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June 14, 2016

CASE NO.: C16016027 : CRIMINAL TRESPASS (HRS §708-813(a) and (b))

**BURGLARY §708-812-5
PERJURY HRS §710-1060 (1)
FORGERY IN THE FIRST DEGREE: HRS §708-851(1)(a);
HINDERING PROSECUTION (of Hester) HRS §§ 710-1028(1)(3)(4) and (5) 1029(1).
THEFT AND RELATED OFFENSES: HRS § 708-830 (1) or (6)(a) and (7);
CRIMINAL CONTEMPT HRS §710-1077(c) and (g);
TAMPERING WITH A GOVERNMENT RECORDS: HRS § 710-1017(c);**

**Suspects/Offenders: Paul J. Sulla, Jr., Robert Dukat, and Lori Enriquez
Violation Date: June 10, 2016
Violation Location: 13-3775 Pahoa-Kalapana Road, Pahoa, HI 96778
Witnesses: Resident Clayton Owens, Joseph Garramone, Heida (Neighbor);
Leonard Horowitz, Sherri Kane (Property owners)**

HILO POLICE DEPARTMENT

349 Kapiolani Street
Hilo, HI 96720

**Sargent Correia and Officer Nactor (Initial Complaint 6-10-16: MI6033763;
Related Cases: Investigator Dean Uyetake:
Securities Fraud C13015256 (6-16-13) and M13049389 (9-20-13)**

**SHERIFF DIVISION FOR THE COUNTY OF HAWAII
STATE OF HAWAII, DEPARTMENT OF PUBLIC SAFETY**

Lt. Patrick Kawai
75 Aupuni Street
Hilo, HI 96720
Telephone: 808-933-8833
and
1177 Alakea Street., Room #418
Honolulu, Hawaii 96813

TO: Officers Correia, Nactor, Uyetake and Others for Whom This May Concern:

This correspondence regards the afore-captioned persons and matters of alleged crimes. I make this report under the pains and penalties of perjury, and I bring this Criminal Complaint as concerned citizen, victim of the evidenced crimes, and the legal owner of the subject Property where the damaging incidents and acts occurred on June 10, 2016, as detailed below under FACTS.

Please be noticed that I am a witness and crime victim in these matters, with rights provided me by law, HRS §801D-4 **Basic bill of rights for victims and witnesses**, that include: (a) to be (1) “notified of major developments in the case,” “(3) To receive protection from threats or harm;” and “(6) To have any stolen or other personal property expeditiously returned by law enforcement agencies . . .”

I. FACTS:

(1) On the morning of King Kamehameha Day, June 10, 2016, while working in Honolulu as an investigative journalist, I and my partner, Sherri Kane, received a “tip” (from an anonymous source) that Hilo attorney Paul J. Sulla, Jr. was planning to take the law into his own hands with a group of people he assembled to illegally take possession of my and Kane’s Property.

(2) Since 2009, Sulla has criminally libeled me, claiming that I neglected to make mortgage payments, or defaulted on my Mortgage with his alleged “client”—Cecil Loran Lee (hereafter, “Lee”)—a predicate felon, convicted drug trafficker, and repeat certified forger disciplined by the Nakamura Court for manufacturing and altering legal documents in court case Civ. No. 01-01-0444, involving an earlier victim of Lee’s crimes, Philip Maise. (Maise’s knowledge gained as a banking industry officer with Wells Fargo, and a victim himself of the drug trafficking enterprise controlling, or seeking to control this Property, is extensive; and he too has worked to bring the criminals, including Mr. Sulla, to justice.)

(3) After receiving the “tip,” Sherri Kane and I contacted the Hilo Police Dept. and was referred to Officer Nactor, to whom Sherri relayed the notice of Mr. Sulla’s schemed holiday assault on our residence, fellow residents, and caretakers, at which point Officer Nactor contacted Mr. Sulla and directed him to meet right away with Nactor to evidence Sulla’s claim of right to eject the residents and possess the Property. Material to this holiday meeting was Nactor’s knowledge that Mr. Sulla:

(a) had been disqualified by federal judges in this exact ejectment action (See attached Disqualification Order, Exhibit 9);

(b) had already been told to stand down by my attorney and local Sheriffs who Sulla solicited to exercise ejectment actions in violation of my automatic stay obtained in bankruptcy proceedings, with additional State court stay filings pending as required;

(c) had “altered” the key foreclosing documents used by Sulla to commit his illegal non-judicial foreclosure action encumbering title to my Property, including using at least one, and probably to photocopies of Lee’s (forged) signatures in that legal record called the “Articles of Incorporation” for the “Foreclosing Mortgagee.” This document is hereto attached as Exhibit 10—a sworn analysis and Declaration by expert forensic document and handwriting expert, Beth Chrisman, who Kane and I hired to examine Sulla’s foreclosure fraud;

(d) had concealed his own conflicting interest in securing possession of my property through an illegal Mortgage “loan” Sulla issued to his strawman, Jason Hester (hereafter, “Hester”), as shown in Exhibit 11. Notice is hereby given to Sulla’s filing of Bureau of Conveyances Document Nos. 2011-093772 and 2011-093773, both simultaneously filed by Sulla on June 14, 2011. By those false filings Sulla established his “sham Creditor” and judgment-proof “sham Plaintiff” Hester as the new fake “owner” of the Property. Sulla used Hester, falsely claiming Hester was Lee’s “nephew”

and “proper heir,” to disguise or conceal Sulla as the real party in interest. Exhibit 11 proves that Sulla’s interest in the Property is superior to Hester’s alleged interest, since Hester authorized Sulla to foreclose on the Property if Hester did not pay taxes or the debt, neither of which Hester is able to pay being a pauper. In essence, Nactor and the Sheriffs were informed about Sulla’s theft scheme that relied on concealing Sulla’s liability for using Hester as the fake “owner” who foreclosed using altered and forged documents. (This is how white collar criminals steal people’s properties—and there are thousands of victims of this kind of white collar crime that certain lawyers are regularly committing, Sulla being one.);

(e) had schemed and acted on this holiday knowing that the Sheriff would be off work, and police protection would be minimal. The Sheriff, along with my attorney, Margaret Wille, informed Sulla that any ejectment action would need to be administered by and through the Sheriff’s Department. So Sulla recklessly acted, knowing he was violating law enforcers’ express instructions; and

(f) defied Officer Nactor’s instruction to await the end of the holiday for the Sheriff’s return to work, before going to the Property, or attempting to eject anyone.

(4) Upon leaving Sulla’s meeting with Nactor, Sulla drove to the Property to eject the residents and take possession of the Property by force and acts of criminal trespass, terroristic threatening, hindering prosecution, assault, and theft.

(5) Sulla directed an assault squad to do his dirty work. The violators included: (a) “Pyramid Process Service” owner Robert Dukat (hereafter, “Dukat”); (b) a “Big Guy” (possibly Dukat) also believed to go by the name “Bill Kennedy,” (c) Big Island Land Co’s real estate agent Lori Enriquez, (hereafter, “Enriquez”) whose boss/owner of the company is Greg Gadd (hereafter, “Gadd”), Sulla’s partner in shady land development deals and property title conversions; (d) Sulla’s son and an accompanying friend; and (e) an unidentified locksmith.

(6) According to the testimony of caretaker and resident Clayton Owens (hereafter, “Owens”), Dukat showed up first bearing a “Writ of Ejectment.” Dukat stated that he was authorized by the police to serve that Writ. Dukat stated that the police were coming right behind him. Dukat further stated that Owens would be arrested if he did not immediately open the gate. Terrorized by these false claims, Owens opened the gate, and the suspects entered.

(7) According to photos taken on the Property by caretaker Joseph Garramone (hereafter, “Garramone”) using his cell phone, and testimony provided by Garramone and fellow caretaker and resident Clayton Owens (hereafter, “Owens”), a number of vehicles’ license plates were recorded along with the pictures of the suspects. Exhibit 7 shows Sulla entering the house after Dukat broke through the blocked doorway. Garramone and Owens pushed my piano against the door to barricade the entryway and prevent the trespassers from entering the inn. As “the big guy” (suspected to be Dukat) began to break through the door and barrier, Garramone yelled multiple times “Breaking and Entering.” (See Affidavit, Exhibit 8B). Insets in Exhibit 7 show the changing of locks and Enriquez’s car door.

(8) The caretakers, naturally terrorized by the breaking and entering and threatened assault and battery, immediately attempted to contact the police for assistance. As Garramone telephoned the police he was assaulted by the “Big Guy” (either Dukat or “Bill Kennedy”), who attempted to grasp the phone out of Garramone’s hand, and when that failed, he pulled the telephone cord out of the wall socket. Then, as Garramone went to use his cell phone, the “Big Guy” attempted to grab that phone too, to prevent police contact. The “Big Guy” gave the telephone cord to Enriquez, who

promptly stashed it in the trunk of her car to prevent Owens and Garramone from using any telecommunications.

(9) Garramone objected to the trespass demanding to know Sulla's authority for challenging my and Kane's ownership of the Property. Sulla replied, "No one owns this property." He did not mention Hester, or state as Sulla alleged in court, "Hester owns this property." Hester, in fact, was not present, as would be expected if Hester was the property "owner" taking possession.

(10) Garramone left the house in efforts to establish cell phone contact with police. Kane and I likewise, knowing this attack was happening (having received earlier alerts from Owens and Garramone) also repeatedly called the police and our neighbor, Heida, for emergency assistance to be rendered at the Property.

(11) Hours later, after the locksmith had completed changing all the locks, and Owens had been threatened with loss of his valuables if he did not gather them and vacate promptly, the police arrived. Sulla's son and his unidentified "friend," who had schemed to take up residence on the Property following our ejection, fled the crime scene in Sulla's car minutes before the police arrived, possibly frightened away by turmoil. They left behind their U-Haul trailer truck for Sulla to drive back to Hilo.

(12) Officer Walker then directed the parties to be separated for interviews. Walker examined Sulla's paperwork, considered his arguments, and promptly informed Sulla to leave the Property along with his cohorts, or otherwise be arrested for criminal trespass.

(13) At that point, Enriquez returned to her car to obtain the telephone equipment she had stashed, and witnesses observed her returning the stolen property.

(14) After the police left the Property, and Owens and Garramone restored telecommunications with me, I directed them to replace the locks with the original ones. But that became impossible after Garramone discovered my locks had been stolen or disposed of by the suspects. This required Garramone to purchase new locks, and install them at my expense.

(15) Examination of the Property in the aftermath showed my "No Trespassing" signs had been removed from the front gate and main entranceway to the Property, and taken by the suspects. The offenders also removed the address numbers from our U.S. Postal Service box adjacent the front gate, as reported by our neighbor Heida.

(16) Subsequent correspondence between Kane and Hilo prosecutor Mitch Roth, and teleconferenced with Sargent Correia, prompted my filing of this criminal complaint.

II. LAWS

The aforementioned facts and verifiable evidence provide probable cause for the suspects to be charged with the following crimes, as defined (in relevant parts) by the Hawaii Revised Statutes ("HRS"):

A. CRIMINAL TRESPASS in the first degree (HRS §708-813(a) and (b)):

(1) A person commits the offense of criminal trespass in the first degree if: (a) That person knowingly enters or remains unlawfully: (i) In a dwelling; or (ii) In or upon the premises of a hotel or apartment building; (b) That person: (i) Knowingly enters or remains unlawfully in or upon premises that are fenced or enclosed in a manner designed to exclude intruders.

B. BURGLARY §708-812-5

[§708-812.5] Burglary offenses; intent to commit therein a crime against a person or against property rights. A person engages in conduct "with intent to commit therein a crime against a person or against property rights" if the person formed the intent to commit within the building a crime against a person or property rights before, during, or after unlawful entry into the building. [L 2006, c 230, pt of §2]

C. UNAUTHORIZED ENTRY IN A DWELLING. §708-812.6

(1) A person commits the offense of unauthorized entry in a dwelling if the person intentionally or knowingly enters unlawfully into a dwelling with reckless disregard of the risk that another person was lawfully present in the dwelling, and another person was lawfully present in the dwelling.

(2) Unauthorized entry in a dwelling is a class C felony.

(3) It is an affirmative defense that reduces this offense to a misdemeanor that at the time of the unlawful entry:

(a) There was a social gathering of invited guests at the dwelling the defendant entered;

(b) The defendant intended to join the social gathering; and

(c) The defendant had no intent to commit any unlawful act other than the entry. [L 2006, c 230, pt of §2]

D. PERJURY HRS §710-1060 (1)

(1) A person commits the offense of perjury if in any official proceeding the person makes, under an oath required or authorized by law, a false statement which the person does not believe to be true.

(2) No person shall be convicted under this section unless the court rules that the false statement is a "materially false statement" as defined by section 710-1000(9). It is not a defense that the declarant mistakenly believed the false statement to be immaterial.

E. FORGERY IN THE FRIST DEGREE: HRS §708-851(1)(a);

(1) A person commits the offense of forgery in the first degree if, with intent to defraud, the person falsely makes, completes, endorses, or alters a written instrument, or utters a forged instrument, . . . which is or purports to be, or which is calculated to become or to represent if completed:

(a) Part of an issue of . . . securities, or other valuable instruments issued by a government or governmental agency; or

(b) Part of an issue of . . . instruments representing interests in or claims against a corporate or other organization or its property.

F. TAMPERING WITH A GOVERNMENT RECORD: HRS § 710-1017(c);

1) A person commits the offense of tampering with a government record if: . . .

(c) The person knowingly records, registers, or files, or offers for recordation, registration, or filing, in a governmental office or agency, a written statement which has been falsely made, completed, or altered, or in which a false entry has been made, or which contains a false statement or false information; . . .

(2) For the purpose of this section, "government record" includes all official books, papers, written instruments, or records created, issued, received, or kept by any governmental office or agency or required by law to be kept by others for the information of the government.

G. CRIMINAL CONTEMPT OF COURT HRS §710-1077(c) and (g);

(1) A person commits the offense of criminal contempt of court if: . . .

(c) As an attorney, clerk, or other officer of the court, the person knowingly fails to perform or violates a duty of the person's office, or knowingly disobeys a lawful directive or order of a court; . . .

(g) The person knowingly disobeys or resists the process, injunction, or other mandate of a court;

(b) If the offense was not committed in the immediate view and presence of the court, nor under such circumstances that the court has knowledge of all of the facts constituting the offense, the court shall order the defendant to appear before it to answer a charge of criminal contempt of court; the trial, if any, upon the charge shall be by the court without a jury; and proof of guilt beyond a reasonable doubt shall be required for conviction. . .

(4) When the contempt under subsection (1) also constitutes another offense, the contemnor may be charged with and convicted of the other offense notwithstanding the fact that the contemnor has been charged with or convicted of the contempt.

(5) Whenever any person is convicted of criminal contempt of court or sentenced therefor, the particular circumstances of the offense shall be fully set forth in the judgment and in the order or warrant of commitment. In any proceeding for review of the judgment, sentence, or commitment, no presumption of law shall be made in support of the jurisdiction to render the judgment, pronounce the sentence, or order the commitment. A judgment, sentence, or commitment under subsection (3)(a) shall not be subject to review by appeal, but shall be subject to review in an appropriate proceeding for an extraordinary writ or in a special proceeding for review.

H. HINDERING PROSECUTION (of Hester) HRS §§ 710-1028(1)(3)(4) and (5); and 1029(1).

For the purposes of sections [710-1029 and 710-1030], a person renders assistance to another if he:

(1) Harbors or conceals such person; . . .

(3) Provides such person with money, transportation, weapon, disguise, or other means of avoiding discovery, apprehension, prosecution, or conviction;

(4) Prevents or obstructs, by means of force, deception, or intimidation, anyone from performing an act that might aid in the discovery, apprehension, prosecution, or conviction of such person; or

(5) Suppresses by an act of concealment, alteration, or destruction any physical evidence that might aid in the discovery, apprehension, prosecution, or conviction of such person. [L 1972, c 9, pt of §1]

HRS §1029 - Hindering prosecution in the first degree. (1) A person commits the offense of hindering prosecution in the first degree if, with the intent to hinder the apprehension, prosecution, conviction, or punishment of another for a class A, B, or C felony or murder in any degree, the person renders assistance to the other person.

(2) Hindering prosecution in the first degree is a class C felony. [L 1972, c 9, pt of §1; am L 1997, c 149, §6]

I. THEFT AND RELATED OFFENSES: HRS § 708-830 (1) or (6)(a) and (7);

A person commits theft if the person does any of the following:

(1) Obtains or exerts unauthorized control over property. A person obtains or exerts unauthorized control over the property of another with intent to deprive the other of the property.

(2) Property obtained or control exerted through deception. A person obtains, or exerts control over, the property of another by deception with intent to deprive the other of the property.

(3) Appropriation of property. A person obtains, or exerts control over, the property of another that the person knows to have been lost or mislaid or to have been delivered under a mistake as to the nature or amount of the property, the identity of the recipient, or other facts, and, with the intent to deprive the owner of the property, the person fails to take reasonable measures to discover and notify the owner. . . .

(5) Diversion of services. Having control over the disposition of services of another to which a person is not entitled, the person intentionally diverts those services to the person's own benefit or to the benefit of a person not entitled thereto.

§708-830.5 Theft in the first degree. (1) A person commits the offense of theft in the first degree if the person commits theft:

(a) Of property or services, the value of which exceeds \$20,000; . . . (2) Theft in the first degree is a class B felony. [L 1986, c 314, §63; am L 1992, c 289, §1; am L 1993, c 14, §1; am L 2006, c 116, §6]

III. CLAIMS IN COMPLAINT

A. CRIMINAL TRESPASS in the first degree (HRS §708-813(a) and (b)):

(1) Sulla, Dukat, and Enriquez committed the offense of criminal trespass in the first degree by:

(a) knowingly entering or remains unlawfully on the subject Property, that is an “Inn” and residence of the Complainant and his caretakers;

(b) That Sulla, Dukat, and Enriquez: (i) Knowingly entered and remained unlawfully in or upon premises that are fenced or enclosed in a manner designed to exclude intruders.

B. BURGLARY §708-812-5

Per §708-812.5. Burglary offenses; intent to commit therein a crime against a person or against property rights. Sulla engaged in conduct of entering the home of the Complainants "with intent to commit therein a crime against a person or against property rights"—in this force possession and take ownership of Horowitz's and Kane's home. Sulla formed this scheme, and premeditated his actions with "the intent to commit within the building a crime against a person or property rights before," and during the crime.

C. UNAUTHORIZED ENTRY IN A DWELLING. §708-812.6

(1) Sulla committed the offense of unauthorized entry into Horowitz's, Kane's and Owen's dwelling since Sulla intentionally and knowingly entered unlawfully, since he had earlier that day spoken with Officer Nactor, and even before that the Sheriff, and was told not to enter the Property, or it would be a trespass. Nonetheless, Sulla entered into the dwelling with reckless disregard of the risk that other people were lawfully present in the dwelling, and another person was lawfully present in the dwelling. Those two people were Owens and Garramone. (2) Unauthorized entry in a dwelling is a class C felony. And Sulla cannot claim any of the affirmative defenses to this crime.

C. PERJURY HRS §710-1060 (1)

(1) Sulla committed the offense of perjury during official proceedings in Civ. No. 12-1-0417, Civ. No. 05-1-0304, and Federal Bankruptcy Proceedings BK No. 16-00239; and Adversary Proceeding No. 16-90015; by making under oath required or authorized by law, false statements of: (a) default on the Mortgage; (b) valid/legal non-judicial foreclosure; (c) Hester's "ownership," which Sulla knows is not true, and no reasonable law abiding person aware of the facts could believe to be true.

(2) Sulla's false statements made to the courts, and police, are "materially false statements" as defined by section 710-1000(9). It is not a defense that Sulla mistakenly believed the false statement to be immaterial, or even true, because Sulla obviously altered and forged Lee's signature on the Department of Commerce and Consumer Affairs (DCCA) government records, then falsely verified those Articles of Incorporation containing Sulla's alterations and photocopies signatures of the deceased Property Seller, Lee, as "true and correct."

D. FORGERY IN THE FRIST DEGREE: HRS §708-851(1)(a);

(1) Sulla committed the offense of forgery in the first degree whereas, with intent to defraud, Sulla falsely made, completed, endorsed, and altered the written instrument, Articles of Incorporation, and uttered that forged instrument, along with false Assignment of Mortgage and false Assignment of Promissory Note, conveying these securities into the "Foreclosing Mortgagee" incorporated by said forged and altered Articles of Incorporation . . . which Sulla purported to be, and which Sulla calculated to become or to represent, when completed:

(a) Part of an issue of . . . securities, or other valuable instruments issued by the State of Hawaii to Hester as verification of Sulla's Quitclaim Deed to Hester, recorded in the Hawaii Bureau of Conveyances including Doc. Nos. 2011-093773, filed June 14, 2011, evidencing Sulla superior interest in the subject Property and financing of Hester secured illegally by the Property; Sulla's Quitclaim Deed to Hester, dated the same day and filed at the same time, Doc. No. 2011-093772; and Sulla's Assignment of the crime victim's Mortgage to Sulla's sham religious "trust," Doc. No. 2009-136885, dated September 8, 2009.

(b) Part of an issue in the aforementioned chain of records, evidencing instruments representing Sulla's interests in or claims against Hester's corporation, the "Gospel of Believers" trust, and its invalid property interest contrived by Sulla.

E. TAMPERING WITH A GOVERNMENT RECORD: HRS § 710-1017(c);

1) Sulla committed the offense of tampering with a government record when: . . .

(c) Sulla knowingly recorded, registered, and filed, or offered to record, register, or file, in the Hawaii DCCA or Hawaii Bureau of Conveyances, the aforementioned Articles of Incorporation, and related securities Assignments by written statements which Sulla falsely made, completed, or altered, or in which false entries were made, and which contained false statements or false information purporting to the validity and legality of these instruments; . . .

F. CRIMINAL CONTEMPT OF COURT HRS §710-1077(c) and (g);

(1) Sulla committed the offense of criminal contempt of court, evidenced by his acts . . .

(c) As an attorney, Sulla person knowingly failed to perform ethically and in compliance with laws, and violated his duty and oath of license as an “officer of the court,” knowingly disobeying Sullas disqualification by federal court judges in serving as attorney in Hester’s quiet title and ejectment action, Civ. No. 14-1-0304, a lawful directive or order that the federal court made following removal, on January 5, 2015, in CIV. NO. 14 00413 JMS/RLP.(Exhibit 9)

(g) Sulla also knowingly disobeyed and resisted the process, injunction, and other mandates of the courts precluding by stays due processes in appellate courts the crime victim’s ejectment, dispossession of Property, or conversion of the Property, without further notice by the courts;

(b) Sulla did not commit the offenses in the immediate view and presence of the court, nor under such circumstances that the court has knowledge of all of the facts constituting the offense. Accordingly, the Complainant shall request that the court order Sulla to appear before it to answer a charge of criminal contempt of court; the trial, if any, upon the charge shall be by the court without a jury; and proof of guilt beyond a reasonable doubt shall be required for conviction. . .

(4) Whereas Sulla’s criminal contempt of court also constitutes other offenses, including Theft or attempted theft in the first degree, and the aforementioned crimes, Sulla may be charged with and convicted of the other offenses notwithstanding the fact that Sulla has been charged with or convicted of the contempt.

G. HINDERING PROSECUTION (of Hester) HRS §§ 710-1028(1)(3)(4) and (5); and 1029(1).

For the purposes of sections [710-1029 and 710-1030], Sulla rendered assistance to Hester, Sulla claimed:

(1) Harboring and concealing Hester and his whereabouts; . . .

(3) Sulla provides Hester with money, according to Sulla’s recorded “loan” to Hester (Exhibit 11); Sulla also gave Hester a disguise, falsely claiming Hester was Lee’s “nephew” and legal heir; and Sulla used other means of avoiding discovery, apprehension, prosecution, or conviction of both persons, Hester and Sulla, as recorded by numerous affidavits of process servers who were not able to find or serve Hester, except through Sulla, who repeatedly denied service for Hester. (This discovery evidence, already part of the public record, is available on request.);

(4) Sulla and his agents, Dukat and Enriquez, prevented and obstructed, by means of force, deception, and intimidation, caretakers Owens and Garramone from contacting the police for help, and performing acts that might aid in the discovery of the aforementioned crimes, apprehension of Hester and Sulla to secure justice and mitigate Horowitz’s, Kane’s and the caretakers and fellow residents’ damages, prosecution of Sulla and Hester for their crimes, and conviction of the aforementioned for their crimes; and

(5) Sulla and Dukat suppressed, by acts of concealment and alteration of ejectment warrants served on three occasions, September 20, 2013 (M13049389), March 12, 2016, and April 10, 2016, providing physical evidence that might aid in the discovery, apprehension, prosecution, or conviction of Sulla and Hester. [L 1972, c 9, pt of §1]

HRS §1029 - Hindering prosecution in the first degree. (1) Sulla committed the offense of hindering prosecution in the first degree when, with the intent to hinder the apprehension, prosecution, conviction, or punishment of Hester for the class B and C felonies detailed herein, Sulla rendered assistance to Hester.

H. THEFT AND RELATED OFFENSES: HRS § 708-830 (1) or (6)(a) and (7);

Sulla and Hester committed theft of the victim's real property title, in attempted conversion of the Property:

(1) Sulla and Hester obtained and exerted unauthorized control over the Subject Property. Sulla and Hester obtained or exerted unauthorized control over the Property of Horowitz and Kane with intent to deprive the the couple of their Property.

(2) Sulla and Hester obtained and exerted unauthorized control over the Subject Property through deception. Sulla and Hester obtained, and exerted control over, the Complainants' Property by deception with intent to deprive Horowitz and Kane of the Property.

(3) Sulla misappropriated the Property. Sulla obtained, and exerted control over the property of Horowitz and Kane that Sulla knew had been delivered to Sulla and Hester under a mistake pursuant to the identity of the recipient, being really Sulla, not his strawman Hester, and other facts that prove Sulla's intent to deprive the owners of the Property, and Sulla failed to take reasonable measures to discover and notify the owners of the Property, of their rights. . . .

(5) Sulla diverted his services as Hester's lawyer, and GOB corporation's "Debt Collector," having control over the legitimate legal disposition of services rendered to Hester and GOB, to his own unjust enrichment which Sulla was not entitled to do, or authorized by law to do, and Sulla intentionally diverted his services to the Sulla's own benefit as evidenced by the crimes committed on June 10, 2016, and Sulla's fraudulently concealed Mortgage "loan" to Hester effectively granting Sulla the Property for Hester's failure to pay taxes. (Exhibit 11)

§708-830.5 Theft in the first degree. (1) Sulla committed the offense of theft in the first degree since the value of the Property exceeds \$20,000.

Should anyone in your offices require additional information, please feel free to contact me. My contacts include: 310-877-3002 (cell); 808-946-6999 (office in Honolulu); E-mail: len15@mac.com. My attorney is Margaret Wille, who is appraised of these matters. Her contact information is: : 808-854-6931; E-mail: margaretwille@mac.com.

Thank you very much, in advance, for complying with, and enforcing, the laws of the State of Hawaii and the United States of America, and serving the community in the County of Hawaii by bringing Mr. Sulla and his cronies to justice.

Sincerely yours,



Leonard G. Horowitz DMD, MA, MPH, DNM (hon.) DMM (hon.)
Editor-in-Chief, *Medical Veritas* online journal.

Cc: M. Wille
M. Roth

Attachments: Appendix Exhibits 1-20; Altered Set of Writs of Ejectment Served by Sulla;
Declaration of Expert Chrisman finding Robert Dukat's complicity with Paul Sulla.