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THIRD CIRCUIT
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IN THE CIRCUIT COURT OF THE THIRD CIRCUIT

STATE OF HAWAII

STATE OF HAWAII,)	CR. NO. _____
)	
vs.)	INDICTMENT
)	
PAUL J. SULLA, JR. and)	
HALAI HEIGHTS, LLC.,)	(Hilo)
)	
Defendant.)	

INDICTMENT

The Grand Jury charges:

COUNT 1 C18009739/HL

On or about the 6th day of September, 2016, in the County and State of Hawaii, PAUL J. SULLA, Jr., with intent to defraud, falsely made, completed, endorsed or altered a written instrument, and/or uttered a forged instrument, which is or purports to be, or which is calculated to become or to represent if completed, a deed and/or other instrument which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation or status concerning real property, thereby committing the offense of Forgery in the Second Degree, in violation of Section 708-852(1), Hawaii Revised Statutes, as amended.



It is further alleged that the statute of limitations has not run in accordance with Section 701-108(3)(a), Hawai'i Revised Statutes, as amended, as the above offense involves fraud and/or deception as defined in Section 708-800, and this action is being commenced within three years after discovery of the offense by an aggrieved party on or about February 1, 2018, and who is oneself not a party to the offense, but in no case is this action, under this provision, extending the period of limitations by more than six years from the expiration of the period of limitation prescribed in Section 701-108(2), Hawai'i Revised Statutes, as amended.

COUNT 2 (C19-*/HL; C18009739/HL)

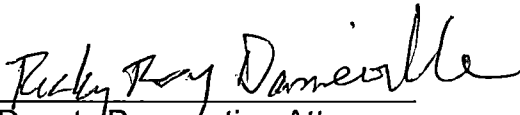
On or about the 6th day of September, 2016, to and including November 27, 2019, in the County and State of Hawai'i, PAUL J. SULLA, JR., and HALAI HEIGHTS, LLC, an unincorporated association, as part of one scheme and/or a continuing course of conduct intentionally obtained or exerted control over the property of another, a parcel of real estate known as Remnant "A" and later known as TMK 3-1-3-001-095-0000, belonging to LEONARD G. HOROWITZ and/or THE ROYAL BLOODLINE OF DAVID, by deception, with intent to deprive LEONARD G. HOROWITZ and/or THE ROYAL BLOODLINE OF DAVID of the property; and PAUL J. SULLA, JR., and HALAI HEIGHTS, LLC intended, believed, knew and/or was aware the value of the property taken exceeded \$20,000.00; And/or PAUL J. SULLA JR. and HALAI HEIGHTS, LLC, an unincorporated association, intentionally received, retained and/or disposed of the property of another, real property known as Remnant "A" and later known as TMK 3-1-3-001-095-0000, belonging to LEONARD G. HOROWITZ and/or THE ROYAL BLOODLINE OF DAVID, knowing that the real property had been stolen, with intent to

deprive LEONARD G. HOROWITZ and/or The ROYAL BLOODLINE OF DAVID, of the property; and PAUL J. SULLA, JR., and HALAI HEIGHTS, LLC intended, believed, knew and/or was aware the value of the property stolen exceeded \$20,000.00;

thereby committing the offense of Theft in the First Degree in violation of Section 708-830(2), and/or 708-830(7), and 708-830.5(1)(a), Hawai'i Revised Statutes, as amended.

Dated: Hilo, Hawai'i, December 4, 2019.

A TRUE BILL



Deputy Prosecuting Attorney
County of Hawaii



Foreperson