

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY, PENNSYLVANIA

ORPHAN'S COURT DIVISION

No. 00809IV of 2021 Control Number 213354

Trust of ALLAN L GRAHAM, Settlor under Deed of Trust dated July 8, 2008

MOTION TO CORRECT RECORD

To the Honorable Judge Carrifiello :

I, Dawn J Graham, Successor Trustee,SETTLOR , of the Trust of Allan L Graham, (here after referred to as RESPONDENT) respectfully MOTION TO CORRECT RECORD to reflect the true and accurate Revocable Living Trust, now made Irrevocable, as per the Trust contract and Pour Over Will, Last and Final Testament by the TRUSTOR, Allan L Graham, upon his death on June 20, 2020.

1. The Living Revocable Trust of Allan L Graham, of 315 N 54th Street, Philadelphia, PA was misclassified as an “InterVivos Trust” in this matter present to Orphan’s Court in February 2021, after the creation of the Living Revocable Trust and transfer of property at 315 N 54th Street, Philadelphia, PA 19139 recorded in the City of Philadelphia in July of 2008.
2. Allan L Graham, Trust has a contract in which the Trustees are bonded by the Trust Agreement as set forth and only revocable by the Trustor Trustee and there is no provision or named “Attorney of Trust”.
3. The Trustee Beneficiary may use the trust property at 315 N 54th Street, Philadelphia, PA 19139, without landlord and free of maintenance cost and maintain all homestead rights.

I, Dawn J Graham, Settlor Trustee of the Allan L Graham, Trust am bond to administrate for the protection of the estate of the Trustor and for the benefit of the named Beneficiaries. The Trust is private; however named Trustees in this matter, are not autonomous, nor does the Trust protect the Trustee or his or her agents who are personally liable for actions against the will or intent of the Trustor, nor is it the opinion, that the Court should administrate matters out of its jurisdiction, when the Trust agreement is clear on how conflict and controversy is and will be settled thru American Arbitration Association, if necessary.

I respectfully motion to let the record reflect : Allan L Graham, Trust or as recorded Allan L. Graham, TR.

SUBMITTED BY: DAWN J GRAHAM, TRUSTEE SETTLOR SEPTEMBER 11 2023

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MOTION TO DISQUALIFY COUNSEL

To the Honorable Judge Carrifiello :

I, Dawn J Graham, Successor Trustee,SETTLOR , of the Trust of Allan L Graham, (here after referred to as RESPONDENT) respectfully MOTION TO DISQUALIFY COUNSEL to reflect the true and accurate Revocable Living Trust, now made Irrevocable, as per the Trust contract and Pour Over Will, Last and Testament of the Trustor of 315 N 54th Street, Philadelphia, PA 19139.

1. The administration of the Allan L Graham, Trust does not qualify any attorney in the contract or agreement.
2. David Rubin represents Alfred L Graham, the first listed Trustee after, Allan L Graham, the Trustor. Mr. Graham hired Mr. Rubin as Mr. Graham was “unwilling and unable” to behave within the intent of the expressed contract and will of the Trustor.
3. David Rubin is not and was not hired by the Trustees, nor hired by the Trustor, Allan L Graham.
4. Mr. Rubin mislead the Courts by misrepresenting an Irrevocable Trust, being aware that the Trustor was deceased in June 2020, as an “InterVivos Trust”, meaning Living Trust. It is impossible for Allan L Graham to have been present to hire Mr. Rubin in 2021.
5. Mr. Rubin totally disregarded the statue set forth that the Trust has in Pennsylvania and acted as a “ Trustee” but with the authority that only the Trustor maintained.
6. Mr. Rubin behaves as if he was hired by the Trustor to create the original Trust and Estate plan by interpreting parts of the Trust administration documents to the advantage of his client(s); however disregarding that this Trust is irrevocable and conflicts , controversy goes to arbitration .
7. Mr. Rubin has flagrantly disregarded the rules of law in this matter. He was granted citations in behalf of his clients based on fraud and deception, and violating the privacy and rights of the Trust and the Trustee Beneficiaries.
8. Mr. Rubin has not filed an “Accounting Checklist” required for the InterVivos Trust he created for a “Allan L Graham” in this matter. He has not filed a record of “Cash Receipts and Disbursements” in Orphan’s Court or Register of Wills. He has not provided any information to the beneficiaries , nor has the major beneficiary received any disbursements, nor have the maintenance expenses or cost been paid for the use of

the beneficiary living in the trust property. Mr. Rubin has never provided the Trustees, or the Settlor Trustee a fee agreement for the administration of the Trust.

9. Mr. Rubin has not registered with the Supreme Court of Pennsylvania to be a “Attorney of Trust”; however he has assisted in the removal of assets from accounts per contract to be retitled from Allan L Graham to Allan L Graham, Tr, that are now missing since July 2022.
10. Mr. Rubin administrated and directed the Trustee clients like “executors” with assets for probate, but in the cover of the Trust to avoid paying taxes and not accounting for asset transfers and or allocations.
11. Mr. Rubin and his clients and or agents are being investigated as to the evasion of privacy, theft, vandalism and fraud by local and federal law enforcement.

I , Dawn J Graham , as Settlor, Trustee of the Allan L Graham, Trust respectfully Motion to Disqualify Counsel, David Rubin, Esq. based on the aforementioned facts and the actions of the Trustee and his representative counsel are violating the “interest of the decedent” based on Rule 42 Pa. C.S. 5930 and its Rationale In re Estate of Hall A.2d47, 53 (Pa.1987). The Dead’s Man’s Act seeks to prevent injustice that has arisen from a “Surviving Party”being permitted to a transaction such as IV 2021 -00809 “to testify favorable to himself and adversely to the interest of the decedent” as the intent of the Decedent and his property and assets and heir and beneficiary designations are represented by the now Irrevocable Trust created in July 2008 by the decedent and recorded as per the deed for the said property at 315 N 54th Street, Philadelphia, PA 19139.

Submitted : Dawn J Graham, Settlor Trustee. September 11, 2023

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MOTION TO REDEEM PREMISES

To the Honorable Judge Carrifiello :

I, Dawn J Graham, Successor Trustee,SETTLOR , of the Trust of Allan L Graham, (here after referred to as RESPONDENT) respectfully MOTION TO REDEEM PREMISES to reflect the true and accurate Revocable Living Trust, now made Irrevocable, as per the Trust contract and Pour Over Will, Last and Final Testament.

1. The property at 315 N 54th Street, Philadelphia, PA 19139, was placed in his Living Revocable Trust on July 8, 2008 as recorded in the City of Philadelphia, PA.
2. Dawn J Graham, has been residing at 315 N 54th Street, Philadelphia, 19139, as per the will of the Trustor before and after the Living Revocable Trust of Allan L Graham, became irrevocable June 20, 2020.
3. As Trustee Beneficiary with address listed within the Trust and heir of the share of the Trustor, Dawn J Graham, as per the contract and Last Will and Testament of the Trustor, may live in the said trust property "without landlord or maintenance cost".

I, Dawn J Graham Trustee, Settlor, respectfully Motion to Redeem Premises, as per the intent and will of the Allan L Graham, Trust, back to the resident and heir, Dawn J Graham, of 315 N 54th Street, Philadelphia, PA 19139 and let the record reflect or be dismissed in this matter.

Submitted: Dawn J Graham, Trustee Settlor September 11, 2023