

## AFFIDAVIT OF LONEY J. SALAS

This Affidavit is based on my personal knowledge, except where otherwise stated, and, if called upon to do so, I could and would competently testify to the matters herein stated.

- 1) I am Loney J. Salas, of 13-3775 Kalapana Highway, Pahoa HI, (96778). I am 33 years old, and I work as the Director of Permacultural Development on the estate of The Royal Bloodline of David, overseen by Dr. Leonard G. Horowitz.
- 2) Since I came to work with Dr. Horowitz, I have been made aware that for many years he and his ministry estate has been involved in litigations since 2004, and has issued several police complaints against Cecil Loran Lee, Mr. Herbert Ritke, and Jason Hester since 2009, involving fraud, forgery, and falsified records filed with the State of Hawaii, administered by Hilo attorney Paul J. Sulla, Jr.
- 3) On or around New Years Eve on 2002-2003, I went to attorney Paul J. Sulla, Jr.'s Santo Daime Church in Honoka'a to participate in an Ayahuasca ceremony.
- 4) To gain access to the Church of Santo Daime, I was first referred to see an attorney, whose name, known around Honoka'a, was simply "Augustuz." Augustuz had an office on Mamane Street, the main street of Honoka'a that I visited. This office was located near Rice of Hawaii, on the same side of the street. However, when I searched recently for this attorney's contact information there, I noticed was he was not listed in the telephone directory.
- 5) Then Dr. Horowitz showed me a photograph of Paul Sulla, and I noticed a striking similarity in Mr. Sulla's appearance compared to the attorney named "Augustuz" who had urged me to attend the Church of Santo Daime for the Ayahuasca ceremony. Both "Augustuz" and Sulla: 1) were attorneys, 2) wore similar glasses, 3) were slightly balding, 4) had the same black and gray facial hair with a similarly trimmed beard, 5) wore a similar straw hat around town, and 6) were affiliated with the Santo Daime Church in Honoka'a. In retrospect, it is very possible, if not highly probable, that "Augustuz" was Paul Sulla.
- 6) Ayahuasca ceremonies have been part of my family's heritage. My father is from Columbia, and is indigenous, and has participated in many Ayahuasca ceremonies in S. America, and he encouraged me to participate in similar ceremonies. So he and I are very familiar with what typically happens during Ayahuasca ceremonies, and we know the psychotropic powers of the plant and tea.
- 7) "Augustuz," representing himself to me as a licensed attorney, showed me in his office a lot of legal paperwork that I would need to sign to attend the ceremony. I thought this was odd, because I desired to attend a "church," for a religious ceremony, and I never was made to sign legal forms when I participated in other spiritual or church activities.

- 8) While in his office “Augustuz” informed me that I would need to pay \$45 in cash as a “fee” to attend the ceremony. This fee was *not* represented to me as a “donation,” but as the cost to access the church and Ayahuasca ceremony.
- 9) “Augustuz” also informed me that participants needed to wear white for the ceremony.
- 10) So on New Year’s Eve, my father and I arrived at attorney Sulla’s Santo Daime Church in the evening, wearing white as “Augustuz” had instructed me, and the first thing we were made to do is sign a release of liability form, and the lot of other legal paperwork, including a non-disclosure agreement whereby we pledged to not discuss the ceremony and activities surrounding it and the Church.
- 11) Then church leaders directed the men to be separated from the women, and led us to smaller separate rooms, awaiting receipt of the Ayahuasca drink.
- 12) We then drank the formula and were instructed to lie down in the darkened room for about 30-minutes.
- 13) After this we were led into the main room in this octagon-shaped house, with side rooms. We were directed to form male and female semicircles around a man and woman church member dressed in white robes with white pointed hats. These outfits reminded me of the Ku Klux Klan (KKK), and gave me a feeling that this was a cult, not simply an Ayahuasca church or religious ministry.
- 14) Later, my father also told me that he felt this ceremony was cult-like and strange, unlike any of the many previous Ayahuasca ceremonies in South America and the Big Island of Hawaii he had attended.
- 15) At this time we were instructed to sing, chant and dance, monotonously, three steps to the left, and three steps to the right, following the directions of the ceremony directors who remained in the middle of the gathering.
- 16) The two leaders used quasi-Christian books to lead the ceremony, reading from them to direct participants’ chants. The language used seemed to be a combination of English, Spanish, and Portuguese. The ceremony, given the psychotropic effects of the Ayahuasca plant, could be some kind of cult indoctrination, or hypnosis session, I considered at the time.
- 17) After about 2-hours of this same ritual conducted on a concrete floor, we were given a brief intermission, but were told not leave the house. The place felt stuffy to me. I wanted to go out to get some fresh air. Besides this, the dancing done on the hard floor was hard for me since I have a chronic knee injury, after having surgery on my knee twice. I needed to sit down, but did not feel good about sitting in the back room as instructed.
- 18) I mentioned this to my father; that I needed to go outside, and he told me to go if I felt it was best for me.

- 19) I also shared with my father that the Ayahuasca was very weak, and I really did not feel any benefit, or even effect, from taking it.
- 20) As I began to walk out of the house, two men blocked my exit. So I made it clear to them that they needed to step aside to let me get out of the house.
- 21) When I asserted my way out, I was immediately surrounded by at least five men, not dressed in white robes, not participating in the ceremony, but acting as tight security.
- 22) This threatened and disturbed me even more, and I decided that I would leave the ceremony and property, and I informed them so. They responded by threatening legal action against me since I signed their forms.
- 23) When their legal action threats did not dissuade me from leaving, they threatened to call the police if I did not return to the house.
- 24) I did not believe them when they threatened police action. It was inconceivable to me that the police would permit this kind of confined, cult-like, and for me abusive activity.
- 25) Fed up with these threats, I moved through the group, got in my truck, told the men that if they did not move, or open the gate, I would run them over and crash down their gate. The men slowly moved, but made no attempt to open the gate, so I drove right through it.
- 26) I went home, and the next day I spoke with my father about all of this. He had remained at the ceremony until it was done. My father said that this was unlike any previous Ayahuasca ceremony he had ever been to. In describing his experience of the whole event, he said the ceremony was "SICK."
- 27) I am providing this notarized affidavit, first and foremost, on behalf of the community-at-large. My father and I both feel Mr. Sulla's church harms the community as well as the reputation of the international Church of Santo Daime. I am also providing this testimony in support of the Hilo Police Department, and the Prosecutor's Office, who has received complaints from Dr. Leonard Horowitz to investigate Mr. Sulla's church activities and complicity in filing false and misleading business records with the State of Hawaii on behalf of the deceased Mr. Lee, Herb Ritke, and Jason Hester, who has fraudulently claimed residence and title to this ministry property in Pahoia where I work and reside.

I declare under penalty of law that the foregoing is true and accurate, and provided in the Spirit of Aloha.

DATED: March 15, 2011

*J. Salas*

LONEY J. SALAS  
13-3775 Kalapana Highway,  
Pahoa, HI 96778

State of Hawaii

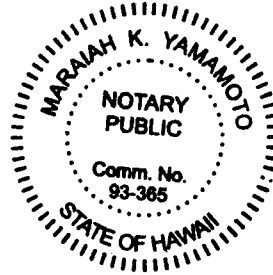
4 of 4

County of Hawaii

Subscribed and sworn to before me, this 15<sup>th</sup> [day of month] day of March [month], 20 11.

[Notary Seal:]

*Maraiah K. Yamamoto*  
[signature of Notary]



Document Date: <u>3/15/2011</u>	No. of Pages: <u>4</u>
Notary Name: MARAIAH K. YAMAMOTO	<i>Notary Seal</i>
Document Description: <u>Accident of Loney J. Salas</u>	
Notary Signature: <i>Maraiah K. Yamamoto</i>	
Date: <u>3/15/2011</u>	Commission Exp: <u>7/5/2013</u>