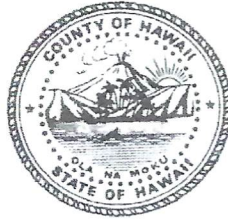


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OFFICE OF THE PROSECUTING ATTORNEY

November 5, 2020

LEONARD HOROWITZ
7463 Pomegranate Drive
Bokeelia, FL 33922

Re: Defendants: PAUL J. SULLA JR. and HALAI HEIGHTS LLC
Case No.: 3CPC-19-0000968

Dear Mr. Horowitz,

This is to advise you that the Office of the Prosecuting Attorney will be moving to dismiss charges without prejudice in the above-stated matter(s) for which the Defendants were charged by Indictment filed on December 5, 2019. The State must prove all elements of a criminal case beyond a reasonable doubt in order to obtain a conviction. Upon further review of the evidence in this case, including additional documents that we have obtained, as well as additional information obtained through recent witness interviews, it is our opinion that the State would be unable to prosecute this case successfully because the facts are insufficient to establish the offenses of Forgery in the Second Degree and Theft in the First Degree, or any lesser included offenses.

Very truly yours,

CHRISTOPHER K. ROTHFUS
Deputy Prosecuting Attorney