with his ADLs and general household management. While it was initially suggested that he required memory care, my assessment determined that assisted living was a more appropriate fit at that time. Don was dealing with several challenges, including mobility issues, frequent falls, and alcohol use. The local fire rescue squad was being called to his home regularly to assist him back into his chair. While he had a caregiver, Katrice Davis, his physical size made it difficult for her to assist him safely after a fall. I also spoke with his brother, Bill Adams, several times when he traveled from DC to tour various senior living facilities with us. Ultimately, Don decided not to move as he did not want to leave his home.

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Regards,

Stephanie Zeverino



ZEVERINO
ELDER CARE SOLUTIONS

See my interview on Dateline Health News!
(Long Term Care Options as we Age)
https://www.youtube.com/watch?v=JucbquKpom4
Stephanie A. Zeverino
954-895-5705 / stephanie@zeverinoecs.com

3. Emotional distress and dependency. Medical records reflect diagnoses of anxiety and major depression. Donald Adams' 2019 through 2023 medication schedule reflects a prescription for Xanax from psychiatrist Dr. Rooney, and his VA primary care physician, Dr. Nelson, documented the same diagnoses. Captain Jonathan Spiegel ("Ace"), the captain of the boat docked at Donald Adams' dock, stated that from approximately May through August 2025, Donald Adams repeatedly asked him to call 911 and displayed panic and distress, and that **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** discouraged emergency intervention by telling Spiegel that Donald Adams had mental illness and dementia. **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** abandoned that account at the time the deed and trust were being arranged.

C. Confidential Relationship and Opportunity for Influence

1. Total dependence. From March 2025. When Donald Adams became bedridden with esophageal cancer and required a PEG feeding tube, he depended on his live-in caregiver **FLORENCE ROSE MARIE MUNDLE** and **DONNA MARIE RUDDOCK** for food and hydration, medication administration, mobility and transfers, access to medical care, and communication with others. **FLORENCE ROSE MARIE MUNDLE** confirmed in her deposition testimony to Ryan Shrouder Esq., summarized in this affidavit, that she provided around-the-clock care, administered his medications, and that **DONNA MARIE RUDDOCK** controlled his transportation to medical appointments.

2. Isolation from family and friends. **DONNA MARIE RUDDOCK** was referred to Donald Adams by his former neighbor Belinda (Cramer) Malmin and began work on April 6, 2024, under a handwritten contract. **MARC BRENT LIPP's** April 8, 2024, email to William Adams, quoted above, confirms that **MARC BRENT LIPP** and **DONNA MARIE RUDDOCK** changed the locks and the side door code within days of **DONNA MARIE RUDDOCK's** start. William and Theresa Adams reported to your Affiant that longtime friends and family members to whom Donald Adams had entrusted keys and the door code lost access to the home; that friends Holly Miller and Larry Gluck, known to Donald Adams for more than 25 years, were excluded from the home and from the home improvement work William Adams had hired them to perform over the years, which **DONNA MARIE RUDDOCK** took over herself in place of the caregiving tasks

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she was hired to perform; that **FLORENCE ROSE MARIE MUNDLE** routinely refused to open the door to visitors; that the family was excluded from medical decisions, hospital updates, and hospice involvement even though Theresa Adams had worked with the VA clinic to set up VA home care services; that Donald Adams' phone and laptop were taken from him and monitored, and that **MARC BRENT LIPP** emailed William Adams asking for the computer passcode; and that the family was never told of any change in Donald Adams' estate plan or his burial wishes.

Nancy Gentry, a longtime friend of Donald Adams and the dock rental agent for his property, whose late husband Lonny was a close friend of Donald Adams, reported in voice messages to Theresa Adams and in a written letter that Donald Adams telephoned her on November 29, 2024, and February 15, 2025, and that he told her he did not trust **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**, and that he was guarded and lacked the privacy to speak openly with her.

Sat, Feb 21, 11:00 AM
Nancy Gentry
to me

Hi Terry,

I wanted to just send you a brief email regarding two phone calls I received from Don while he was in he "care" of Donna and Flo

On November 29th, 2024. Don called me and told me he had a "dire situation" he needed to speak with me about. He was concerned that he had agreed to hire these women and was unsure of their intentions. He was very "guarded" in his verbiage and asked me if I could stop by sometime. We normally discussed the boat at his dock and he wanted to clarify how much the rent was. He was a bit confused about funds and was cautiously explaining he "didn't trust" people. Since I have known Don since 2004 I sensed that his concern was valid.

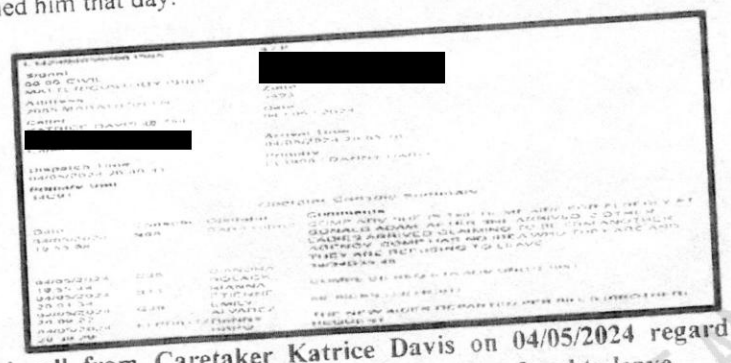
On or about February 15th, 2025. I received another call from Don stating that he needed to speak with me about the boat at his dock. He sounded "guarded" again, like there were people listening to his conversation. I told him the rental amount and confirmed that Terry and Bill were handling his banking and all household affairs. He said they were, and yet he was asking about receiving the rental from the dock. I assured him that he was in good hands with family taking care of his needs and that he need not be concerned. I gathered his concern was directed to the caregivers, not his family. He onvited me to stop by to see him and yet when I called back I got Donna on the phone, not Don. She spoke to me about my Mom when I asked her about her agencys services. She quoted me prices and said "do you want services or not"??? Quite demanding and not caring or understanding. I declined."

3. Removal of prior caregivers. William and Theresa Adams and former caregiver Katrice Davis reported that on Friday, April 5, 2024, the day before **DONNA MARIE RUDDOCK**'s contract start date, **DONNA MARIE RUDDOCK**, and **MARC BRENT LIPP** came to the residence and told Katrice Davis, the VA-arranged BrightStar aide who had cared for Donald Adams for aproximately three years, that **DONNA MARIE RUDDOCK** was "in charge now." Law

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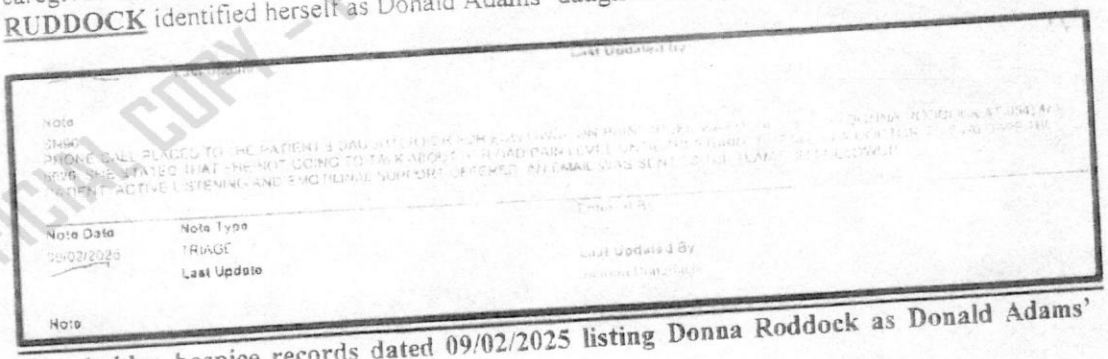
Enforcement was then called by Katrice Davis. Belinda Malmin[1], neighbor of Donald Adams who resided at [redacted] and who had referred **DONNA MARIE RUDDOCK** to Donald Adams, telephoned him that day.



911 dispatched call from Caretaker Katrice Davis on 04/05/2024 regarding two ladies arriving unannounced at Donald Adams' residence and refused to leave.

D. Control of Information, Access, and Finances

1. Access and medical decision-making. **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** controlled Donald Adams' access to friends and family (witness statements), to medical providers and medical information (July through October 2025 text messages; Broward Health records of August 21 through 29, 2025; hospice records), and, through the Durable Medical Power of Attorney dated August 21, 2025, to medical decision-making itself. The August 29, 2025, discharge and hospice records identify **DONNA MARIE RUDDOCK** as Donald Adams' primary caregiver and decisionmaker, and the Trustbridge hospice records reflect **DONNA MARIE RUDDOCK** identified herself as Donald Adams' daughter during a hospice telephone call.



Trustbridge hospice records dated 09/02/2025 listing Donna Roddock as Donald Adams' daughter

2. Discouragement of emergency care and disparagement of family. Witness Captain Spiegel reported that he heard Donald Adams make sounds of pain nightly for several months and that he witnessed **DONNA MARIE RUDDOCK** discourage emergency medical care when Donald Adams asked him to call 911. Spiegel also reported that shortly before and after Donald Adams' death, **DONNA MARIE RUDDOCK** and **MARC BRENT LIPP** told him that Donald Adams'

[1] A DHSMV query of Belinda Lee Malmin yielded that she died on December 5th, 2025.

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family was "crazy" and that Donald Adams hated his brother. Donald Adams' 2006 and 2021 wills, his August 11, 2025, voicemail to his brother quoted below, and the regular telephone calls and family visits reported by the family contradict those statements, including a Thanksgiving 2024 family visit documented by photograph.

3. Financial control. **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** had access to Donald Adams'checkbook and debit card, and **DONNA MARIE RUDDOCK** had his online banking credentials. On September 20, 2025, the day Donald Adams died, **DONNA MARIE RUDDOCK** told Theresa Adams, a joint holder of the account, that she knew the account balance of approximately $11,000.00 because "Don gave it to me," referring to his online banking passcode. Wells Fargo checks written on the account in August and September 2025 bear Donald Adams' full signature, while the deed, trust, and will of August 2025 bear only an abbreviated mark; those signature discrepancies are addressed further below. Wells Fargo Check No. 5273, payable to "Cash" in the amount of $5,000.00, bears the date October 18, 2025, four weeks after Donald Adams'death, and was negotiated into **DONNA MARIE RUDDOCK's** business account on September 23, 2025, as set out in the JP Morgan Chase account analysis below.

4. Secrecy, haste, and selection of the attorney. The August 2025 instruments were prepared without the knowledge of Donald Adams' family by an attorney he had never used. **FLORENCE ROSE MARIE MUNDLE** testified that **DONNA MARIE RUDDOCK** located Attorney Alexander Karantzalis through a Google search on Donald Adams'computer and that **DONNA MARIE RUDDOCK** paid Alexander Karantzalis' fee with her own money as noted in JP Morgan Chase bank records. Donald Adams' longtime estate planning attorney and college fraternity brother, Thomas LaSalle, who prepared the 2006 and 2021 wills, was not consulted. No family member, friend, or independent advisor was present at the purported August 21, 2025, signing, and no recording of it was made. The signing took place while Donald Adams was bedridden in a hospital bed in his living room, thirty days before his death, and on the same afternoon that Fire Rescue transported him to the Broward Health emergency department with sepsis and acute kidney injury, as set out below.

E. Evidence of Donald Adams' Contrary Intent

1. Long-standing estate plan. Donald Adams' 2006 and 2021 wills, both prepared by Thomas LaSalle, left his estate to his brother William Adams, with his sister-in-law Theresa Adams and his nephews Michael Adams and John ("JB") Adams as contingent beneficiaries. Friends and former caregivers, including Katrice Davis and Johnnie Mae Davis, who cared for Donald Adams for approximately three years before **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**, reported that Donald Adams consistently told them that everything would go to his family.

2. The August 11, 2025, voicemail. On August 11, 2025, ten days before the August 21, 2025, trust and will, and eight days after the date the Quit Claim Deed originally bore, Donald Adams left the voicemail for his brother quoted in full below. In it he stated that the estate should go to "the kids," referred to a bequest to **FLORENCE ROSE MARIE MUNDLE** of "like $50,000 out of the estate or more," and said nothing about leaving his home or his estate to his caregivers.

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FLORENCE ROSE MARIE MUNDLE's testimony that Donald Adams had spoken for some months about leaving "something" to her and **DONNA MARIE RUDDOCK** is consistent with a bequest of the kind Donald Adams described in that voicemail. It is not consistent with a transfer of his entire estate to them.

F. Result of the Transfer

The August 2025 instruments, **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**, non-family caregivers of approximately sixteen months, received the whole of Donald Adams' real and personal property, and his only family received nothing. The value transferred far exceeds any reasonable compensation for caregiving, for which **DONNA MARIE RUDDOCK** was in any event being paid by Donald Adams throughout. **FLORENCE ROSE MARIE MUNDLE** testified that she received $600 to $700 per week plus room and board, paid by **DONNA MARIE RUDDOCK** from the funds Donald Adams paid to **DONNA MARIE RUDDOCK's** company.

G. Witnesses and Records

The following individuals have provided information directly or through statements furnished to your Affiant by William and Theresa Adams concerning the matters described above:

- Thomas LaSalle, Esq., Donald Adams' college fraternity brother and the drafter of his 2006 and 2021 wills
- Holly Miller, longtime friend and neighbor, former caregiver, and witness to Donald Adams' living will
- Larry Gluck, longtime friend and handyman
- Nancy Gentry, dock rental agent and longtime friend
- Captain Jonathan Spiegel ("Ace"), eyewitness to Donald Adams' distress, isolation, and the conduct of the caregivers
- Katrice Davis and Johnnie Mae Davis, Donald Adams' caregivers for approximately three years before April 2024
- Stephanie Zeverino, elder care professional who assessed Donald Adams in January 2023

SWORN STATEMENT OF CARETAKER KATRICE DAVIS

On April 28, 2026, Fort Lauderdale Police Detective Anthony Windes obtained a sworn recorded statement from Katrice Davis at 1025 Northwest 11th Avenue, Fort Lauderdale, Florida, regarding her previous employment as a caregiver for Donald Adams.

Davis stated that she began caring for Donald Adams around October 2021 after being referred by Holly Miller. Her mother, Johnnie Mae Davis, also worked at the residence. Davis provided assistance with daily activities, medical appointments, shopping, and financial matters until her employment ended on April 5, 2024.

During her employment, Davis observed Donald Adams frequently consuming excessive alcohol, becoming intoxicated and verbally aggressive, and suffering repeated falls requiring emergency

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medical assistance. She stated that firefighters expressed concerns about his condition and recommended continuous supervision or assisted living arrangements.

Davis described Donald Adams as exhibiting memory problems, confusion, repetitive conversations, and poor judgment, even when sober. She suspected dementia or Alzheimer's disease but acknowledged that neither condition had been definitively diagnosed by his physicians. Davis also reported that Donald Adams frequently attempted to disclose personal and financial information to unknown telephone callers, requiring her intervention.

Due to concerns about his deteriorating condition, Davis contacted Donald Adams' brother, Bill Adams, who subsequently visited with his wife, Terry. Davis explained Donald Adams' need for continuous care, and arrangements were eventually made for additional assistance through Veterans Affairs.

Davis stated that her employment ended following the unexpected arrival of two women claiming authorization to care for Donald Adams. Neither initially produced documentation establishing their authority. Davis contacted Terry, who explained that an unidentified friend had recommended the women and that Donald Adams wanted their assistance.

Davis contacted the Fort Lauderdale Police Department. Responding officers questioned the women about a purported caregiver contract signed by Donald Adams. According to Davis, one woman claimed her husband possessed the document, but it was never produced. Officers subsequently instructed the women to leave. Donald Adams reportedly expressed a desire for Davis to continue providing care while also wanting the women involved. Davis believed the women were identified as Flo and Donna but did not positively identify them during that portion of her statement.

Davis also identified a woman known as Belinda, who reportedly lived near Donald Adams and had repeatedly expressed interest in purchasing his residence. Davis believed Belinda introduced the two caregivers and encouraged Donald Adams to accept their services.

According to Davis, Donald Adams consistently refused to sell his residence, including an offer of approximately $1.1 million, and repeatedly expressed his intention to remain there until his death. He also stated that he intended to leave his residence and assets to his brother, Bill Adams, and his two nephews. Davis reported seeing a will reflecting those intentions.

Davis stated that she discontinued her employment because she did not trust the new caregivers or understand the circumstances surrounding their arrival. Approximately three months later, she contacted Donald Adams by telephone and believed he sounded worried and had difficulty speaking.

Based on her approximately two and a half years of employment and numerous conversations with Donald Adams, Davis expressed disbelief that he would have voluntarily transferred ownership of his residence to individuals he had only recently met.

SWORN STATEMENT OF CARETAKER JOHNNIE MAE DAVIS

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On April 21, 2026, Fort Lauderdale Police Detective Anthony Windes obtained a sworn recorded statement from Johnnie Mae Davis regarding her previous employment as a home health aide for Donald Adams, his physical and cognitive condition, his expressed wishes concerning his residence, and the circumstances surrounding the arrival of two caregivers identified as Donna and Florence.

Davis stated that she began caring for Donald Adams after being referred through an agency and a neighbor, Holly Miller. Davis initially worked two to three days per week before providing additional weekend assistance. Her daughter, Katrice Davis, also worked as Donald Adams' caregiver and eventually provided care seven days per week. Davis remained employed until two women assumed responsibility for Donald Adams' care.

During her employment, Davis became familiar with Donald Adams' family, including his brother, William "Bill" Adams, and sister-in-law, Terry Adams. Davis described Donald Adams as having limited mobility, requiring assistance with personal hygiene and navigating portions of his residence. She stated that Donald Adams frequently consumed alcohol, repeatedly discussed the same subjects, and exhibited confusion and questionable judgment.

Based on her experience caring for individuals with dementia and Alzheimer's disease, Davis believed Donald Adams displayed symptoms consistent with early-stage cognitive impairment. However, she acknowledged having no knowledge of a formal diagnosis. Davis also assisted Donald Adams with medications, including vitamins and blood pressure medication. She recalled an unidentified medication that her daughter believed negatively affected Donald Adams' alertness and mental condition.

Davis described an incident in which Donald Adams allowed an unidentified individual associated with a boat behind his residence into his home and signed paperwork without verifying the individual's identity or consulting his caregivers. Davis cited this incident as an example of Donald Adams' questionable judgment and vulnerability.

Regarding the arrival of Donna and Florence, Davis stated that a Veterans Affairs caregiver contacted Katrice after two women unexpectedly arrived at Donald Adams' residence and instructed the caregiver to leave, claiming they were assuming responsibility for his care.

Davis subsequently responded to the residence and encountered the women, who claimed Donald Adams had hired them to provide 24-hour care. Davis also observed a man who was identified by one of the women as her husband, although she could not independently verify his identity.

According to Davis, the women claimed Terry Adams had authorized their involvement. Katrice contacted Terry, who reportedly confirmed that Donald Adams wanted continuous care and had agreed to utilize the women's services. Katrice questioned the circumstances and contacted law enforcement. Responding officers questioned the women regarding their authorization, and the women identified Terry as the individual who had permitted them to provide care.

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Davis also identified another woman, whose name was transcribed as Belinda or Melinda, whom she had previously observed visiting Donald Adams approximately two or three times. Davis believed this woman was involved in introducing the caregivers and expressed concerns regarding her possible interest in Donald Adams' residence. However, Davis provided no firsthand information establishing that the woman attempted to acquire the property.

Following the incident, Davis discontinued her employment because of concerns surrounding the new caregivers. Katrice initially remained but subsequently discontinued her employment as well. Davis reported having no further contact with Donald Adams, Terry, Donna, or Florence.

Of particular significance, Davis stated that Donald Adams repeatedly expressed his wishes regarding the disposition of his residence and personal assets following his death. According to Davis, Donald Adams consistently stated that he wanted his brother and two nephews to inherit his residence and everything he owned. Davis emphasized that Donald Adams expressed these intentions on numerous occasions throughout her employment.

Davis further stated that she became suspicious of Donna and Florence following their arrival and warned Katrice that unfamiliar individuals assuming control of Donald Adams' care could potentially exploit him financially. Katrice reportedly expressed similar concerns to Terry, who did not believe the women would engage in such conduct.

Davis concluded her statement by expressing continued concerns regarding Donald Adams' cognitive condition, his ability to make informed decisions, and the circumstances surrounding the two women's involvement in his care.

LIST OF HOME MEDICATIONS PRIOR TO EMERGENCY DEPARTMENT VISIT

Medications taken by Donald Adams at home prior to the August 21st, 2025, Admission to the Emergency Department:

- *Hydromet 5-1.5 mg/5mL*
- *LORazepam (Ativan) 0.5 MG*
- *Warfarin (Coumadin) 5 MG*
- *Atorvastatin (Lipitor) 40 MG*
- *Furosemide (Lasix) 40 MG tablet Take 60 mg*
- *Losartan (Cozaar) 100 MG tablet*
- *Metoprolol tartrate (Lopressor)*
- *Pantoprazole (Protonix*
- *Radiation therapy from March- June of 2025*

QUIT CLAIM DEED DATED AUGUST 3, 2025

On August 3rd, 2025, a Quit Claim Deed (QCD), instrument #120433999, was purportedly signed by Donald J. Adams, conveying his property listed as [redacted] Ft. Lauderdale, to the grantee listed as Donald J. Adams as Trustee (Under Trust Agreement dated August 21, 2025). On page two of this QCD, the date of August 3rd, 2025, is documented a second time under the notary

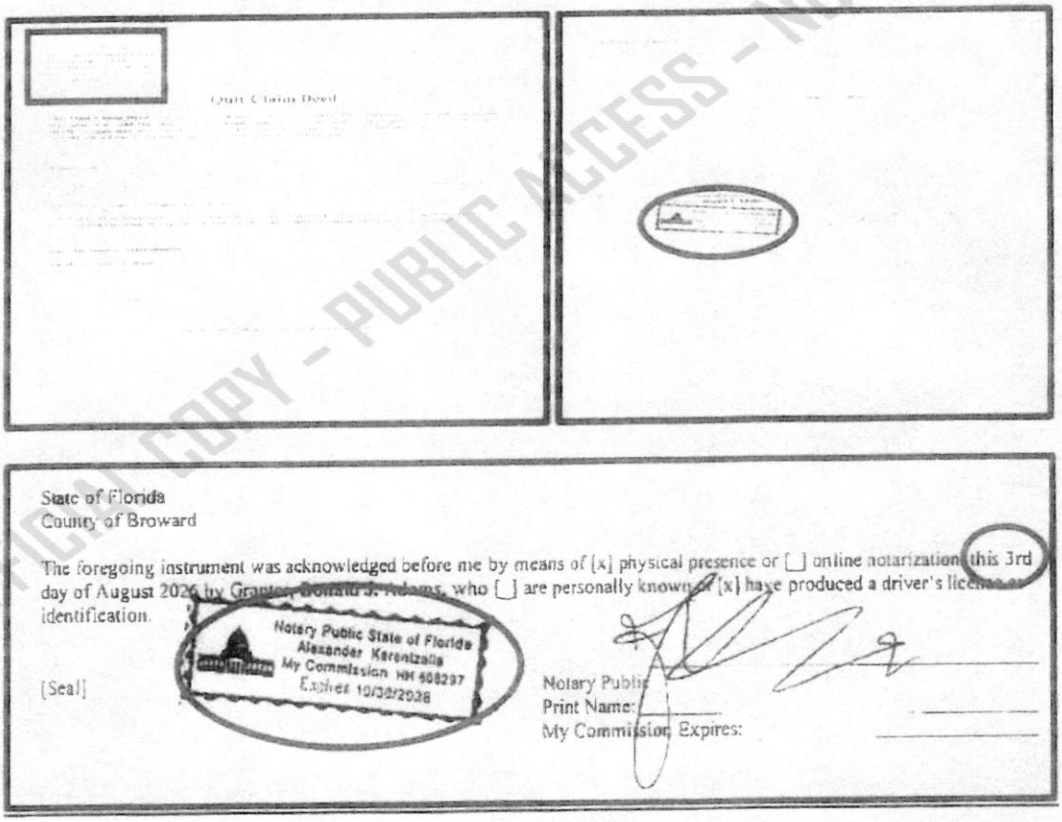
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section and brings into question the later admission that is was a scrivener's error by both parties and the fraud being committed. This QCD was notarized, prepared, and recorded by Attorney Alexander Karantzalis, 1398 SW 160th Ave., Ste 102, Ft. Lauderdale, Fl 33326, 954-548-3558. The witnesses for the signatures on this deed were listed as Kassie Fernandez [2], and Zach Fernandez, 1398 SW 160th Ave, Weston. This deed was recorded on September 12th, 2025, at 2:45PM with Deed Doc Stamps being $0.70.

The face of the Quit Claim Deed also recites: "This deed is recorded for the purpose of reflecting Grantor's name change." The instrument does not reflect a name change. It purports to convey the residence from Donald J. Adams individually to Donald J. Adams as Trustee of a trust that, according to the instrument itself, was not created until August 21, 2025, eighteen days after the date the deed bears, and of which **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** are the sole beneficiaries. A recital of that kind is ordinarily used to avoid documentary stamp tax on a conveyance, and here it misstates the nature and effect of the instrument on the face of the public record.



FLORIDA BAR ATTORNEY

A query of Attorney Alexander Karantzalis via the Florida Bar yielded the following:

[2] Attorney Alexander Karantzalis and Kassie Marie Fernandez were married on 11-01-2025

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Echelon Legal, PLLC
1398 SW 160th Ave., Ste 102
Weston, Fl 33326
Bar # 124755
Cell 954-298-8660

CLEVELAND CLINIC VISIT ON AUGUST 11TH, 2025

On August 11th, 2025, Donald Adams visited Paul Thambi MD of the Hematology / Oncology Department of Cleveland Clinic in Weston, Florida. In addition to being treated for terminal stage IV cancer, Donald Adams was also being treated for the below listed conditions:

- *Essential hypertension*
- *Anxiety disorder*
- *Major depression*
- *Hyperlipidemia*
- *Actinic keratosis*
- *Habitual alcohol use*
- *Foot pain*
- *Fall at home*
- *Back pain*
- *Osteoarthritis*
- *H/O epistaxis*
- *Hypertension*
- *Acute Kidney Injury*
- *High anion gap metabolic acidosis*
- *Gait instability*
- *Obesity*
- *Alteration in instrumental activities of daily living*
- *Hypotension*
- *Stroke*
- *Hyponatremia*
- *Fluid overload*
- *Hyperkalemia*
- *Venous stasis ulcer of calf*
- *Cellulitis*
- *Polypharmacy*
- *Leg edema*
- *Stage 3a chronic kidney disease*
- *Alcoholic polyneuropathy*
- *Stage 3b chronic kidney disease*
- *Lung nodules*
- *Hypokalemia*

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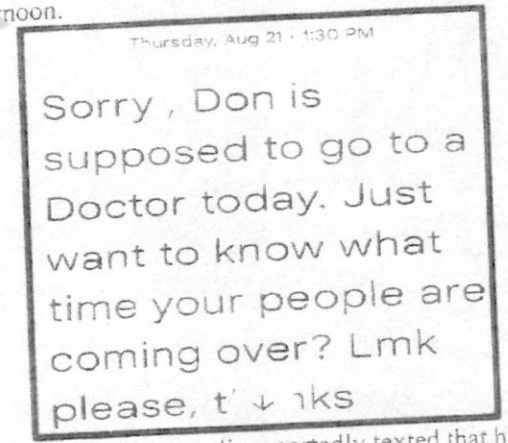
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- *Chronic pulmonary aspiration*
- *Congestive heart failure*
- *Acute cough*
- *Anemia*
- *Muscle weakness*
- *Decreased activities of daily living*
- *Unable to ambulate*
- *Enteral nutrition feeding*
- *Urinary incontinence*
- *Frailty*
- *Decreased independence with bed mobility*
- *Paroxysmal atrial fibrillation*
- *Psychophysiological insomnia*
- *Leukocytosis*
- *Percutaneous endoscopic gastrostomy*
- *Impaired functional mobility*

AUGUST 21st, 2025

August 21, 2025, is very a significant date in this investigation because the purported execution of estate-related documents was at Donald Adams residence and his subsequent emergency hospitalization via ambulance a few hours later.

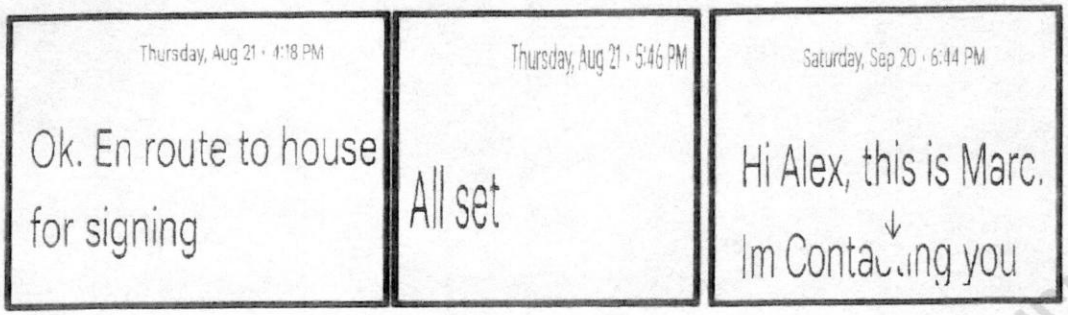
At approximately 1:30 p.m. on this date, **MARC BRENT LIPP** reportedly texted Attorney Alexander Karantzalis concerning Donald Adams anticipated doctor's appointment and asked what time Alexander Karantzalis' people were coming to the residence. Additional communications followed during the afternoon.



At 4:18 p.m., Attorney Alexander Karantzalis reportedly texted that he was "En route to house for signing." At 5:46 p.m., Alexander Karantzalis, Esq. sent a text stating, "All set."

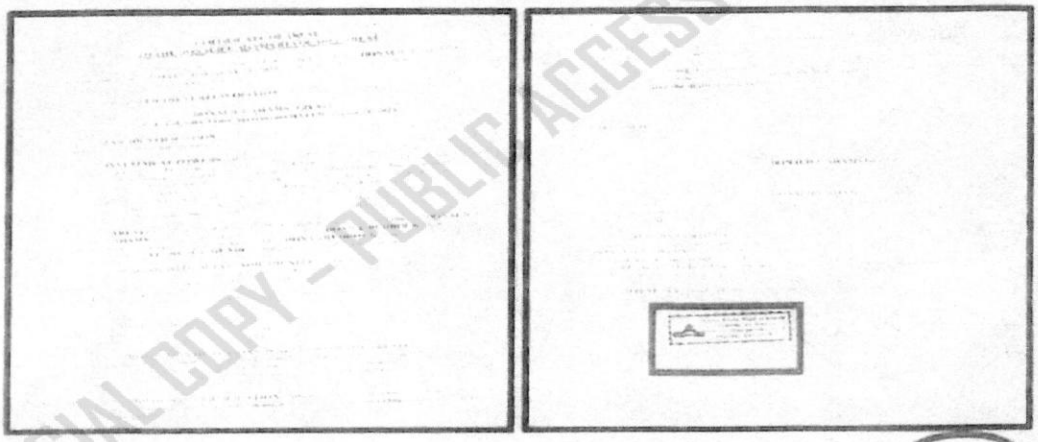
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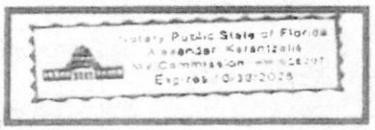
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CERTIFICATE OF TRUST TO THE DONALD J. ADAMS REVOCABLE TRUST

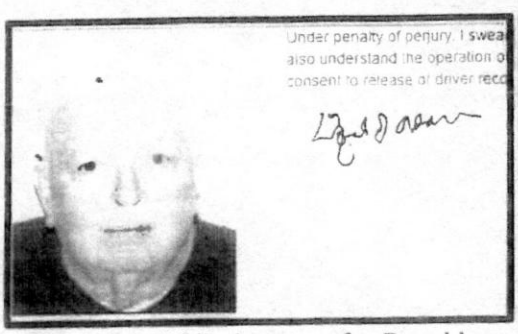
Also on August 21st, 2025, a Certificate of Trust To the Donald J. Adams Revocable Trust, was purportedly signed by Donald J. Adams, being the Grantor and Trustee, with **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** as being successor trustees upon death of Donald J. Adams. This was notarized on page two reflecting a second date on the last page being August 21st, 2025 by Attorney Alexander Karantzalis.



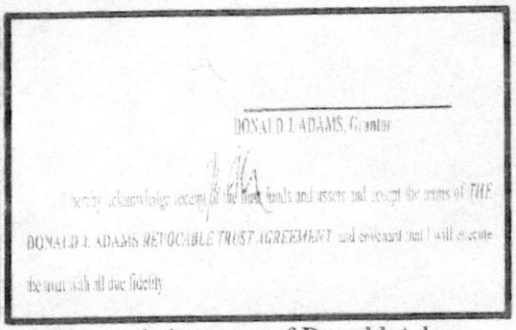


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Official D.A.V.I.D signature for Donald Adams



Purported signature of Donald Adams for Revocable Trust Agreement

The Revocable Trust Agreement and Quit Claim Deed were purportedly presented for Donald Adams' signature at his residence. These documents identify Attorney Alexander Karantzalis as the notary associated with the instruments and identify Kassie Fernandez and Zach Fernandez as witnesses to the Quit Claim Deed. The address printed for the witnesses was 1398 SW 160th Avenue, Weston, Florida, which identifies as the same building housing Alexander Karantzalis, Esq. law firm, Echelon Legal, PLLC.

The documents placed Donald Adams homestead into the Donald J. Adams Revocable Trust with the beneficiaries as caretakers/suspects **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** in connection with successor trustee positions.

LAST WILL & TESTAMENT OF DONALD J. ADAMS

A separate Last Will and Testament also bears an execution date of August 21, 2025. That will expressly state that Donald Adams revoked his prior Wills and codicils, including the March 13, 2021, Will. It provides certain tangible personal property to **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** and leaves the remainder of Donald Adams' property to the Donald J. Adams Revocable Trust dated August 21, 2025. **DONNA MARIE RUDDOCK** is nominated as personal representative, with **FLORENCE ROSE MARIE MUNDLE** designated as alternate.

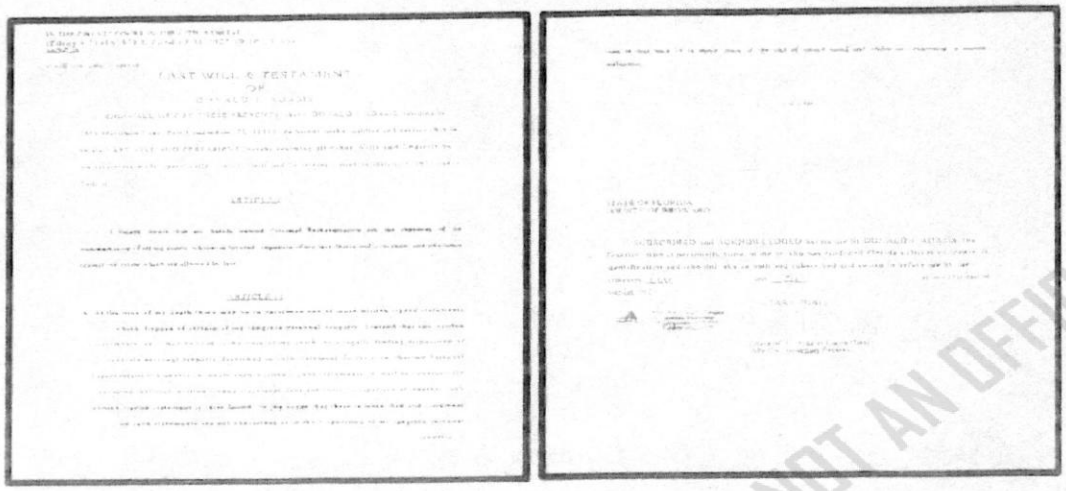
The August 21 Will contain differing language concerning Donald Adams' final arrangements. Article I references payment of expenses associated with his last illness and cremation, while Article VII states that Donald Adams wished to be buried in a Veterans Affairs burial plot in Palm Beach, Florida, specifically declined cremation, and directed that his life insurance policy be used for burial arrangements.

The Will's signature section is dated August 21, 2025. Its self-proof language represents that *Donald Adams was of sound mind and under no constraint or undue influence*. The notarial acknowledgment identifies Attorney Alexander Karantzalis, commission number HH 608297.

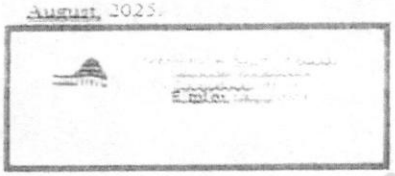
These records identify Alexander Karantzalis, Esq., as the attorney associated with preparation and execution of the later August 2025 estate documents. Additionally, Alexander Karantzalis had not previously represented Donald Adams.

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Witnesses: 1 4 At and Zbf On this 21st day of August, 2025.

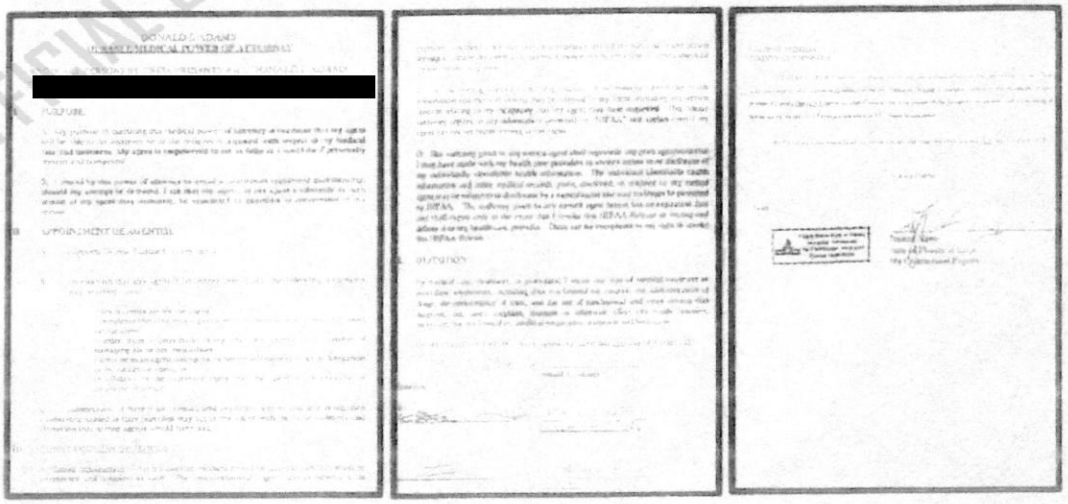


NOTARY PUBLIC

State of Florida at Large (Seal)
My Commission Expires

DONALD J. ADAMS DURABLE MEDICAL POWER OF ATTORNEY

On August 21st, 2025, a five-page Durable Medical Power of Attorney was purportedly signed by Donald Adams appointing **DONNA MARIE RUDDOCK** as his agent. This document was notarized by Attorney Alexander Karantzalis.



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WITNESS my hand and official seal in the County and State last aforesaid this 21st day of August 2025.

Notary Public:

(Seal)

Notary Public State of Florida
Alexander Karantzalis
My Commission HH 526267
Expires 10/30/2028

Printed Name:
State of Florida at Large
My Commission Expires:

COMMUNICATIONS

Attorney Ryan Shrouder provided your Affiant with the below listed communications and others, which were obtained by subpoena duces tecum or produced voluntarily in the probate proceeding, in re: Estate of Donald J. Adams, Broward County Circuit Court Case No. PRC25000453, and the related action for reformation of the Quit Claim Deed, Case No. PR-C-25-0005221, including at deposition.

- On August 14, 2025, Attorney Alexander Karantzalis reportedly emailed an Estate Planning Intake Form to **DONNA MARIE RUDDOCK** at an email account identified as "Donna Homecare." Donald or William Adams was reportedly not copied on that email. **DONNA MARIE RUDDOCK** then forwarded the intake form to **MARC BRENT LIPP**.

- On August 17, 2025, **MARC BRENT LIPP** reportedly sent Attorney Alexander Karantzalis a text message confirming that **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** could be at Alexander Karantzalis' office at 9:00 a.m.



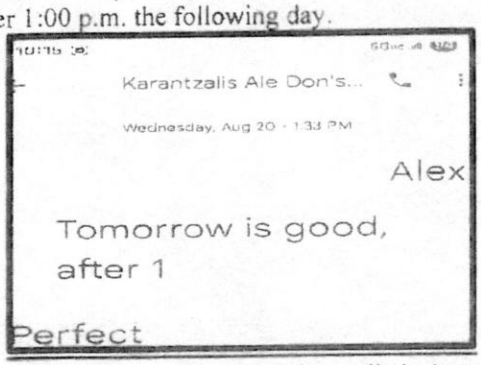
- The text messages exchanged between **MARC BRENT LIPP** and Attorney Alexander Karantzalis refer only to **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** attending the August 18, 2025, office meeting; Donald Adams is not mentioned in them. In their later deposition testimony, summarized below, Alexander Karantzalis and **FLORENCE ROSE MARIE MUNDLE** each stated that Donald Adams

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attended that meeting and that **FLORENCE ROSE MARIE MUNDLE** waited in the lobby while Donald Adams met with Attorney Alexander Karantzalis.

- On August 20, 2025, Attorney Alexander Karantzalis reportedly confirmed by text that he could see them after 1:00 p.m. the following day.



- On September 20, 2025, the date Donald Adams died, Attorney Alexander Karantzalis communicated to **MARC BRENT LIPP** that the deed had been recorded and that the trustee was then in charge of the trust.

- On September 25, 2025, **MARC BRENT LIPP** texted Attorney Alexander Karantzalis: "Hi Alex, we have questions. When are you available to talk? Thanks."

- On September 26, 2025, **MARC BRENT LIPP** texted Attorney Alexander Karantzalis: "We would like the original Will that Don kept at his house in his bedroom drawer. It was drafted by his attorney friend, Thomas LaSalle. And . . ." (Donna 000008). Five and six days after Donald Adams' death, **MARC BRENT LIPP** and **DONNA MARIE RUDDOCK** were therefore seeking the original of Donald Adams' prior Will, which he kept in his bedroom at the residence that **FLORENCE ROSE MARIE MUNDLE** occupied and **DONNA MARIE RUDDOCK** controlled.

Your Affiant notes that Section 825.103(1)(f) reaches the obtaining of an elderly person's property or estate through the intentional modification, alteration, or fraudulent creation of a plan of distribution expressed in a Will or trust, and that the disappearance of the original prior will following these communications is relevant to the knowledge and intent of **DONNA MARIE RUDDOCK, MARC BRENT LIPP,** and **FLORENCE ROSE MARIE MUNDLE**.

- On August 21, 2025, at 5:54 p.m., Donald Adams was transported via ambulance to Broward Health Medical Center Emergency Department. The medical record states that Donald Adams was admitted following approximately five days of worsening diarrhea and Sepsis. His caregiver **FLORENCE ROSE MARIE MUNDLE** reported that his stool had changed from brown to dark or black and that increased drainage had been observed around his PEG feeding tube. The admitting physician documented that Donald Adams was limited in providing his medical history when his aide was not at bedside.

- At 6:08 p.m., Donald Adams' blood pressure was documented as 91/43. His laboratory findings included a white blood cell count of 15.86, blood urea nitrogen of 134, creatinine

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of 5.2, and lactate of 2.9. The medical records document intravenous fluids, antibiotics, and subsequent hospital admission.

- At 6:57 p.m., while Donald Adams was already at Broward Health Medical Center, Attorney Alexander Karantzalis reportedly emailed **DONNA MARIE RUDDOCK** the "executed trust documents" and advised that he would proceed with recording the deed.

EMERGENCY MEDICAL TRANSPORT AND HOSPITALIZATION

According to Broward Sheriff's Office communications records, on August 21st, 2025 @ 17:18:04 Hours, **FLORENCE ROSE MARIE MUNDLE** called 911 from phone # [redacted] which ultimately led to Donald Adams being transported to the hospital by Fire Rescue.

Broward Sheriff's Office Communications Division
Summary Sheet
Incident Number FFL25082100036898
Prio./Disp. 4 / TFR
Signal S67SP *M*SICK PERSON
Agency FORT LAUDERDALE FR
Address [redacted]
Zone 47F
Caller FLORENCE @ [redacted]
Date 08 / 21 / 2025
Caller Address
Arrival Time 08/21/2025 17:25:47
Dispatch Time 08/21/2025 17:18:04
Primary R47 / RESCUE R47
Primary Unit R47

Operator Console Summary

Date	Console	Operator	Comments
08/21/2025 17:17:43	N11	TIFFANY HINES	#MEDI PT HAS CANCER & THE PT HAS TEST TUBE IN HIS STOMACH IS LEAKING & THE PT HAS DIARRHEA...
08/21/2025 17:18:38	N11	TIFFANY HINES	85 YOM...AWAKE...BREATHING...
08/21/2025 17:19:16	N11	TIFFANY HINES	THE PT IS IN HIS BED & THE CLLR WILL SHOW RESPONDER TO THE PT WHEN THEY ARRIVE.

HOSPITAL MEDICATION LIST ON AUGUST 22nd, 2025

Listed below are medications that Donald Adams was taking on August 22, 2025, that include Hydromorphone and Oxycodone, two powerful opioids (pain killers and sedatives). These two opioids are listed on Donalds Adams medication schedule for August 23, 2025.

BROWARD HEALTH MEDICAL CENTER EMERGENCY DEPARTMENT

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On Page 79 of BHMC MR dated 8/22/2025, Donald Adams was administered the following medications, some with side effects of sedation and confusion, especially the HYDROmorphone and Oxycodone that continued to be listed on the 8/23/25 to be taken as needed.

Current Facility-Administered Medications:

- *Acetaminophen (Tylenol) tablet 650 mg, 650 mg, Oral, q4h PRN, Bethrand Nwachukwu, MD*
- *CefTRIAXone (Rocephin) 2 g in sodium chloride 0.9 % 50 mL IVPB-MB+, 2 g, Intravenous, q24h, Bethrand Nwachukwu, MD, Last Rate: 100 mL/hr at 08/22/25 0404, 2 g at 08/22/25 0404 Powerful antibiotic to treat serious bacterial infections*
- *Heparin injection 5,000 Units, 5,000 Units, Subcutaneous, q8h SCH, Mohammed Baig, MD*
- *Hydromorphone (Dilaudid) injection 1 mg, 1 mg, Intravenous, q3h PRN, Bethrand Nwachukwu, MD*
- *Mupirocin (Bactroban) 2 % ointment, Topical, BID, Rude Henry, NP, Given at 08/22/25 1148*
- *ondansetron (Zofran) injection 4 mg, 4 mg, Intravenous, q6h PRN, Bethrand Nwachukwu, MD*
- *OxyCODONE-acetaminophen (Percocet) 5-325 MG per tablet 1 tablet, 1 tablet, Oral, q4h PRN, Bethrand Nwachukwu,MD*
- *Pantoprazole (Protonix) 40 mg in sodium chloride (NS) 10 mL IVP, 40 mg, Intravenous, q12h SCH, Rude Henry, NP,40 mg at 08/22/25 1019*
- *Sodium Bicarbonate 150 mEq in dextrose 5 % 1,150 mL IV Infusion, 150 mL/hr, Intravenous, Continuous, Zachary Kornblum, DO, Last Rate: 150 mL/hr at 08/22/25 1252, 150 mL/hr at 08/22/25 1252*
- *Sodium Chloride 0.9% IV bolus 1,000 mL, 1,000 mL, Intravenous, Once, Zachary Kornblum, DO, Last Rate: 500 mL/hr at 08/22/25 1252, 1,000 mL at 08/22/25 1252*
- *Vancomycin (Vancocin) capsule 125 mg, 125 mg, 125 mg, Oral, 4x daily, Bethrand Nwachukwu, MD, 125 mg at 08/22/25 092 A powerful antibiotic used for serious bacterial infections.*

AUGUST 23rd, 2025 – SEVERE ACUTE KIDNEY INJURY & HIGH RISK OF DECOMPOSITION

On August 23rd, 2025, only one day after being admitted to the emergency room (ED) and suffering with multiple serious conditions, **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** and their drafting attorney Alexander Karantzalis claimed the deed dated August 3, 2025, on separate pages, was actually executed on August 23, 2025, and later changed a third time to August 21st, 2025, after a civil deposition by Ryan Shrouder Esq. on September 29, 2026. This is the day that Dr. Zachary Kornblum from South Florida Kidney and Hypertension Care diagnosed Donald Adams with *"severe Acute Kidney Injury with azotemia and high anion gap acidosis" and "high risk for decomposition."*

Below are Dr. Kornblum's notes with his comments:

Recommendations: *"Donald Adams Acute Kidney Injury is driven by profound volume depletion with intractable diarrhea. No urgent indications for kidney replacement therapy, we will try aggressive IV fluid resuscitation with isotonic bicarbonate infusion in dextrose. Discussed with the primary team in the nurse. No signs of obstruction on CT imaging from a GU*

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standpoint. Really bad monitor fluid balance strictly. Please call should the situation change. High risk for clinical decompensation."

- *Dr. Komblum's physician notes state: "I believe his Acute Kidney Injury is driven by profound volume depletion with intractable diarrhea.*
- *wound culture identified ESBL Klebsiella, an antibiotic-resistant bacterium;*
- *MRSA*
- *Candida krusei;*
- *antibiotics continued;*
- *TPN titrated: (Total parenteral Nutrition) infused directly into the bloodstream.*
- *renal function improving (Cr 4.0);*
- *PICC placed for TPN;*
- *nephrology noted no indication for dialysis;*
- *GI recommended holding PEG removal,*
- *continue parenteral nutrition, and*
- *monitor for drainage;*
- *anemia and hypoalbuminemia persisted*
- *8/23: Blood cultures positive for Salmonella; wound culture identified ESBL Klebsiella, MRSA, and Candida krusei; antibiotics continued; TPN titrated; renal function improving (Cr 4.0); PICC placed for TPN; nephrology noted no indication for dialysis; GI recommended holding PEG removal; continue parenteral nutrition; and monitor for drainage; anemia and hypoalbuminemia persisted.*

In the physician's notes of 8/23/2025 below, Dr. Komblum states that "*Donald Adams "is exceptionally poor historian" and that Donald Adams was suffering from "severe AKI with azotemia and high anion gap acidosis." This is a serious condition that "causes physical symptoms such as nausea, vomiting, confusion, and fatigue."*

AUGUST 23, 2025 - BHMC P 113 - 8/23/25 Confused & Hospital Medications
Neurologic: Awake, alert, normal speech, confused
Height 185.4 cm (6' 0.99"), weight 88.4 kg (194 lb 14.2 oz).
Last data filed at 8/23/2025 0314
Hospital Medications:
atorvastatin, 40 mg, Oral, Nightly
CefTRIAXone, 2 g, Intravenous, q24h
dextrose, 40 mL/hr, Intravenous
folic acid, 1 mg, Oral, Daily
heparin, 5,000 Units, Subcutaneous, q8h SCH
mupirocin, , Topical, BID
pantoprazole, 40 mg, Intravenous, q12h SCH
Adult Clinimix PN, 50 mL/hr, Last Rate: Stopped (08/23/25 0100)
sodium bicarbonate 150 mEq in dextrose 5 % 1,150 mL IV Infusion, 150 mL/hr, Last Rate: 150 mL/hr (08/23/25 0050)
PRN medications: acetaminophen, Hydromorphone, Ondansetron, Oxycodone-Acetaminophen
Lab Review
Recent Results (from the past 24 hours)

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CBC auto differential

During Donald Adams hospitalization, a stool test was positive for Salmonella, and blood cultures were subsequently positive for Salmonella. The medical records document treatment involving intravenous antibiotics, intravenous fluids, parenteral nutrition, and management of his PEG tube. His kidney function gradually improved during the admission.

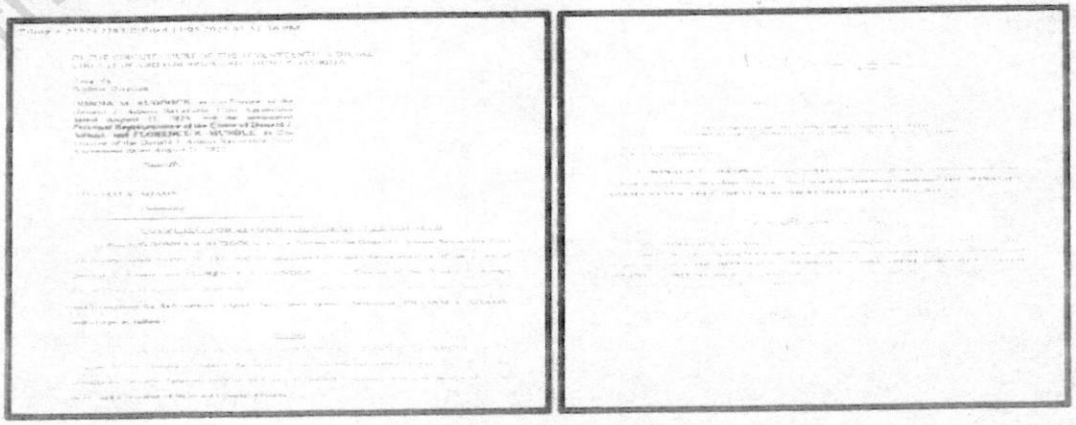
A physical therapy evaluation conducted August 24th documented that Donald Adams had a caregiver available around the clock and required assistance with daily activities and mobility. The therapist documented that Donald Adams identified person and place, demonstrated delayed responses, followed one-step commands with additional time or cues, and required substantial assistance with bed mobility.

By August 29th, Donald Adams diarrhea had been resolved, and he was tolerating PEG-tube feeding. The discharge examination described Donald Adams as alert and oriented to one or two spheres and able to follow commands. A hospice evaluation was discussed, and the discharge plan involved Donald Adams returning home with hospice/home-health services. Donald Adams was discharged at approximately 6:07 p.m. on August 29th.

The discharge diagnoses included acute diarrhea, PEG-tube malfunction, Salmonella bacteremia, and sepsis. The physician described severe sepsis with acute kidney injury as present on admission.

COMPLAINT FOR REFORMATION OF QUIT CLAIM DEED

On November 5th, 2025, a 21-page Complaint For Reformation of Quit Claim Deed was signed by Plaintiffs **DONNA MARIE RUDDOCK**, as Co-Trustee of the Donald J. Adams Revocable Trust Agreement dated August 21, 2025, and the nominated Personal Representative of the Estate of Donald J. Adams, and **FLORENCE ROSE MARIE MUNDLE**, as Co-Trustee of the Donald J. Adams Revocable Trust Agreement, by and through their undersigned counsel Daniel A. Seigel Esq., file this Complaint for Reformation of Quit Claim Deed, against Defendant William A. Adams. This was purportedly signed by Donald J. Adams, grantee and trustee. This was notarized on page two reflecting a second date being August 21st, 2025 by Attorney Alexander Karantzalis. This was filed under # 235212787.



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D. Grantor directs that all the rest, residue, and remainder of the corpus of Grantor's trust including any legacies that may lapse or be invalid or for any reason fail to take effect, and including all property over which Grantor may have any power of appointment or testamentary disposition, be distributed to Grantor's beneficiaries as follows:

1. FIFTY (50%) Percent to, DONNA RUDDOCK to be hers absolutely and forever.
2. FIFTY (50%) Percent to, FLORENCE MUNDLE to be hers absolutely and forever.

On pages 2 and 3 of the above listed Complaint for Reformation of Quit Claim Deed characterize a discrepancy in the execution date as a "mutual scrivener's error" involving both Attorney Alexander Karantzalis and the now decedent Donald Adams. The Complaint asserts that the document was mistakenly dated August 3, 2025, when the purported correct execution date was August 23, 2025.

Based upon the chronology of events and the documents reviewed, your Affiant does not believe this discrepancy was merely a mutual scrivener's error but a blunder by the suspects to make their story fit the theft scheme. The Trust to which Donald Adams residence was purportedly conveyed was not created until August 21, 2025. Consequently, an execution date of August 3, 2025, deed, would have predated the creation of the Trust by approximately eighteen days and therefore made it null and void.

Your Affiant believes the significance of this date blunder was subsequently recognized by the bad actors, and the execution date was changed from August 3, 2025, to August 23, 2025, thereby placing the purported execution of the deed two days after the Trust was created. Notably, changing the date from August 3 to August 23 could be accomplished simply by inserting the numeral "2" before the existing numeral "3."

The purported corrected date of August 23, 2025, however, presents additional and significant problems for **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**. Even if August 23, 2025, was accepted as the actual execution date as represented by Attorney Alexander Karantzalis, Donald Adams was gravely ill at that time with septic shock with a sepsis score of 54.8 and was administered a significant amount of medicine as outlined in his medical records. Donald Adams was suffering from terminal cancer, was being treated for life-threatening medical side effects, and was receiving numerous medications affecting his mind and body.

Therefore, the purported correction of the execution date does not resolve the circumstances surrounding the conveyance of the deed. Rather, it raises two separate problems requiring consideration: whether the original August 3, 2025, date was subsequently altered because it predated the creation of the Trust, and whether Donald Adams, considering his documented medical condition and treatment, actually executed the documents on the subsequently claimed date of August 23, 2025.

Additionally, a review of the signature samples attributed to Donald Adams on page 24 of this affidavit revealed substantial discrepancies in both the style and formation of the signature, as well

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as their placement in relation to the designated signature line and corroborates his state of mind and medical condition at the time. These inconsistencies are particularly significant and concerning when considered alongside Donald Adams documented medical condition during the relevant period and the nature and complexity of the legal transactions purportedly undertaken by him.

These questioned documents involved significant decisions concerning the transfer and disposition of Donald Adams' residence and estate interests and contradict his current Wills in place for his brother William Adams. These transactions were materially inconsistent with the testamentary intentions Donald Adams had previously expressed through his 2006 and 2021 Wills and his voicemail he left for William on August 11th, 2025. The apparent departure from those longstanding legal intentions, coupled with the numerous discrepancies observed among his signatures and his documented condition at the time, raises additional legal problems regarding the circumstances/evidence under which the documents were prepared, presented, and purportedly executed by and through their attorney Alexander Karantzalis.

When considered with the totality of the evidence developed during this investigation, these circumstances further support fraud/theft by the actions of **DONNA MARIE RUDDOCK**, **MARC BRENT LIPP**, and **FLORENCE ROSE MARIE MUNDLE**, and whether the questioned documents were knowingly and voluntarily executed by Donald Adams or were instead utilized to facilitate the suspected fraudulent transfer/theft and control of his property contrary to his previously documented wishes.

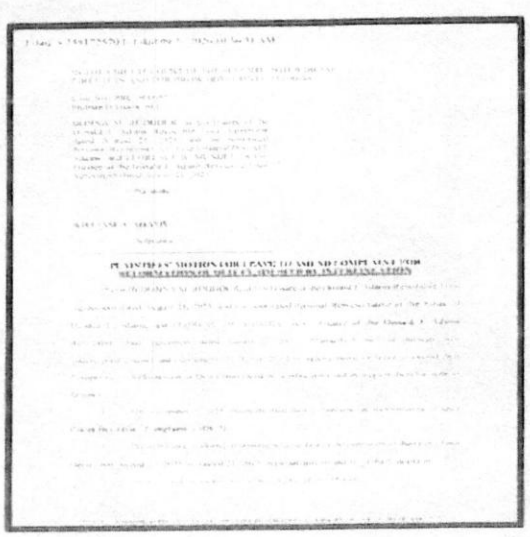
MOTION FOR LEAVE TO AMEND COMPLAINT FOR REFORMATION OF QUIT CLAIM DEED BY INTERLINEATION

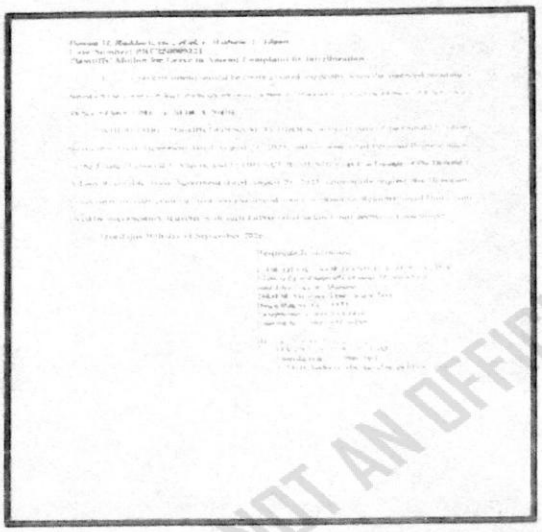
On September 30, 2026, **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**, through their attorney Daniel Seigel, filed a Motion for Leave to Amend Complaint for Reformation of Quit Claim Deed by Interlineation, which states the following:

"Plaintiffs seek to amend all references to the date of the execution of the Quit Claim Deed from August 23, 2025, to August 21, 2025, in paragraphs 10 and 16 of the Complaint."

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Suspects **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** purportedly relied upon a Quitclaim Deed (QCD) allegedly executed by Donald Adams on August 3, 2025. Thereafter, the execution date was represented as August 23, 2025, with the discrepancy characterized as a "mutual scrivener's error." After a deposition by Attorney Ryan Shrouder, they again realized another blunder in their timeline with a purported execution date that was subsequently changed a third time, from August 23, 2025, to August 21, 2025, the day Donald Adams was transported to the hospital in serious condition with sepsis and leaking green fluid from his PEG tube, an obvious clear sign of a serious infection.

Attorney Ryan Shrouder, counsel for William Adams, deposed Attorney Alexander Karantzalis on July 29, 2026, and **FLORENCE ROSE MARIE MUNDLE** on September 29, 2026. The examination of each witness addressed the timeline of the documents purportedly signed by Donald Adams and, more importantly, his state of mind and his life-threatening condition upon arrival at the Broward Health Medical Center Emergency Department on the same afternoon.

The Motion for Leave to Amend Complaint for Reformation of Quit Claim Deed by Interlineation was filed after **FLORENCE ROSE MARIE MUNDLE's** deposition being September 30th, 2026. This Motion to Amend the date of the signing of the QCD to now August 21, 2025, was 1 day after the deposition and is another blunder by the suspects who realized that the August 23, 2025 date, didn't corroborate with Donald Adams medical condition and had to be changed again.

Having twice sworn to execution dates that the evidence would not support, **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** changed the purported execution date a third time, to August 21, 2025, the only date on which the witnesses and the text messages place Attorney Alexander Karantzalis at the residence.

These repeated and material changes to the purported execution dates are significant to this fraud investigation, particularly because August 21, 2025, corresponds with the formation and execution of the Certificate of Trust for the Donald J. Adams Revocable Trust. The progression of the QCD's

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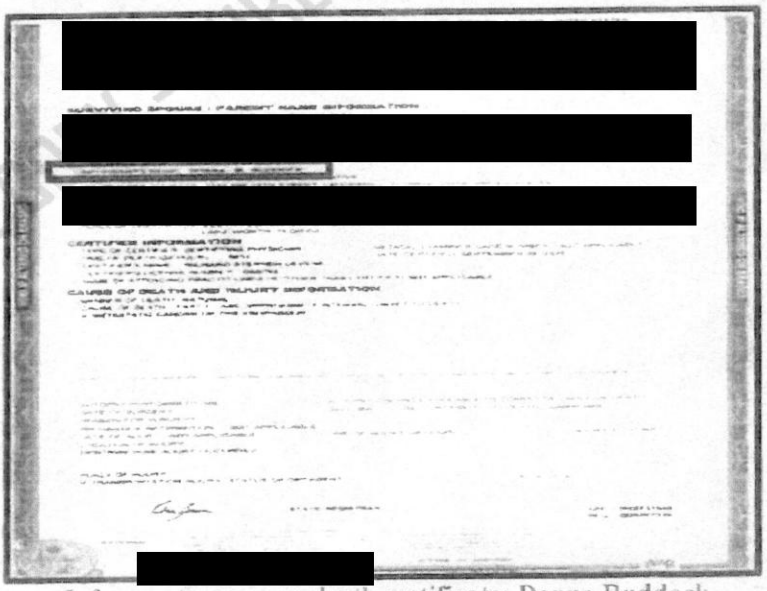
purported execution date from August 3 to August 23, and ultimately to August 21, 2025, raises substantial questions regarding the authenticity, timing, and circumstances surrounding the execution of the QCD and its relationship to the creation of the Trust with the appearance of Attorney Alexander Karantzalis.

These discrepancies go directly to the central issues and crimes being committed and constitute evidence relevant to determining the knowledge, intent, and conduct of **DONNA MARIE RUDDOCK, FLORENCE ROSE MARIE MUNDLE,** and **MARC BRENT LIPP** in connection with the transfer of Donald Adams' real property and the formation of the Donald J. Adams Revocable Trust.

DATE OF DEATH FOR DONALD JULIAN ADAMS - SEPTEMBER 20, 2025

The State of Florida Certification of Death, State File Number 2025163391, records Donald Adams date of death as September 20, 2025, at the age of 85. His place of death is identified as his residence at [redacted] Fort Lauderdale, Broward County, Florida 33312. The certificate lists the manner of death as natural and the cause of death as metastatic cancer of the esophagus. No autopsy was performed.

The death certificate identifies **DONNA MARIE RUDDOCK** as the informant and lists her relationship to Donald Adams as "Legal Representative." The certificate records the method of disposition as burial at South Florida National Cemetery, Lake Worth, Florida. Richard Stephen Levene is identified as the certifying physician, and the time of death is recorded as 0514 hours. The death was certified on September 22, 2025, and the certificate was issued September 29, 2025.



Informants name on death certificate: Donna Ruddock

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VOICEMAIL FROM DONALD ADAMS TO WILLIAM ADAMS ON AUGUST 11TH, 2025

Your Affiant was provided with a voicemail from Donald Adams from Teresa Adams dated August 11th, 2025, which was 41 days prior to his death and was as follows:

"Hey Bill, this is Don. I just want to give you a call. I just got back from Cleveland Clinic. They're not going to do anything. Basically, I'm in hospice without the good drugs. Um, so when I go make sure Flo gets like $50,000 out of the estate or more. And I don't know what the rest of it was, I guess to the kids, they got all the money in the world too. So whatever you think the stuff could go for. Humane Society or whatever. I went to Cleveland Clinic today and the guy said, I don't know why you're here and he looked at me and sent me home. He said , most of the cancer is gone but I'm too weak for chemo, so they're not going to do anything. So basically, I'm just here until I am not. C'est la vie. I've had a good life. Guess you can take the house receipts and the estate receipts. Should be four, maybe 4 million. Hum, I guess give it to the kids. OK, have a great day. Call me back again. Thanks."

An Analysis of Donald Adams' Bank of America account # [redacted] on August 11th, 2025, yielded a balance of $11,468.93 and contradicts his voicemail on this date regarding *"Guess you can take the house receipts and the estate receipts. Should be four, maybe 4 million."*

POST-DEATH PROBATE DOCUMENTS

Following Donald Adams death, William A. Adams sought establishment and probate of the March 13, 2021, Will. William Adams signed the petition on October 9, 2025, and it was electronically filed in the Broward County Circuit Court, Probate Division, on October 10, 2025. The petition requested establishment of the 2021 Will and appointment of William Adams as personal representative. In the alternative, William Adams requested admission of Donald Adams April 13, 2006, will or, if neither Will were admitted, intestate administration.

The petition states that the original 2021 Will could not be located. It further alleges that Donald Adams had expressed an intention as recently as August 2025 to leave his estate to William for the benefit of William's family.

The documents therefore reflect materially different estate arrangements. The 2006 and 2021 Wills primarily provide for William Adams and his family. The August 21, 2025, Will expressly revokes the prior Will, provide specified tangible personal property to **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**, leaves the residue to the August 21, 2025, Revocable Trust, and nominates **DONNA MARIE RUDDOCK** as personal representative. The documents do not contain a final court order determining which will govern Donald Adams estate or resolving the validity of the disputed instruments.

On August 21, Attorney Alexander Karantzalis reportedly traveled to Donald Adams' residence for document signing. At 5:46 p.m., Alexander Karantzalis communicated that the signing was "All set." At 5:54 p.m., Donald Adams arrived at Broward Health Medical Center by Fire Rescue. At 6:08 p.m., his blood pressure was 91/43, and subsequent medical evaluation documented serious conditions including Salmonella bacteremia, severe sepsis with acute kidney injury,

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dehydration, and other medical issues. At 6:57 p.m., while Donald Adams was at the hospital, Alexander Karantzalis emailed the executed trust documents to **DONNA MARIE RUDDOCK**.

The August 21 documents materially differed from Donald Adams earlier estate-planning documents. His 2006 and 2021 Wills provided principally for his brother and family, whereas the August 21, 2025, Will provide specified personal property to suspects **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** and transferred the residue of the estate to the newly created Revocable Trust. Ten days before August 21, Donald Adams reportedly left a voicemail discussing his estate going to his brother and his brother's children and a substantially smaller bequest to **FLORENCE ROSE MARIE MUNDLE**.

DEPOSITION OF ATTORNEY ALEXANDER KARANTZALIS

On July 29, 2026, Attorney Alexander Karantzalis was deposed by Ryan Shrouder Esq. who provided sworn testimony in the Estate of Donald J. Adams, Broward County Circuit Court Case No. PRC25000453. Alexander Karantzalis testified that Donald Adams and **DONNA MARIE RUDDOCK** contacted him regarding estate planning. He stated that he met privately with Donald Adams at his Weston office and that Donald Adams expressed his desire for his residence to benefit his caregivers, **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE**.

After reviewing text messages exchanged with **MARC BRENT LIPP**, Alexander Karantzalis identified August 18, 2025, as the office meeting date and August 21, 2025, as the date the documents were signed at Donald Adams' residence. He identified the documents as including a revocable trust, certificate of trust, quitclaim deed, pour-over will, and powers of attorney. He stated that Kassie Fernandez, his then-girlfriend and administrative assistant, and her brother, Zade Fernandez (printed on the deed as "Zach Fernandez"), served as witnesses. **FLORENCE ROSE MARIE MUNDLE** was present in the residence. Alexander Karantzalis denied executing documents with Donald Adams at a hospital.

During questioning, Alexander Karantzalis acknowledged that the Quit Claim Deed and his notarial acknowledgment displayed August 3, while the trust displayed August 21, 2025. When questioned about a complaint alleging an intended deed date of August 23, he initially indicated that date might be correct but expressed uncertainty. After reviewing the text messages, he testified that all documents were signed together on August 21, 2025, and attributed the deeds August 3 date to a scrivener's error.

Alexander Karantzalis described Donald Adams as physically weakened and sitting up in bed during signing, but stated that Donald Adams appeared coherent, communicated his wishes clearly, and displayed no mental limitations. He denied observing pressure or undue influence. He acknowledged that he did not consult Donald Adams' medical providers and could not recall whether he reviewed prior estate planning documents. He also could not confirm the location of the original signed documents and agreed to locate and produce additional records.

DEPOSITION OF FLORENCE ROSE MARIE MUNDLE

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On September 29, 2026, **FLORENCE ROSE MARIE MUNDLE** provided sworn testimony by video conference concerning the estate of Donald J. Adams. Attorney Ryan C. Shrouder conducted the examination on behalf of Donald Adams' brother, William Adams. Attorney Daniel A. Seigel represented the respondents. Court reporter and Florida notary Janis Tierney administered the oath. **DONNA MARIE RUDDOCK** was also present.

FLORENCE ROSE MARIE MUNDLE testified that she had worked as a caretaker for more than 15 years and held a home health aide certificate. In April 2024, she began providing around-the-clock care for Donald Adams, approximately 82 years old, while residing at his home at [redacted] Fort Lauderdale. **DONNA MARIE RUDDOCK** assisted on weekends, provided transportation, and supervised **FLORENCE ROSE MARIE MUNDLE** through her company, Norma's Affordable Healthcare. **FLORENCE ROSE MARIE MUNDLE** received approximately $600 to $700 weekly, including room and board, with payments made through Zelle by **DONNA MARIE RUDDOCK**, who was paid by Donald Adams Wells Fargo account.

FLORENCE ROSE MARIE MUNDLE's responsibilities included bathing, toileting, meal preparation, cleaning, laundry, medication assistance, and companionship. She testified that Donald Adams previously suffered a stroke affecting his mobility and balance, requiring a walker and assistance to prevent falls. He subsequently developed esophageal cancer, kidney and liver problems, and swelling in his feet. Due to difficulty swallowing, he received nutrition and water through a PEG feeding tube. A hospital bed was placed in his living room, and he underwent approximately 28 or 29 radiation treatments at Broward Hospital. Despite these medical conditions, **FLORENCE ROSE MARIE MUNDLE** denied observing dementia, confusion, or memory problems and maintained that Donald Adams remained coherent.

Regarding August 21, **FLORENCE ROSE MARIE MUNDLE** testified that Donald Adams experienced severe diarrhea and green fluid leaking from his PEG tube area, prompting her to call 911. Emergency personnel transported him to the hospital, where he was reportedly dehydrated. Although initially uncertain about the date, she later recalled that Donald Adams was transported on the evening of August 21. She visited him daily during his hospitalization and assisted hospital personnel with his medical history and medications. **FLORENCE ROSE MARIE MUNDLE** stated that Donald Adams requested hospice care and asked hospital personnel to contact **DONNA MARIE RUDDOCK**, although she could not identify who coordinated the arrangements.

Concerning Donald Adams' estate, **FLORENCE ROSE MARIE MUNDLE** testified that approximately six months after she began caring for him, Donald Adams expressed his intention to leave something to her and **DONNA MARIE RUDDOCK**. She stated that Donald Adams requested an attorney, who **DONNA MARIE RUDDOCK** located through Google. **FLORENCE ROSE MARIE MUNDLE** accompanied Donald Adams and **DONNA MARIE RUDDOCK** to the attorney's office in Weston, with **MARC BRENT LIPP** providing transportation. She identified the attorney as "Alex" and remained in the lobby during their meeting. **FLORENCE ROSE MARIE MUNDLE** testified that **DONNA MARIE RUDDOCK** paid the attorney using her own money but could not explain why Donald Adams did not pay.

FLORENCE ROSE MARIE MUNDLE testified that the attorney and two witnesses, a young man and woman, subsequently visited Donald Adams' residence on August 21 to execute

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documents. Donald Adams was lying in his hospital bed in the living room when the attorney asked whether he recognized him, and Donald Adams responded affirmatively. **FLORENCE ROSE MARIE MUNDLE** acknowledged that she was performing household duties and did not personally observe the signing. She stated that the attorney took the documents afterward and that documents were later mailed to the residence, which she gave to **DONNA MARIE RUDDOCK**.

During questioning, **FLORENCE ROSE MARIE MUNDLE** was shown a quitclaim deed marked as Petitioner's Exhibit A, which identified an execution date of August 3. However, **FLORENCE ROSE MARIE MUNDLE** maintained that the documents were signed on August 21. When questioned about a pleading referencing August 23, she denied any document signing on that date and stated that the attorney visited the residence only once. She could not explain the conflicting dates or why Donald Adams' signature appeared below the designated signature line. Although she described a hard surface used for signing, she acknowledged that she was not standing beside Donald Adams during the execution.

FLORENCE ROSE MARIE MUNDLE testified that she first understood Donald Adams intended to leave his residence or entire estate to her and **DONNA MARIE RUDDOCK** when Donald Adams discussed the matter with his brother, William Adams, during his hospitalization. According to **FLORENCE ROSE MARIE MUNDLE**, Donald Adams stated that he had left everything to "Flo and Donna," and William responded that Donald Adams could do as he wished with his property. **FLORENCE ROSE MARIE MUNDLE** maintained that the decision was Donald Adams' own and reflected his appreciation for their care.

Following Donald Adams' death, **FLORENCE ROSE MARIE MUNDLE** continued residing alone at the property without paying rent, although she paid approximately $300 to $400 monthly for utilities. She testified that **DONNA MARIE RUDDOCK** took possession of Donald Adams' truck, which he had reportedly promised her. **FLORENCE ROSE MARIE MUNDLE** did not know whether the truck was included in his Will. She further stated that Donald Adams' brother and sister-in-law collected requested personal belongings from the residence and that she and **DONNA MARIE RUDDOCK** shared their legal representation expenses equally.

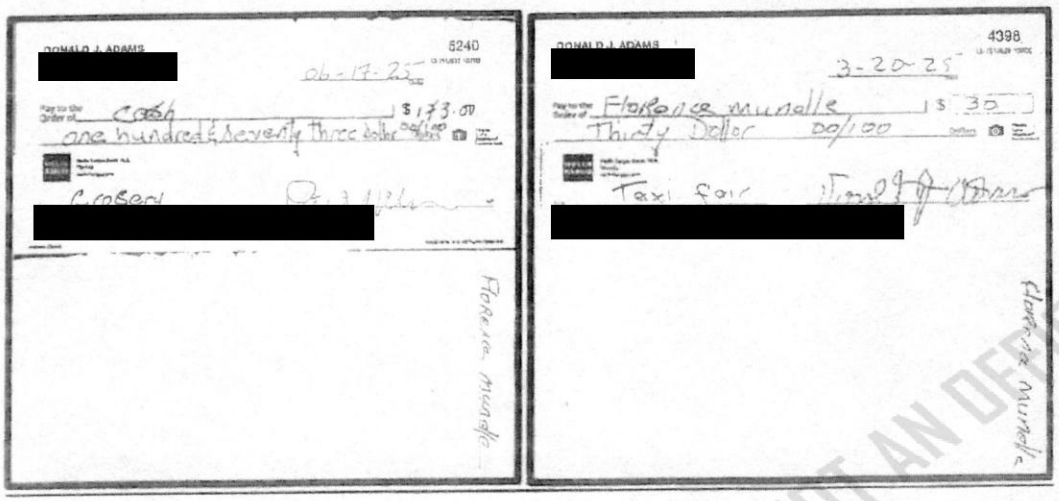
JP MORGAN CHASE BANK ACCOUNT [redacted] – FLORENCE ROSE MARIE MUNDLE

On August 31st, 2018, **FLORENCE ROSE MARIE MUNDLE** opened JP Morgan Chase account # [redacted] as the sole account holder with the address of [redacted] Sunrise, Florida, [redacted] phone # [redacted] taxpayer ID # [redacted]

An analysis of account # [redacted] yielded a deposited check written out to "Cash" and **FLORENCE ROSE MARIE MUNDLE** related to the Wells Fargo bank account of Donald J. Adams.

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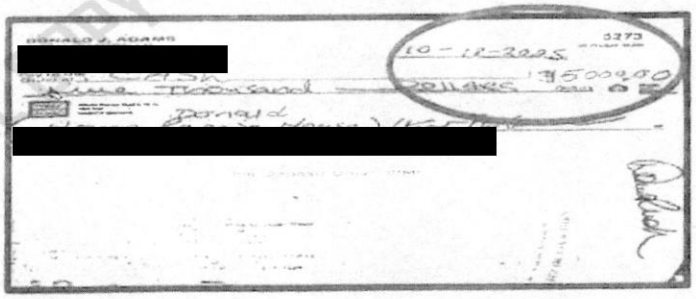
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JP MORGAN CHASE BANK ACCOUNT # [redacted] – NORMA'S AFFORDABLE HOME HEALTH CARE INC. /DONNA MARIE RUDDOCK

On June 27th, 2024, **DONNA MARIE RUDDOCK** opened JP Morgan Chase Business account # [redacted] as the president with the address of [redacted] Lauderhill, Florida 33319, phone # [redacted] taxpayer ID # [redacted].

On September 23rd, 2025, three days after the death of Donald Adams, a Wells Fargo check # 5273 from his account with a Pay to the order of "Cash," was written, and negotiated into the JP Morgan Chase account # [redacted] and dated "10-18-2025." This check was endorsed by **DONNA MARIE RUDDOCK**.



OTHER WITHDRAWALS

DATE	DESCRIPTION	AMOUNT
09/29	Deposited Item Returned NSF ISI 099017539 # of Dep Items00001Ck# 0000005273 Dep Am0000500000 Date092225Ck Am0000500000	$5,000.00
	Total Other Withdrawals	$5,000.00

On October 10th, 2025, a Zelle payment was sent from JP Morgan Chase bank account # [redacted] to phone number – [redacted].

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- 10/10 Zelle Payment To "Ale Karantzallis" [redacted] $750.00

The specifics for this debit were as follows:

- *10/10/2025 14:33:09 payments quick pay accept chantal133 10/10/2025 14:33:09, application id - payments, accept mode - auto, branding - ncc, client source ip - [redacted] date added - 10/10/2025, due date - 10/14/2025, from acct index - [redacted] from acct num - [redacted] from email - [redacted] from nickname - norma's affordable home health care inc., kana notification id - payment- [redacted] memo - rental spot donald dock, notification type - suppress, notificationtype1 - suppress, ntwrk_clnt_id - [redacted] payment audit id - [redacted] payment type – quick pay_outbound, pmt status - accepted, process date - 10/10/2025, pymt amt - 750, receiver network - jpm, receiver non chase - y, receiver org - jpm, receiver token status - active, receiving profile id - 0, sender network - cxc, sender non chase - n, sender org - wfc, sender profile id - [redacted] to acct index - [redacted] to acct num - [redacted] to mobile phone - [redacted] server id - [redacted] channel id - mod, slot code – 2081.*

A law enforcement query of phone number – [redacted] yielded the following information:

- **ALEXANDER B. KARANTZALIS** – [redacted] Plantation, Fl [redacted]

SWORN STATEMENT OF NEIGHBOR HOLLY MILLER

On October 27, 2026, your Affiant obtained a sworn recorded statement from witness Holly Ann Miller at the Broward County Property Appraiser's Office regarding the theft of the residence belonging to deceased victim Donald J. Adams, located at [redacted] Fort Lauderdale, Florida.

Miller stated that she has resided on Marathon Lane for approximately 39 years and had known Donald Adams for approximately 25 years. Miller previously served as Donald Adams' caretaker, maintained a key to his residence, assisted during medical emergencies, transported him to Alcoholics Anonymous meetings, and assisted with personal matters.

Miller advised that Donald Adams maintained a positive relationship with his brother, William Adams, who provided financial assistance, paid household expenses, compensated Miller for caretaking services, and funded improvements to Donald Adams' residence. Miller stated that William encouraged Donald Adams to seek assistance for his alcohol consumption and consider relocating closer to family. Miller denied knowing of any falling out between the brothers.

Miller personally witnessed the execution of a Will prepared for Donald Adams by Tom LaSalle, who arrived at the residence with another individual serving as a witness. Miller also signed as a witness. According to Miller, Donald Adams previously had another Will and intended to update his estate planning. Based on their conversations, Miller understood that Donald Adams wanted his brother and nephews to inherit his property.

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Miller stated that two female caretakers, identified as Donna and Flo, became involved in Donald Adams' care around April 2024. Miller did not know how they were introduced to Donald Adams but learned from his sister-in-law, Theresa, that Donald Adams had hired them. Following their involvement, Miller's access to Donald Adams became increasingly restricted. Despite previously having unrestricted access, Miller was repeatedly denied entry and informed that Donald Adams was sleeping or unavailable. Miller believed the caretakers were intentionally isolating Donald Adams from longtime friends and family.

Miller recalled visiting Donald Adams while Flo was present and observing him lying in a hospital bed in his living room, appearing seriously ill. During their conversation, Donald Adams pointed toward Flo and indicated that she would receive his residence. Miller reminded Donald Adams that he already had a Will. Miller could not recall the date of this conversation but stated that Donald Adams' comments contradicted his previously expressed intentions to leave his property to family members.

During this same general period, Donald Adams expressed a desire to leave his residence, ride in Miller's vehicle, visit the beach, and go to Outback Steakhouse. Miller questioned his physical ability to participate in these activities because of his deteriorating condition. Miller did not provide a medical assessment of Donald Adams' mental capacity.

Following Donald Adams' death, Miller learned that Donna reportedly withheld information from William and Theresa concerning his cremation arrangements. Miller attended a small memorial gathering with family members and stated that attendance was restricted. She did not know who authorized the cremation or currently possessed Donald Adams' remains.

Miller further advised that William and Theresa were not permitted unrestricted access to Donald Adams' residence to retrieve personal belongings. According to Miller, the family received boxes containing items of little significance, while family photographs, possessions belonging to Donald Adams' deceased mother, and possible jewelry remained unaccounted for.

Miller also recalled that Donald Adams owned a black truck that was not supposed to be sold. She subsequently observed that the vehicle was no longer parked at the residence but had no firsthand knowledge of its disposition.

Miller expressed her belief that Donna and Flo improperly obtained Donald Adams' residence, citing his previously expressed estate-planning intentions, restrictions on visitors, and deteriorating physical condition. Miller also raised concerns regarding possible mistreatment and the caretakers' qualifications but acknowledged having no proof supporting those suspicions.

SWORN STATEMENT OF BOAT CAPTAIN JONATHAN SPIEGEL

On October 27, 2026, your Affiant obtained a sworn recorded statement via video from witness Jonathan Wayne Spiegel, also known as "Ace," regarding the theft of the residence belonging to deceased victim Donald Adams.

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Spiegel stated that he became acquainted with Donald Adams in approximately November 2024 after arranging to dock a vessel at Donald Adams' residence. The vessel remained at the property until approximately two months after Donald Adams' death. During this period, Spiegel regularly visited the property and interacted with Donald Adams and his caretakers, identified as Donna and Flo.

Spiegel described Donald Adams as elderly, seriously ill, and physically limited, frequently requiring a wheelchair. Although Donna and Flo characterized Donald Adams as mentally unstable and possibly suffering from dementia, Spiegel described him as intelligent, articulate, and capable of recalling events from decades earlier. Spiegel acknowledged occasional short-term memory difficulties but did not observe a definite progressive cognitive decline. He further acknowledged that he was not medically qualified to assess Donald Adams' mental condition.

Spiegel recalled multiple occasions when Donald Adams personally requested that he contact 911. During the first incident, Donald Adams called Spiegel by his nickname and instructed him to summon emergency assistance. Spiegel initiated the call; however, Flo immediately intervened and repeatedly instructed him not to contact emergency services. Spiegel terminated the call and subsequently advised the dispatcher that assistance was unnecessary. Several hours later, Donna confronted and reprimanded him for contacting 911.

Spiegel described additional incidents during the months preceding Donald Adams' death when he called from the rear sliding glass door, repeatedly requesting emergency assistance. Flo intervened and indicated that Donald Adams was experiencing confusion or behavioral problems. Spiegel stated that he accepted her explanations at the time and did not contact emergency services during those subsequent incidents.

Spiegel further reported hearing prolonged, loud moaning sounds coming from Donald Adams' residence during the evening hours throughout the final one to three months of his life. He described the sounds as consistent with someone experiencing significant discomfort but could not determine their cause. Spiegel did not personally witness anyone physically assaulting Donald Adams.

Spiegel advised that Flo generally controlled access to the residence and determined whether visitors could enter. Donald Adams personally complained to Spiegel that his caretakers would not allow him to see other people. Spiegel stated that these circumstances caused him to question whether Donald Adams was being intentionally isolated.

Spiegel also reported that Donna and Flo portrayed Donald Adams' relationship with his brother, William Adams, as hostile and described William as mentally unstable. However, Spiegel stated that Donald Adams frequently spoke positively about his brother and displayed a photograph of them together near his medical bed. Spiegel personally met William and observed nothing supporting the caretakers' negative descriptions.

Spiegel stated that Donald Adams never expressed an intention to leave his residence to Donna or Flo. However, he acknowledged that he had never discussed Donald Adams' specific estate-planning arrangements or intended beneficiaries.

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Regarding September 20, 2025, Spiegel stated that Flo notified him by text message that Donald Adams had died during the early morning hours. Approximately two hours after receiving the notification, Spiegel approached the residence to express his condolences.

Upon arriving, Spiegel observed Donna standing near the front entrance. According to Spiegel, Donna raised her arms, looked upward, and excitedly stated, *"This is all ours."*

Simultaneously, Spiegel observed **MARC BRENT LIPP**, identified as Donna's romantic partner, changing the locks on the front door. Spiegel found their behavior suspicious, particularly because Donald Adams had reportedly died only hours earlier. Spiegel stated that **MARC BRENT LIPP** avoided eye contact despite their previously established relationship involving the vessel's dockage arrangements.

Spiegel explained that **MARC BRENT LIPP** had previously assisted with matters involving the City of Fort Lauderdale concerning permission to maintain the vessel at Donald Adams' dock. Spiegel referenced approximately $5,000 in monthly dockage-related revenue and stated that payments were directed to Donald Adams during his lifetime. However, Spiegel suspected that Donna and Flo may have benefited financially because he believed they had access to Donald Adams' financial accounts. Spiegel did not provide financial documentation establishing improper withdrawals or identifying the ultimate recipients of the funds.

Following the events of September 20, 2025, Spiegel contacted Donald Adams' family by email to report his observations and concerns. Spiegel stated that his suspicions increased after communicating with family members regarding the caretakers' possible access to Donald Adams' finances.

Spiegel expressed his belief that Donna and Flo had taken advantage of Donald Adams and improperly obtained his residence. He based his concerns on Donald Adams' repeated requests for emergency assistance, the caretakers' interference with those requests, Donald Adams' complaints of isolation, their negative statements regarding his brother, and their conduct immediately following Donald Adams' death.

Spiegel advised that he made face to face contact with **MARC BRENT LIPP** about 12 times and could identify him from a photograph. Spiegel was provided with a single source photograph of **MARC BRENT LIPP** Florida driver's license and positively identified him.

EMAIL from FLORENCE ROSE MARIE MUNDLE to MARY ROBERTS REGARDING DONALD ADAMS' DOCK MONTHLY RENTAL SPACE

Mary Roberts, who works for NOGTX, oversaw the dock rental space and payments sent to Donald Adams for Captain Jonathan Spiegel monthly boat storage at his residence. Roberts provided your Affiant with an email from **FLORENCE ROSE MARIE MUNDLE** regarding changing the beneficiary bank account for these future payments for Spiegel's boat.

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From: Florence mundle [redacted]
Sent: Monday, September 29, 2025, 12:32 PM
To: Mary Roberts [redacted]
Subject: Donald adams dock

"Hi my name is Donna Ruddock and Florence Mundell Donald family notified us that the account was being closed because of Donald passing this is the new account that you can send the payment to every month of $3,750, we will send you the routing number and the account number that could be used for the deposit, my number is [redacted] *if you have any questions and I have questions so if you can give me a call I appreciate it. The account the routing number is* [redacted] *account number is* [redacted]
Thank you"

Pursuant to subpoenaed JP Morgan Chase bank records, account # [redacted] is a joint account belonging to **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** opened on September 22nd, 2025.

DONALD ADAMS 2011 CHEVROLET TRUCK

On September 29th, 2025, **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** obtained a Florida title for Donald Adams black truck VIN [redacted] and provided the "Last Will & Testament of Donald J. Adams" to the Florida Department of Highway Safety & Motor Vehicles, and his death certificate, and copies of both of their Florida ID and Driver's license to secure this transfer.

CONCLUSION

Based upon the totality of the investigation, including sworn witness statements, medical records, financial records, recorded real estate instruments, testamentary documents, electronic communications, deposition testimony, and other documentary evidence, your Affiant has established probable cause to believe that **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** knowingly exploited their positions of trust and confidence as caregivers to obtain ownership and control of the residence and assets belonging to Donald Julian Adams, an 85-year-old terminally ill individual, and contrary to *Florida Statute § 825.103.*

The investigation established that **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** began providing caregiving services to Donald Adams in approximately April 2024. During their employment, both individuals gained access to Donald Adams' residence, personal affairs, financial information, and medical care. As Donald Adams' health deteriorated, he became increasingly dependent upon his caregivers for his daily necessities, medications, transportation, communication, and access to medical treatment.

Medical records obtained from Broward Health Medical Center and the Cleveland Clinic documented Donald Adams' significant medical conditions, including terminal esophageal adenocarcinoma, a previous cerebrovascular accident with residual cognitive impairment, severe physical deterioration, malnutrition, dehydration, Sepsis, and other serious medical complications.

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On August 21, 2025, Donald Adams was transported to Broward Health Medical Center, where he was treated for life-threatening medical conditions, including sepsis and acute kidney injury.

The investigation further established that during this period of substantial physical and cognitive vulnerability, a series of legal instruments were prepared that fundamentally altered Donald Adams' longstanding estate plan. These documents included a Quit Claim Deed, Revocable Trust Agreement, Certificate of Trust, Last Will and Testament, and Durable Medical Power of Attorney. The instruments ultimately designated **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** as the sole beneficiaries and successor co-trustees of the Donald J. Adams Revocable Trust.

These changes were contrary to Donald Adams' previously documented estate plans established through his 2006 and 2021 Wills, which identified his brother, William Adams, and other family members as beneficiaries. Additionally, an August 11, 2025, a voicemail left by Donald Adams for his brother referenced leaving his estate to family members while providing a monetary bequest to **FLORENCE ROSE MARIE MUNDLE**. The voicemail did not indicate that Donald Adams intended to transfer ownership of his residence or his entire estate to his caregivers.

Of particular investigative significance were the discrepancies involving the execution dates of the Quit Claim Deed. The instrument originally reflected August 3, 2025, although the Donald J. Adams Revocable Trust was not established until August 21, 2025. Subsequent court filings attributed the discrepancy to a mutual scrivener's error and changed the purported execution date to August 23, 2025, before it was changed again to August 21, 2025, after being deposed. These repeated changes, considered alongside Donald Adams' documented medical condition and hospitalization, raised substantial questions concerning the circumstances surrounding the execution and recording of the instruments.

The investigation also established that Attorney Alexander Karantzalis, who prepared the August 2025 estate-planning documents, had not previously represented Donald Adams. According to deposition testimony, **DONNA MARIE RUDDOCK** located Alexander Karantzalis and paid his legal fees and not Donald Adams. Donald Adams' longtime estate-planning attorney, Thomas LaSalle, who prepared his previous Wills, was not consulted regarding these substantial changes.

Sworn witness statements further documented concerns regarding the caregivers' control over Donald Adams' residence, restrictions involving family members and longtime friends, and their involvement in his medical and financial affairs. These circumstances were particularly significant considering Donald Adams' deteriorating medical condition and increasing dependence upon the individuals who ultimately became beneficiaries of his estate.

The Broward County Property Appraiser's Office established an approximate 2026 Just Market Value of $766,032.00 for Donald Adams' unencumbered residence located at [redacted] Fort Lauderdale, Florida. The investigation established that **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** were non-relative caregivers who had known Donald Adams for approximately sixteen months before the August 2025 property transfer. Donald Adams received no consideration for the transfer, and **DONNA MARIE RUDDOCK** was already receiving compensation for caregiving services.

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Following Donald Adams' death on September 20, 2025, witness Jonathan Spiegel reported observing **DONNA MARIE RUDDOCK** at the residence proclaiming, *"This is all ours,"* while **MARC BRENT LIPP** was changing the locks. These observations, together with the subsequent exercise of control over the residence, provided additional evidence concerning the suspects' conduct following Donald Adams' death.

Financial records further established that Wells Fargo Check No. 5273, payable to cash in the amount of $5,000.00 and bearing the date October 18, 2025, was negotiated into **DONNA MARIE RUDDOCK's** business account on September 23, 2025, three days after Donald Adams' death. The investigation also documented the September 29, 2025, transfer of title to Donald Adams' 2011 Chevrolet truck to **DONNA MARIE RUDDOCK** and **FLORENCE ROSE MARIE MUNDLE** using testamentary documentation and his death certificate.

When considered collectively, the evidence establishes a pattern of conduct involving the suspects' positions of trust, control over Donald Adams' personal and financial affairs, the procurement of legal instruments substantially benefiting themselves, material discrepancies in recorded property documents, and the continued exercise of control over Donald Adams' property following his death.

As of October 29th, 2026, **FLORENCE ROSE MARIE MUNDLE** is currently residing in the residence of [redacted] Ft. Lauderdale. Your Affiant believes the evidence establishes probable cause that **DONNA MARIE RUDDOCK, FLORENCE ROSE MARIE MUNDLE,** and **MARC BRENT LIPP,** acted as principles to unlawfully obtain and exercise control over Donald Adams' residence and assets, depriving him and subsequently his estate of their use, benefit, and possession.

Based upon the facts, circumstances, and evidence documented throughout this investigation, your Affiant has established probable cause to believe that **DONNA MARIE RUDDOCK, FLORENCE ROSE MARIE MUNDLE,** and **MARC BRENT LIPP,** committed the offenses of Grand Theft of $100,000 or More, contrary to Florida Statute 812.014; Unlawful Filing of False Documents or Records Against Property, contrary to Florida Statute 817.535(2)(a); and Exploitation of an Elderly Person involving property valued at $100,000.00 or More, contrary to Florida Statute 825.103; **DONNA MARIE RUDDOCK,** and **FLORENCE ROSE MARIE MUNDLE** additionally committed the offense of Fraudulently Obtaining a Motor Vehicle Title, contrary to Florida Statute F.S. 319.33(1)(E).

Additionally, your Affiant has established probable cause to believe that **DONNA MARIE RUDDOCK** committed Fraudulent Use of Personal Identification Information of a Deceased Person, contrary to Florida Statute 817.568(8)(a). Accordingly, your Affiant respectfully submits the foregoing investigative findings and supporting evidence in support of the application for the arrest of **DONNA MARIE RUDDOCK, FLORENCE ROSE MARIE MUNDLE,** and **MARC BRENT LIPP,** for the aforementioned offenses.

STATUTE(S) BEING VIOLATED

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ARREST AFFIDAVIT
Broward County Sheriff's Office
Case # 90-2609-008652
State of Florida v. Donna Marie Ruddock, Florence Rose Marie Mundle, & Marc Brent Lipp

Count I
Grand Theft, $100,000 or More
F.S. 812.014(1)(a), F.S. 812.014(1)(b), and F.S. 812.014(2)(a)

Count II
Unlawful Filing of False Documents or Records Against Property
F.S. 817.535(2)(a)

Count III
Exploitation of an Elderly Person, $100,000 or More
F.S. 825.103-2a

Count IV
Fraudulent Use of Personal Identification Information of a Deceased Person
F.S. 817.568(8)(a)

Count V
Fraudulently Obtaining a Motor Vehicle Title
F.S. 319.33(1)(E)

The offenses set forth in the foregoing Affidavit are contrary to the statute in such case made and provided, and against the peace and dignity of the State of Florida. This affidavit is hereby submitted bearing your Affiant's signature, supported by oath or affirmation, in compliance with F.S. 901.02. I, Detective Christopher Bradley, having been duly sworn, say that the facts contained herein are true and correct to the best of my knowledge, information, and belief.

Christopher Bradley
DETECTIVE CHRISTOPHER BRADLEY CCN 12143
BROWARD SHERIFF'S OFFICE

The foregoing instrument was duly sworn to and subscribed before me this 13th day of November 2026, by Detective Christopher Bradley, who is personally known to me or who has produced (ID) as identification and who DID take an oath.

Officer Administering the Oath (Signature) Theophilus Defreze

Officer Administering the Oath (Printed Name) Theophilus Defreze

Your Affiant submitted this Affidavit and Application for review on November 13th, 2026, to Assistant State Attorney Aaron Passy.

Submitted to and reviewed by me this 13 day of November 2026

THE HONORABLE JUDGE Michael Usan
JUDGE OF THE CIRCUIT COURT

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State of Florida Vs. Lipp, Marc Brent

Broward County Case Number: 26013659CF10A
State Reporting Number: 062026CF013659A88810
Court Type: Felony
Case Type: Felony
Filing Date: 11/18/2026
Case Status: Active
Court Location: Central Courthouse
Judge ID / Name: Lynch - FA, Michael `
Magistrate Id / Name: N/A
BCCN: N/A

Party(ies)

Total: 2

Party Type	Party Name	Address	Attorneys / Address Denotes Lead Attorney
State	**State of Florida**		
Defendant	**Lipp, Marc Brent** **Gender:** Male **Race:** White **Height:** 5'9" **Weight:** 185 **Eye:** Brown **Hair:** Blond or Strawberry **DOB:** [redacted]	[redacted]	

Charge(s)

Total: 3

Offense Date	Charge	Degree	Detail
11/17/2026	1	(X)	**Felony** Date Filed: 11/17/2026 Current Statute: (X)FXXU Filing Agency: Broward Sheriff Office
11/17/2026	2	(X)	**Felony** Date Filed: 11/17/2026 Current Statute: (X)FXXU Filing Agency: Broward Sheriff Office

Offense Date	Charge	Degree	Detail
11/17/2026	3	(X)	**Felony** Date Filed: 11/17/2026 Current Statute: (X)FXXU Filing Agency: Broward Sheriff Office

Warrant(s)

Total: 0

There is no Warrant information available for this case.

Bond(s)

Total: 0

There is no Bond information available for this case.

Arrest(s)

Total: 3

Arrest Date	Charge	Arrest Number	Detail
11/17/2026	1	BS2603621	**Arrest** Name At Arrest: Lipp, Marc Brent Offense: Felony Degree: (X) Bond Amount: $ Statute: FXXU OBTS Number: 607403135
11/17/2026	2	BS2603621	**Arrest** Name At Arrest: Lipp, Marc Brent Offense: Felony Degree: (X) Bond Amount: $ Statute: FXXU OBTS Number: 607403135
11/17/2026	3	BS2603621	**Arrest** Name At Arrest: Lipp, Marc Brent Offense: Felony Degree: (X) Bond Amount: $ Statute: FXXU OBTS Number: 607403135

Disposition(s)

Total: 0

Offense Date	Charge	Disposition(s)

Case Financial Details

Charge	Citation Number	Total Imposed Amount	Total Amount Paid	Current Amount Due	Last Payment Date	Last Payment Amount	Due Date

Event(s) & Document(s)

Total: 2

Date	Description	Additional Text	View / Pages
11/18/2026	**Arrest Paperwork**		/54
11/18/2026	**Arrest Paperwork**		/54

Hearing(s)

Total: 0

There is no Hearing information available for this case.

Related Case(s)

Total: 0

There is no related case information available for this case.