

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

No.: 502014CP003698XXXXNB
Probate Division IA

TED BERNSTEIN, as Trustee of the
Shirley Bernstein Trust Agreement Case
dated May 20, 2008, as amended,

Plaintiff,

v.

ALEXANDRA BERNSTEIN; ERIC BERNSTEIN;
MICHAEL BERNSTEIN; MOLLY SIMON;
PAMELA B. SIMON, Individually and as Trustee
f/b/o Molly Simon under the Simon L. Bernstein
Trust Dtd 9/13/12; ELIOT BERNSTEIN,
individually, as Trustee f/b/o D.B., Ja. B. and Jo. B.
under the Simon L. Bernstein Trust Dtd 9/13/12, and
on behalf of his minor children D.B., Ja. B. and Jo.
B.; JILL IANTONI, Individually, as Trustee f/b/o J.I.
under the Simon L. Bernstein Trust Dtd 9/13/12, and
on behalf of her Minor child J.I.; MAX
FRIEDSTEIN; LISA FRIEDSTEIN, Individually,
as Trustee f/b/o Max Friedstein and C.F., under the
Simon L. Bernstein Trust Dtd 9/13/12, and on behalf
of her minor child, C.F.,

Defendants.

/

EMERGENCY

**PETITION OF TRUSTEE GINGER STANGER TO WITHDRAW AND
TRANSFER CERTAIN FUNDS IN COURT REGISTRY TO THE
BENEFICIARIES JOSHUA, JACOB AND DANIEL BERNSTEIN**

COMES NOW, Petitioner Ginger Stanger, who respectfully shows and Petitions this Court as follows:

1. I am the Court appointed Trustee over the funds held in the Registry for Joshua, Jacob and Daniel Bernstein as sole beneficiaries.
2. I believe the Registry has a present balance of approximately \$277,000.00.
3. I have discussed the needs for this Distribution with Joshua, Jacob and Daniel Bernstein and have approved their request for an immediate Distribution on an Emergency basis upon Consent for \$25,000.00 to be released to each beneficiary individually with Instructions to the Clerk to issue individual Checks in each of their names and totaling \$75,000.00 combined.
4. Each of them are over age 21 being Joshua 27 years old, Jacob 26 years old and Daniel Bernstein 22 years old.
5. They are able to make informed Consent decisions about their affairs and this Petition.
6. Funds are necessary for their own plans and needs, including around their Company BFR LLC's primary asset being the property at 2753 NW 34th Street, Boca Raton FL 33434 in Case Number:

50-2018-CA-002317-XXXX-MB which has been their family home since they moved to Florida almost 17 years ago and they have invested over \$250,000 in the purchase price.

7. At the time of the prior Feb. 16, 2021 Order of this Court, the Court approved my appointment as their maternal grandmother as Trustee on behalf of Joshua, Jacob and Daniel Bernstein on an interim, annual basis and further approved partial Distributions of funds from the Registry at that time.
8. The prior Order of this Court made it clear that as Trustee I could apply to the Court for further Distributions from the Registry as appropriate for the benefit of Joshua, Jacob and Daniel Bernstein.
9. I have been made aware by the Beneficiaries that a prior motion for release of funds filed under DE No. 444 dated 12/19/2023 is obsolete by a change of circumstances.
10. I understand from the Beneficiaries that their Uncle Ted Bernstein and his lawyer have no standing to be heard or object to this Petition as Uncle Ted is not the Trustee over these Court Registry funds as he relinquished possession and control several years ago when depositing the funds out of the Shirley Trust into this Court Registry solely for their Benefit.
11. The Beneficiaries tell me they use AI and ChatGPT which says "Once deposited, the funds become custodial property of the Court. The Florida

Court Registry operates as a neutral stakeholder under the supervision of the judiciary, and only parties with a demonstrable legal interest in the funds have standing to be heard on their disposition.”

12. I am told by the Beneficiaries that their Uncle Ted Bernstein knows he and his lawyer Alan Rose have acted directly adverse to their interests and rights while simultaneously acting as a Fiduciary and Trustee for them in the Shirley Trust by acting in several cases directly hostile and adverse such as in the foreclosure case against the brothers and their company’s primary asset in Case Number: 50-2018-CA-002317-XXXX-MB where they colluded with Robert Sweetapple on attorneys fees and actions in a false Final Judgment of Foreclosure and impaired their rights by pursuing a Second Mortgage against them and their company knowing the Statute of Limitations was far expired and the Second Mortgage was a paper tiger.

13. Their Uncle Ted and his lawyer Alan Rose also officially appeared and litigated against their interests in an Involuntary Bankruptcy Case No. 22-13009-EPK in 2022 when they were forced by necessity to take action then to save their family home and primary company asset.

14. The Beneficiaries hope and believe their Uncle Ted Bernstein and his lawyer Alan Rose will finally just discontinue the bad faith actions and

simply not block or interfere in the Registry Funds any further including this request for distribution.

15. The Beneficiaries do not believe it should be necessary to use funds to hire a lawyer just for this Distribution request and no one else is proper to object to this emergency request.

16. The Beneficiaries hope and believe attorney Robert Sweetapple will withdraw the motion he filed under DE No. 446 almost exactly a year ago and that he will also discontinue bad faith actions against them and their company.

17. Even if Mr. Sweetapple does not cease and desist the bad faith, the amount of this present emergency Distribution request still leaves a sufficient balance in case the Beneficiaries are forced by his actions or others to hire more lawyers and fight against them if somehow they lose which they do not believe would be proper anyway.

18. I remain ready, willing and able to continue as Trustee and have approved this Request by the signature below.

19. As brothers they have all discussed this and Consent to the funds being released immediately.

20. I respectfully ask that the Court instruct the Clerk to issue 3 individual checks in the amount of \$25,000.00 each payable in their individual names.

WHEREFORE, it is respectfully prayed for an Order directing the immediate release of \$75,000.00 of the Registry funds and monies held for Joshua, Jacob and Daniel Bernstein to be paid in 3 individual checks in the amount of \$25,000.00 named to each and for such other and further relief as may be just and proper.

Dated: May 20, 2025

/s/ Ginger Stanger
263 Pinon Way
Red Bluff, Ca 96080
530-526-5748
Mrscrystalkaywaller@gmail.com

DECLARATION OF JOSHUA BERNSTEIN

Under penalties of perjury, I declare that I have read the foregoing Petition for Release and Withdrawal of certain Registry funds payable individually in amounts of \$25,000.00 each to us brothers and that the facts stated in it are true to the best of my own knowledge and further consent to such Petition being granted and for such other and further relief as may be just and proper,

Dated : May 20, 2025

Joshua Ennio Zander Bernstein

DECLARATION OF JACOB BERNSTEIN

Under penalties of perjury, I declare that I have read the foregoing Petition for Release and Withdrawal of certain Registry funds payable individually in amounts of \$25,000.00 each to us brothers and that the facts stated in it are true to the best

of my own knowledge and further consent to such Petition being granted and for such other and further relief as may be just and proper,

Dated : May 20, 2025

Jacob Noah Archie Bernstein

DECLARATION OF DANIEL BERNSTEIN

Under penalties of perjury, I declare that I have read the foregoing Petition for Release and Withdrawal of certain Registry funds payable individually in amounts of \$25,000.00 each to us brothers and that the facts stated in it are true to the best of my own knowledge and further consent to such Petition being granted and for such other and further relief as may be just and proper,

Dated : May 20, 2025

Daniel Elishja Abe Ottomo Bernstein

DECLARATION OF TRUSTEE GINGER STANGER

Under penalties of perjury, I declare that I have read the foregoing Petition for Release and Withdrawal of \$75,000.00 Registry funds total payable individually in

amounts of \$25,000.00 each of the 3 Beneficiaries Josh, Jake and Danny Bernstein and that the facts stated in it are true to the best of my own knowledge and further consent to such Petition being granted and accept continuing as Trustee herein and for such other and further relief as may be just and proper,

Dated : May 20, 2025

Ginger Stanger

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all parties requiring service were served electronically via the Florida ECourt filing portal on this 20th day of May 2025.

Dated: May 20, 2025

/s/Ginger Stanger
263 Pinon Way
Red Bluff, Ca 96080
530-526-5748
Mscrystalkaywaller@gmail.com