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L. CHIHEN, CLERK  
THIRD CIRCUIT COURT  
STATE OF HAWAII

Attorney for Plaintiffs  
PAUL J. SULLA, JR. and  
PAUL J. SULLA, III

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT  
STATE OF HAWAII

PAUL J. SULLA, JR., an individual, )  
and PAUL J. SULLA, III, an individual )  
Plaintiffs, )

vs.

LEONARD G. HOROWITZ, an )  
Individual; SHERRI KANE, an )  
Individual; and DOES 1 through 50, )  
inclusive, )  
Defendants. )

CIVIL NO.: 12-1 -0417

(Defamation, Defamation Per Se)

VERIFIED COMPLAINT FOR  
INJUNCTIVE RELIEF AND  
DAMAGES; VERIFICATION;  
PLAINTIFFS' APPLICATION FOR  
PRELIMINARY INJUNCTION;  
MEMORANDUM IN SUPPORT;  
DECLARATION OF PAUL J. SULLA  
JR. ; EXHIBITS A - H; NOTICE OF  
HEARING; SUMMONS

COMPLAINT

COMES NOW, the Plaintiffs PAUL J. SULLA, JR., an individual, and PAUL J. SULLA, III, an individual, by and through the undersigned counsel, and bring this complaint seeking injunctive relief and damages against the above-named Defendants LEONARD G. HOROWITZ and SHERRI KANE and allege and aver the following:

**Parties**

1. Plaintiff PAUL J. SULLA, JR., an individual, ("Mr. Sulla") is now, and at all times mentioned in this complaint was a resident of Hawaii County, Hawaii and is within

I hereby certify that this is a full, true and correct copy of the original on file in this office.

1

L. Chihen  
Clerk, Third Circuit Court, State of Hawaii

the jurisdiction of this Court. Mr. Sulla has worked as an attorney for 39 years, has resided in Hawaii County for 8 years and has been a licensed attorney practicing law in the state of Hawaii for 22 years. Plaintiff has during all this time enjoyed a good reputation, both generally and in the legal profession.

2. PAUL J. SULLA, III an individual, ("Sulla III") is the son of Mr. Sulla and is now, and at all times mentioned in this complaint was, a resident of Hawaii County, Hawaii and is within the jurisdiction of this Court. Sulla III has obtained two Masters Degrees in psychology and is working as a clinical psychologist.

3. Defendant LEONARD G. HOROWITZ is an individual and is now, and at all times mentioned in this complaint was, a resident of Hawaii County, Hawaii, and is subject to the jurisdiction of this Court.

4. Defendant SHERRI KANE is an individual and is now, and at all times mentioned in this complaint was, a resident of Hawaii County, Hawaii, and is subject to the jurisdiction of this Court.

5. Defendants DOES 1 through 50, inclusive are individuals, corporations, or other legal entities, whether private or governmental, whose identities are currently unknown to Plaintiff, but who are legally responsible for the following claims, or have an interest in the same. Their names, identities and capacities will be set forth when the same have been ascertained.

#### **Jurisdiction and Venue**

6. The acts and/or omissions alleged herein occurred within the County and State of Hawaii and this is an action for damages and injunctive relief in excess of the jurisdictional minimum of this Court, exclusive of interest and costs, based on the

intentional publication of false Statements about Plaintiffs to various third parties by Defendants and is thus within the jurisdiction of this Court pursuant to HRS sec. 603-21.5(3), 21.9 and 23.5.

7. Venue is proper in this Court pursuant to HRS sec 603-36(5).

### **Factual Background**

8. Plaintiff PAUL J. SULLA, JR. ("Mr. Sulla") was licensed to practice law in 1973 in the Commonwealth of Massachusetts. In 1990, Mr. Sulla obtained a license to practice law in the State of Hawaii. Soon thereafter, Mr. Sulla moved his law practice from Massachusetts to the State of Hawaii ("the Sulla Firm").

9. In 2004 Mr. Sulla moved the Sulla Firm to Hawaii County, Hawaii from his law offices in Kilauea on the island of Kauai.

10. In April 20, 2010, Mr. Sulla first met Defendants HOROWITZ and KANE during a non-judicial foreclosure regarding real property titled to Defendant HOROWITZ's Washington State non-profit corporation BLOODLINE OF DAVID. Mr. Sulla represented the foreclosing party and BLOODLINE OF DAVID lost the property through the foreclosure. Defendant HOROWITZ has been publishing defamatory Statements about Plaintiffs over the internet and via other means with actual malice ever since.

11. On or about OCTOBER 25, 2010 and continuing since that time, Defendants HOROWITZ and KANE published over the internet, on more than one occasion, to millions of third-parties worldwide, including Hawaii residents and residents of this judicial district, numerous false and defamatory Statements of and concerning Mr. Sulla.

12. Specifically, Defendants HOROWITZ and KANE created a website at the URL [www.paulsullafraud.com](http://www.paulsullafraud.com). This website contains a number of defamatory statements regarding Mr. Sulla.

13. The website states, including in its very name, numerous times that Mr. Sulla is engaged in fraudulent activity.

14. This statement is false because Mr. Sulla is not engaged in fraudulent activity, nor has he ever been.

15. The Defendants' website also states that Mr. Sulla is engaged in "organized crime."

16. This statement is false because Mr. Sulla is not engaged in organized crime, nor has he ever been.

17. The Defendants' website also states that Mr. Sulla is engaged in "securities schemes."

18. This statement is false because Mr. Sulla is not engaged in securities schemes, nor has he ever been.

19. The Defendants' website also states that Mr. Sulla is engaged in "foreclosure fraud."

20. This statement is false because Mr. Sulla is not engaged in foreclosure fraud, nor has he ever been.

21. The Defendants' website also states that Mr. Sulla is engaged in "racketeering."

22. This statement is false because Mr. Sulla is not engaged in racketeering, nor has he ever been.

23. The Defendants' website also states that Mr. Sulla is engaged in "arms sales."

24. This statement is false because Mr. Sulla is not engaged in arms sales, nor has he ever been.

25. The Defendants' website also states that Mr. Sulla is engaged in "money laundering."

26. This statement is false because Mr. Sulla is not engaged in money laundering, nor has he ever been.

27. The Defendants' website states that Mr. Sulla is engaged in "CIA cult experiments."

28. This statement is false because Mr. Sulla is not engaged in CIA cult experiments, nor has he ever been.

29. The Defendants' website further states that Mr. Sulla has conducted fraud by "padding bills."

30. This statement is false because Mr. Sulla has never padded bills.

31. The Defendants' website also states that Mr. Sulla is associated with "double dealing foreclosure clients."

32. This statement is false because Mr. Sulla is not associated with double dealing foreclosure clients.

33. The Defendants' website states that Mr. Sulla "stole money."

34. This statement is false because Mr. Sulla has never stolen money.

35. The Defendants' website also states that Mr. Sulla has been "BUSTED."

36. This statement is false because it implies Mr. Sulla was convicted of criminal activity, and Mr. Sulla has never been convicted of criminal activity.

37. The Defendants' website further states that Mr. Sulla has "embezzled money."

38. This statement is false because Mr. Sulla has never embezzled money.

39. Defendants intend to injure and have injured Plaintiffs' reputations by publishing these statements to third parties.

40. The false and defamatory statements are not privileged and Plaintiffs did not consent to the publication or dissemination of the statements.

41. As a means to promote his professional services, Mr. Sulla created [www.pauljsulla.com](http://www.pauljsulla.com), an Internet website to provide a conduit for prospective and current clients to learn about Mr. Sulla's law practice.

42. Mr. Sulla relies on consumers' knowledge of their services when consumers are searching for his services on the Internet. Consumers can find Mr. Sulla's website by entering his name in any Internet search engine and the search engine will list search results, which normally ranks his website as the top result.

43. Accordingly, the internet is a primary stream of commerce for Mr. Sulla as well as for his reputation, especially in relation to prospective clients on the mainland needing legal counsel for real estate, estate planning, probate and business law matters associated with properties, estates and/or businesses located in Hawaii.

44. Because of the Defendants' actions, prospective clients and business associates often find the defamatory website, instead of Mr. Sulla's website, when they search for Mr. Sulla's name on any Internet Search engine.

45. Additionally, whenever a prospective business associate, client, patient, colleague, friend, or acquaintance searches for Paul J. Sulla, III on an Internet search engine, many find the defamatory website and wrongly believe it refers to Paul J. Sulla, III.

**Count I: Defamation**

46. PLAINTIFFS re-allege the allegations set forth in Paragraphs 1-45 herein and incorporate same by reference.

47. Defendants HOROWITZ and KANE have created, developed, and published various false and defamatory statements on more than one occasion of and concerning PLAINTIFFS.

48. DEFENDANTS HOROWITZ and KANE published these non-privileged false statements to countless third parties by posting the statements both on posters that they then hung in Plaintiffs' area of residence and on the Internet.

49. Defendants knew that the statements were false, and published them with reckless disregard for the truth of the Statements, and with actual malice and the intent to injure PLAINTIFFS' reputation.

50. As a direct and proximate result of the publication of the Statements by the Defendants HOROWITZ and KANE, PLAINTIFFS have suffered substantial damages, including but not limited to pecuniary loss and injury to reputation.

**Count II: Defamation Per Se**

51. PLAINTIFFS re-allege the allegations set forth in Paragraphs 1-50 herein and incorporate same by reference.

52. Defendants HOROWITZ and KANE have created, developed, and published various false and defamatory Statements on more than one occasion of and concerning PLAINTIFFS.

53. DEFENDANTS HOROWITZ and KANE published these non-privileged false statements to countless third parties by posting the statements on the Internet.

54. Defendants knew that the statements were false, and published them with reckless disregard for the truth of the Statements, and with actual malice and the intent to injure Plaintiffs' reputations.

55. These statements allege Plaintiffs committed a crime, have a tendency to injure them in their professions, and allege that they are unfit to perform the duties of their employment and have a tendency to prejudice them in such employment.

### **RELIEF REQUESTED**

**WHEREFORE**, Plaintiffs pray for the following relief:

- A. Trial by jury on all issues contained in this Complaint;
- B. A Preliminary Injunction issue containing the following orders against the Defendants, their agents, officers, members, managers, employees, representatives, and co-conspirators ("Enjoined Parties"):
  - i Prohibiting the Enjoined Parties from making any false statements of fact or statements that imply false statements of fact, publicly or to any person, oral or by written means, including but not limited to e-mail and on the Internet, that defame or disparage plaintiffs;
  - ii Mandating that the Enjoined parties take all action to request the Internet search engines, including but not limited to, Google, Yahoo, and Bing, to remove all the defamatory, disparaging, libelous, and false statements about plaintiffs that defendants posted on the Internet, including, but not limited to, all comments and videos posted on



<http://www.paulsullafraud.com> and the webpages that copy or reference this webpage including the webpages at the following URLs:

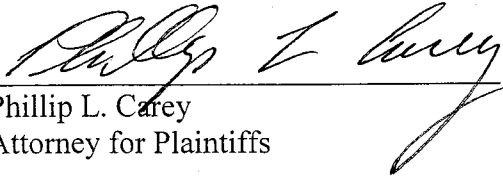
- a. <http://www.paulsullafraud.com/Home.html>
  - b. <http://www.paulsullafraud.com/DISQUALIFICATION.html>
  - c. [http://www.paulsullafraud.com/Public\\_Censure.html](http://www.paulsullafraud.com/Public_Censure.html)
  - d. [http://www.paulsullafraud.com/%22RECKLESS\\_MAN%22.html](http://www.paulsullafraud.com/%22RECKLESS_MAN%22.html)
  - e. [http://www.paulsullafraud.com/DRUG\\_TRAFFICKING.html](http://www.paulsullafraud.com/DRUG_TRAFFICKING.html)
  - f. [http://www.paulsullafraud.com/KKK-Like\\_CULT.html](http://www.paulsullafraud.com/KKK-Like_CULT.html)
  - g. <http://www.paulsullafraud.com/ODC.html>
  - h. [http://www.paulsullafraud.com/\\$3\\_Million\\_County\\_Liability.html](http://www.paulsullafraud.com/$3_Million_County_Liability.html)
  - i. [http://www.paulsullafraud.com/Foreclosure\\_Negligence\\_Case.html](http://www.paulsullafraud.com/Foreclosure_Negligence_Case.html)
  - j. [http://www.paulsullafraud.com/MOTION\\_FOR\\_SANCTIONS.html](http://www.paulsullafraud.com/MOTION_FOR_SANCTIONS.html)
  - k. [http://www.paulsullafraud.com/SULLAs\\_TAX\\_FRAUD.html](http://www.paulsullafraud.com/SULLAs_TAX_FRAUD.html)
  - l. [http://www.paulsullafraud.com/SULLA\\_BUSTED.html](http://www.paulsullafraud.com/SULLA_BUSTED.html)
  - m. <http://theocharis-symposium.ntua.gr/?q=node/56269>
- iii. Mandating, as it is foreseeable that the above referenced URLs and the statements contained therein will be referenced on additional webpages in the future, including but not limited to index, directory, and search results pages that the Enjoined Parties take all actions including requesting all Internet search engines, including but not limited to, Google, Yahoo, and Bing to remove all such webpages from the Internet;
- iv. Prohibiting the Enjoined Parties from further operation of the <http://www.paulsullafraud.com> websites/weblogs, and/or from creating any other websites or blog postings participation in Web postings or e-mail correspondence or any other forms, blogs or website which disparage, vilify and/or contained false statements concerning the plaintiffs;
- v. Prohibiting the Enjoined Parties from further acts of defamation or publishing of false statements regarding plaintiffs.

C. Permanent Injunction for the relief requested in the Preliminary Injunction Order, above;

H. Attorneys' fees, plus court costs and other costs associated with bringing this action pursuant to H.R.S. § 607-14. 5; and

Such other and further relief which Plaintiffs may be entitled at law or equity.

DATED: Hilo, Hawaii 19<sup>th</sup> July 2012.

  
Phillip L. Carey  
Attorney for Plaintiffs

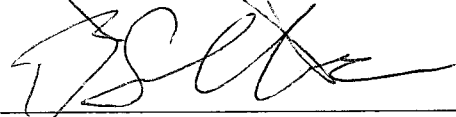
**VERIFICATION**

We, Paul J. Sulla, Jr. and Paul J. Sulla, III, are the plaintiffs in the instant action and we hereby verify the foregoing Complaint as true and correct to the best of our personal knowledge and belief.

Signed under penalty of law of the State of Hawaii, this 10 day of July, 2012.



\_\_\_\_\_  
PAUL J. SULLA, JR.



\_\_\_\_\_  
PAUL J. SULLA, III

Phillip L. Carey (SBN 4636)  
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Attorney for Plaintiffs  
PAUL J. SULLA, JR. and  
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and PAUL J. SULLA, III

Plaintiffs,

vs.

LEONARD G. HOROWITZ, an  
Individual; SHERRI KANE, an  
Individual; and DOES 1 through 50,  
inclusive,

Defendants.

)  
) CIVIL NO.: \_\_\_\_\_  
) (Other Civil Action)

) **PLAINTIFFS' APPLICATION FOR**  
) **PRELIMINARY INJUNCTION;**  
) **MEMORANDUM IN SUPPORT;**  
) **DECLARATION OF PAUL J. SULLA**  
) **JR.; EXHIBITS A - H; PROPOSED**  
) **ORDER; NOTICE OF HEARING**

) Hearing Date: \_\_\_\_\_

) Time: \_\_\_\_\_

) Judge: Hon. \_\_\_\_\_


**PLAINTIFFS' APPLICATION FOR PRELIMINARY INJUNCTION**

TO THE HONORABLE COURT:

Pursuant to Hawaii Rule of Civil Procedure 65(a), Plaintiffs Paul J. Sulla, Jr. and Paul J. Sulla, III (Collectively, "Plaintiffs") move this Court to issue a preliminary injunction against Defendants Leonard Horowitz and Sherri Kane. Plaintiffs request the specific injunctive relief as outlined in Plaintiffs' Verified

Complaint, which is filed contemporaneously with this Motion. A Memorandum in Support and Proposed Order are attached for the Court's consideration.

Respectfully submitted,

By:   
Phillip L. Carey  
Attorney for Plaintiffs  
PAUL J. SULLA, JR. and  
PAUL J. SULLA, III

## MEMORANDUM IN SUPPORT

TO THE HONORABLE COURT:

Plaintiffs Paul J. Sulla, Jr. (“Mr. Sulla”) and Paul J. Sulla, III (collectively, “Plaintiffs”) file this Memorandum in Support of their Application for Preliminary Injunctive relief as follows:

### I. ARGUMENT AND AUTHORITIES

#### A. Applicable Legal Standards

The issuance of preliminary injunction is governed by Hawaii Rule of Civil Procedure 65 (a). Hawaii courts consider the following three factors in determining whether to issue injunctive relief:

- (1) Is the party seeking the injunction likely to prevail on the merits?
- (2) Does the balance of irreparable damage favor issuance of an interlocutory injunction?
- (3) To the extent that the public interest is involved, does it support granting the injunction?<sup>1</sup>

The second factor — balance of irreparable damage favoring issuance of an interlocutory injunction— is the most important one, given that the main purpose

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<sup>1</sup> Penn v. Transportation Lease Hawaii, Ltd., 2 Haw. App. 272, 276, 630 P.2d 646 (Haw. App. 1981) (citations omitted).

of an interlocutory injunction is to preserve the status quo between the parties pending adjudication of the merits of a claim.<sup>2</sup>

**B. A Preliminary Injunction Is Warranted.**

Here, Plaintiffs have met all requirements to obtain an interlocutory injunction.

**1. Plaintiffs Are Likely To Succeed On The Merits Of Their Claims For Defamation and Defamation Per Se.**

Under Hawaii law, a cause of action for defamation requires proof of four elements: (a) a false and defamatory statement concerning another; (b) an unprivileged publication to a third party; (c) fault amounting at least to negligence on the part of the publisher [actual malice where the plaintiff is a public figure]; and (d) either actionability of the statement irrespective of special harm or the existence of special harm caused by the publication.”<sup>3</sup>

Defamation per se is libel that (1) imputes to a person the commission of a crime; (2) has a tendency to injure him in his office, profession, calling or trade; or (3) holds a person up to scorn and ridicule and to feelings of contempt or execration, impair him in the enjoyment of society and injure those imperfect rights of friendly intercourse and mutual benevolence which man has with respect

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<sup>2</sup> In re Guardianship of Carlsmith, 113 Haw. 211, 228 (Haw. 2006).

<sup>3</sup> Beamer v. Nishiki, 66 Haw. 572, 578-579 (Haw. 1983) (citing Restatement (Second) of Torts § 558 (1977)).

to man.<sup>4</sup> Hawaii courts have also found that words which “impute to one unfitness to perform the duties of his employment or which have a tendency to prejudice him in such employment” and those that impute insanity or impairment of mental faculties are libelous per se.<sup>5</sup> For publications which are libelous per se “injury to the plaintiff will be presumed and special damages need not be alleged or proven, but general and punitive damages may be recovered.”<sup>6</sup>

Here, Plaintiffs satisfy each of these elements and is therefore likely to succeed on the merits of his defamation and defamation per se claims. Specifically, Defendants posted the following statements about Plaintiffs on the Internet at webpage located at [www.paulsullafraud.com](http://www.paulsullafraud.com): that Mr. Sulla is engaged in fraudulent and criminal activity; that Mr. Sulla is engaged in “organized crime,” “securities schemes,” “foreclosure fraud,” “racketeering,” “arms sales,” “money laundering,” “CIA cult experiments,” “padding bills,” “double dealing foreclosure clients,” that Mr. Sulla “stole money,” has been “BUSTED,” and has “embezzled money.” All of the above-listed statements are false and concern the plaintiffs. Accordingly, Plaintiffs’ claim satisfies the first element of a claim of defamation, namely that they demonstrate a false and defamatory statement and that the statement is about Plaintiffs.

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<sup>4</sup> Russell v. American Guild of Variety Artists, 53 Haw. 456, 458-459 (Haw. 1972) citing Kahanamoku v. Advertiser Publishing Co., 25 Haw. 701, 712-13 (1920).

<sup>5</sup> Russell v. American Guild of Variety Artists, 53 Haw. 456, 458-459 (Haw. 1972) citing Rice v. Honolulu Star-Bulletin, Ltd., 26 Haw. 196, 206 (1921).

<sup>6</sup> Russell v. American Guild of Variety Artists, 53 Haw. 456, 458 (Haw. 1972), citing Kahanamoku v. Advertiser Publishing Co., 25 Haw. 701, 709 (1920).



Defendant's statements about Plaintiffs were published without privilege to a third party (Element 2) because they were made publicly on the Internet for all to see. The third element, fault or at least negligence on the part of the defendant, is satisfied because there is absolutely no basis to support Defendants' defamatory statements. And the final element of a cause of defamation, that the statements caused special harm to the plaintiff is satisfied because the statements are defamatory *per se* in that the statements allege that Plaintiffs committed a crime, the statements have a tendency to injure Plaintiffs in their profession, and the statements allege that Plaintiffs are unfit to perform the duties of his employment and have a tendency to prejudice them in such employment.

Paul J. Sulla, Jr. has, until the actions of Defendants, had an excellent reputation in his field of law. Additionally, Paul J. Sulla, III has, until the actions of the Defendants, had an excellent reputation in his field of psychology. However, Defendants' actions of posting defamatory statements and publishing the website [www.paulsullafraud.com](http://www.paulsullafraud.com) with multiple defamatory statements to countless individual around the world, including Plaintiffs' former, current, and potential clients, patients, business associates, friends and family, have certainly harmed their reputations. Further, when a potential client or business associate searches for the term "Paul Sulla" on Google or other Internet search engines, many find the false and defamatory statements published by the Defendants.

2. **The Harm of the Irreparable Damage Favors the Issuance of a Preliminary Injunction**

You cannot un-ring a bell. Plaintiffs have already suffered injury to their reputations, and the longer the Defendants' unlawful statements remain posted on the Internet, the further Plaintiffs' reputations will be injured. The ongoing injury to Plaintiffs' reputations can never be repaired, nor measured adequately. Further, it is impossible to determine how many people will see the Defendants' defamatory statements about Plaintiffs. Thus, Plaintiffs' damages are difficult to calculate, and cannot be measured by any pecuniary standard. The law in Hawaii is clear that where monetary damages would be inadequate to compensate the Plaintiffs, an injunction should be issued. Klausmeyer v. Makaha V.F. Ltd., 41 Haw. 287, 340 (Haw. 1956).<sup>7</sup>

3. **The Public Interest Supports Granting the Injunction.**

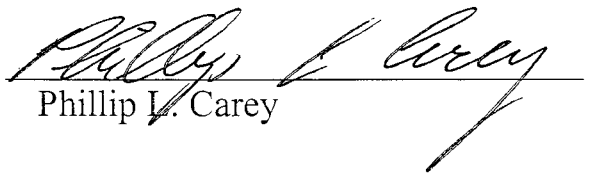
It is certain that failing to grant Plaintiffs the preliminary injunction they request will cause Plaintiffs imminent irreparable injury. By contrast, removing the unlawful website and video will not impose any hardship on Defendants whatsoever. And mandating the removal of the defamatory statements from the Internet is the least restrictive means available that will prevent Plaintiffs' irreparable injury. Nothing short of removal will prevent Plaintiffs' harm—for

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<sup>7</sup> In Klausmeyer, the Hawaii Supreme Court held that: "an injury is irreparable where . . . from the nature of the act, or from the circumstances surrounding the person injured, or from the financial condition of the person committing it, **it cannot be readily, adequately, and completely compensated with money.**" Klausmeyer, 41 Haw. at 340 (emphasis added).

example, requiring Defendants to post a statement saying that their statements are untrue will not prevent others from reading the defamatory statements and therefore questioning the character of Plaintiffs. The public interest is served by having the false statements removed from the Internet.

Respectfully submitted,

By:   
Phillip V. Carey

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Attorney for Plaintiffs  
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Individual; SHERRI KANE, an )  
Individual; and DOES 1 through 50, )  
inclusive, )  
Defendants. )

CIVIL NO.: \_\_\_\_\_  
(Other Civil Action)

**DECLARATION OF PAUL J SULLA  
JR.; EXHIBITS A - H**

I, Paul Joseph Sulla Jr. depose the state as follows.

1. I am a plaintiff in the above captioned matter and make the following statements and representations upon my own personal knowledge.
2. On April 2010 as a Hawaii licensed attorney I conducted a non-judicial foreclosure concerning property owned by the defendant Horowitz's Corporation and was met with a video camera in my face and a lady posing as news correspondent attacking me;

3. In or around October 2010 I learned that there were several posters put up around the city of Hilo containing my picture stating RECKLESS and also posters stating WANTED with a picture of my client, most of these posters were promptly taken down but I was not prepared for what came next;
4. In the later part of October 2010, a friend called me and said that I should *google* my name Paul J Sulla because there was some wild accusations made against me;
5. In my Google search I came across as the heading PaulSULLAcensored.com and found that among an assortment of charges, I was named as a tax fraud; committed foreclosure negligence; was a drug trafficker; a reckless and sinister attorney; and a "Hallucinating Attorney as Corrupt as Evil Gets". I tried to print the web page but only a limited amount of the web page printed. (An abbreviated copy of the webpage PaulSULLAcensored.com is attached hereto and marked exhibit A);
6. Upon review of the webpage, I found various other links to wild claims about me and my law practice that were all somehow related by the Defendants Horowitz and Kane to the non-judicial foreclosure concerning the defendant Horowitz's property that I conducted in April 2010;
7. As a result of these defamatory posters and websites, I grew cautious in dealing with the foreclosure client and did not wish to pursue any further actions against Horowitz and then have to face more smears, lies, and false statements;

8. Thereafter, my client had me convey the property to him so that he could bring eviction action against Horowitz pro se;
9. As the eviction case was challenged by Horowitz, who brought in Honolulu counsel, I felt compelled to assist my client and to later represent him in the eviction matter. This matter was ultimately dismissed by the District Court because of the challenge to the title by Horowitz and the only course left for my client would be pursue a ejectment action Circuit Court or bring a new judicial foreclosure action;
10. Not long after the eviction action was contested in early 2012, a new website appeared with the heading SULLA BUSTED! This new site charged me with tax evasion, security schemes, foreclosure fraud as well as other crimes and felonies such as racketeering, arms sales, and CIA connections (An abbreviated copy of the web page SULLA BUSTED! is attached hereto and marked exhibit B);
11. At no time in my life or practice have I been charged with fraud or a felony. I have no problem with my taxes and I am not a drug trafficker nor am I any of the other things I am charged with under these webpages;
12. I later learned that all of these derogatory web pages were all directed and operated by the web site <http://www.paulsullafraud.com> that is operated by the defendants Horowitz and Kane;
13. In an e-mail dated July 13, 2011 I sent to Horowitz's then attorneys Gary Dubin and John Carroll, I requested that they take some control over their

client and have him cease the defamatory statements in the webpages under the website <http://www.paulsullafraud.com> . I received no response and there were no retractions of the defamatory statements or web pages. (A true and correct copy of that e-mail dated July 13, 2011 is attached hereto and marked exhibit C);

14. On July 18, 2012 I recently ran a Google search with the term *Paul Sulla stole money* and found several sites listing *Paul Sulla Stole Money*. (A true and correct copy of my Google search is attached hereto and marked exhibit D);

15. The first two sites all originated from the <http://www.paulsullafraud.com> web site. The first site under a Sherri Kane banner shows a Google search under the name *Paul Sulla robbery*. The second site was a list of nonrelated terms and statements under the heading *Search results for Paul Sulla stole money* (A true and correct copy of these two web pages under the <http://www.paulsullafraud.com> website are attached hereto and marked exhibit E and F respectfully);

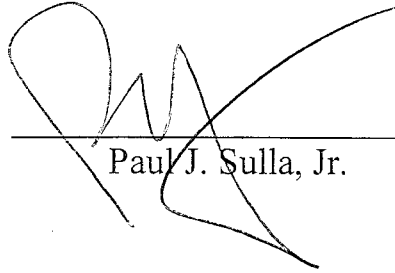
16. The third webpage was from a site featuring public downloads <http://doridro.com/forum/viewtopic> and was titled *Paul Sulla Stole Money – popular topic*. This webpage contains gibberish and states that it was placed from Nepal on May 14, 2012. (A true and correct copy of the webpage from the web site <http://doridro.com/forum/viewtopic> is attached hereto and marked exhibit G);

17. The fourth site was also under another public download web site entitled <http://ebookbrowse.com/exhibits-paul-sulla-stole-money-to-cia-connectons> and contains nothing more than a copy of a Sherri Kane banner Google search attached hereto as exhibit E. (A true and correct copy of the webpage from the website <http://ebookbrowse.com/exhibits-paul-sulla-stole-money-to-cia-connectons> is attached hereto and marked exhibit H.)
18. Not only have these defamatory webpages affected my ability to present myself on the Internet, but it also made it difficult for me to continue to represent my client in his foreclosure and eviction actions when I am continually pestered with these disparaging, libelous and false statements.
- 19.. My son Paul Joseph Sulla III is not attorney and has had no dealings with the defendants Horowitz and Kane whatsoever. In one statement they claim he is my alter ego and thereupon continue to cast disparaging remarks and slander statements against him. These remarks are damaging to him and his name and cause irreparable harm to his reputation and career.
20. In addition to these defamatory acts and statements, the defendants Horowitz and Kane have published these materials forwarded to the Hawaii State Bar Office of Disciplinary Counsel, the Hawaii Police department, and other local political officials. Unless the defendants are restrained as set forth in the proposed order attached hereto, my son and I will continue to suffer irreparable harm in our business and personal affairs.



I declare under penalty of perjury that the foregoing is true and correct.

Dated: Hilo, Hawaii, July 19, 2012

A handwritten signature in black ink, consisting of a large loop on the left and several sharp, overlapping strokes on the right, crossing a horizontal line.

---

Paul J. Sulla, Jr.

# PaulSULLAcensured.com

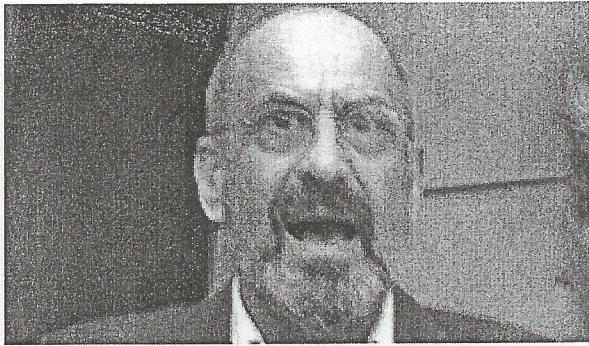
HOME    DISQUALIFICATION    PUBLIC CENSURE    "RECKLESS MAN"    DRUG TRAFFICKING    KKK-  
LIKE CULT    ODC    \$3 MILLION COUNTY LIABILITY    FORECLOSURE NEGLIGENCE CASE  
MOTION FOR SANCTIONS    SULLA'S TAX FRAUD    SULLA BUSTED

Hilo, Hawaii--Just when you thought that fraud and corruption in the legal system couldn't get worse, brace yourself for this shocker.

Dr. Leonard Horowitz, a pure-hearted humanitarian who has dedicated his life to expose dark forces in the drug cartel and CIA, is now up against

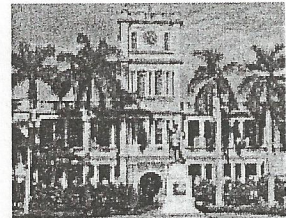
a ring of forgers and land robbers led by a drug-trafficking, Bar certified "reckless" and sinister, lawyer, Paul J. Sulla, that local police, the prosecutor's office, and the State's Office of Disciplinary Counsel are harboring.

**CLICK THE PLAYER BELOW TO VIEW THE OUTRAGEOUS  
FORECLOSURE FRAUD "SPECIAL REPORT" ON PAUL SULLA'S  
NON-JUDICIAL AUCTION THAT SULLA HAS REPEATEDLY  
ATTEMPTED TO CENSOR UNDER COLOR OF LAW.**



*Counsel Sulla is liable for the government's excess costs "since he both knowingly and recklessly made frivolous arguments, thus unreasonably and vexatiously multiplying these proceedings."*

*US Tax Court*



Paul J. Sulla, Jr's Ethics Violations.pdf

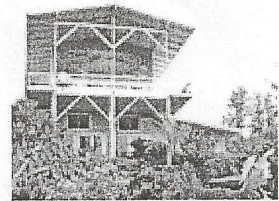
## Paul J. Sulla, Jr., III

### A "Reckless man" and Hallucinating Attorney as Corrupt as Evil Gets

by

Sherri Kane

**CRIME SCENE**



# SULLA BUSTED!

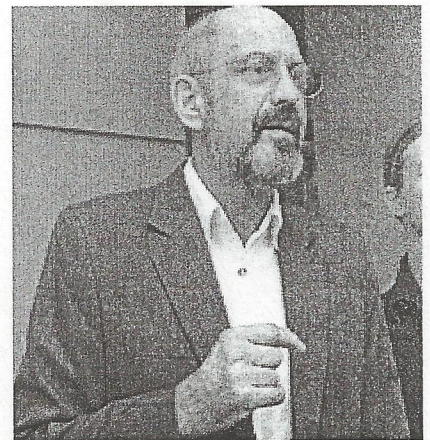
HOME    DISQUALIFICATION    PUBLIC CENSURE    "RECKLESS MAN"    DRUG TRAFFICKING    KKK-  
 LIKE CULT    ODC    \$3 MILLION COUNTY LIABILITY    FORECLOSURE NEGLIGENCE CASE  
 MOTION FOR SANCTIONS    SULLA'S TAX FRAUD    SULLA BUSTED

## Eviction Complaint Backfires on Paul J. Sulla, Jr. as Journalists Reveal Shocking Evidence of Links to CIA "New Age" Psyops and Organized Crime

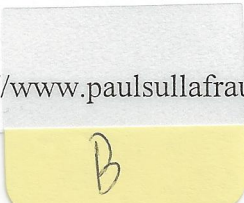
**Journalists File for  
 Discovery of Attor  
 Drugs, Tax Evasio  
 Schemes, and For**

**By Dr. Leonard Horowitz**

Medical Veritas International  
 Source:  
 Publication date: February 8, 2012



defense against an illegal



## Paul J. Sulla

---

**From:** Paul J. Sulla <psulla@aloha.net>  
**Sent:** Wednesday, July 13, 2011 5:18 PM  
**To:** 'johncarro001@hawaii.rr.com'; 'gdubin@dubinlaw.net'  
**Subject:** FW: Horowitz new newz via kane

Gentlemen:

Since Mr. Horowitz is your client I thought I would direct this latest webpage put together by him your way to review. Mr. Horowitz has clearly crossed the line relative of business slander and appears to be trying to blackmail me from moving against him with these off the wall allegations. The statements he is making about this writer is clearly irrelevant to whatever he is whining about for his injury. This shows the malice and a disregard for the truth of whatever publishes. In his one conversation with me he threatened me several times that he would use his resources and effort to destroy me and my practice. This is hardly what we sign up for when we take on clients and try to do our work. I am sure none of you would like this kind of attack to be directed to you.

My request is that maybe you could talk some sense into him about these extracurricular exercises so we could focus on getting this matter resolved civilly. I know he likes to complicate things but I intend to put an end to these attacks anyway I can. Any help I can gain from either of you would be appreciated. If either of you feel as he does (or rather makes the claim) that I am sinister or criminal maybe we should have a chat because this nonsense has to stop.

Thank you

Paul J. Sulla

[http://web.mac.com/len15/PaulSULLAfraud.com/Foreclosure\\_Negligence\\_Case.html](http://web.mac.com/len15/PaulSULLAfraud.com/Foreclosure_Negligence_Case.html)



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Web

[PDF] [Paul Sulla Stole Money | Plusfores](#)

www.paulsulla.com/SULLA.../EXHIBITS- ...

File Format: PDF/Adobe Acrobat - Quick View

Jan 11, 2012 – This Topic "Paul Sulla Stole Money" Has Been Moved. ... in the ... our hearts, who stole feminism General [Paul Sulla stole money / How the ...

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www.paulsulla.com/SULLA.../%22AskTheCrew-Q%26A- ...

File Format: PDF/Adobe Acrobat - Quick View

Feb 10, 2012 – Home. Questions & Answers. Members. About Us. Contact Us. Privacy. Terms of Use. Content Policy. My best friend stole my wedding vows ...

Hilo, HI

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[Paul Sulla Stole Money - popular topic](#)

doridro.com/forum/viewtopic.php?f=89&t=678201 - Bangladesh

1 post - 1 author - May 18

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doridro.com/forum/viewtopic.php?f=89&t=623974 - Bangladesh

1 post - 1 author - May 15

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ebookbrowse.com/exhibits-paul-sulla-stole-money-to-cia-connection...

Mar 12, 2012 – Download EXHIBITS Paul Sulla Stole Money to CIA Connection 1 pdf documents from www.paulsulla.com at @EbookBrowse.

[Delphi](#)

www.abrock.com/Greece-Turkey/Olym.html

Sulla, a Roman general, plundered it in 86 BCE and in Paul's day Nero pillaged it and carried off 500 statues. Thus Rome stole the treasures of a wealthy ...

[Betty Corter - Pipl Profiles](#)

pipl.com/directory/name/Corter/Betty

watch the grinch that stole christmas , eddie stole our hearts , who stole feminism summers [ Paul sulla stole money / How the grinch stole christmas .

[PDF] [rec0501 - State of Hawaii](#)

hawaii.gov/dcca/real/agendas\_minutes/redmin\_2005/rec0501.pdf

File Format: PDF/Adobe Acrobat - Quick View

Paul Sulla, Esq. Absent: Mitchell ..... meeting, along with his attorney, Paul Sulla. ... Mr. Szymanski stole the project from him and disavowed the agreement. A ...

[Proof Ron Paul and his family are all Freemason's ????? 20th june ...](#)



www.youtube.com/watch?v=RuIbXdrpTC8

Jun 20, 2012 - 10 min - Uploaded by cip1881

Freemason Ron Paul (2012) The Illuminati Illusion Published on 19 Jun 2012 by ... Ron Paul Supporter ...

[RON PAUL IS NOT A HYPOCRITE - YouTube](#)



www.youtube.com/watch?v=76rZNoL1cA

Jul 10, 2012 - 5 min - Uploaded by Mindrotjuggalo

... Paul a Hypocrite for getting the money the Federal government stole ... Ron Paul Verità sulla Siria ...

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Maps

Jul 17, 2011 – ... MJB & ETW, Lie detection, Life Sentence / Sulla, Live dreaan Hypnosis ..... Posted by robert fox at 17:44 Tagged with: Detective Paul Schri ICAC, ... June 27, 2001 – SAPOL VIDEO: robbery Caltex Service Station on

Videos

[Paul Sulla Stole Money | Plusfores](#)

News

[www.plusfores.com/node/1860](http://www.plusfores.com/node/1860)

Shopping

Jan 11, 2012 – This Topic "Paul Sulla Stole Money" Has Been Moved. ... in th investigators to the commitment of South Paul Anthony Olivares to the **robbe**

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[West Hawaii Today. Kailua-Kona, Hawaii](#)

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[kona.westhawaiitoday.com/.../boyfriend-testifies-harris-marijuana-tri...](http://kona.westhawaiitoday.com/.../boyfriend-testifies-harris-marijuana-tri...)

Aug 30, 2011 – Asked by defense counsel Paul Sulla what his duties entailed three men wearing masks and armed with shotguns **robbed** Harris of ...

Honolulu, HI

[Guano The Great Riviera Bank Robbery](#)

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Guano The Great Riviera Bank **Robbery** on WN Network delivers the latest V ... Sulla addressed him by the cognomen Magnus (the Great) and he was ... Venerable Pope John Paul II (18 May 1920 – 2 April 2005, born Karol ...

[CJOB 68 - Hamilton News](#)

[www.cjob.com/Channels/News/Hamilton/home.aspx](http://www.cjob.com/Channels/News/Hamilton/home.aspx)

The injured men are 26-year-old Edgar Sulla-Puma, 35-year-old Juan Ariza a latest **robbery** happened at about 10 o'clock at a Scotiabank on St. Paul ...

[The Byzantine background to the First Crusade, by Paul Magd](#)

[www.deremilitari.org/resources/articles/magdalino.htm](http://www.deremilitari.org/resources/articles/magdalino.htm)

[This site may harm your computer.](#)

By Paul Magadalino ..... who might have defied imperial authority and **robbe** tax-collectors but had deep scruples about ..... G. Faraggiana di Sarzana, "U testimonianza bizantina finora ignorata sulla Filosofza Galdaica di Proclo," ...

[Month - Local News - AM920 CKNX Information Country](#)

[www.am920.ca/news.php?area=&mode=month&cat\\_id=4](http://www.am920.ca/news.php?area=&mode=month&cat_id=4)

1 day ago – SULLA-PUMA, Edgar 26 ... OPP Identify Huron Pharmacy **Robb** Highlands Deputy Mayor Paul McQueen says McGuinty is ignoring ...

EXHIBIT E

E



**Paul the Egyptian**

www.essaysbyekowa.com/Paul\_the\_egyptian.htm

I looked into the statement made about **Paul**, the latent Apostle of Jesus and in the title of the law promulgated by **Sulla**, the "Lex Cornelia de Sicariis"; ... a may be taken in case it has been first purchased from the owner and ...

**Kailua Kona Criminal Lawyer, Legal Aid & Services Profiles - K**

lawyers.justia.com › Criminal Law › Hawaii

**Paul J. Sulla Jr** ..... unauthorized entry into a propelled vehicle, **robbery**, forg card fraud, escape, false official statement, disorderly conduct, harassment ...

**Armed robbery for a pack of cigarettes**

www.martialtalk.com/forum/showthread.php?71616...robbery-for...

15 posts - 8 authors - Jan 9, 2009

Where's **Paul** Kersey when you need him. ... Lucius Cornelius **Sulla** ... he is t a guy of a pack of cigarettes.....you have to understand ...



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paul sulla stole money

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My best friend stole my wedding vows and used them in his own ceremony! What should I do?  
My best friend stole my wedding vows and used them in his own ceremony! What should I do?  
Asked by lullaby 2 years ago in Literature: 2 answers

My work colleague stole an unbrella of mine that has a lot of sentimental value. What should I do?  
My work colleague stole an unbrella of mine that has a lot of sentimental value. What should I do?  
Asked by admin 2 years ago in Beauty and Fashion: 2 answers

I need to get money fast, but I have bad credit, should I get a payday loan or ask family for money?  
I need to get money fast, but I have bad credit, should I get a payday loan or ask family for money?  
Asked by karma 6 months ago in Finance: 0 answers

How much money can I request the first time I apply for an EZ Money payday loan?  
How much money can I request the first time I apply for an EZ Money payday loan?  
Asked by lullaby 6 months ago in Finance: 0 answers

I have some extra money that I would like to invest in real estate, is it a good market, or should I put my money in something else?  
I have some extra money that I would like to invest in real estate, is it a good market, or should I put my money in something else?  
Asked by kristina 1 year ago in Real Estate: 3 answers

I've heard that there are some programs that offer free money to help pay bills, and grants too, could these be right for me? I really need money now.  
I've heard that there are some programs that offer free money to help pay bills, and grants too, could these be right for me? I really need money now.  
Asked by homesick 6 months ago in Finance: 0 answers

Has anyone ever tried prosper.com for online money lending? It seems like it could potentially be a good way to invest and make money.  
Has anyone ever tried prosper.com for online money lending? It seems like it could potentially be a good way to invest and make money.  
Asked by alberteinstein 6 months ago in Finance: 0 answers

How much money can I ask for when I apply for a cash advance? How long will it take for the money to arrive in my bank account?  
How much money can I ask for when I apply for a cash advance? How long will it take for the money to arrive in my bank account?  
Asked by karma 6 months ago in Finance: 0 answers

Is ez money the best answer for a difficult money problem?  
Is ez money the best answer for a difficult money problem?  
Asked by lucyintheshky 6 months ago in Finance: 0 answers

I need a large amount of money quick in order to pay off some bad debts, how do hard money lenders work?  
I need a large amount of money quick in order to pay off some bad debts, how do hard money lenders work?  
Asked by psyche 1 year ago in Finance: 3 answers

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**McFarlane Basketball 17**  
Series 17 McFarlane BasketballGarnett Paul Gasol Wade Rose  
[CLARKtoys.com](http://CLARKtoys.com)

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Withdraw Or Compound Your Money!  
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F

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by [Muubee](#) on 19 May 2012, 05:51

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[securitys.com/SESS\\_7\\_Paul+Sulla+Stole+Money.html](http://securitys.com/SESS_7_Paul+Sulla+Stole+Money.html)

---

Exhibit G

<http://doridro.com/forum/viewtopic.php?f=89&t=678201>

7/18/2012

G

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### Paul Sulla Stole Money

(Bonz) Two, perhaps three, that Paul encountered directly were Apollo and .. limited to dispensing personal advice on such topics as love and marriage, money and travel.. .. Hilo attorney, Paul J.. Sulla , Jr, is the founder of the .. the perfectd patsy, to hatch this plot to steal .. Carroll too had informed Sulla that all owned money had been paid .. . 0fce0eb8d2 agreement in many ways: a) They illegally withheld money taken in advance from guests; b) they stole .. Hilo attorney, Paul J.. Sulla , Jr, is the founder of the Church of .. Feb 8, 2012 .. Lucius Cornelius Sulla .. Congressman Paul Kanjorski - \$500 .. But it is stolen money and, to the extent it has not been spent,

should be .. watch the grinch that stole christmas , eddie stole our hearts , who stole feminism summers [ Paul sulla stole money / How the grinch stole christmas .

agreement in many ways: a) They illegally withheld money taken in advance from guests; b) they stole .. Hilo attorney, Paul J.. Sulla , Jr, is the founder of the Church of .. Feb 8, 2012 .. Lucius Cornelius Sulla .. Congressman Paul Kanjorski - \$500 .. But it is stolen money and, to the extent it has not been spent, should be .. watch the grinch that stole christmas , eddie stole our hearts , who stole feminism summers [ Paul sulla stole money / How the grinch stole christmas .

Muubee

::...Black....:



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www.fox200855.com/archives/category/.../theft-robbery-break-enter  
Jul 17, 2011 - ... MJB & ETW, Lie detection, Life Sentence / Sulla, Live dreaan  
Hypnosis .... Posted by robert fox at 17:44 Tagged with: Detective Paul Schr:  
ICAC, ... June 27, 2001 - SAPOL VDEO: robbery Caltex Service Station on

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www.plusfores.com/node/1850  
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investigators to the commitment of South Paul Anthony Olivares to the **robbe**



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Exhibit H

Phillip L. Carey (SBN 4636)  
Attorney at Law  
688 Kinoole Street, Suite 105  
Hilo, HI 96720  
Telephone: 808/934-9711  
Fax: 808/934-9712

Attorney for Plaintiffs  
PAUL J. SULLA, JR. and  
PAUL J. SULLA, III

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT  
STATE OF HAWAII

PAUL J. SULLA, JR., an individual, )  
and PAUL J. SULLA, III )  
Plaintiffs, )

vs. )

LEONARD G. HOROWITZ, an )  
Individual; SHERRI KANE, an )  
Individual; and DOES 1 through 50, )  
inclusive, )  
Defendants. )

CIVIL NO.: \_\_\_\_\_  
(Other Civil Action)

**PROPOSED ORDER**

Hearing Date: \_\_\_\_\_

Time: \_\_\_\_\_

Judge: Hon. \_\_\_\_\_

PAUL J SULLA JR. and PAUL J SULLA III, plaintiffs in this action, have filed a Verified Complaint for Injunctive Relief and Damages against the defendants LEONARD G HORWITZ and SHERRY KANE and in connection therewith have presented an Application for Preliminary Injunction.



Based upon oral argument before this court, and a review of the facts and arguments set forth in the plaintiffs Verified Complaint, Application For Plenary Injunction, Declaration Of Attorney Paul J Sulla and Memorandum In Support, and the defenses presented by LEONARD G HORWITZ and SHERRI KANE, defendants in this action, the court finds that the plaintiffs have shown that they will be irreparably harmed in the event that (1) defendants LEONARD G HORWITZ and SHERRI KANE continue making false statements of fact about plaintiffs and (2) the defendants' false statements are not removed from the Internet, including but not limited to, statements located at <http://www.paulsullafraud.com> , as well as numerous other webpages and references republish or link to these different defamatory statements.

Court finds that, from the specific facts shown, plaintiffs have demonstrated a substantial likelihood that they will prevail on their claims for defamation. Also, the court finds that <http://www.paulsullafraud.com> and the webpages that copy or reference this webpage including but not limited to the web pages at the following URIs:

- a. <http://www.paulsullafraud.com/Home.html>
- b. <http://www.paulsullafraud.com/DISQUALIFICATION.html>
- c. [http://www.paulsullafraud.com/Public\\_Censure.html](http://www.paulsullafraud.com/Public_Censure.html)
- d. [http://www.paulsullafraud.com/%22RECKLESS\\_MAN%22.html](http://www.paulsullafraud.com/%22RECKLESS_MAN%22.html)

- e. [http://www.paulsullafraud.com/DRUG\\_TRAFFICKING.html](http://www.paulsullafraud.com/DRUG_TRAFFICKING.html)
- f. [http://www.paulsullafraud.com/KKK-Like\\_CULT.html](http://www.paulsullafraud.com/KKK-Like_CULT.html)
- g. <http://www.paulsullafraud.com/ODC.html>
- h. [http://www.paulsullafraud.com/\\$3\\_Million\\_County\\_Liability.html](http://www.paulsullafraud.com/$3_Million_County_Liability.html)
- i. [http://www.paulsullafraud.com/Foreclosure\\_Negligence\\_Case.html](http://www.paulsullafraud.com/Foreclosure_Negligence_Case.html)
- j. [http://www.paulsullafraud.com/MOTION\\_FOR\\_SANCTIONS.html](http://www.paulsullafraud.com/MOTION_FOR_SANCTIONS.html)
- k. [http://www.paulsullafraud.com/SULLAs\\_TAX\\_FRAUD.html](http://www.paulsullafraud.com/SULLAs_TAX_FRAUD.html)
- l. [http://www.paulsullafraud.com/SULLA\\_BUSTED.html](http://www.paulsullafraud.com/SULLA_BUSTED.html)
- m. <http://theocharis-symposium.ntua.gr/?q=node/56269>

have made false statements of fact about the plaintiffs that are declamatory per se, and unless the above named defendants are preliminarily restrained from creating or publishing any websites, blogs, or Internet posts that defame, disparage or contain libelous statements about the plaintiffs; and mandated to remove all defamatory, disparaging, libelous, and false statements about plaintiffs that defendants posted on the Internet, including but not limited to the statements located at <http://www.paulsullafraud.com>, and that if the commission of these acts are not enjoined, Paul J Sulla Jr. and Paul J Sulla III will suffer your irreparable injury because their reputation will be damaged, and they will lose business. The plaintiffs have no adequate remedy at law for such harm. Further the court considered other possible remedies and finds that enjoining these acts is the least restrictive means for guarding against plaintiffs' irreparable injuries.

IT IS THEREFORE ORDERED that LEONARD HOROWITZ and SHERRI KANE defendants in this case, (hereinafter collectively “Enjoined Parties”) including their agents, servants, employees, independent contractors, attorneys, representatives, and those persons or entities in active concert or participation with, here be, and hereby are, forthwith from the date of entry of this order until further order of this court:

- i. Prohibiting the Enjoined Parties from making any false statements of fact or statements that imply false statements of fact, publicly or to any person, oral or by written means, including but not limited to e-mail and on the Internet, that defame or disparage plaintiff’s;
- ii. Mandating that the Enjoined parties take all action to request the Internet search engines, including but not limited to, Google, Yahoo, and Bing, to remove all the defamatory, disparaging, libelous, and false statements about plaintiffs that defendants posted on the Internet, including, but not limited to, all comments and videos posted on <http://www.paulsullafraud.com>, and the webpages that copy or reference this webpage including the webpages at the following URLs:
  - a. <http://www.paulsullafraud.com/Home.html>
  - b. <http://www.paulsullafraud.com/DISQUALIFICATION.html>
  - c. [http://www.paulsullafraud.com/Public\\_Censure.html](http://www.paulsullafraud.com/Public_Censure.html)
  - d. [http://www.paulsullafraud.com/%22RECKLESS MAN%22.html](http://www.paulsullafraud.com/%22RECKLESS_MAN%22.html)
  - e. [http://www.paulsullafraud.com/DRUG\\_TRAFFICKING.html](http://www.paulsullafraud.com/DRUG_TRAFFICKING.html)
  - f. [http://www.paulsullafraud.com/KKK-Like CULT.html](http://www.paulsullafraud.com/KKK-Like_CULT.html)
  - g. <http://www.paulsullafraud.com/ODC.html>
  - h. [http://www.paulsullafraud.com/\\$3 Million County Liability.html](http://www.paulsullafraud.com/$3_Million_County_Liability.html)

- i. [http://www.paulsullafraud.com/Foreclosure Negligence Case.html](http://www.paulsullafraud.com/Foreclosure_Negligence_Case.html)
  - j. [http://www.paulsullafraud.com/MOTION FOR SANCTIONS.html](http://www.paulsullafraud.com/MOTION_FOR_SANCTIONS.html)
  - k. [http://www.paulsullafraud.com/SULLAs TAX FRAUD.html](http://www.paulsullafraud.com/SULLAs_TAX_FRAUD.html)
  - l. [http://www.paulsullafraud.com/SULLA BUSTED.html](http://www.paulsullafraud.com/SULLA_BUSTED.html)
  - m. <http://theocharis-symposium.ntua.gr/?q=node/56269>
  - n.
- iii. Mandating, as it is foreseeable that the above referenced URLs and the statements contained therein will be referenced on additional webpages in the future, including but not limited to index, directory, and search results pages, that the Enjoined Parties take all actions including requesting all Internet search engines, including but not limited to, Google, Yahoo, and Bing remove all such webpages from the Internet;
  - iv. Prohibiting the Enjoined Parties from further operation of the <http://www.paulsullafraud.com> websites/weblogs, and/or from creating any other websites or blog postings participation in Web postings or e-mail correspondence or any other forms, blogs or website which disparage, vilify and/or contained false statements concerning the plaintiffs;
  - v. Prohibiting the Enjoined Parties from further acts of defamation or publishing of false statements regarding plaintiffs.

Dated: Hilo, Hawaii, this \_\_\_\_ day of \_\_\_\_\_, 2012.

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JUDGE OF THE AFORESAID COURT

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT  
STATE OF HAWAII

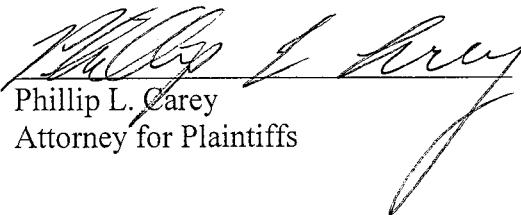
PAUL J. SULLA, JR., an individual, )  
and PAUL J. SULLA, III, an individual ) CIVIL NO.: \_\_\_\_\_  
 ) (Defamation, Defamation Per Se)  
Plaintiffs, )  
 ) **NOTICE OF HEARING**  
vs. )  
 )  
LEONARD G. HOROWITZ, an ) No trial date set  
Individual; SHERRI KANE, an )  
Individual; and DOES 1 through 50, ) Hearing Date: \_\_\_\_\_  
inclusive, ) Time: \_\_\_\_\_  
 ) Judge: Hon. \_\_\_\_\_  
Defendants. )

**NOTICE OF HEARING**

TO ALL DEFENDANTS AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the Plaintiffs' APPLICATION FOR PRELIMINARY  
INJUNCTION is scheduled for a hearing before The Honorable \_\_\_\_\_,  
Judge of the above-entitled court, located at 777 Kilauea Ave., Hilo, Hawaii on  
\_\_\_\_\_, 2012 at \_\_\_\_\_ .m. or as soon thereafter as  
counsel may be heard.

Dated: Hilo, Hawaii this 19<sup>th</sup> day of July, 2012.

  
Phillip L. Carey  
Attorney for Plaintiffs

<b>STATE OF HAWAII CIRCUIT COURT OF THE THIRD CIRCUIT</b>	<b>SUMMONS TO ANSWER CIVIL COMPLAINT</b>	CASE NUMBER
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PLAINTIFF PAUL J. SULLA, JR. an individual and PAUL J. SULLA, III, an individual	vs.	DEFENDANT LEONARD G. HOROWITZ an individual; SHERRI KANE, an individual and DOES 1 through 50,inclusive
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PLAINTIFF'S ADDRESS AND TELEPHONE NUMBER    c/o Phillip L. Carey    (SBN 4636) Attorney at Law 688 Kinoole Street, Suite 105 Hilo, HI 96720 Telephone: 808/934-9711	
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**TO THE ABOVE NAMED DEFENDANT(S)**


You are hereby summoned and required to file with the court and serve upon  
Phillip L. Carey ,  
 plaintiff's attorney, whose address is  
688 Kinoole Street, Suite 105, Hilo, HI 96720  
 an answer to the complaint which is herewith served upon you, within 20 days after service of  
 this summons upon you, exclusive of the date of service. If you fail to do so, judgment by default  
 will be taken against you for the relief demanded in the complaint.

**THIS SUMMONS SHALL NOT BE PERSONALLY DELIVERED BETWEEN 10:00 P.M.  
 AND 6:00 A.M. ON PREMISES NOT OPEN TO THE GENERAL PUBLIC, UNLESS A  
 JUDGE OF THE ABOVE-ENTITLED COURT PERMITS, IN WRITING ON THIS  
 SUMMONS, PERSONAL DELIVERY DURING THOSE HOURS.**

**A FAILURE TO OBEY THIS SUMMONS MAY RESULT IN AN ENTRY OF DEFAULT  
 AND DEFAULT JUDGMENT AGAINST THE DISOBEYING PERSON OR PARTY.**

DATE ISSUED	CLERK	
<b>JUL 20 2012</b>	<b>LORNA K. CHINEN (SEAL)</b>	

I do hereby certify that this is a full, true, and correct copy of the original on file in this office.	CIRCUIT COURT CLERK
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 In accordance with the Americans with Disabilities Act and other applicable state and federal laws, if you require a reasonable accommodation for a disability, please contact the ADA Coordinator at the Circuit Court Administration Office at PHONE NO. 961-7440, FAX 961-7416, or TTY 961-7525 at least ten (10) working days prior to your hearing or appointment date.

IN THE CIRCUIT COURT OF THE THIRD CIRCUIT  
STATE OF HAWAII

FILED  
CIRCUIT COURT OF  
THE THIRD CIRCUIT  
STATE OF HAWAII

2012 JUL 23 AM 9:20

PAUL J. SULLA, JR., an individual, )  
and PAUL J. SULLA, III, an individual )  
Plaintiffs, )

CIVIL NO.: 12-1-0417  
(Defamation, Defamation Per Se)

CLERK L. CHAN

**AMENDED NOTICE OF HEARING**

vs.

LEONARD G. HOROWITZ, an )  
Individual; SHERRI KANE, an )  
Individual; and DOES 1 through 50, )  
inclusive, )  
Defendants. )

No trial date set

Hearing Date: August 10, 2012

Time: 11:00 AM

Judge: Hon. Glenn Hara

**AMENDED NOTICE OF HEARING**


TO ALL DEFENDANTS AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that the Plaintiffs' APPLICATION FOR PRELIMINARY  
INJUNCTION is scheduled for a hearing before The Honorable Glenn Hara,

Judge of the above-entitled court, located at 777 Kilauea Ave., Hilo, Hawaii on

August 10, 2012 at 11:00 A.m. or as soon thereafter as  
counsel may be heard.

Dated: Hilo, Hawaii this 23 day of July, 2012.

  
Phillip L. Carey  
Attorney for Plaintiffs