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Stanley H. Roehrig Roehrig, Roehrig, Wilson & Hara 101 Aupuni Street, Suite 124 Hilo, HI 96720-4260 808-969-1441

Dear Attorney Roehrig:

I seek your counsel to mediate a very challenging matter involving your law firm and my contract served by Glenn S. Hara in early 2004, just prior to his appointment to the bench by Governor Linda Lingle.

Attached is a copy of a letter that I sent to Judge Hara on November 29, 2012, that provides an overview of this matter, to which Mr. Hara never replied, neglecting my request for a "remedial discussion" at that time.

In recent weeks, this criminal and civil matter has escalated in the Ibarra court in Civ. No. 14-1-0304, and related case Civ. No. 05-1-0196, to the point where Judge Ibarra has issued a Minute Order granting summary judgment and "Quiet Title" to my Pahoa, HI property to a sham client of Hilo attorney, Paul J. Sulla, Jr, proximately caused by attorney Hara's malpractices.

Mr. Sulla fraudulently concealed his conflicting interests in my property, and has caused damages by his false filings with the State. These include clear and convincing forgeries and fraudulent transfers of my original mortgage and notes, both contingent upon an "Agreement for Closing Escrow" "("AFCE") that Glenn Hara drafted for me on January 13, 2004, in your office. Following four years of litigation over this contract, Mr. Sulla fraudulently transferred my interests therein to a sham "church" incorporation that he abused to illegally foreclose on my contracts with the seller. Thusly, Sulla acquired a colored title and now the court's authorization for "Quiet Title."

In defense of my interests, I have recently filed in federal court Civ. No. 15-00186JMS-BMK, to sue Mr. Sulla and complicit parties for my damages. I have no interest in suing Third Circuit

Court justices at this time, unless compelled to do so by the compounding injustices damaging me, my businesses, and properties.

The aforementioned injustice in the disputed title has occurred as a direct result of the fraud and crime issuing from Glenn Hara's malpractices and subsequent witness tampering and obstruction of justice in the Ibarra court pursuant to the AFCE. That contract derives from my having been referred to your office by Island Title, Co. to draft the AFCE; which attorney Hara provided, and then neglected to: a) record, and b) defend by appearing at trial in my defense. Admissible evidence in my possession includes correspondence showing complicity between my subsequent counsel, John S. Carroll, and judge Hara, to conceal his witness and "Hara file" evidence at trial. Judge Hara refused to even provide an affidavit in support of our contract and my defense, apparently due to his malpractices and threatened political embarrassment.

Consequently, the defrauded jury falsely found that the certified true original AFCE drafted by Mr. Hara, had been purportedly altered and forged by me. Meanwhile, Mr. Sulla's client, the Seller, Cecil Loran Lee, who was found by the Nakamura court to have repeatedly altered documents to defraud courts, got away with his crimes, enabling Mr. Sulla to steal my property title.

Due to these facts, we now stand to lose our property to Mr. Sulla, as the Ibarra Court issued a Minute Order in Civ. No. 14-1-0304 granting Sulla's purported "client"—Jason Hester—title to my property.

Judge Ibarra's damaging Minute Order follows:

- (1) his administration's altering of the Record on Appeal in Civ. No. 05-0196, whiting-out Glenn Hara's handwritten notes on the chain of records from which Glenn Hara drafted the AFCE;
- (2) altering the Court's Findings of Facts and Conclusion of Law to conceal the AFCE as the forged document central to the fraud in the sale of the property;
- (3) never having issued an appealable final judgment by which a mortgage release or clear title could be gained upon the resolution of Civ. No. 05-1-0196;
- (4) an outrageous violation of laws depriving me of my civil rights and due process to defend my interests, featuring ridiculously unjust and inconsistent rulings to prohibit my standing to plead, and compulsory counterclaims to defend, in the related case, Civ. No. 14-1-0304; and
- (5) granting Sulla's motion for summary judgment despite there being a many facts in dispute, including: (a) Mr. Sulla's failure to follow the non-judicial foreclosure requirements of HRS 667-5; (b) frank violations of the Universal Fraudulent Transfer Act, HRS 651C. *et se*; and (c) Mr. Sulla's fraudulent concealment as "collection agent" surety with conflicting having violation RCCH Rule 26(b).

Accordingly, the record presents more than an "impression of impropriety." There is clear-and-convincing evidence tampering, witness tampering, obstruction of justice, and criminal contempt of court by the Ibarra Court to conceal certain malpractices by judge Ibarra's subordinate judge/attorney Hara, resulting in more than \$6 million in damages to me during ten years of attempted theft of my \$1 million property.

Consequently, I would like to meet with you to discuss these matters to mitigate damages and prevent further lawsuits.

If you have some time next week for me to come to your office to meet, I think it will serve everyone's interest.

Sincerely yours,

Leonard G. Horowitz

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