

IN THE DISTRICT COURT OF HARRIS COUNTY, TEXAS  
334th CIVIL JUDICIAL DISTRICT

CAUSE NO. 2025-17063

ANDREI DUNCA,  
Petitioner,

v.  
RODNEY SAMUEL SPRAWLING, JR.,  
Respondent.

**UNSWORN DECLARATION OF RODNEY SAMUEL SPRAWLING**

**1. DECLARANT INFORMATION**

My name is Rodney Samuel Sprawling. My date of birth is April 12, 1986. My current address is 565 Ortega Street, San Francisco, CA 94122

**2. STATEMENT OF FACTS**

I am the Complainant in the matter of Cause No. 2025-17063, currently pending in the 334th Judicial District Court of Harris County, Texas 4444. I am submitting this declaration to accompany and support the following documents:

- Motion for Investigation into Missing Persons<sup>5</sup>;
- Emergency Motion for Immediate Evidentiary Hearing and Request for Protective Order<sup>666</sup>;
- Exhibit A: Criminal Report/Police Report detailing allegations of missing persons, human trafficking, and death threats<sup>777</sup>; and
- Exhibit B: Medical Documentation and Assessments regarding my sanity and sobriety<sup>888</sup>.

The facts stated in the aforementioned motions and exhibits are within my personal knowledge and are true and correct<sup>999999999</sup>. These facts include, but are not limited to:

- **Missing Persons:** The disappearance of my spouse and business partner, Andrei George Dunca (DOB: 05/29/1984), and my close friends Kyle Joseph Egan (DOB: 05/01/2000) and Richard "Richie" Alan Vetter (DOB: 10/14/1988)<sup>10101010</sup>.
- **Threats and Harassment:** A direct death threat issued by Xavier Ortiz following my inquiries into the missing subjects, as well as ongoing physical stalking and vehicle intimidation<sup>11111111</sup>.
- **Digital Manipulation:** The use of "digital kidnapping" tactics, including SIM-based communication sabotage and AI-generated deepfakes to isolate me and simulate the presence of the missing individuals<sup>12121212</sup>.

CAUSE NO. 2025-17063 - UNSWORN DECLARATION OF RODNEY SAMUEL SPRAWLING

NOTICE OF FILING - MOTION FOR INVESTIGATION INTO MISSING PERSONS - EMERGENCY MOTION FOR IMMEDIATE EVIDENTIARY HEARING AND REQUEST FOR PROTECTIVE ORDER

PAGE 1 OF 2

- **Medical Verification:** My sobriety and mental stability have been clinically documented by Dr. Naheed Ali, M.D., who also witnessed the stalking activity around my residence<sup>13131313</sup>.

### 3. VERIFICATION

I declare under penalty of perjury under the laws of the United States of America and the State of Texas that the foregoing is true and correct.

Executed on this 28th day of December, 2025.

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Respectfully Submitted,

Rodney Samuel Sprawling  
Declarant

Rodney Sprawling-Dunca  
565 Ortega Street  
San Francisco, CA. 94122  
R.S.Dunca@AndreiGeorgeDunca.Llc  
346.785.6657

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**CAUSE NO. 2025-17063**

IN THE DISTRICT COURT OF HARRIS COUNTY, TEXAS

334TH JUDICIAL DISTRICT

**EMERGENCY MOTION FOR IMMEDIATE EVIDENTIARY HEARING AND  
REQUEST FOR PROTECTIVE ORDER**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW, Rodney Samuel Sprawling (the "Complainant"), and files this Emergency Motion for Immediate Evidentiary Hearing and Request for Protective Order. In support thereof, Complainant shows the Court as follows:

**I. DECLARATION OF EMERGENCY**

This motion is filed on an emergency basis because there is an immediate threat to the safety of the Complainant and the missing subjects of this case: Andrei George Dunca, Kyle Joseph Egan, and Richard Alan Vetter.

Recent death threats, coordinated physical stalking, and "digital kidnapping" (the use of cyber warfare to isolate victims) create a situation where any delay in judicial intervention may result in loss of life or the further trafficking of the missing subjects.

**II. FACTUAL BASIS FOR EMERGENCY**

- 1. Death Threats and Physical Terror:** Following inquiries into the whereabouts of Kyle Egan, **Xavier Ortiz** issued a direct threat: *"Stop digging before you piss off the people usually responsible for the digging."* This was immediately followed by "staking out" of the Complainant's residence and vehicle intimidation intended to strike the Complainant.
- 2. Missing Persons and Trafficking:** Kyle Egan and Richard Vetter have disappeared under circumstances involving drug and human trafficking. Evidence from Kory Lamar Word suggests Mr. Egan was being victimized for **sex trafficking** and was previously found under duress near the Mexican border.
- 3. Lack of Proof of Life:** Andrei George Dunca has been missing for over two years. Purported legal counsel for Mr. Dunca continues to file documents without providing a "wet signature" or proof of a retainer, suggesting that the legal process is being used as a cover for his disappearance or exploitation.
- 4. Digital Isolation:** The Complainant is currently victimized by "Digital Kidnapping," where his communication devices have been compromised to block emergency services and simulate his presence through synthetic media (deepfakes).

**CAUSE NO. 2025-17063**

EMERGENCY MOTION FOR IMMEDIATE EVIDENTIARY HEARING AND REQUEST FOR PROTECTIVE ORDER

PAGE 1 OF 2

### III. REQUEST FOR PROTECTIVE ORDER

Pursuant to the Texas Rules of Civil Procedure, Complainant requests a Protective Order prohibiting Xavier Ortiz, Kory Lamar Word, Victoria Alana Garcia, and any agents of the named law firms from:

- Coming within 500 feet of the Complainant's residence or person;
- Engaging in further cyber-surveillance or digital manipulation of the Complainant's accounts;
- Communicating with the Complainant in a threatening or harassing manner.

### IV. PRAYER

WHEREFORE, PREMISES CONSIDERED, Complainant respectfully requests that this Court:

1. Set an **Immediate Evidentiary Hearing** to address the safety of the missing persons and the Complainant.
2. Issue a **Protective Order** against the individuals named herein.
3. Require counsel for Andrei Dunca to produce a **verified "wet signature"** and proof of life for their client at said hearing.

Respectfully submitted,

/s/ Rodney Samuel Sprawling

Rodney Samuel Sprawling

Reporting Party/Complainant

Rodney Samuel Sprawling

565 Ortega Street

San Francisco, CA 94122

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346.785.6657

**CAUSE NO. 2025-17063**

IN THE DISTRICT COURT OF HARRIS COUNTY, TEXAS

334TH JUDICIAL DISTRICT

**MOTION FOR INVESTIGATION INTO MISSING PERSONS**

**TO THE HONORABLE JUDGE OF SAID COURT:**

COMES NOW, Rodney Samuel Sprawling (the "Complainant"), and files this Motion for Investigation into Missing Persons. In support thereof, the Complainant respectfully submits the following, incorporating the attached Criminal Report (the "Police Report") as **Exhibit A**:

**I. SUBJECTS OF INVESTIGATION**

The Complainant requests a formal investigation into the current whereabouts and safety of the following individuals:

1. **Andrei George Dunca** (DOB: 05/29/1984)
2. **Kyle Joseph Egan** (DOB: 05/01/2000)
3. **Richard "Richie" Alan Vetter** (DOB: 10/14/1988)

**II. GROUNDS FOR MOTION**

The Complainant alleges a sophisticated criminal effort to isolate and exploit the above individuals. As detailed in **Exhibit A**, the following evidence supports the need for immediate judicial intervention:

- **Suspected Exploitation of Andrei Dunca:** Mr. Dunca has been missing for more than two years. Despite his status as a successful tech entrepreneur, he has allowed jointly-owned property with Sprawling to fall into foreclosure, permitted shared business entities to collapse—leaving Sprawling effectively destitute—and has failed to address multiple critical legal obligations during his unexplained absence. Purported legal counsel has failed to provide a "wet signature" or a verified retainer since November 2024, suggesting they may not be communicating with a live client.
- **Verified Reports of Abduction (Kyle Egan):** Kyle Egan and his fiancé, **Kory Lamar Word**, identified **Xavier Ortiz** as the individual responsible for taking Mr. Egan by intimidation from their apartment. Mr. Word reported the group is involved in drug and human trafficking and expressed fear that Mr. Egan was being **sex trafficked**.
- **Patterns of Coercion:** Before disappearing, Mr. Egan warned the Complainant that certain texts would "**prevent me from coming home**," and reported he had no control over his phone or movements. **Richard Vetter** similarly reported he could not return to Los Angeles due to active harassment by this same group.

### III. RELEVANT DETAILS REGARDING VICTORIA ALANA GARCIA (WINDER)

The Complainant requests a specific investigation into **Victoria Alana Garcia** (also known as Victoria Garcia Winder), who claims to be the personal assistant to Andrei George Dunca.

Relevant details include:

- **Last Known Contact:** Ms. Garcia is the last person known to have had physical contact or proximity to Mr. Dunca before his total disappearance from the Complainant's life.
- **Obstruction of Discovery:** Despite her claims of employment, Ms. Garcia has consistently refused to provide any verifiable information regarding Mr. Dunca's physical location, health, or safety.
- **Consistency with Criminal Pattern:** The Complainant alleges that Ms. Garcia's role is to act as a "gatekeeper" to facilitate the isolation of Mr. Dunca. Her refusal to cooperate with family members while Mr. Dunca's estate is being neglected is a primary indicator of duress or complicity in his disappearance.
- **Suspicious Representation:** Ms. Garcia has been a primary point of contact for the law firms that have failed to produce a verified "wet signature" from Mr. Dunca, further linking her to the suppression of his actual status.

### IV. COORDINATED CAMPAIGN OF TERROR AND DIGITAL MANIPULATION

Following a direct inquiry into these disappearances, **Xavier Ortiz** issued a death threat to the Complainant. This was followed by:

- **Physical Intimidation:** Aggressive vehicle intimidation and "staking out" the Complainant's residence.
- **Digital Kidnapping:** Sudden digital isolation, SIM-based communication sabotage, and the use of AI-generated deepfakes to simulate the presence of the missing subjects.

### V. PRAYER

WHEREFORE, PREMISES CONSIDERED, Complainant respectfully requests that this Court order a formal investigation into the disappearances of the subjects and order the questioning of **Victoria Alana Garcia, Kory Lamar Word, and Xavier Ortiz**.

Respectfully submitted,

/s/ Rodney Samuel Sprawling

Rodney Samuel Sprawling

Reporting Party/Complainant

Rodney Samuel Sprawling  
565 Ortega Street  
San Francisco, CA. 94122  
R.S.Dunca@AndreiGeorgeDunca.Llc  
346.785.6657

Unofficial Copy Office of Marilyn Burgess District Clerk

## Automated Certificate of eService

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Status as of 12/29/2025 11:20 AM CST

### Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Katie Sunstrom		katie.sunstrom@gmail.com	12/28/2025 6:01:45 PM	SENT
Mila Janusonis		mila@muddlaw.com	12/28/2025 6:01:45 PM	SENT
Katherine Stahl		katie@muddlaw.com	12/28/2025 6:01:45 PM	SENT
Elizabeth Miller		Elizabeth@muddlaw.com	12/28/2025 6:01:45 PM	SENT
Rodney Sprawling		ssp.llc.me@gmail.com	12/28/2025 6:01:45 PM	SENT
Alexys Wortman		Alexys@BurrusLawGroup.com	12/28/2025 6:01:45 PM	SENT
joshua pagan		josh@muddlaw.com	12/28/2025 6:01:45 PM	SENT
David Burrus		dj@burruslawgroup.com	12/28/2025 6:01:45 PM	SENT
Victoria AlanaGarcia-Winder		victoria.2010.winder@gmail.com	12/28/2025 6:01:45 PM	SENT
Richard AustinHeafey		austin@unfoldpsychology.com	12/28/2025 6:01:45 PM	SENT
Richard AustinHeafey		austin@unfoldpsychology.com	12/28/2025 6:01:45 PM	SENT
DAVID MATHIEU		DAVIDMATHIEU@CD4.HCTX.NET	12/28/2025 6:01:45 PM	SENT

## EXHIBIT A-1

# CRIMINAL REPORT

REPORTING PARTY: ESRA DUNCA-SPRAWLING  
[565 ORTEGA ST. SAN FRANCISCO, CA. 94122] [13339 BALMORE CIRCLE, HOUSTON, TX 77060]  
ESRA@DUNCA-SPRAWLING.COM 8454808258

FALSE IMPRISONMENT CYBER CRIMES SEXTORTION MISSING PERSON

### Incident Summary:

Andrei George Dunca, Sprawling's spouse and business partner, is missing. There has also been harassment and stalking by individuals suspected to be responsible for Mr. Dunca's disappearance. Andrei George Dunca 05/29/84

Two close friends of complainant also reported the same type of harassment and stalking before they also went missing around the same time.

- Kyle Joseph Egan 05/01/00
- Richard "Richie" Alan Vetter 10/18/88

Andrei, Kyle and Richie have not been seen by the complainant and also did not say goodbye. Complainant had separate plans with their partner and friends for the near future that were not kept or canceled. No explanation was given for missing planned meetings.

Both Kyle and Richie were involved with members of the group of individuals suspected of being responsible. The group of individuals suspected of being responsible are said to be involved in drug and human trafficking.

Kyle had previously reported being taken and held against his will by the people he and his fiancé Kory reported were responsible for harassing and stalking them.

Kory reported Kyle being taken by intimidation from their apartment by people he described as "Mexican gangsters" and named one individual: Javier "Xavier Ortiz" Ortega.

- Kory Lamar Word 07/11/88

### Complainant reports:

## EXHIBIT A-2

- group of individuals telling friends, family and business associates; Mr. Sprawling is part of a production, under their care as a patient, under investigation or suffering from a mental break triggered by drug induced psychosis as a way of getting away with committing crimes against complainant.
- devices being compromised and communication being blocked or rerouted and answered by individuals posing as the intended receiver of Mr. Sprawling's daily communication and distress calls to law enforcement and emergency services.
- Being held false prisoner in their home and place of business since September 2022.
- Experiencing torture described as "enhanced interrogation like techniques" deprived of sleep and receiving low voltage electrical shocks for prolonged periods of time.
- home security system being tampered with and disabled.
- Sexually abused, tortured and manipulated into performing sexual acts which are documented and used to extort by threatening exposure and end of complainants pursuit of career as a producer and actor in motion picture and television.
- Harassment, torture, stalking and false imprisonment is consistent 24hrs/day.
- Individuals heard saying "we will not stop until you kill yourself".
- Perpetrators attempt to manipulate complainant into believing they are a subject in a documentary, actor in a film/tv production, undergoing treatment for addiction or mental health condition, in couples therapy as part of reconciliation with missing partner Mr. Dunca, being interrogated as a suspect in the disappearance of Kyle Egan and Richie Vetter.
- Mortgage fraud & Illegal Eviction: group believed to be responsible for false eviction and fraudulent foreclosure notices in an attempt to displace complainant and family in order to cause financial hardship and take possession of Mr. Sprawling-Dunca and their spouses assets.

### Possible motive:

- revenge from friends and romantic/sexual partners of ex relationship.
- Intervention for condition or substance abuse triggered by false narrative started by disgruntled ex-employee/friend Victoria Garcia Winder
- Malicious and racially motivated
- Landlord retaliation / illegal eviction

### Primary Possible Suspects:

- Richard Alan Vetter II @divinelyrich - Kyle Joseph Egan @dacherub
- Kory Lamar Word
- Yoni Richard Spiro
- Sean Richard Spiro
- Maya Miller Estes
- Andrei George Dunca

## EXHIBIT A-3

List of suspected members and associates of alleged group/ Instagram: - "The Professor"

- Edwin Ortega @eddy\_ortega30
- @maahez
- @elmalilla
- Taylor McCarthy @taylorsolar
- Daniel Forero @daniel\_forero
- Johnny @johnnycashsolar
- Isaiah Brown @isaiahbrownmusic
- Paige Hill @paigehill1
- Pablo Gomez @thepablogomez
- Donovan Andrews @donovan\_andrews\_
- Danielle Fletcher @barbiedanz
- Jay Alonzo @mrjayalonzo
- @marcostaxout
- Rick Silver @ricksilver
- Brie Jasmin @briejasmin
- Sergio Santos @sergiosanxos
- @Abujaproerty
- Jeremy Gail @jeremygail
- Justin Konda @wakonda30
- Joey Varsanik @joey\_varsanik
- Ryan Flores @ryanflores\_lasvegas
- Brian Qualls @hapless444
- @yaya.thegeneral
- @simplecleantech
- @brixtoninmobiliaria
- @itzsizemore
- Jessica Graham @thejessgram
- Shane Galindo @shanegalindooo
- Joe Mac @jumpinjocymac
- @getndough
- @tekayylaaaa
- @ujgold

### Details of the Incident:

Missing Person: Name: Andrei George Dunca Relationship to Complainant: Business Partner and Spouse Last Seen: [Insert Date and Location] Description: [Insert Physical Description]

### Circumstances:

Disappearance of Andrei George Dunca:

## EXHIBIT A-4

- Andrei George Dunca disappeared with the complainant's dog without saying goodbye shortly after the complainant's abusers isolated them.
- Despite multiple attempts to contact him, Andrei has not confirmed his identity or provided proof of life. The complainant has not heard his voice or seen his face in over two years.
- The last person to see Andrei was Victoria Garcia Winder, who refuses to cooperate and give any details to help locate Andrei, although she claims to still work as his assistant.
- Andrei disappeared when the complainant first reported stalking and harassment. When the complainant obtained proof of their sanity and sobriety, they lost all communication with Andrei, and Victoria made herself the only point of contact for him.
- Around the same time, friends Kyle Joseph Egan, Richie Alan Vetter, and the complainant's landlord Yuri Richard Spiro, whose personal loan of \$38,000 was a month from due, all disappeared without giving explanation or saying goodbye.
- Andrei is a highly successful tech entrepreneur who in 7 as CTO exited their company LiveRail when acquired by Facebook for a reported 500 million dollars.
- Two law firms, Johnston, Kinney & Zulaica LLP and Mudrow Offices, have reached out claiming to represent Andrei, telling the complainant not to make claims that he is missing. However, neither could provide documentation proving they represented Andrei, had no evidence to rule him out as a missing person, and could not validate the identity of the person they claimed to be their client, Andrei George Dunca.
- Andrei ignored emails and calls from the complainant regarding the sale of their shared property which would give Andrei a return of \$200k from the proceeds. Without communication and the withholding of information by Mr. Dunca and Mrs. Winder, the home was foreclosed and sold at auction. As a result, the primary residents of the home, two senior citizen, disabled, 30-year USMC veterans, are facing homelessness and \$200k was lost. The complainant does not believe Mr. Dunca would let this happen to his inlaws, especially when the foreclosure could have been avoided with his signature or an email containing the needed documents.
- During a wellness check to Mrs. Winder's address, as it had become the new primary address listed for Andrei although he owns a home with the complainant just blocks away, Victoria told the officer the same story and he took her word for it. He did not see or was able to identify Andrei and left the complainant's home, refusing to take a missing person's report.
- Andrei failed to take immediate action to stop the abuse or provide support, despite being aware of the situation.

The complainant fears that the same individuals responsible for the cyber attack and crimes against them have done the same to victimized Andrei George Dunca or have imprisoned him and are taking advantage of him financially.

## EXHIBIT A-5

### Summary of Alleged Crimes:

An unredacted discovery from a false arrest used to illegally evict complainant will reveal the names of individuals listed in a police report, identifying them as actors who if bound by confidentiality must break their non-disclosure agreements (NDAs). This evidence is expected to support complainant's report of the following crimes committed against them:

#### Criminal Matters:

1. Felony False Imprisonment (presence of menace elevates the crime to a felony)
2. Organized Crime
3. Forced Labor
4. Espionage
5. Invasion of Privacy
6. Kidnapping
7. Impersonating Police
8. False Arrest (intentional to displace complainant and recover property attached to valid lease for financial gain and aid in concealing other crimes and to silence a witness, the complainant)
9. Failure to Render Aid
10. Impeding an Investigation
11. Obstruction of Justice
12. Cyber Crimes (including acts when addition of technology used may be considered new crimes used to set a precedent for charges in future cases involving cyber-crimes)
13. Identity Theft
14. Misrepresentation
15. Wiretaps Without a Warrant
16. Domestic Terrorism
17. Intimidation
18. Menace (elevating eligible misdemeanor charges to felonies)
19. Trafficking Across State Lines
20. Criminal Mischief
21. Evidence Tampering
22. Destruction of Evidence
23. Witness Tampering
24. Corruption or Collusion (including collusion with law enforcement to deny the complainant their human rights and obstruct justice)
25. Practicing Therapy Without a License Across State Lines Using Cyber Methods
26. Entrapment
27. Filing a False Police Report
28. Money Laundering
29. Endangerment of a Minor(s)
30. Reckless Endangerment

## EXHIBIT A-6

31. Willful Negligence Causing Bodily Injury

32. Illegal Eviction (to create a monopoly)

Civil Matters:

1. Slumlord Practices
2. Misrepresentation
3. Slander
4. Libel
5. Defamation
6. Filming or Documenting Without a Permit

Hate Crime Component:

The alleged crimes include a hate crime component, as most documented actors are white. The argument is that the actors/co-conspirators would not have dehumanized the complainant to the extent they did if the complainant had been:

- A white woman and a white cisgender woman.
- A heterosexual male and a heterosexual female.

The placement of monetary gain and entertainment above the human life of a black, gender-fluid, Native American young entrepreneur supports the hate crime claim. The intent to expose the complainant without cause, organizing and singling them out to create a lynch mob to publicly humiliate them, is evident when the complainant was dragged out of their residence and place of business at peak business hours and denied clothing for a misdemeanor crime for which no warrant or evidence was presented. Additionally, the constant reference to the complainant's hair and attempted forced removal of human hair extensions, which was referenced by actors as a wig despite being educated about the racial insensitivity and history associated with using cultural styling, protective techniques, and hair texture as a tool to shame and discriminate against the black community, further supports the hate crime claim. □ A white male and a white cisgender male

The placement of monetary gain and entertainment above the human life of a black, gender-fluid, Native American young entrepreneur supports the hate crime claim. The intent to expose the complainant without cause, organizing and singling them out to create a lynch mob to publicly humiliate them, is evident when the complainant was dragged out of their residence and place of business at peak business hours and denied clothing for a misdemeanor crime for which no warrant or evidence was presented.

Sexual Assault/Rape/Sexual Exploitation:

The complainant was manipulated into engaging in sexual activities with individuals conspiring with actors without their knowledge. The sexualization of necessary human functions, such as

## EXHIBIT A-7

having a bowel movement or showering, was used to control and manipulate the complainant into additional sexual acts under the threat of extortion. Sexual acts forced upon the complainant were said to be filmed, and the threat of releasing videos of these acts was used to extort, threaten revenge porn, and control the complainant, isolating them from their support systems, legal and medical aid, and denying them the freedom to leave their location or speak freely about their experience. The promise of sexual favors as a reward for compliance, as well as denying the complainant self-gratification and the right to choose sexual partners without their influence or monitoring as punishment for non-compliance, was also used as a means of control. The exploitation of racial conditioning and racist depictions of black bodies in porn to shame the complainant, in addition to various other techniques to deny the complainant self-gratification and force sexual acts, was another means to control and continue crimes surrounded by a pattern of racial insensitivity.

### Domestic Terrorism Component:

The activities in question may meet the criteria to label the actors as domestic terrorists. These activities involve acts dangerous to human life that violate criminal laws, appear intended to intimidate or coerce a civilian population, influence government policy by intimidation or coercion, and affect the conduct of government by mass destruction, assassination, or kidnapping. These activities primarily occur within the territorial jurisdiction of the United States.

### RICO Act Applicability:

The activities in question meet the criteria for prosecution under the RICO Act, targeting organized crime and ongoing criminal enterprises. The same crimes were engaged in across two states, California and Texas.

### Possible Conspiracy Charges:

Individuals associated with the case who knowingly assisted and failed to report activities committed by organizations eligible for prosecution under the RICO Act should be investigated, and we are seeking to press charges against these individuals for conspiracy.

### Motive:

The file also shows a motive to conceal these crimes for monetary gain and to evade justice.

### Additional Evidence:

Police associated with the case will testify they were hired as off-duty officers, confirming collusion, false imprisonment, obstruction, intimidation, and unethical practices. Dr. Heafey's personal relationship with the arresting officer constitutes an abuse of power as an officer of the court. The facility where the complainant was taken and held on false charges will show contradictions in the arrest, proving the arrest to be false and intentionally misleading to obstruct

## EXHIBIT A-8

justice, tamper with a witness, and continue to imprison the complainant without cause or authority, proving collusion.

### False Imprisonment Report

Date: December 24, 2024 Reporting Officer: [Insert Officer's Name] Complainant: EsRā Dunca-Sprawling Address: 13339 Balmore Circle, Houston, TX 77069 and 565 Ortega St, San Francisco, CA 94122 Contact Information: [Insert Contact Information] Incident Type: False Imprisonment and Crimes Against Complainant

#### Details of the Incident:

##### False Imprisonment:

The complainant reported experiencing false imprisonment by individuals who manipulated and controlled their movements and actions. This period of imprisonment involved the complainant being held against their will and deprived of their freedom.

The complainant was subjected to psychological manipulation and coercion, including threats and intimidation to ensure compliance with the captors' demands. The captors employed various tactics to isolate the complainant from their support network, restricting communication with family and friends and closely monitoring their activities.

The complainant's movements were closely monitored, and they were afraid to leave due to intimidation by individuals patrolling the property and staking out at their exits. Additionally, the complainant was made to fear leaving due to threats of extortion.

To maintain control, the captors propagated a false narrative, leading authorities to believe that the complainant's reports were the product of mental illness or drug use. Consequently, the complainant ceased calling the police and instead sought help from their doctor when overwhelmed. Dr. Naheed Ali, M.D., a celebrity doctor, documented the complainant's sobriety and sanity and witnessed the stalking. Dr. Ali visited the complainant weekly at their temporary residence in the same building where they were opening a new business. She walked over from her office two blocks away for weekly home visits, sometimes more often when the complainant became overwhelmed, experienced panic attacks, or called in fear for their safety. Dr. Ali never questioned the complainant's sanity or sobriety during any of her visits, and this was confirmed as she checked their vitals each visit. A drug test administered by Dr. Ali and sent for testing at an independent lab showed the complainant to test negative for all illicit substances. The complainant had been prescribed Xanax by Dr. Ali and their previous general practitioner at Forward Medical in San Francisco, Dr. Karimi Gituma, who received her medical degree from Harvard.

The complainant was given 12 Xanax at a time by their own request, as their previous doctor, Dr. Gituma, warned about its potential effects in accelerating a family history of Alzheimer's and

## EXHIBIT A-9

dementia. They only took them in emergencies when they could not cope with a panic attack using tools and homeopathic methods learned in therapy with their ex-therapist in San Francisco, Susan Reagan, MFT. During their entire time in Beverly Hills, they only called in the prescription once. Dr. Ali noted rapid weight loss during this time and said she would hospitalize the complainant if they didn't gain weight. After her counseling during a home visit, the complainant began cooking regular meals and not letting anxiety keep them from eating.

The complainant was subjected to torture, including sleep deprivation and non-stop interrogation-like questioning until they performed sexual acts. This was the only time the abusers ceased the torture, which was made to seem as if it were symptoms of drug use or a mental break.

When the complainant attempted to leave, their phone would malfunction, Uber would not work, and their calls would not connect. Calls to emergency services appeared to be rerouted, as the operators' responses were unusual. On one occasion, the operator, instead of sending help, insisted, "Tell me what drugs you've taken."

When the complainant did manage to exit the building, people would be waiting outside, calling them names until they retreated back inside.

One night, after the complainant attempted to document their abusers, a female voice shouted, "You will face serious legal repercussions for ruining our movie." The next day, the complainant was arrested on false charges under a name not recognized or used by them. They were informed by the detective that they could not return to the building where they had a valid lease. This occurred after over six months of false imprisonment at 420 N. Camden Drive, 90210.

Following this, the complainant went to their sister-in-law, Brittany Smith, in San Diego before returning to Houston. Throughout this period, the complainant's abusers seemed to follow them, and once in Houston, the same torture experienced in Beverly Hills continued.

The motive for the false imprisonment appeared to be to prevent the complainant from contacting Andrei, as he was the first person they lost contact with under circumstances not related to him. At the time, the loss of contact with Kyle and Richie seemed like incidents isolated to the complainant's LA circle of friends, not associated with business or their partner Andrei.

The complainant was forced to endure this imprisonment for an extended period, during which they were subjected to mental and emotional abuse. Their attempts to seek help or escape were thwarted by the captors, who used fear and intimidation to maintain control.

The complainant's experience of false imprisonment has had a lasting impact on their mental and emotional well-being, and they continue to seek justice and support to recover from this traumatic event.

**EXHIBIT A-10**

*Unofficial Copy Office of Marilyn Burgess District Clerk*

## EXHIBIT A-11

List of Suspicious Behavior/Activity

Unofficial Copy Office of Marilyn Burgess District Clerk

**EXHIBIT A-12**

*Unofficial Copy Office of Marilyn Burgess District Clerk*

## EXHIBIT A-13

Maya Miller

Called my business three times. I could hear her downstairs. She first called with a blocked number. The third time number 4157228395 appeared on my caller ID. As soon as it showed her number she hung up and was overheard saying "my number isn't blocked...the mexicans fucked up". Her voice was heard regularly during complainants false imprisonment in Beverly Hills at 420 N Camden Drive.

Andrei George Dunica:

- When informed about the stalking, Andrei suggested getting a psychological evaluation despite having been Sean's domestic partner for years and never witnessing any signs of mental illness that would make him believe Sean was hallucinating.
- Even when told that Sean was sober, Andrei insisted that Sean consider their experience as a result of psychosis.
- Andrei ignored multiple distress messages from Sean, leading to feelings of abandonment and betrayal.
- Andrei was accused by the captors of being involved in the abuse and funding their operations.
- Andrei failed to take immediate action to stop the abuse or provide support, despite being aware of the situation.

Yuri Richard Spiro – Complainant's ex-landlord at 420 North Camden Drive 90210. In debt to complainant \$800k+;

- Shortly before Yuri's disappearance, he asked the complainant how they would feel if someone were making a movie which included them as an actor but they were unaware of it.
- When made aware of the complainant's concerns for safety and their complaint of being harassed and stalked, Yuri dismissed the report as a mental break.
- Yuri was later overheard having an argument about the people harassing the complainant with the only other tenant Keith Fraser, who mentioned specific details associated with the stalking. Yuri responded in a tone as if trying to justify and mentioned \$1 million dollars.
- Yuri had hard drives for security cameras removed.
- Shortly before Yuri stopped returning all forms of correspondence and abandoned the building, leaving the complainant with no point of contact, the normally dim street was illuminated by spotlights that pointed only at the complainant's building, which was their place of business and temporary place of residence at 420 N Camden Drive, Beverly Hills, 90210. The dark parking lot and alley behind the building were now lit as if for filming.

Keith Fraser Ex-tenant at 420 N. Camden Drive/ Witness:

Keith is no longer seen in the building after the complainant asked him for a conversation as he was a witness, to which he replied no and literally ran out the door.

- The complainant was told by Yuri's business associate that Keith was ending his lease due to what was wrongfully described as a confrontation.

## EXHIBIT A-14

Kyle Joseph Egan – Ex/Missing Friend and known prostitute previously committed fraudulent activities against complainant for financial gain and entertainment/cruel joke. Actions were similar to those in this complaint. Actions associated with fraud include: Blackmail threats/ use of reports to police to manipulate and form false narrative/ Stalking/ Intentional infliction of emotional distress with intent to cause self harm/ pattern of emotional abuse / physically violent / False promise/interest in romantic relationship for financial support conspiring with secret Fiancé/Husband Kory Lamar Word/Ward

- Images and video are also projected on walls and appear to be the product of augmented reality, which can be viewed more easily with a phone in video mode. The image changes depending on the magnification of the lens when zoomed in or out.
- The images are usually disturbing and sexual in nature, depicting people in different states of decomposition and videos showing people the complainant has had romantic feelings for engaging in sexual acts with each other and other loved ones in their life, with Kyle appearing frequently in a way seemingly intentional meant to trigger emotional distress. Some of the videos seem to be live.
- On one occasion, Kyle is seen kissing and masturbating a Latino male in his early 20s. When the complainant noticed the image, the person Kyle was kissing and engaging with sexually turned their head, hid their face, and hid behind Kyle.
- When packing, the complainant was searching for a larger bag, and a voice which sounded like Kyle said, "What about your Loxyard duffel," a bag that only he knew the complainant had, which was sold before their abusers appeared.
- The complainant called Kyle to confront him as they were suspicious he was involved in committing crimes against them with the people harassing them and held false prisoner. On the call, he mentions a picture he posted and says that it was old to diminish the severity of his actions. However, the complainant had not yet mentioned knowing of the picture, which their abusers mentioned to upset them.
- On another occasion, Kyle sent the complainant a random text expressing regret for something he does not offer context for and says, "It all just got too scary and out of control."

Kory Lamar Word/Ward, Secret Husband of Kyle Joseph Egan; Kyle's accomplice in previous fraud committed against complainant.

- Reported that Kyle Joseph Egan was taken from their apartment.
- Despite Kyle being found and brought home, Kory did not provide any further details about the incident.
- Suggested that Kyle was sold and sex trafficked across the border the second time Kyle went missing.
- Told authorities that the complainant called the police only because Kyle wouldn't talk to them, but failed to explain the fear both he and Kyle expressed to the complainant about their safety from people Kory described as Mexican gangsters.
- Claimed that Kyle left when he was in the hospital.
- Made plans for the complainant, Kyle, and Kory to get together for dinner, but just before heading out, Kory answered the phone and said he and Kyle had just had a heated

## EXHIBIT A-15

moment. After that, the complainant could no longer get Kyle to answer FaceTime or meet in person to confirm his identity or safety.

- Kory's mother, Vallory Ward, who had previously agreed to take the complainant to see them at their apartment in Sherman Oaks, CA, called ahead. When the complainant called her back after a long wait, she seemed to be crying and could not offer an explanation as to why she no longer wanted to take the complainant to visit them.
- Displayed concern for Kyle's safety but avoided answering questions or providing information that could help in understanding the situation.
- Displayed a lack of cooperation with the complainant and authorities in investigating the incident.
- Kyle described his relationship with Kory as a violent, abusive one from which he was afraid to leave.
- When visiting, the complainant witnessed Mr. Word speak into a device, the voice in the feedback sounded like Kyle. Kory explained it was a voice app and then changed the subject.

Victoria Alana Garcia Winder – Disgruntled ex-employee /high school acquaintance:

- Despite being the last point of contact for Andrei Mrs. Winder refuses to give any information which would prove his safety. She tells everyone that he has moved to Germany and doesn't want to speak to the complainant despite the complainant never receiving this news themselves or given time to prepare as Mr. Dunca is required to do by valid contracts in shared businesses with the complainant. In addition, notice of their departure from the domestic partnership requires a mutual ending of the relationship and a process similar to divorce in order to separate assets and settle any disputes. No such process has occurred and a mutual end to the relationship could not be possible without a conversation or even knowing the whereabouts and safety of their partner.
- Victoria and Kyle reported to the complainant's law enforcement, emergency/medical personnel, friends, family, and professional network that the complainant was suffering from symptoms associated with untreated mental illness and drug addiction. Doctors' assessments and drug tests prove this to be false.
- Due to the false narrative by Kyle and Victoria, calls to police to report abuse during false imprisonment were responded to as wellness/psych checks. Police asked questions to make sure the complainant was not a danger to themselves or others, as well as basic questions to establish sanity and good health, while abusers were able to escape being detained for questioning.

## EXHIBIT A-16

Dr. Austin Richard Heafey – Psychologist (fired due to unethical behavior/pattern of abuse/discovered to have personal relationship with missing spouse and suspected abusers):

- Pressured the complainant to sign documents that would place them in his care and allow him to hospitalize and medicate them as he saw fit. This occurred after the complainant confronted him upon discovering his association with individuals who were abusing them.
- Failed to disclose a personal relationship with the complainant's partner and broke confidentiality by discussing the complainant with their partner's assistant, with whom he also had a personal relationship. Dr. Heafey claimed that Victoria reached out to him out of concern for the complainant's wellbeing, although she was unaware he was treating them.
- Despite being fired, Dr. Heafey continued to reach out late at night, even as late as 2am, for the next two years. He insisted on being the complainant's doctor and pressured them to allow him to medicate them. When the complainant mentioned they were not ready for therapy due to financial constraints, he offered his services free of charge, stating that he "cared."
- Dr. Heafey was fired because he became abusive during their conversations. He seemed to intentionally trigger panic attacks and then abruptly end the conversation. Instead of helping the complainant discover tools to best cope with the symptoms of trauma and their abusers, Dr. Heafey would become argumentative and put the complainant in a position where they had to defend every detail of the abuse, worsening their symptoms and prolonging the abuse. Without having to argue each session, the complainant would have had someone credible to confirm their sanity and undo the harm caused by the false statements made by Mrs. Winder and Mr. Spiro about their sobriety and mental health.
- Dr. Heafey's initial opinion was that the complainant seemed to be suffering from symptoms associated with PTSD triggered by a real source, but was otherwise sane and not suffering from visual/auditory hallucinations or delusions resulting from psychosis. This opinion changed only after he was confronted with information suggesting he had personal connections with the complainant's abusers and partner.
- During the time the complainant first reported Andrei missing in conversations with Dr. Heafey, he claimed he didn't know the complainant's partner. However, on a few occasions, he suggested he could make contact with Andrei, contradicting an earlier conversation in which he stated, "I spoke to him (Andrei)" and "I went to the house (Dunca-Sprawling residence)" when questioned about where he got personal details he mentioned about the complainant. He later denied ever speaking to Andrei. He also said he only looked up the house online but had stated in a different previous conversation that he had put in an offer for the house when it first went on the market and thought it was odd when it was declined.
- When told Andrei is the co-borrower on the mortgage for the complainant's family home, Dr. Heafey replied, "Let me see if true, one sec," somehow having the ability to check without having the personal information to do so and for some reason had the desire to make the effort to check into it. He did not return to the conversation after leaving to check.
- Ignoring the assessments of the complainant's general practitioner and an emergency clinic doctor, Dr. Heafey insisted the abuse the complainant was reporting was imagined due to meth-induced psychosis and continued to pressure the complainant to put themselves back under his care and to check themselves into a hospital, although he had not seen the complainant in person and had no evidence to be able to give this diagnosis,

## EXHIBIT A-17

which was no more than an opinion reflecting the false narrative of the complainant's abusers.

- Pressuring the complainant to check themselves into a hospital when he, as a medical professional acting as their therapist, could contact authorities to have them hospitalized if he truly believed they were in need of constant care and observation due to a mental break exposes the fact that he had no reason or evidence to suggest the complainant be hospitalized, which explains why he pressured them to hospitalize themselves

Brittany Smith-Sprawling – Brother's alleged ex-wife:

- Upon being informed about the stalking, Brittany Smith, a professional in the field of cybersecurity and the complainant's sister-in-law, readily believed the complainant and suggested that she herself had been a victim of a similar cyber attack. She accurately described the process the complainant had experienced, despite the complainant providing minimal information out of fear they would not be believed, as they were not previously when making the same reports to people not familiar with the latest advancements in cyber crime and security.
- Ms. Smith elaborated on the system used to separate the complainant from their finances and to commit crimes against them, while simultaneously discrediting and isolating them from all their contacts. She spoke of this process with familiarity, as if it were a common occurrence, and supported her statements with her education in cybersecurity and her professional knowledge of hackers.
- Shortly after the complainant reached out to Ms. Smith for assistance, all communication was lost. Subsequently, a cease and desist letter was sent to the complainant's email address, which could not be confirmed as originating from Ms. Smith. The letter was addressed to the complainant's household rather than specifically to the complainant, which was unusual given that there had been no confrontation. The letter claimed that Ms. Smith's son, CJ, was injured and received no medical attention while in the complainant's care, resulting in a black eye. The letter suggested abuse, although while Ms. Smith was away and left her son in the complainant's care longer than expected as she rescheduled pick-up twice, the complainant was in constant contact with her. Ms. Smith was made aware of the accident, which happened when the child, aged 7, pulled down on his stocking hanging on the mantel and a nutcracker fell, striking his left cheek. He received immediate attention from the complainant's mother, Mrs. Martha Sprawling, a trained nurse, as well as from the complainant's father, a USMC veteran of 30 years with medical training suitable for battlefield triage. When Ms. Smith returned to pick up her son, CJ, she did not complain or seem angry. She left and hugged the family goodbye before her trip back to San Diego. The complainant had offered to have them for Christmas as there were no decorations or presents in their apartment when the complainant visited her, and it was unlike the holidays at the complainant's family home, which were suited for the children in the family every year.

Richard "Richie" Alan Vetter II – Sexual Partner:

- Claimed to be harassed by the same individuals believed to be responsible for holding Kyle against his will and making the complainant a victim of false imprisonment.

## EXHIBIT A-18

- When asked by complainant to visit him in LA, Vetter replied "I can't come to LA, too much dark energy... the same people are messing with me".
- Was involved with members of the group of individuals suspected of being responsible.
- Disappeared without saying goodbye, despite having plans for the near future that were not kept or canceled.
- Failed to provide any explanation for missing planned meetings.
- Was last seen in the company of individuals suspected of being responsible for the crimes against the complainant.
- Described a similar experience to the complainant and, during their last encounter, checked the complainant's apartment for hidden cameras and recording devices, despite the complainant not having yet told him of their experience and being unaware they were being watched at the time.
- Is the only one of the complainant's contacts they seem to be able to get in touch with, but questions concerning answers about the complainant's experience are ignored or the calls are abruptly ended.
- Vetter claimed to be harassed by the same people who are believed to be the same people who held Kyle against his will and the same who made the complainant a victim of false imprisonment.
- The complainant fears he is missing as well. They are not able to get any information during the calls to confirm Richie's identity, and the few video conferences that were accepted seemed to be an AI-generated avatar of him.

Sam Sprawling

Background:

- Sam Sprawling, my uncle, reported false imprisonment in 2017 and was subsequently portrayed as mentally ill.
- He has a background in IT and recon for the USMC.
- Sam went missing for a short period before resurfacing, having lost 80 pounds. He claimed that no one believed his story.

Suspicious Behavior:

- Sam left tablets in my home, gifting each of us one without any clear reason. I suspected the tablets were compromised.
- He began sending us links and urged us to use them on our tablets, including links to online casino games and chess.
- Despite his extensive experience in IT security, he acted incapable when I called him for help, which was unusual given his self-proclaimed title of "IT GOD."
- He offered to send me software on a flash drive and asked if I had a Mac out of the blue.

Additional Information:

- Sam's daughter, Ashley, and her husband are also in the IT field and are best friends with my brother, Christopher Phillip Sprawling, who shares a similar background in military and cyber securities.

## EXHIBIT A-19

- When I was a child, Sam taught me how to patch into a phone line with a baby monitor, indicating his technical skills and knowledge.

### Other Suspicious Behavior/Activity:

- The complainant's calls seem to be rerouted, since September 2022 cannot get a response from contacts they have close business and personal relationships with. The few people they've managed to reach fail to answer questions to confirm their identity. For example, the complainant asked an old friend what her ex was up to and referred to him by name. She answered she didn't know what he was up to. The complainant reminded her that he had killed himself, and she seemed confused before ending the conversation when the complainant continued on to another question. She could not have forgotten this. It was an abusive relationship, and he blamed her for his death in his suicide note.
- Another friend from high school could not tell the complainant the name of a mutual friend of theirs or the places they frequented together, although it's easy to remember considering where they lived.

### Additional complaints:

- False Imprisonment: The complainant has been a victim of false imprisonment for the past two years.
- Sexual and Emotional Abuse: The complainant reports being abused daily, both emotionally and sexually. Complainant describes experience by unknown assailant as "rape".
- Theft: All of the complainant's money and identification were stolen.
- Cybercrime: The complainant's devices have been hacked, and their calls, emails, and texts are being rerouted.
- Additional Information:
- The complainant has obtained proof of their sanity and sobriety to support their report.

### LegalZoom Platform Requests:

- All requests made by the complainant through the LegalZoom platform for legal advice have been accepted but later canceled, with the fee reversed.
- It is possible that Andrei has involvement in the company, creating a conflict of interest, but no explanation is given or available when questioned.
- The complainant wanted to note this in case it could be a result of or related to the same cyber attack or false imprisonment.
- The complainant used the platform to request legal help for family law, personal injury, and real estate law.

## EXHIBIT A-20

### **SUBMITTED INTO FILE FOR LAWSUIT FILED AGAINST ME BY SUSPECTED ABUSERS**

Filing Accepted for Case: 202517063; DUNCA, ANDREI; SPRAWLING, RODNEY SAMUEL (JR)

- REQUEST SUBMITTED FOR INVESTIGATION
- LAWSUIT FILED BY LEGAL OFFICE CLAIMING TO REPRESENT ANDREI GEORGE DUNCA ALTHOUGH THEY REFUSE TO PROVIDE DOCUMENTATION PROVING THEIR CLAIM TO BE REPRESENTATION OF COMPLAINTANTS SPOUSE, .

This letter constitutes a formal request for an order compelling Andrei George Dunca to appear in person before your court in Precinct 4, Place 1.

I, Rodney Sprawling (Esrâ Dunca-Sprawling), am the defendant in this matter, case number 254100033877, for which I have filed an appeal. This appeal is in part due to the absence of my spouse, Andrei George Dunca, upon whom I am financially dependent. He is also a co-borrower on the loan for the property in question. I have not seen or heard from him since August 22<sup>nd</sup>.

My concern for Mr. Dunca's well-being is paramount, and I believe his in-person appearance is crucial for the following reasons:

- Sudden Cessation of Communication and Potential Threat:

## EXHIBIT A-21

Communication with Mr. Dunca abruptly ceased at a time when I received a credible death threat. This threat was connected to an individual reported to have forcibly taken and detained a mutual acquaintance.

- Uncharacteristic Behavior and Doubtful Emails:

Since his disappearance, I have received only a few emails from my spouse, as he has refused to answer or return phone calls.

Mr. Dunca's behavior has deviated significantly from his established patterns. As his spouse and business partner since 2012, I am intimately familiar with his character.

The property in question is home to my senior citizen disabled veteran parents (USMC 30 years) since its purchase. There was a clear understanding between them, myself, and Andrei that they would reside there permanently. Andrei's failure to uphold his co-borrower agreement, which precipitated this legal action, is another example of his uncharacteristic behavior.

The emails I have received, purportedly from Mr. Dunca, stating he relocated to Germany, are inconsistent with his usual communication style, raising serious concerns.

- Potential Endangerment:

Given the aforementioned death threat and the suspicious circumstances surrounding Mr. Dunca's disappearance, I fear he may be in danger.

I believe that an in person appearance is the only way to ascertain Mr. Dunca's safety and well-being and to properly address the issues related to this case.

I urge the court to issue an order compelling his appearance at the earliest possible date.

## EXHIBIT A-22

I understand that this request may fall outside the typical scope of a Justice Court matter. However, the unique and urgent circumstances warrant your immediate attention.

Thank you for your consideration of this critical matter.

Sincerely,

Esrā Dunca-Sprawling

### **COMPLAINT: CONSTABLE MARK HERMAN'OFFICE / DEPUTY DIAZ**

CALL TO 281.376.3472 – Houston TX.

- RESPONDING OFFICER DEPUTY DIAZ SUSPECTED OF COLLUSION WITH ABUSERS
- VIDEO OF DEPUTY RESPONSE AVAILABLE

EsRā Dunca-Sprawling  
565 Ortega Street, San Francisco, CA 94122  
415.286.0329  
Esra@Dunca-Sprawling.com

Subject: Formal Complaint Against Deputy Diaz of Constable Mark Hermans Office for Refusal to Properly Investigate Missing Person Report and Potential Homophobic Bias

Your Honor,

I am writing to file a formal complaint against Deputy Diaz of Constable Mark Hermans Office for his failure to properly investigate my missing spouse, Andrei Dunca, and his dismissive conduct during my attempt to file a missing person report. I also believe his actions demonstrate a potential homophobic bias that influenced his handling of my case.

On [Date of Incident], I attempted to file a missing person report concerning my spouse, Andrei Dunca, who has been missing since August 2022. Deputy Diaz responded to the call. His initial

## EXHIBIT A-23

demeanor and line of questioning gave me the distinct impression that he viewed me and Andrei as complete strangers, and that he had a seemingly personal interest in discrediting my relationship. He immediately questioned my relationship with Andrei, focusing on disproving my spousal status rather than gathering information critical to the investigation. He asked if Andrei lived with me and for how long, questioned my delay in reporting, and suggested Andrei might simply not want to speak with me. This felt less like a standard missing person inquiry and more like an attempt to invalidate my concerns.

Despite my providing a copy of Andrei's driver's license, Deputy Diaz did not attempt to verify his identity or ask relevant questions. He returned from a welfare check at the address of [Employee's Name], my former employee, which recently appeared online as Andrei's address. It is important to note that Andrei is homosexual, and this employee has a history of making false claims about being his romantic partner.

I am deeply concerned that Deputy Diaz's repeated questioning of my spousal status, his dismissive attitude, his seemingly personal interest in discrediting my relationship, and his treatment of me and Andrei as complete strangers indicate a potential homophobic bias and/or inappropriate personal interest. I believe that a heterosexual couple in a similar situation would have been treated with greater respect and seriousness. His conduct suggests he was not operating in a neutral and professional capacity.

Furthermore, I am the target of a sophisticated cyberattack, disrupting all communication, including emergency services. My calls are rerouted. I became aware of this when I stayed on the line to hear the outgoing voicemail messages, which revealed the number I dialed did not match the number attached to the voicemail. My emails are also compromised. I am also dealing with threats and harassment from individuals reported to be involved in drug and human trafficking. Deputy Diaz's actions constitute a failure to perform his duties and a disregard for my concerns. His actions include:

- \* Improperly questioning my spousal status instead of conducting a proper investigation, potentially influenced by homophobic bias and/or inappropriate personal interest.
- \* Displaying a seemingly personal interest in discrediting my relationship, rather than conducting a neutral investigation.
- \* Treating me and Andrei as strangers, suggesting a lack of impartiality.
- \* Relying on unverified information from a potentially unreliable source.
- \* Failing to acknowledge the seriousness of my concerns, particularly given the cyberattacks, related security threats, and the potential involvement of individuals reported to be involved in drug and human trafficking.
- \* Failing to ask for a photograph of the missing person.
- \* Demonstrating a dismissive attitude that suggests a prejudiced view of same-sex relationships and a personal interest in discrediting my report.

I request the court to:

- \* Investigate Deputy Diaz's conduct and take appropriate disciplinary action, including an examination of whether bias and/or inappropriate personal interest played a role in his handling of my missing person report.
- \* Order Constable Mark Hermans Office to immediately conduct a proper investigation into Andrei Dunc's disappearance.
- \* Ensure law enforcement personnel are properly trained to handle missing person reports and treat all individuals with respect, regardless of sexual orientation or personal biases.
- \* Request an investigation into the cyber attacks being used against me.
- \* Require that the law enforcement agency review their policies regarding the handling of domestic partnerships and marriages to ensure that all citizens are treated equally and impartially.

## EXHIBIT A-24

\* Investigate the seemingly personal interest that Deputy Diaz displayed during the interaction.

I am prepared to provide any additional information or documentation.



Sincerely,  
EsRa Dunca-Sprawling

Supporting Evidence/Information:

Spouse of Andrei George Dunca reached out to Houston Police Dept.

Unknown why the constables office responded. Complainant suspects call was rerouted; evidence of false imprisonment. The deputy is suspected to be an actor or off duty deputy for hire. Deputy C. Diaz refused to file a missing persons report although he reported he did not see or speak to Mr. Dunca when performing a wellness check at the address of Mr. Dunca's assistant Victoria Garcia Winder.



AndreiDunca-Abuse.com

## EXHIBIT A-25



"The Captain" – Missing, last seen with Andrei George Dunca. Requests for updates and photos of The Captain by complainant have been ignored. Mr. Dunca refused to give possession of the companion animal to his spouse to accompany him Southern California for business during a temporary separation.

### **COMPLAINT: SF POLICE DEPT**

CALL TO 4157593100 – TARAVAL STATION 9/04/24

#### REPORTING PARTY

Rodney Samuel Sprawling /Esra Dunca-Sprawling

[Esra@Dunca-Sprawling.com](mailto:Esra@Dunca-Sprawling.com)

8454008258

565 Ortega Street.

San Francisco, CA. 94122

## EXHIBIT A-26

13339 Belmore Circle.

Houston, TX 77069

### SUMMARY OF COMPLAINT:

- Officer refusal to investigate the disappearance of Andrei George Dunca-Sprawling.
- Withholding information from spouse (Esra Andrei Dunca-Sprawling) of person reported missing.

### MISSING PARTY:

Andrei George Dunca/Andrei George Dunca-Sprawling

[Andrei@Dunca.name](mailto:Andrei@Dunca.name)

4157062984

565 Ortega Street.

San Francisco, CA, 94122

13339 Belmore Circle.

Houston, TX 77069

## EXHIBIT A-27

### COMPLAINT AGAINST RESPONDING OFFICER SFPD:

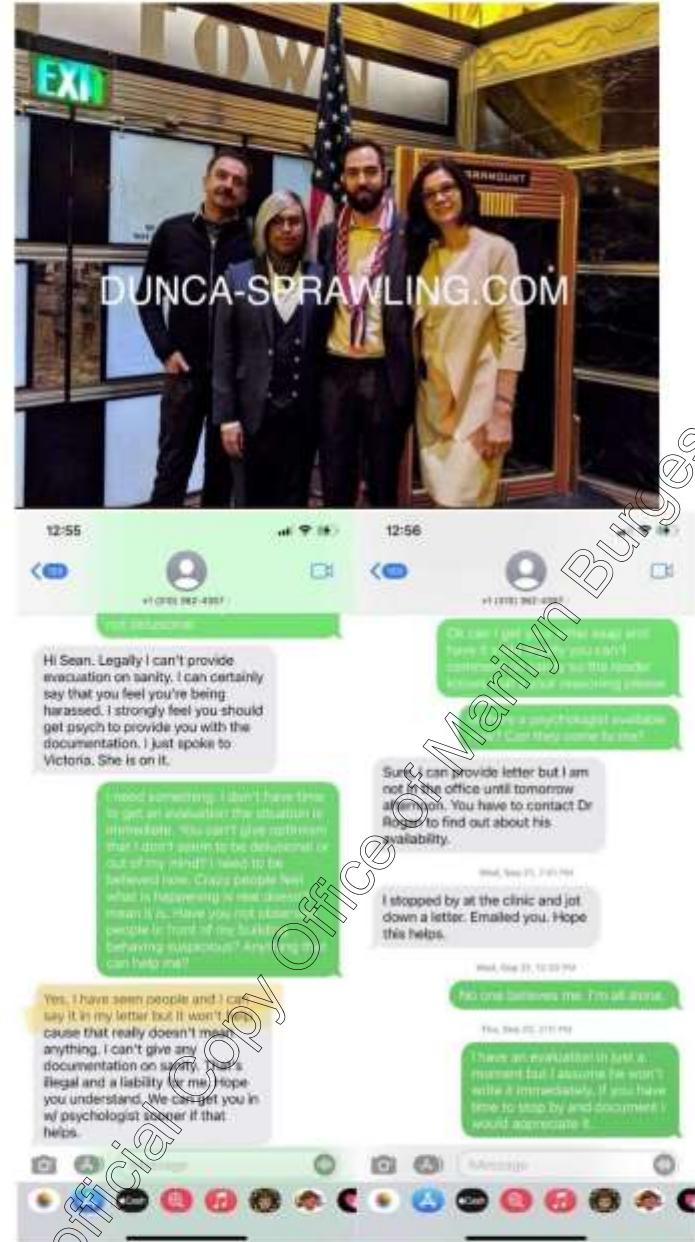
My spouse, Andrei G. Dunca (DOB 05/29/1984), went missing with my dog around the same time as two other friends who were involved with people associated with alleged members of organized crime involved in human and drug trafficking. I received threats to stop looking for my missing friends and was falsely imprisoned, sexually abused, stalked, harassed, and targeted in a cyberattack that prevented me from communicating with my contacts, law enforcement, and emergency services.

I called the SFPD to help locate my spouse and confirm his safety. A wellness check was conducted at our primary residence, 565 Ortega St., San Francisco, CA 94122, before I was denied entry and illegally evicted. The officer later informed me, without providing evidence, that my spouse was not missing and that he would be closing the missing persons file and not investigate further.

I still have not heard from or seen my spouse. There has been no activity in our shared accounts, our taxes have not been filed, documents for business compliance have missed deadlines, and none of his political contributions have been made. I am being led to believe that our shared property and the primary residence of my disabled veteran parents were foreclosed and sold at auction, which will leave us homeless. As Andrei's spouse and business partner, I am entitled to information that has been withheld from me, resulting in significant financial hardship and emotional distress due to the officer withholding information about my missing spouse.

EsRā Andrei Dunca-Sprawling

## EXHIBIT A-28



Text exchange between me and my doctor who I'd call and she would do a house call when having a panic attack after being harassed to document my health. Dr. Dilshad is a witness to the harassment.

## EXHIBIT A-29

Page: 1 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

**Rodney Sprawling**  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 271450015    Encounter Date: 12/23/2022

**ENCOUNTER TYPE:** Consultation

**SUBJECTIVE:**

**Chief Complaint:** Patient requested consultation visit.

**History Of Present Illness:** 36 year old male, known to me from previously, requested a consultation via his PDA, Victoria. Please see previous notes for details. Of note, visit was done in presence of Victoria Wonder who joined video call.

Patient states he has been served a restraining order with a court appearance scheduled for 1/3/20 this morning by his land lord and he's feeling anxious about it. Patient states he still feels being harassed by unknown people and that he feels he is being listened. Patient seems bit Shaky and anxious. He was prescribed Xanax however he hasn't filled out his anxiety meds.

During conversation, Victoria video call got disconnected. Patient confirms his anxiety. He states he is eating and trying to take care of himself. He states he is working with a psychologist and he is planning to call after my consultation is done. He confirmed again that he has no intrusive thoughts including any suicidal or homicidal ideation. He otherwise seems clinically and hemodynamically stable.

**Medical History:** Anxiety, Depression, P TSD, Asthma, None

**Surgical History:** Mother: HTN, Asthma, Kidney disease, Obesity

**Family History:** Father: HTN, Coronary artery disease, Prostate cancer, Gout

**Social History:** Siblings: 1 brother w/ HTN. Another half brother w/ "Iver" condition. Doesn't smoke regular cigarettes. Drinks alcohol occasionally. Smoker marijuana recreationally

**Socioeconomic History:**  
Occupation: Self employed/ Business owner  
Diet: Doesn't follow special diet  
Marital status: Divorced  
No of children: None

**Medications:**  
Xanax pm, Albuterol inhaler pm  
No known allergies

**Allergies:**

**Review of System:**  
Review of System: No Fever, No Cough, No Night Sweats, Head: No headache, No pressure, Eyes: No Vision Changes, No diplopia, No pain, Ears: No Hearing Changes, No tinnitus, Earache, Cardiovascular: No Chest pain, No chest pressure, No Palpitations, Respiratory: No Cough, No Dyspnea, No congestion, Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis, Gastrointestinal: No Diarrhea, No Hematuria, No Urinary Incontinence, Musculoskeletal: No Arthralgia, No Back Pain, No joint swelling, Neurological: No Seizure, No Dizziness, No Recent Falls, Psychiatric: No Hallucinations, No Hallucinations, No Anxiety and Panic

**OBJECTIVE:**

Page: 2 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

**Rodney Sprawling**  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 271450015    Encounter Date: 12/23/2022

## EXHIBIT A-30

Page: 1 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling

Patient ID: 114779752 DOB:04/12/1986 Sex: M Account No.:

Encounter ID: 269954699 Encounter Date: 11/29/2022

Encounter Type: Consultation

SUBJECTIVE:

Chief Complaint:

History Of Present

Illness:

Patient requested consultation visit.

36 year old male, known to me from previous, requested a follow up consultation. Please see previous notes for details. Please see previous notes for details. Of note, patient's power of attorney Victoria Windham called out yesterday requesting to see patient in consultation as well.

Patient states he's again feeling anxious and stressed because he continues to feel he is being harassed by "people" outside his home. He again stated that he tried to record these incidents but unable to do so. Patient states he had asked local legal authorities few times to help and had cops arrived at his home however he said, they were not helpful in resolving the situation.

He mentions that his nephew passed away recently and that he is grieving him. He doesn't demonstrate any out of ordinary symptoms of grievance and denies feeling depressed. He says he is isolated and otherwise managing all questions appropriately. States he is trying to focus on work.

Of note, for his anxiety and panic, he was prescribed Xanax by a psychiatrist. Patient was given refill previously however he didn't fill it yet. He states he had taken xanax before. Of note that helped him however he doesn't want to "medicate himself" with drugs.

He confirmed again that he doesn't have intrusive thoughts to cause self-harm, attempt suicide or has homicidal ideation. He is working with a psychologist at this time. He has virtual visit scheduled w/ psychologist shortly. He is otherwise acting clinically and normally.

Medical History:

Surgical History:

Family History:

Social History:

Anxiety, Depression, PTSD, Asthma,

None

Mother: HTN, Asthma, Kidney disease, Obesity

Father: HTN, Coronary artery disease, Peripheral Arteries, Gout.

Siblings: 1 brother w/ HTN. Another half brother w/ "liver" condition

Doesn't smoke regular cigarettes, Does smoke occasionally. Smokes marijuana recreationally

Socioeconomic History:

Occupation: Self employed: Business owner

Diet: Doesn't follow special diet

Marital status: Divorced.

No of children: None

No known allergies

Xanax pm, Albuterol metered dose inhaler

Review of Systems: No Headache, No pressure

Head: No headache, No pressure

Eyes: No Vision Changes, No diplopia, No pain

Ears: No Hearing changes, No tinnitus

Cardiovascular: No Chest Pain, No chest pressure, No Palpitations

Respiratory: No Cough, No Dyspnea, No congestion

Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis

Page: 2 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling

Patient ID: 114779752 DOB:04/12/1986 Sex: M Account No.:

Encounter ID: 269954699 Encounter Date: 11/29/2022

## EXHIBIT A-31

Page: 1 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling

Patient ID: 114779752 DOB:04/12/1986 Sex: M Account No.:

Encounter ID: 269954699 Encounter Date: 11/29/2022

Encounter Type: Consultation

SUBJECTIVE:

Chief Complaint:

History Of Present

Illness:

Patient requested consultation visit.

36 year old male, known to me from previous, requested a follow up consultation. Please see previous notes for details. Please see previous notes for details. Of note, patient's power of attorney Victoria Windham called out yesterday requesting to see patient in consultation as well.

Patient states he's again feeling anxious and stressed because he continues to feel he is being harassed by "people" outside his home. He again stated that he tried to record these incidents but unable to do so. Patient states he had asked local legal authorities few times to help and had cops arrived at his home however he said, they were not helpful in resolving the situation.

He mentions that his nephew passed away recently and that he is grieving him. He doesn't demonstrate any out of ordinary symptoms of grievance and denies feeling depressed. He says he is isolated and otherwise managing all questions appropriately. States he is trying to focus on work.

Of note, for his anxiety and panic, he was prescribed Xanax by a psychiatrist. Patient was given refill previously however he didn't fill it yet. He states he had taken xanax before. One that helped him however he doesn't want to "medicate himself" with drugs.

He confirmed again that he doesn't have intrusive thoughts to cause self-harm, attempt suicide or has homicidal ideation. He is working with a psychologist at this time. Has a virtual visit scheduled w/ psychologist shortly. He is otherwise acting clinically and normally.

Anxiety, Depression, PTSD, Asthma.

None

Mother: HTN, Asthma, Kidney disease, Obesity

Father: HTN, Coronary artery disease, Peripheral vascular, Gout.

Siblings: 1 brother w/ HTN. Another half brother w/ "liver" condition

Doesn't smoke regular cigarettes. Does smoke occasionally. Smokes marijuana recreationally

Socioeconomic History:

Occupation: Self employed/ Business owner

Diet: Doesn't follow special diet

Marital status: Divorced.

No of children: None

No known allergies

Xanax pm, Albuterol inhaler pen

Review of Systems: No Fever, No Chills, No Night Sweats,

Head: No headache, No pressure

Eyes: No Vision Changes, No diplopia, No pain

Ears: No Hearing changes, No Otalgia

Cardiovascular: No Chest Pain, No chest pressure, No Palpitations

Respiratory: No Cough, No Dyspnea, No congestion

Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis

Page: 2 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling

Patient ID: 114779752 DOB:04/12/1986 Sex: M Account No.:

Encounter ID: 269954699 Encounter Date: 11/29/2022

## EXHIBIT A-32

Page: 1

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

**Rodney Sprawling**  
Patient ID: 114779752      DOB: 04/12/1986      Sex: M      Account No.:  
Encounter ID: 265188287      Encounter Date: 09/09/2022  
Encounter Type: Consultation

**SUBJECTIVE:**  
Chief Complaint: Patient requested house call  
History Of Present Illness: 36 year old male, known to me from previous, requested a house call as a follow up. Since we previous no for details. Patient requested house call as he felt he was having anxiety attack. Patient requested me to see his house from back door since front door is kept locked. He seemed bit anxious in the beginning. He stated he continue to get harassed w/ unknown motor vehicles passing in front of back of his home. He further s that he asked his building owner to keep the door locked at all times however the owner didn't comply. He he had caught unusual activity of harassment on camera however was unable to find them. After reassuring and speaking to him, he seemed calm. He states he continues to work from home, that he did grocery shopping and eating well. He was asked if he would feel safe with someone he views like his parents or trusted friends however he states he has chronic anxiety issues and he can deal with it very well on his own.

He admitted to not taking anxiety meds prescribed previously. I strongly recommended him that he needs to see psychologist for behavioral therapy and psychiatrist that I have provided a referral for. He continue express that he has intentions of following up w/ them.

**MENTAL STATUS:**  
No auditory or visual hallucinations reported. He is oriented to time and place. No suicidal or homicidal ideation. He other seems clinically stable.

**Medical History:**  
Anxiety, Depression, PTSD, Asthma.  
**Surgical History:**  
None  
**Family History:**  
Mother: HTN, Asthma, Kidney disease, Obesity.  
Father: HTN, Coronary artery disease, Prostate cancer, Gout.  
**Social History:**  
Siblings: 1 brother w/ HTN. Another brother w/ "liver" condition.  
Doesn't smoke regular cigarettes. Does alcohol occasionally, Smoker marijuana recreationally.

**Socioeconomic History:**  
Occupation: Self employed business owner  
Diet: Doesn't follow specific  
Marital status: Divorced  
No of children: None

**Medications:**  
Xanax pm, Albuterol inhaler pm  
No known allergies

**Allergies:**  
Review of System: No Fever, No Chills, No Night Sweats.  
Head: No Headache, No pressure.  
Eyes: No Vision Changes, No diplopia, No pain  
Ear: No Hearing Changes, No Otitis  
Cardiovascular: No Chest Pain, No chest pressure, No Palpitations  
Respiratory: No Cough, No Dyspnea, No congestion  
Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis  
Urinary: No Dysuria, No Hematuria, No Urinary Incontinence  
Musculoskeletal: No Arthralgia, No Back Pain, No joint swelling

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

**Rodney Sprawling**  
Patient ID: 114779752      DOB: 04/12/1986      Sex: M      Account No.:  
Encounter ID: 265188287      Encounter Date: 09/09/2022

## EXHIBIT A-33

6:21

Report Status: Final

SPRAWLING, RODNEY



Page 2 of 4

12/02/2022 07:11:06 AM

Patient Information		Specimen Information	Client Information
SPRAWLING, RODNEY		Specimen: EN0117913 Requisition: 120459	Client #: 90210158 ALI, NAHEED P DILSHAD CONCEIVED Attn: BEVERLY HILLS 435 N BEDFORD DRIVE, 107 BEVERLY HILLS, CA 90210-4326

### Drug Monitoring Report

Test Ordered	Result	Cutoff	Lab
<b>DRUG MONITOR, BASE PANEL, SCREEN, URINE</b>			
Benzodiazepines	POSITIVE See Note A See Note A	100 ng/mL	
Cocaine Metabolite	NEGATIVE See Note A See Note A	150 ng/mL	
Opiates	NEGATIVE See Note A See Note A	100 ng/mL	
Oxycodeone	NEGATIVE See Note A See Note A	100 ng/mL	
<b>TEST ORDERED</b>			
<b>SPECIMEN VALIDITY TEST</b>			
Creatinine	78.3	> or = 20.0 mg/dL	
pH	4.8.0		
Oxidant	NEGATIVE	<200 mg/mL	

### NOTES AND COMMENTS

This drug testing is for medical treatment only. Analyses are performed as non-forensic testing and these results should be used only by healthcare providers to render diagnosis or treatment, or to monitor progression of medical conditions.

#### Note A:

The results are presumptive, based only on screening methods, and they have not been confirmed by a definitive method.

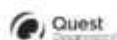
Healthcare Providers needing interpretation assistance, please contact us at 1.877.40RXTOX (1.877.407.8869) M-F, 8am to 10pm EST.

CLIENT SERVICES: 866.697.8178

SPECIMEN: EN0117913

PAGE 1 OF 3

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Page 3 of 4

12/02/2022 07:11:06 AM

Report Status: Final

SPRAWLING, RODNEY

Patient Information		Specimen Information	Client Information
SPRAWLING, RODNEY		Specimen: EN0117913 Collected: 12/02/2022 / 17:15 PST	Client #: 90210158 ALI, NAHEED P

CAUSE NO. 2025-17063: EXHIBIT A

MOTION FOR INVESTIGATION INTO MISSING PERSONS

PAGE 33 OF 34

EXHIBIT A-34

Rodney Sprawley  
2/8/22 Urine Analysis  
Reviewed

Date: 02-08-22 06:25 pm

Operator: 10000

No. 10000

LEU	-	neg
NIT	-	neg
URO	-	3.5 $\mu$ mol/L
NU	-	neg
PH	6.0	
BLO	-	neg
SG	1.030	
KET	-	neg
BIL	-	neg
GLU	-	neg

Unofficial Copy Office of Marilyn Burgess, District Clerk

## EXHIBIT B-1



Date: 5/29/25  
5:55 PM

To whom it may concern (Re: Rodney Samuel Sprawling)

This letter is to provide an update regarding Rodney Sprawling, who has been under my care at Dilshad Concierge Medicine. Mr. Sprawling has been thoroughly evaluated by me on multiple occasions at his temporary place of residence at 420 North Camden Drive, Beverly Hills, CA 90210. Rodney feels he is being harassed by individuals and subsequently feels extremely anxious and panicked. He is requesting a letter to confirm that his perceptions are not unfounded or a product of a mental break.

On 09/09/2022, Mr. Sprawling requested a home visit as a follow-up, stating he felt he was having an anxiety attack and was overwhelmed. He further explained on 11/29/2022 that he continued to feel harassed by "people" outside his home and tried to record these incidents but was unable to do so. He stated that he had asked local legal authorities multiple times for help, and had cops arrive at his home, but they were not helpful in resolving the situation. He conveyed feeling that he is being watched and listened to. He stated that he asked his building owner to keep the front door locked at all times, however, the owner didn't comply. On one occasion, prior to the restraining order, Mr. Sprawling asked me to sit in on a meeting he was to have with his landlord after a home visit to document his emotional state due to the feeling of harassment he experienced that day. The landlord refused to continue the meeting after being introduced as Mr. Sprawling's doctor and asked that I leave, which I complied with, but I found the request odd given my position and relationship to the Mr. Sprawling as his doctor. He further explained that the restraining order he was served with on 12/23/2022 resulted from his requests to the landlord regarding his security concerns, and this order was the reason for his visit that day as he was experiencing anxiety. During my consultations, I have observed individuals with phones taking pictures or possibly video, watching the building, and the patient pointed out cars he stated were harassing and watching him. This activity appeared suspicious and not typical for the area or time of day. This suggests that his feelings of being watched, listened to, and harassed may be rooted in actual external circumstances.

On 09/14/2022, I received a call from Victoria Winder, who is an assistant to Mr. Sprawling's domestic partner. She inquired if she could be proactive in taking steps regarding Mr. Sprawling's mental health. Due to confidentiality, I informed her that his medical condition could not be discussed without his consent, as my interactions with him at that time did not lead me to believe he was a danger to himself or others. Victoria later obtained power of attorney, and I was then able to discuss details about the patient with Victoria.

During his visits, Mr. Sprawling has consistently appeared clinically stable. He has denied any auditory or visual hallucinations, as well as any suicidal or homicidal ideation. Observations of his behavior have included being somewhat anxious in the beginning visits, appearing calm after reassurance, and demonstrating a depressed mood and being tearful. He otherwise seemed relaxed and answered questions appropriately, and confirmed he was eating well and trying to take care of himself. A urine drug screen performed on 12/9/22 was negative for all illicit substances. Based on my interactions and the counseling provided, I did not observe any signs of drug-induced psychosis, which Mr. Sprawling specifically asked to rule out.

## EXHIBIT B-2



Mr. Sprawling has engaged in behavioral therapy and counseling as recommended and has been encouraged to continue with psychological and psychiatric follow-up. He was previously prescribed Xanax for anxiety, to be taken as needed. He was advised to follow up with a Psychologist or Psychiatrist for a mental status examination should he need a document pertaining to his mental status and cognitive clarity. I believe a visit with a psychologist would confirm my assessments as a medical professional and that he remains clinically stable and does not appear to be suffering from a mental break or drug-induced psychosis.

Sincerely,

A handwritten signature in black ink, appearing to read "Naheed Ali, M.D."

Naheed Ali, M.D., F.H.M  
Dilshad Concierge Medicine  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA. 90210  
Ph: 310 307 7865  
Fax: 310 307 7860

## EXHIBIT B-3

Page: 1 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

**Rodney Sprawling**  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 271450015    Encounter Date: 12/23/2022

**Encounter Type:** Consultation

**SUBJECTIVE:**

**Chief Complaint:** Patient requested consultation visit.  
**History Of Present Illness:** 36 year old male, known to me from previously, requested a consultation via his POA, Victoria Wonder. Please see previous notes for details. Ofnote, visit was done in presence of Victoria Wonder who joined via video call.

Patient states he has been served a restraining order with a court appearance scheduled for 1/3/23 this morning by his land lord and he's feeling anxious about it. Patient states he still feels being harassed by unknown people and that he feels he is being listened. Patient seem bit Shaky and anxious. He was prescribed Xanax however he hasn't filled out his anxiolytics.

During conversation, Victoria video call got disconnected. Patient confirms his well being. He states he is eating and trying to take care of himself. He states he is working with a psychologist whom he is planning to call after my consultation is done. He confirmed again that he has no intrusive thoughts including any suicidal or homicidal ideation. He otherwise seems clinically and hemodynamically stable.

**Medical History:** Anxiety, Depression, PTSD, Asthma, None

**Surgical History:** Mother: HTN, Asthma, Kidney disease, Obesity

**Family History:** Father: HTN, Coronary artery disease, Prostate cancer, Gout

**Social History:** Siblings: 1 brother w/ HTN. Another half brother w/ "liver" condition  
Doesn't smoke regular cigarettes, Drinks alcohol occasionally, Smoker marijuana recreationally

**Socioeconomic History:**  
Occupation: Self employed/ Business owner  
Diet: Doesn't follow special diet  
Marital status: Divorced  
No of children: None

**Medications:**  
Xanax prn, Albuterol inhaler prn  
No known allergies

**Allergies:**

**Review of System:** Review of System: No Fever, No Chills, No Night Sweats, Head: No headache, No pressure, Eyes: No Vision Changes, No diplopia, No pain, Ears: No Hearing Changes, No Otorrhea, Cardiovascular: No Chest Pain, No chest pressure, No Palpitations, Respiratory: No Cough, No Dyspnea, No congestion, Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis, Genitourinary: No Dysuria, No Hematuria, No Urinary Incontinence, Musculoskeletal: No Arthralgia, No Back Pain, No joint swelling, Neurological: No Syncope, No Dizziness, No Recent Falls, Psychiatric: No delusions, No Hallucinations, + Anxiety and Panic

**OBJECTIVE:**

Page: 2 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

**Rodney Sprawling**  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 271450015    Encounter Date: 12/23/2022

## EXHIBIT B-4

Page: 1 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 269954699    Encounter Date: 11/29/2022  
Encounter Type: Consultation  
SUBJECTIVE:  
Chief Complaint: Patient requested consultation visit  
History Of Present Illness: 36 year old male, known to me from previous, requested a follow up consultation. Please see previous notes for details. Please see previous notes for details. Ofnote, patient's power of attorney Victoria Winder reached out yesterday requesting to see patient in consultation as well.

Patient states he's again feeling anxious and stressed because he continue to feel he is being teased by "people" outside his home. He again stated that he tried to record these incidents but unable to do so. Patient states he had asked local legal authorities few times to help and had cops arrived at his home however he said, they were not helpful in resolving the situation.

He mentions that his nephew passed away recently and that he is grieving his demise. He doesn't demonstrate out of ordinary symptoms of grievance and denies feeling depressed. He seem relaxed and otherwise answering all questions appropriately. States he is trying to focus on work.

Ofnote, for his anxiety and panic, he was prescribed Xanax by a psychiatrist. Patient was given refill previously however he didn't fill it yet. He states he had taken xanax before yesterday that helped him however he doesn't want to "medicate himself" with drugs.

He confirmed again that he doesn't have intrusive thoughts to cause self harm, attempt suicide or has homicidal ideation. He is working with a psychologist at this time. He has virtual visit scheduled w/ psychologist shortly. He is otherwise seems clinically and hemodynamically stable.

Medical History: Anxiety, Depression, PTSD, Asthma,  
Surgical History: None  
Family History: Mother: HTN, Asthma, Kidney disease, Obesity  
Father: HTN, Coronary artery disease, Prostate cancer, Gout.  
Siblings: 1 brother w/ HTN. Another half brother w/ "liver" condition  
Social History: Doesn't smoke regular cigarettes, Drinks alcohol occasionally, Smokes marijuana recreationally

Socioeconomic History:  
Occupation: Self employed/ Business owner  
Diet: Doesn't follow special diet  
Marital status: Divorced  
No of children: None  
Allergies: No known allergies  
Current Medications: Xanax prn, Albuterol inhaler prn  
Review of System: Review of System: No Fever, No Chills, No Night Sweats,  
Head: No headache, No pressures  
Eyes: No Vision Changes, No diplopia, No pain  
Ears: No Hearing Changes, No Otorrhea  
Cardiovascular: No Chest Pain, No chest pressure, No Palpitations  
Respiratory: No Cough, No Dyspnea, No congestion  
Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis

Page: 2 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 269954699    Encounter Date: 11/29/2022

## EXHIBIT B-5

Page: 1 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 269954699    Encounter Date: 11/29/2022  
Encounter Type: Consultation  
SUBJECTIVE:  
Chief Complaint: Patient requested consultation visit  
History Of Present Illness: 36 year old male, known to me from previous, requested a follow up consultation. Please see previous notes for details. Please see previous notes for details. Ofnote, patient's power of attorney Victoria Winder reached out yesterday requesting to see patient in consultation as well.

Patient states he's again feeling anxious and stressed because he continue to feel he is being teased by "people" outside his home. He again stated that he tried to record these incidents but unable to do so. Patient states he had asked local legal authorities few times to help and had cops arrived at his home however he said, they were not helpful in resolving the situation.

He mentions that his nephew passed away recently and that he is grieving his demise. He doesn't demonstrate out of ordinary symptoms of grievance and denies feeling depressed. He seem relaxed and otherwise answering all questions appropriately. States he is trying to focus on work.

Ofnote, for his anxiety and panic, he was prescribed Xanax by a psychiatrist. Patient was given refill previously however he didn't fill it yet. He states he had taken xanax before yesterday that helped him however he doesn't want to "medicate himself" with drugs.

He confirmed again that he doesn't have intrusive thoughts to cause self harm, attempt suicide or has homicidal ideation. He is working with a psychologist at this time. He has virtual visit scheduled w/ psychologist shortly. He is otherwise seems clinically and hemodynamically stable.

Medical History: Anxiety, Depression, PTSD, Asthma,  
Surgical History: None  
Family History: Mother: HTN, Asthma, Kidney disease, Obesity  
Father: HTN, Coronary artery disease, Prostate cancer, Gout.  
Siblings: 1 brother w/ HTN. Another half brother w/ "liver" condition  
Social History: Doesn't smoke regular cigarettes, Drinks alcohol occasionally, Smokes marijuana recreationally

Socioeconomic History:  
Occupation: Self employed/ Business owner  
Diet: Doesn't follow special diet  
Marital status: Divorced  
No of children: None  
Allergies: No known allergies  
Current Medications: Xanax prn, Albuterol inhaler prn  
Review of System: Review of System: No Fever, No Chills, No Night Sweats,  
Head: No headache, No pressures  
Eyes: No Vision Changes, No diplopia, No pain  
Ears: No Hearing Changes, No Otorrhea  
Cardiovascular: No Chest Pain, No chest pressure, No Palpitations  
Respiratory: No Cough, No Dyspnea, No congestion  
Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis

Page: 2 of 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling  
Patient ID: 114779752    DOB: 04/12/1986    Sex: M    Account No.:  
Encounter ID: 269954699    Encounter Date: 11/29/2022

## EXHIBIT B-6



Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Page: 1

Rodney Sprawling  
Patient ID: 114779752      DOB: 04/12/1986      Sex: M   Account No.:  
Encounter ID: 265188287      Encounter Date: 09/09/2022  
Encounter Type: Consultation

**SUBJECTIVE:**

Chief Complaint: Patient requested house call  
History Of Present Illness: 36 year old male, known to me from previous, requested a house call as a follow up. Please see previous note for details. Patient requested house call as he felt he was having anxiety attack. Patient requested me to acc his home from back door since front door is kept locked. He seemed bit anxious in the beginning. He stated he continue to get harassed w/ unknown motor vehicles passing in front and back of his home. He further stated that he asked his building owner to keep the door locked at all times however the owner didn't comply. He stated he had caught unusual activity of harassment on camera however was not able to find them. After reassuring and speaking to him, he seemed calm. He states he continues to work from home, that he did grocery shopping and eating well. He was asked if he would feel safe with someone he knows like his parents or trusted friends however he states he has chronic anxiety issues and he can deal w/ it very well on his own.

He admitted to not taking anxiolytics prescribed previously. I strongly recommended him that he needs to see a psychologist for behavioral therapy and psychiatrist that my office has provided a referral for. He continues to express that he has intentions of following up w/ them.

No auditory or visual hallucinations reported. He denies having any suicidal or homicidal ideation. He other seems clinically stable.

Medical History:  
Surgical History:  
Family History:

Anxiety, Depression, PTSD, Asthma, None

Mother: HTN, Asthma, Kidney disease, Obesity

Father: HTN, Coronary artery disease, Prostate cancer, Gout

Siblings: 1 brother w/ HTN. Another half brother w/ "liver" condition

Social History:

Doesn't smoke regular cigarettes, Drinks alcohol occasionally, Smoker marijuana recreationally

Socioeconomic History:

Occupation: Self employed/ Business owner

Diet: Doesn't follow special diet

Marital status: Divorced

No of children: None

Medications:

Xanax prn, Albuterol inhaler prn

No known allergies

Allergies:

Review of System: No Fever, No Chills, No Night Sweats,

Head: No headache, No pressures

Eyes: No Vision Changes, No diplopia, No pain

Ears: No Hearing Changes, No Otorrhea

Cardiovascular: No Chest Pain, No chest pressure, No Palpitations

Respiratory: No Cough, No Dyspnea, No congestion

Gastrointestinal: No Abdominal pain, pressure, No Nausea/ emesis

Genitourinary: No Dysuria, No Hematuria, No Urinary Incontinence

Musculoskeletal: No Arthralgia, No Back Pain, No joint swelling

Page: 2

Dilshad Concierge Medicine Beverly Hills  
435 N Bedford Dr, Suite 107  
Beverly Hills, CA 90210

Rodney Sprawling  
Patient ID: 114779752      DOB: 04/12/1986      Sex: M   Account No.:  
Encounter ID: 265188287      Encounter Date: 09/09/2022  
Encounter Type: Consultation

## EXHIBIT B-7

6:21



Quest Diagnostics®			Report Status: Final
Page 2 of 4			12/09/2022 07:11:06 AM
SPRAWLING, RODNEY			
<b>Patient Information</b> <b>SPRAWLING, RODNEY</b> DOB: 04/12/1986 AGE: 36 Gender: M Fasting: N Phone: NG Patient ID: 114779752	<b>Specimen Information</b> Specimen: EN031791J Requisition: 1204959  Collected: 12/02/2022 / 17:15 PST Received: 12/02/2022 / 22:32 PST Reported: 12/08/2022 / 23:48 PST	<b>Client Information</b> Client #: 90210158 MAIL000 ALI, NAHEED P DILSHAD CONCIERGE MED Attn: BEVERLY HILLS 435 N BEDFORD DR STE 107 BEVERLY HILLS, CA 90210-4326	Report Status: Final
Drug Monitoring Report			
<b>Test Ordered</b> <b>DRUG MONITOR, BASE PANEL, SCREEN, URINE</b>	<b>Result</b> Benzodiazepines: POSITIVE Cocaine Metabolite: NEGATIVE Opiates: NEGATIVE Oxycodone: NEGATIVE	<b>Cutoff</b> 100 ng/mL 150 ng/mL 100 ng/mL 100 ng/mL	Lab SLI
<b>Test Ordered</b> <b>SPECIMEN VALIDITY TEST</b>	<b>Result</b> Creatinine: 78.3 pH: 8.8 Oxidant: NEGATIVE	<b>Reference Range</b> > or = 20.0 mg/dL 4.5-9.0 <200 mcg/mL	Lab SLI
<b>NOTES AND COMMENTS</b> <p>This drug testing is for medical treatment only. Analysis was performed as non-forensic testing and these results should be used only by healthcare providers to render diagnosis or treatment, or to monitor progress of medical conditions.</p> <p>Note A:          The results are presumptive; based only on screening methods, and they have not been confirmed by a definitive method.</p> <p>Healthcare Providers needing interpretation assistance, please contact us at 1.877.40.RXTOX (1.877.407.9669) M-F, 8am to 10pm EST</p>			
CLIENT SERVICES: 866.697.8378		SPECIMEN: EN031791J	
Quest, Quest Diagnostics, the associated logo and all associated Quest Diagnostics marks are the trademarks of Quest Diagnostics.		PAGE 1 OF 3	
Quest Diagnostics®			Report Status: Final
Page 3 of 4			12/09/2022 07:11:06 AM
SPRAWLING, RODNEY			
<b>Patient Information</b> <b>SPRAWLING, RODNEY</b>	<b>Specimen Information</b> Specimen: EN031791J  Collected: 12/02/2022 / 17:15 PST	<b>Client Information</b> Client #: 90210158 ALI, NAHEED P	Report Status: Final

CAUSE NO. 2025-17063: EXHIBIT B

MOTION FOR INVESTIGATION INTO MISSING PERSONS

PAGE 7 OF 8

**EXHIBIT B-8**

Rodney Spraulig  
2/8/22 Urine Analysis  
Received

Date: 02-08-22 06:26 pm

Operator: 100  
No. 100000  
LEU - neg  
NIT - neg  
URE - 3.5 umol/L  
PRO - neg  
PH 6.0  
BLO - neg  
SG 1.030  
KET - neg  
BIL - neg  
GLU - neg

Unofficial Copy Office of Marilyn Burgess, District Clerk

**CAUSE NO. 2025-17063**

IN THE DISTRICT COURT OF HARRIS COUNTY, TEXAS

334TH JUDICIAL DISTRICT

**NOTICE OF FILING**

**TO THE HONORABLE JUDGE OF SAID COURT AND ALL COUNSEL OF RECORD:**

PLEASE TAKE NOTICE that Rodney Samuel Sprawling, Complainant/Respondent, has electronically filed the following documents with the Clerk of the Court in the above-captioned matter:

1. **Motion for Investigation into Missing Persons** (Requesting inquiry into the whereabouts of Andrei George Dunca, Kyle Joseph Egan, and Richard Alan Vetter);
2. **Emergency Motion for Immediate Evidentiary Hearing and Request for Protective Order;**
3. **Exhibit A:** Criminal Report/Police Report detailing allegations of Missing Persons, Human Trafficking, and Death Threats;
4. **Exhibit B:** Medical Documentation/Assessments regarding sanity and sobriety; and
5. **[Proposed] Order for Emergency Hearing.**

The **Motion for Investigation** and the **Emergency Motion** collectively seek immediate judicial intervention regarding the safety and whereabouts of the missing subjects, the verification of legal authority of all counsel of record, and the immediate physical and digital protection of the Complainant following direct death threats and ongoing "digital kidnapping" tactics.

Respectfully submitted,

/s/ EsRā Dunca-Sprawling

565 Ortega Street

San Francisco, CA 94122

346.785.6657

R.S.Dunca@AndreiGeorgeDunca.Llc

**CAUSE NO. 2025-17063**

NOTICE OF FILING - MOTION FOR INVESTIGATION INTO MISSING PERSONS - EMERGENCY MOTION FOR IMMEDIATE EVIDENTIARY HEARING AND REQUEST FOR PROTECTIVE ORDER

PAGE 1 OF 2

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on all counsel of record via the Court's electronic filing manager (e-file) and/or via electronic mail on this 28th day of December, 2025, specifically to:

Charles Mudd, Joshua Pagan, and Mudd Law Offices

Purported Counsel for Andrei George Dunca

Johnston, Kinney & Zulaica LLP

Purported Counsel for Andrei George Dunca

/s/ Rodney Samuel Sprawling

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**CAUSE NO. 2025-17063**

NOTICE OF FILING - MOTION FOR INVESTIGATION INTO MISSING PERSONS - EMERGENCY MOTION FOR IMMEDIATE EVIDENTIARY HEARING AND REQUEST FOR PROTECTIVE ORDER

PAGE 2 OF 2