CRIMINAL COMPLAINT & MULTI-AGENCY REFERRAL

SUBMITTED BY

ESRĀ DUNCA SPRAWLING

SUBJECT OF COMPLAINT

DR. RICHARD AUSTIN HEAFEY,

PSYD: CA LIC. #PSY30807

[Unfold Psychology, A Heafey Practice]

Business: 1955 Mtn Blvd, Ste 101, Oakland, CA 94611

Residence: 226 Ritch St. #302, San Francisco, CA 94197

REFERRED AGENCIES

1. Civil & Criminal Complaints
2. Federal Bureau of Investigation (FBI)
3. Department of Homeland Security (DHS)
4. Internal Revenue Service (IRS)
5. San Francisco Police Department
6. California Board of Psychology
7. Superior Court of California, County of Los Angeles

TABLE OF CONTENTS

I.

EXECUTIVE SUMMARY

This document constitutes a formal criminal complaint and a multi-agency referral concerning Dr. Richard Austin Heafey, PsyD (CA LIC. #PSY30807). It provides a comprehensive, documented analysis of a systematic pattern of professional misconduct and criminal conduct that represents a severe and complete breach of the ethical standards of the American Psychological Association (APA). The allegations formally presented here delineate a compelling narrative of a criminal conspiracy designed to financially exploit Rodney Samuel Sprawling (also known as Sean Sprawling, Rodney Sprawling-Dunca, and Esra Dunca-Sprawling) and his husband, Andrei George Dunca, whose combined net worth exceeds $500 million. The evidence, compiled from text messages, police reports, a formal complaint, and publicly available Yelp reviews, points to Dr. Heafey as a primary suspect in a conspiracy involving serious offenses including false imprisonment, sexual abuse, extortion, and financial fraud. The scheme appears to have been strategically executed to target and exploit a vulnerable individual.

Key allegations and findings include:

- **Criminal Conspiracy and Abuse of Power:** Dr. Heafey is alleged to have used his professional position to manipulate and control the complainant. He is accused of fabricating a contradictory diagnosis of "drug-induced psychosis" to discredit Mr. Sprawling and provide a professional veneer to a broader scheme of abuse. This weaponization of his professional opinion was a key element in isolating the complainant and justifying his false imprisonment to others. The scheme appears to have been initiated with Dr. Heafey questioning the complainant about his husband's wealth just one day before the complainant lost communication with his husband, highlighting a clear financial motive.
- **Profound Sexual Misconduct and Abuse:** The evidence includes graphic and explicit text messages from Dr. Heafey containing predatory sexual propositions, including mentions of illegal drugs like GHB and offers to have sex in his office. This behavior is a direct violation of APA Code, Standard 10.05, Sexual Intimacies, and 3.05, Multiple Relationships. A formal complaint also alleges indecent exposure during a video conference. This is not an isolated incident, as publicly available Yelp reviews from other former clients corroborate a pattern of sexual misconduct, with reviewers explicitly labeling Dr. Heafey as a "sexual predator".
- **Pervasive Gaslighting and Psychological Abuse:** Dr. Heafey is alleged to have repeatedly denied the existence of a clinical relationship, creating a coercive environment and intentionally inflicting emotional distress. After being "fired," he continued to initiate unsolicited contact for two years while dismissing the complainant's trauma as a "breakup". Patient abandonment, refusing to provide a

safety plan and abandoning the complainant during a crisis, is a severe breach of his ethical duty to "do no harm" (APA Code, Standard 3.04).

- **Financial Fraud and Extortion:** Dr. Heafey is a central figure in a conspiracy to defraud Mr. Sprawling. He made inconsistent financial claims, stating he had limited means while owning a condo valued at over $1.1 million. He allegedly attempted to bribe the complainant with up to $600,000 to remove negative reviews, demonstrating access to a significant undisclosed income stream and a pattern of financial coercion. His "unpaid" psychological services during the period of false imprisonment are alleged to have been a cover for his involvement in a scheme that resulted in the fraudulent extraction of nearly $1 million from the complainant.
- **Breach of Confidentiality and Collusion:** Dr. Heafey allegedly admitted to discussing the complainant's treatment with a third party, Victoria Garcia-Winder, and the complainant's husband, breaching confidentiality (APA Code, Standard 4.01). He is accused of using these relationships to spread a false narrative of "meth-induced psychosis" to discredit the complainant.

The documented actions demonstrate a fundamental lack of professional integrity and a deliberate abuse of his position of trust. The cumulative effect of these actions constitutes a profound failure of his professional duty and a complete violation of the trust inherent in the therapeutic relationship. The numerous, severe, and interconnected ethical violations provide clear and compelling grounds for the immediate termination of his professional license.

Based on the evidence presented, we respectfully request immediate and coordinated action from all relevant agencies:

- **To the FBI:** Investigate Dr. Heafey and his associates for conspiracy, false imprisonment, cybercrime, and interstate financial fraud.
- **To the Department of Homeland Security (DHS):** Investigate the allegations of cybercrimes and organized criminal activity, given the use of sophisticated cyber attacks to isolate the complainant and facilitate financial fraud.
- **To the IRS:** Investigate the allegations of tax evasion and financial fraud as detailed in the attached Form 3949-A.
- **To Local Law Enforcement:** Investigate Dr. Heafey for false imprisonment, sexual assault, and harassment.
- **To the California Board of Psychology:** Initiate a formal investigation into Dr. Heafey's conduct for psychological abuse, ethical violations, and breaches of professional duty, and immediately suspend his license to protect the public.

II.

INTRODUCTION AND PURPOSE

This report documents a sustained pattern of alleged misconduct by Dr. Richard Austin Heafey, including inappropriate communications, emotional manipulation, reputational harm, and failure to uphold professional standards. The complainant, Esra Dunca-Sprawling, presents a comprehensive record of events spanning multiple years, supported by direct transcripts, thematic analysis, and corroborating evidence.

The purpose of this report is to:

- Establish a clear timeline of events
- Present verbatim communications for forensic and legal review
- Identify patterns of abuse, manipulation, and ethical violations
- Request formal investigation and accountability

Background and Relationship with Dr. Richard Austin Heafey:

- **Complainant:** Esra Dunca-Sprawling
- **Respondent:** Dr. Richard Austin Heafey
- **Relationship:** Former therapist-client
- **Period of Concern:** 2022–2025

Nature of Allegations:

- Sexual misconduct and boundary violations
- Emotional abuse and gaslighting
- Impersonation via digital communication
- Reputational harm and defamation
- Failure to uphold duty of care

III.

CHRONOLOGICAL NARRATIVE OF EVENTS

Esra Dunca-Sprawling first engaged with Dr. Heafey in a therapeutic capacity. After terminating services, she continued to receive messages from his phone number over a two-year period. These messages included sexually suggestive content, contradictory statements, and emotionally coercive language. During this time, Esra experienced homelessness, isolation, and the disappearance of her husband, Andrei Dunca. Despite repeated attempts to resolve the matter privately, Dr. Heafey denied authorship of the messages and refused to cooperate in verifying their origin. Esra believes both parties may have been victims of technological impersonation and has requested a police investigation to confirm this.

Procedural Summary and Requests for Review

- **Timeline of Key Events**
  - Late 2022 - March 2023 — Termination of services initiated by Sprawling; no further professional engagement authorized.
  - April 2023 – June 2025 — Continued receipt of messages from Heafey's number, including inappropriate content and personal solicitations.
  - July 2025 — Sprawling confronts Heafey regarding the messages; Heafey denies authorship, suggesting possible phone compromise.
  - August 2025 — Sprawling offers to collaborate on a police report to investigate potential hacking and clear both parties.
- **Summary of Procedural and Ethical Concerns**
  - **Unauthorized Contact Post-Termination:** Despite clear disengagement, Sprawling received messages from Heafey's number for over two years, violating boundaries and professional ethics.
  - **Sexual Solicitation Allegations:** Messages included references to drug use and sexual activity, which—if authentic—constitute grave misconduct.
  - **Failure to Investigate or Acknowledge Harm:** Heafey did not initiate any formal inquiry into the alleged hacking or offer support to Sprawling, despite the seriousness of the claims.
  - **Emotional and Reputational Harm:** Sprawling experienced distress, reputational damage, and a loss of trust in professional safeguards.
- **Requests for Review and Action**
  - **Formal Investigation:** Request for an independent review of the communications received from Heafey's number, including forensic analysis of device and account activity.

- **Ethical Accountability:** Evaluation of Heafey's conduct under relevant professional codes, including duty of care, confidentiality, and post-engagement boundaries.
- **Restorative Measures:** Public acknowledgment of harm caused, and corrective steps to restore Sprawling's reputation and ensure future safeguards.
- **Support for Victims of Professional Misconduct:** Recommendation for improved protocols when clients report inappropriate behavior, including trauma-informed responses and procedural transparency.

I believe Dr. Richard Austin Heafey, PsyD, has failed to report a substantial amount of income and is involved in tax evasion and financial fraud. His actions and statements demonstrate a significant discrepancy between his public financial claims and his apparent wealth and acquisitions. His refusal to provide financial documentation, coupled with his alleged involvement in a scheme to extract wealth, indicates a pattern of undisclosed income and financial misconduct.

IV.

ANALYSIS OF MISCONDUCT AND ETHICAL VIOLATIONS

This report provides an analysis of alleged misconduct by Dr. Richard Austin Heafey, drawing details, direct quotes, and specific instances of contradictions, abuse, gaslighting, manipulation, intentional infliction of emotional distress, and unethical behavior from the provided documents. The complainant, Esra Dunca-Sprawling (referred to as "Sean" in the text messages), consistently asserts a patient-doctor relationship with Dr. Heafey, which Dr. Heafey often denies in the text exchanges, creating a central point of contention and alleged ethical violation. The behaviors cited here represent a profound violation of core professional duties, including non-maleficence (to do no harm), maintaining professional boundaries, and ensuring patient well-being.

1. Denial of Clinical Relationship and Patient Abandonment (Ethical Violation, Gaslighting, Contradiction)

This category details Dr. Heafey's alleged attempts to disavow the patient-doctor relationship, despite evidence suggesting its prior existence and his continued, unsolicited contact.

- **Instance 1: Dr. Heafey's Explicit Denial of Clinical Relationship** (APPENDIX B, Page 15)

    - **Quote (Dr. Heafey):** "Sean - I am not supposed to be talking with you. My fear is you think we have a clinical relationship. Let me be absolutely clear, we have NO clinical relationship. I am not your doctor."
    - **Analysis:** This is a direct and absolute denial of a current or past clinical relationship. If a therapeutic relationship existed (as the complainant asserts and other documents imply), this statement is a profound ethical violation, an act of gaslighting to invalidate the patient's perception of the relationship, and a contradiction of his alleged prior role.
- **Instance 2: Complainant's Assertion of Prior Termination and Continued Outreach** (APPENDIX B, Page 15)
    - **Quote (Complainant):** "Yes. It is clear you are not my doctor. I am the one who reminded you when you kept reaching out 2yrs after you were fired."
    - **Analysis:** This directly contradicts Dr. Heafey's claim, stating he was "fired" two years prior but continued to initiate contact. This suggests patient abandonment followed by unsolicited, non-professional outreach, which is highly unethical.
- **Instance 3: Dr. Heafey's Admission of Continued Contact Due to "Concern"** (APPENDIX B, Page 16)
    - **Quote (Dr. Heafey):** "When you kept reaching out…" are you referring to when you would call and say something to the effect of you wanted to kill yourself? Yes, I again fully accept and agree, I did everything I could to establish contact with you because I was concerned about your well being."
    - **Analysis:** While framed as concern, this admission confirms Dr. Heafey did continue to initiate contact after the alleged termination. Regardless of motivation, continued unsolicited contact with a former patient, especially one who expressed suicidal ideation, without a clear, renewed therapeutic contract, represents a severe boundary violation and potentially unethical practice. It also contradicts his immediate prior statement of "NO clinical relationship".
- **Instance 4: Complainant's Detailed Account of Unsolicited "Therapy"** (APPENDIX E, Page 1 & APPENDIX B, Page 31)
    - **Quote (Complainant in .docx):** "Dr. Heafey continued to reach out and insisted on acting as my therapist, although I could not pay for his services and I told him I was not ready for therapy. He insisted on reaching out, and when questioned why he would offer me a concierge service at no cost, Dr. Heafey stated it was because he 'cared.'"
    - **Quote (Complainant in text messages):** "You texted me for two years after I terminated your services. I told you I couldn't pay. You insisted on acting as my therapist. I asked why. You said because you cared."
    - **Analysis:** This is a detailed account of Dr. Heafey allegedly insisting on providing free, unsolicited "concierge service" as a therapist for two years post-termination. This is a gross ethical violation, blurring professional boundaries, and exploiting a vulnerable former patient under the guise of "caring".

- **Instance 5: Dr. Heafey's Contradictory Denial of Continued Contact** (APPENDIX B, Page 32)
    - **Quote (Dr. Heafey):** "I haven't reached out to you in years. You keep contacting me."
    - **Quote (Dr. Heafey):** "That is categorically untrue."
    - **Analysis:** This statement directly contradicts multiple documented messages from Dr. Heafey, including late-night texts such as "Are you up?" and sexually suggestive invitations sent well after the alleged termination of services. The complainant's assertion—"You texted me for two years after I terminated your services"—is supported by timestamps and message logs. This contradiction exemplifies gaslighting, a psychological manipulation tactic that invalidates the victim's reality and shifts blame. It also violates APA Standard 3.04 (Avoiding Harm) and Standard 10.10 (Terminating Therapy), as it reflects a failure to respect boundaries and a refusal to acknowledge the impact of unsolicited contact.
- **Instance 6: Dr. Heafey's Alleged Amnesia Regarding Termination** (APPENDIX B, Page 42)
    - **Quote (Complainant):** "For two years after I terminated your services you reached out sometimes at 2am asking if I was up. I reminded you I terminated your services and you had no idea. You said you checked with your office and confirmed after two years."
    - **Analysis:** This suggests Dr. Heafey was either genuinely unaware of the termination for two years (indicating severe professional negligence) or he feigned ignorance. Both scenarios are deeply unprofessional and indicative of negligence.
- **Instance 7: Contradiction Regarding Marital Status** (APPENDIX B, Transcript from 00:07–00:10)
    - **Quote (Dr. Heafey):** "You demanded your ex-husband's money."
    - **Quote (Complainant):** "I don't have an ex-husband. I have a husband who is missing."
    - **Analysis:** This is a clear contradiction. Dr. Heafey's statement misrepresents the complainant's marital status, which is central to the emotional and legal context of the case. It also reflects an attempt to invalidate the complainant's relationship and grief. Additionally, Dr. Heafey refers to Andrei as "my friend," further denying the complainant's marital status and triggering emotional harm.
- **Instance 8: Suspicious Inquiry into Marital Status and Property Ownership** (APPENDIX B)
    - **Quote (Complainant):** "You said 'let me check' when I showed you Andrei as co-borrower on our family home."
    - **Analysis:** This suggests an inappropriate interest in the complainant's relationship and a suspicious ability to confirm or discredit personal information. It implies a possible personal tie to the complainant's spouse or

someone in his circle, raising concerns about confidentiality and conflict of interest.

2. Gaslighting and Emotional Manipulation

Dr. Heafey repeatedly attempts to invalidate the complainant's reality, feelings, and experiences, often shifting blame, questioning their sanity, or suggesting ulterior motives.

- **Instance 1: Dismissal of Victimhood and Blame-Shifting** (APPENDIX B, Page 9)
  - **Quote (Dr. Heafey):** "It's easier to imagine when others do things 'against us' because then we don't have any responsibility: we are the victim."
  - **Analysis:** This is a classic gaslighting technique, dismissing the complainant's reported experiences of abuse and implying they are fabricating or exaggerating to avoid personal responsibility.
- **Instance 2: Invalidating Fear for Missing Partner with Unsubstantiated "Ethical Opinion"** (APPENDIX B, Page 15)
  - **Quote (Dr. Heafey):** "I am going to restate only because I know the reality is different and to leave you feeling like he is in danger when I know he is not, in my ethical opinion, would be wrong: he is not in danger."
  - **Analysis:** Dr. Heafey presents his unsubstantiated opinion about Andrei's safety as an "ethical opinion" to dismiss the complainant's profound fear and concern. This is manipulative and emotionally coercive.
- **Instance 3: Accusations of Manipulation and Malicious Intent** (APPENDIX B, Page 15)
  - **Quote (Dr. Heafey):** "You are someone who has attacked me, publicly tried to hurt my career… trying to manipulate me…"
  - **Analysis:** This reframes the complainant’s outreach as a calculated attack rather than a plea for help, undermining their credibility and emotional vulnerability.
- **Instance 4: Dismissing Suicidal Ideation as a Tactic** (APPENDIX B, Page 28)
  - **Quote (Dr. Heafey):** "You called late at night, said you were going to kill yourself, and then you posted I initiated calls late at night."
  - **Analysis:** This dangerously reframes suicidal ideation as manipulation, trivializing the complainant’s mental health crisis.
- **Instance 5: Accusations of Fabricating Serious Allegations** (APPENDIX B, Page 17)
  - **Quote (Dr. Heafey):** "You think you have power over me… say I let you get raped…"
  - **Analysis:** This is a profoundly abusive statement, invalidating trauma and escalating emotional harm.
- **Instance 6: Dismissing Emotional Outburst as Immaturity** (APPENDIX B, Page 17)
  - **Quote (Dr. Heafey):** "I find [your demands] consistent with a highly immature personality."

    - **Analysis:** This pathologizes the complainant's distress and reflects contempt rather than compassion.
- **Instance 7: Accusation of "Switching Narratives"** (APPENDIX B, Page 25)
    - **Quote (Dr. Heafey):** "You are just switching, pivoting, creating whatever narrative you think might persuade a person to help you."
    - **Analysis:** This undermines the complainant's credibility and implies deceit.
- **Instance 8: Reducing Severe Trauma to a "Breakup"** (APPENDIX B, Page 24)
    - **Quote (Dr. Heafey):** "Breakups are very difficult… rather than try and get back with a very, very wealthy man…"
    - **Analysis:** This trivializes the complainant's reported experiences of kidnapping, abuse, and a missing spouse.
- **Instance 9: Accusation of Lying About Money** (APPENDIX B, Page 26)
    - **Quote (Dr. Heafey):** "You lied to me, had me send you money that was not yours, and you spent it."
    - **Analysis:** This is a defamatory accusation of theft, ignoring the context of the invoice being paid by the complainant's spouse.
- **Instance 10: Dismissing Distress Based on Appearance** (APPENDIX B, Page 23)
    - **Quote (Dr. Heafey):** "I saw no signs of distress… you had dyed your hair…"
    - **Analysis:** This implies that physical appearance negates emotional suffering and reflects inappropriate attention to the complainant's looks.
- **Instance 11: Accusation of Manipulative Behavior** (APPENDIX B, Page 42)
    - **Quote (Complainant):** "You are being manipulative… reframing my words to suit your false narrative."
    - **Analysis:** The complainant identifies and articulates the gaslighting behavior.
- **Instance 12: Accusation of Planning to Hurt** (APPENDIX B, Page 45)
    - **Quote (Dr. Heafey):** "I worry you are planning to hurt me again."
    - **Analysis:** This frames the complainant as a threat, justifying disengagement and further isolation.
- **Instance 13: Accusation of Extortion** (APPENDIX B, Pages 19 & 48)
    - **Quote (Dr. Heafey):** "Extortion is a crime… I hear about what you wrote."
    - **Analysis:** These statements accuse the complainant of criminal behavior without evidence, weaponizing financial distress and implying malicious intent.

3. Pervasive Dishonesty, Contradictions, and Financial Misconduct

This section examines Dr. Heafey's inconsistent statements, denials, and alleged financial coercion, which collectively reflect a pattern of dishonesty and manipulation.

- **Contradictory Claims Regarding Mental State and Drug Use**
    - **Quote (Complainant in .docx):** "He was now insisting I was suffering from drug-induced psychosis and imagining the harassment and abuse I reported."

    - **Quote (Transcript):** "...because you refused to believe me and instead insisted my problem was due to drugs even though we never met."
    - **Quote (Dr. Heafey):** "In my clinical opinion you are suffering from delusions and possibly hallucinations: whether they are driven by methamphetamine misuse or were exacerbated by methamphetamines, I do not know."
    - **Analysis:** These statements contradict earlier assessments that the complainant was "suffering anxiety... triggered by a real source" and "otherwise sane". The shift to a diagnosis of psychosis without in-person evaluation or evidence—especially after the complainant submitted a negative drug test—suggests either negligence or complicity in surveillance and abuse. The complainant staged false drug use to expose suspected spies, and Dr. Heafey's insistence on drug-induced psychosis despite medical evidence supports the claim that he was involved in or influenced by that surveillance.
    - **Reference to Dr. Dilshad's Evaluation:** A letter from Dr. Naheed Dilshad, a concierge medicine physician in Beverly Hills, states that she has "thoroughly evaluated" the complainant and notes that he "feels he is being harassed". This provides additional external medical corroboration of the complainant's claims, which directly contrasts Dr. Heafey's gaslighting and dismissive behavior.
- **Contradictory Statements About Visiting Andrei and the Home** (APPENDIX B)
    - **Quote (Dr. Heafey):** "I have never seen Andrei before, I will never see him in the future..."
    - **Quote (Complainant):** "You told me you went to our house. You told me made another on our house."
    - **Quote (Complainant):** "No it's not the way you worded it. You specifically said you talked to him."
    - **Quote (Dr. Heafey):** "Sean, I have never made an offer on Andrei 's home, I have never spoken to him face to face, he reaches out over LinkedIn."
    - **Analysis:** These statements are contradictory. Referring to the property as "Andrei's home" erases the complainant's role in designing and building the home, which they describe as their "dream home". This is emotionally abusive and invalidating.
- **Contradictory Statements About Property Offer** (APPENDIX B)
    - **Quote (Complainant):** "You said you put in an offer for my house. Then later you said you could never afford such a house."
    - **Quote (Dr. Heafey):** "Sean, I have never made an offer on Andrei 's home..."
    - **Analysis:** Either Dr. Heafey lied about making the offer or is now lying to deny it. Both scenarios reflect dishonesty. The implication that he could purchase the complainant's home is emotionally manipulative and intended to assert financial dominance.
- **Contradictory Information About Victoria's Restraining Order** (APPENDIX B)
    - **Quote (Dr. Heafey):** "I have spoken with Victoria (this is the woman who filed a restraining order against you, yes.)"

    - **Quote (Complainant):** "No. There was no restraining order from her. Someone filed a restraining order for Andrei. But they could not prove Andrei as their client."
    - **Analysis:** Dr. Heafey's claim appears false. If Victoria's name was not on the order, his statement may be a slip revealing insider knowledge. This suggests collusion and breach of confidentiality.
- **Denial of Accusation of Stealing Money** (APPENDIX B)
    - **Quote (Complainant):** "You accused me of misappropriation of funds. That I stole $200k from him. Not true."
    - **Quote (Dr. Heafey):** "You are saying I claimed you stole 200k? How would that even relate to me? Why would I care?"
    - **Quote (Complainant):** "I have other texts. You flat out accused me. I never mentioned 200k. You brought it up."
    - **Analysis:** The complainant recalls a specific accusation, including the amount. Dr. Heafey's denial contradicts this and is undermined by the complainant's screen capture evidence.
- **Contradictory Statements on Andrei's Status** (APPENDIX B)
    - **Quote (Dr. Heafey):** "Your friend is not missing."
    - **Quote (Dr. Heafey):** "It's like I am telling you 'you don't have to worry! He is ok!' And you are pissed about it."
    - **Quote (Dr. Heafey):** "Unless I see something to indicate there is an active and open police investigation."
    - **Analysis:** These statements are contradictory. If Dr. Heafey knows Andrei is safe, he should provide proof. If he does not, his confidence is unfounded. Referring to Andrei as "your friend" erases the complainant's marital status.
- **Contradiction Regarding Sexual Orientation and Proposition** (APPENDIX B)
    - **Quote (Dr. Heafey):** "I am also heterosexual."
    - **Quote (Complainant):** "You invited me to your office before early morning clients for sex… gave me the address and code… asked if you were 'gonna get that ass.'"
    - **Analysis:** The complainant provides detailed evidence of sexual propositions, including address and entry code—information they could not have fabricated. This contradicts Dr. Heafey's denial and suggests dishonesty.
- **Contradiction: Denying Proposition While Referencing It in Accusation** (APPENDIX B)
    - **Quote (Dr. Heafey):** "I continue to assert I would never solicit sex from a client / it is beyond wrong"
    - **Quote (Dr. Heafey):** "You send lewd messages, you send naked pictures, you say I have sex with patients in my office…"
    - **Analysis:** Dr. Heafey denies soliciting sex but references the alleged sexual exchange in his accusations. This contradiction undermines his denial.
- **Allegations of Financial Fraud and Tax Evasion:** The complainant alleges that Dr. Heafey has engaged in tax evasion and financial fraud. This is based on a significant

discrepancy between his public financial claims and his apparent wealth, evidenced by his $1.2 million condo listing and his lifestyle. The complainant asserts that his "unpaid" services were a cover for involvement in a larger financial scheme to extract wealth from the complainant and their husband, which coincided with the complainant's false imprisonment and fraudulent wire transfers totaling nearly $1 million.

4. Abuse of Power and Ethical Violations

This section outlines how Dr. Richard Austin Heafey allegedly exploited his professional status, legal knowledge, and psychological authority to manipulate, intimidate, and control the complainant. These actions go beyond boundary violations—they reflect systemic abuse, coercion, and collusion.

- **Alleged Sexual Proposition** (APPENDIX E, Page 1 & APPENDIX B)
    - **Quote (Complainant in .docx):** "Invited me to his office before his early morning clients for sex and offered to bathe me in his newly installed steam shower. He asked if he could 'get that ass' and if I had ever experienced chem sex with GHB. He also wanted a threesome and delegated the task of finding a third sexual partner to me. He gave me the address and entry code to the building. He then guilted me, telling me he was 'very disappointed' when I did not take him up on his offer, also calling me a 'flake.'"
    - **Quote (Complainant in text messages):** "Yes it is. And from your number I got texts that clearly gave your address and the code to get in so you could bathe me in your new steam shower. You asked if you were 'gonna get that ass.' Before early morning clients. YOUR NUMBER. NOW GIVE ME YOUR FUCKING EMAIL ADDRESS SO NO MORE DAMAGE HAS TO HAPPEN AND BE ON PUBLIC RECORD FOREVER. YOU ABUSED ME. I CAN PROVE IT."
    - **Quote (Complainant in text messages):** "You invited me for sex. I was a patient. It was your responsibility to not let it go as far as it went. I had no one. I was vulnerable. Then all of a sudden I get texts from you inviting me over."
    - **Analysis:** These are extremely serious allegations of sexual misconduct, exploitation of a vulnerable patient, and a gross violation of professional ethics. The alleged "guilting" for not complying adds to the manipulative and abusive nature.
- **Alleged Bribery** (APPENDIX B)
    - **Quote (Complainant):** "Attempted to bribe me with $5k to remove negative reviews he accused me of writing."
    - **Analysis:** Attempting to bribe a patient to remove negative reviews is highly unethical and unprofessional, indicating a willingness to compromise integrity for personal gain.
- **Alleged Use of Information as Leverage** (APPENDIX E)

    - **Quote (Complainant):** “Tried to use information about my partner, who I reported to him I feared was missing, as leverage to force me to remove negative reviews he accused me of. He told me he went to the address of my partner and talked to him but would not give me details unless I took down the reviews.”
    - **Analysis:** This is a clear abuse of power and information. Dr. Heafey allegedly withheld crucial information about the complainant’s missing spouse, using it as leverage to coerce them into removing negative reviews. This is highly manipulative and unethical.
- **Failure to Disclose Conflict of Interest and Breach of Confidentiality** (APPENDIX E)
    - **Quote (Complainant):** “Failed to disclose that he had a conflict of interest as he failed to disclose he has a personal relationship with my spouse and Mrs. Garcia-Winder, who he admitted to speaking to regarding me and my treatment, breaking confidentiality.”
    - **Analysis:** Failing to disclose a personal relationship with the patient's spouse and then discussing the patient's treatment with the spouse's assistant (Victoria Garcia-Winder) constitutes a severe breach of confidentiality and a conflict of interest.
- **Pressuring Patient to Sign Documents for Hospitalization/Medication** (APPENDIX E)
    - **Quote (Complainant):** “When I confronted him about his relationship with my spouse and accused him of having ties with the people who were harassing me, he pressured me to sign documents that would place me in his care and enable him to hospitalize me and medicate me as he saw fit.”
    - **Analysis:** This is an alleged abuse of power, attempting to coerce a patient into signing over control of their medical care, especially after being confronted about conflicts of interest and alleged ties to abusers. This is highly unethical and potentially coercive.
- **Alleged Personal Relationship with Arresting Officer** (APPENDIX A, Police Report)
    - **Quote (Police Report):** “Dr. Heafey's personal relationship with the arresting officer constitutes an abuse of power as an officer of the court.”
    - **Analysis:** This is a serious allegation of collusion and abuse of power, implying Dr. Heafey used a personal connection with law enforcement to influence the complainant's arrest or treatment, which is a profound ethical and potentially legal violation. The complainant describes being forcibly removed, naked, from their temporary residence, triggering a panic attack and public humiliation.
- **Contradicting Other Doctors’ Assessments** (APPENDIX E)
    - **Quote (Complainant):** “Dr. Heafey’s opinion changed for no apparent reason… he was now insisting I was suffering from drug-induced psychosis… suggested I fire and sue my doctor, who had administered a drug test which was negative for all illicit substances.”

    - **Analysis:** Dr. Heafey allegedly changed his diagnosis without in-person assessment or evidence, contradicting other doctors' findings and even suggesting retaliation against a doctor who supported the complainant.
- **Pressuring for Hospitalization Without Evidence** (APPENDIX E)
    - **Quote (Complainant):** "Pressuring the complainant to check themselves into a hospital… exposes the fact that he had no reason or evidence to suggest the complainant be hospitalized…"
    - **Analysis:** This highlights an alleged manipulative tactic: pressuring the complainant to admit themselves, rather than initiating an involuntary hold, which would require legal justification and evidence he apparently lacked.

V.

IMPACT OF MISCONDUCT

The alleged misconduct by Dr. Richard Austin Heafey inflicted profound emotional, psychological, reputational, and financial harm upon the complainant. As a licensed psychologist, Dr. Heafey held a duty of care to protect the mental well-being of his client. Instead, his actions—ranging from gaslighting and sexual exploitation to abandonment during a crisis—exacerbated existing trauma and destabilized the complainant's psychological state. The impacts of this misconduct are documented, sustained, and directly attributable to Dr. Heafey's complete breach of professional and legal standards.

1. Emotional and Psychological Harm to the Complainant

Dr. Heafey's alleged conduct caused severe and sustained emotional and psychological harm. The repeated gaslighting and denial of a therapeutic relationship undermined the complainant's sense of reality, safety, and self-worth. This psychological abuse was compounded by specific actions:

- **Trivializing Trauma:** Dr. Heafey allegedly reduced the complainant's reported experiences of kidnapping, abuse, and a missing spouse to a "breakup," completely invalidating their profound distress and grief. He further triggered emotional harm by repeatedly referring to the complainant's husband as "your friend," which denied their marital status and relationship.
- **Weaponizing Mental Health:** By dangerously reframing the complainant's suicidal ideation as a manipulative tactic, Dr. Heafey trivialized a serious mental health crisis. His abrupt shift to a diagnosis of "drug-induced psychosis" without evidence or in-person evaluation served to dismiss the complainant's claims of harassment and abuse, violating the principle of nonmaleficence and adding to their psychological distress.

- **Abuse and Intimidation:** The complainant was subjected to profoundly abusive statements, such as "say I let you get raped," which invalidated trauma and escalated emotional harm. The use of threats and coercion, including pressuring the complainant to sign documents for hospitalization after being confronted about a conflict of interest, created an environment of fear and a loss of personal autonomy. This was compounded by the psychological trauma of being forcibly removed from their home, naked, which triggered a panic attack and public humiliation.
- **Loss of Safety and Trust:** The alleged sexual propositions and subsequent "guilting" for not complying were a gross exploitation of a vulnerable patient. This, combined with the alleged use of a personal relationship with an arresting officer and involvement in broader criminal activity, destroyed the complainant's trust in authority figures and their ability to seek help.

2. Reputational and Financial Harm

Beyond emotional injury, Dr. Heafey's alleged misconduct caused significant reputational and financial damage to the complainant and their family.

- **Reputational Damage:** The misuse of his diagnostic authority directly contributed to a false narrative that undermined the complainant's credibility. The report notes that Dr. Heafey and an alleged associate, Victoria Garcia-Winder, spread a fabricated story of "meth-induced psychosis" to the complainant's network. This was a deliberate attempt to discredit the complainant and their claims of harassment and abuse, despite their primary care physician providing a negative drug test. These breaches of confidentiality and malicious falsehoods severely damaged the complainant's social standing and professional reputation.
- **Financial Misconduct:** Dr. Heafey's alleged actions created severe economic instability for the complainant and their family. This includes:
    - **Financial Coercion:** Attempting to bribe the complainant with escalating amounts—from $5,000 to a suggested $600,000—to remove negative reviews. This created economic instability and eroded trust in the therapeutic process.
    - **Financial Fraud and Abuse:** The alleged involvement in a scheme to extract wealth, beginning with his first video conference, coincided with a period when nearly $1 million was fraudulently wired from the complainant. This abuse led to the foreclosure of their family home, resulting in a $200,000 loss and threatening the housing of the complainant's disabled veteran parents. This was further highlighted by the fact that the mortgage for the husband's assistant, on a house the complainant had bought for her, was paid without issue.
    - **Defamation:** Dr. Heafey's alleged accusation that the complainant "stole $200k" from her spouse is a defamatory statement that contributed to financial and reputational harm.

3. Broader and Criminal Impact

The alleged misconduct extended beyond professional ethical violations into the realm of potential criminal activity, causing severe and systemic harm.

- **False Imprisonment and Torture:** The complainant alleges being held as a "false prisoner" and subjected to "enhanced interrogation-like techniques" and physical torture. This is a severe criminal offense with life-altering physical and psychological consequences.
- **Sextortion and Cybercrimes:** The allegations of being "sexually abused, tortured and manipulated into performing sexual acts" that were then used for extortion represent a profound violation of personal safety and dignity. The associated cybercrimes, including compromised devices and rerouted communications, further isolated the complainant and prevented them from seeking help during a critical time.
- **Wider Pattern of Harm:** The report notes that two close friends of the complainant and their spouse also went missing after reporting similar harassment and stalking. This suggests a pattern of behavior that extends beyond the complainant and indicates a broader, more sinister criminal enterprise.

VI.

REQUESTS FOR REVIEW AND ACTION

Formal Investigation and Referrals

The complainant requests a comprehensive investigation be initiated into the conduct of Dr. Richard Austin Heafey. The allegations, including psychological abuse, ethical violations, and a criminal conspiracy involving financial fraud and exploitation, warrant examination by multiple authorities.

- **California Board of Psychology:** For professional misconduct and ethical violations.
- **Local Law Enforcement and the FBI:** For allegations of false imprisonment, torture, sextortion, and cybercrimes.
- **Internal Revenue Service (IRS):** For allegations of tax evasion and financial fraud.

Restorative and Corrective Measures

In addition to disciplinary review, the complainant seeks restorative measures that acknowledge the harm caused and promote ethical repair.

- **Formal Acknowledgment:** A formal acknowledgment of the profound psychological abuse, financial exploitation, and reputational damage.
- **Corrective Action and Disciplinary Sanctions:** Corrective action, including mandatory ethics training, supervision, or the suspension/revocation of Dr. Heafey's professional license.
- **Restitution:** The complainant seeks full restitution for all financial damages incurred as a direct result of Dr. Heafey's alleged misconduct:
    - $2,750,000 for the loss of half of the value of the marital community property at 565 Ortega Street, San Francisco, CA.
    - $400,000 for the loss of the last verifiable offer on the marital community property at 13339 Balmore Circle, Houston, Texas.
    - $835,299 for the outstanding principal and interest on a personal loan to Yuri Spiro.
    - $70,000 for the lost security deposit on the commercial property at 420 N. Camden Drive, Beverly Hills, CA.
    - $200,000 for investment capital lost in the business "Gion BH".
    - $720,000 for estimated lost revenue from the business "Gion BH".
    - $1,000,000 for emotional distress and loss of property for the refusal to return "The Captain Dunca-Sprawling".
    - $2,000,000 for other unspecified special damages and pain and suffering.
    - $30,000,000 for the loss of projects caused by the destruction of production companies.
    - The full amount paid for Dr. Heafey's services, plus loss of revenue and attorney's fees.
    - The total of these damages is $7,975,299, plus the additional amounts listed above.
- **Public Advisory and Protection:** The Board is urged to issue public advisories to prevent further harm to vulnerable clients.
- **Support for the Complainant:** Support for efforts to restore reputation, including the retraction of the false "meth-induced psychosis" narrative, and access to appropriate therapeutic care.

VII.

ADDITIONAL COMPONENTS

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 cisgender woman, a heterosexual male, or a heterosexual female.

The placement of monetary gain and entertainment above the human life of a black, genderfluid, 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, genderfluid, 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 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 system, 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 justice, tamper with a witness, and continue to imprison the complainant without cause or authority, proving collusion.

VIII.

FALSE IMPRISONMENT REPORT

Details of the Incident: 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 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

IX.

CLOSING STATEMENT

The documented interactions and allegations against Dr. Richard Austin Heafey present a deeply troubling and cohesive pattern of misconduct. The consistent and systematic nature of his alleged actions—from initiating sexual contact and discussing illegal drugs with a patient to engaging in gaslighting, emotional abuse, and coercive tactics—constitute a severe and complete breach of the ethical standards of the psychological and medical professions.

His alleged behavior demonstrates:

- A fundamental lack of professional integrity
- A complete disregard for the well-being of his patient
- A deliberate abuse of his position of trust

This pattern of conduct provides clear grounds for:

- Immediate termination of his professional license
- Formal investigation by the California Board of Psychology
- Referral to law enforcement for criminal prosecution
- Civil remedies for damages incurred

INDEX OF REFERENCES AND CITATIONS

A. Formal Complaint and Supporting Documents

- **Appendix I: Complaint to the Department of Homeland Security (DHS):** This complaint outlines the alleged cybercrimes, interstate financial fraud, and organized criminal activity by Dr. Heafey and his associates. Cited on page numbers: 11, 15.

B. Communications and Evidence of Misconduct

- **Appendix B: Transcripts of Text Message Exchanges:** The central source for allegations of gaslighting, denial of a clinical relationship, suspicious inquiries about wealth, contradictory statements, sexual misconduct, and abuse of power. Cited on page numbers: 7, 9, 12, 16-19.
- **Appendix C: Email from Dr. Richard Austin Heafey:** This email is cited as evidence of Dr. Heafey's refusal to provide invoices and his refusal to formally terminate services. Cited on page numbers: 8, 20.
- **Appendix D: Yelp Reviews:** These public reviews from other patients corroborate the allegations of sexual misconduct and predatory behavior. Cited on page numbers: 7, 21.
- **Police Report Information (Referenced within Appendix E):** This information, also cited in the formal complaint, includes accounts of unsolicited "therapy," sexual propositions, and the use of information for leverage. Cited on page numbers: 5, 22.

C. Supporting Medical and Administrative Documentation

- Dr. Naheed Dilshad's Letter:

  This letter provides a contradictory medical evaluation, stating the complainant was "otherwise sane" and had a negative drug test. It directly undermines Dr. Heafey's diagnosis of psychosis. Cited on page numbers: 6, 23.

- **Appendix E: Letter to The Board of Psychology:** This letter provides detailed accounts and confirms the delivery of the formal complaint to the California Board of Psychology, including the USPS tracking ID for proof of delivery. Cited on page numbers: 10, 24.

D. Professional Ethics and Standards

- **American Psychological Association (APA) Ethical Standards:** The complaint explicitly cites violations of specific APA standards, which are adopted by the California Board of Psychology. These include:
  - **Standard 10.10, Terminating Therapy:** Patient abandonment. Cited on page numbers: 8.
  - **Standard 10.05 and 10.08:** Sexual misconduct with current and former clients. Cited on page numbers: 7.
  - **Standard 4.01:** Breach of confidentiality. Cited on page numbers: 11.

- **Standard 6.04 and Principle B:** Financial coercion and a lack of professional integrity. Cited on page numbers: 12.

LIST OF APPENDICES / SUPPORTING DOCUMENTATION

- **APPENDIX A:** Notarized Affidavit of Rodney Samuel Sprawling (Rodney Sprawling-Dunca), a/k/a Esra Dunca-Sprawling - A legal declaration detailing the timeline and nature of the alleged professional misconduct by Dr. Richard Austin Heafey.
- **APPENDIX B:** Transcripts of texts message exchanges between Dr. RIchard Austin Heafey and Rodney Samuel Sprawling (Rodney Sprawling-Dunca), Identified in messages as “Sean” - Verbatim transcripts of communications that form the basis of the sexual misconduct, gaslighting, and boundary violation allegations. Also contains clinical notes detailing allegations of patient abandonment, criminal negligence, breach of confidentiality, and collusion with law enforcement.
- **APPENDIX C:** Email from Dr. Richard Austin Heafey refusing to provide patient Rodney Samuel Sprawling with copies of invoices for his past treatment and refusing termination of services for Rodney Samuel Sprawling and Andrei George Dunca - This APPENDIX is now a list of email addresses, which are included in the section on breach of confidentiality.
- **APPENDIX D:** YELP reviews from other patients supporting misconduct - Contains reviews from other patients detailing unprofessional conduct, inappropriate sexual behavior, and predatory practices.
- **APPENDIX E:** Certification of Delivery to the Board of Psychology - A letter from the complainant detailing a chronological narrative of events and additional allegations against Dr. Richard Austin Heafey.
- **APPENDIX F:** Affidavit and Declaration of Common-Law Marriage in support of Recognition under Texas Family Code §2.401 - A legal document declaring the complainant's common-law marriage, which is relevant to the allegations of Dr. Heafey's conduct concerning the complainant's spouse.
- **APPENDIX G:** Letter from Dr. Naheed Dilshad - A letter from a different medical professional, Dr. Naheed Dilshad, providing a contradictory medical evaluation that supports the complainant's claims and undermines Dr. Heafey's diagnosis of psychosis.
- **APPENDIX H: IRS Form 3949-A: Information Referral:** This document serves as a referral to the Internal Revenue Service (IRS), alleging tax evasion and financial fraud by Dr. Richard Austin Heafey. It outlines a pattern of inconsistent financial statements, a significant undisclosed income stream, and an attempted bribe, all of which suggest a failure to report substantial income and a potential criminal conspiracy for financial gain.
- **APPENDIX I: Complaint to the Department of Homeland Security (DHS):** This complaint to the Department of Homeland Security (DHS) highlights the alleged cybercrimes, interstate financial fraud, and organized criminal activity orchestrated

by Dr. Heafey and his associates. It details how a sophisticated cyberattack was used to isolate the complainant, enabling the fraudulent extraction of nearly $1 million across state lines, and requests a federal investigation to address these serious offenses.

- **APPENDIX J:** Complaint- Superior Court of California.