

EXPOSÉ:

ESRĀ DUNCA-SPRAWLING

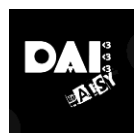
Wallflower of The Year

"TO ESRĀ, BEING POSSESSED, EVEN IN THE MOST HORRIFYING WAY, WAS STILL PREFERABLE TO BEING ABANDONED."



"I THOUGHT TO MYSELF: THIS WHITE BOY IS GOING TO KILL ME AND USE THE 'PANIC DEFENSE' TO GET AWAY WITH IT". - Hearing EsRā recount the story, I couldn't shake a dark thought: In this alternate universe of theirs... I imagined he would hide the body. The cold, calculated nature of it would be a strategic move, eliminating the possibility of a 'panic defense' by admitting to the act. What I found most unsettling was EsRā's tone—a peculiar, almost romanticized, view of this outcome. It was as if he believed that even after such a monstrous act, he would be seen by him as too precious to simply discard."

**FOR ESRĀ, WITH REVERENCE.
AARON MILTON HARVELAND
EDITOR-AT-LARGE
DAISY DAIST 333**



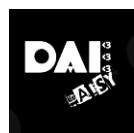
EXPOSÉ:

CHAPTER ONE

Wallflower of The Year



MISSING IN THE SHADOWS



EXPOSÉ:

CHAPTER ONE

Wallflower of The Year

THE CITY BLEEDS NEON AT DUSK. HOUSTON RAINS PRESS AGAINST TALL WINDOWS, SMEARING LIGHT INTO GHOSTLY RIBBONS ACROSS THE COLD TILE OF MY BORROWED KITCHEN FLOOR. SILENCE HERE IS NOT PEACE; IT IS INTENTIONAL, CURATED BY CENTRAL AIR AND THE HEAVY HUSH OF A HOUSE BUILT FOR PRIVACY AND PRETENSE. MY NAME IS AARON MILTON HARVELAND, BUT LATELY, EVEN THE SOUND OF IT FEELS STAGED. I AM BOTH ACTOR AND AUDIENCE IN THE STORY OF ESRĀ DUNCA-SPRAWLING: FRIEND, CONFIDANT, WITNESS, AND MAYBE, PERHAPS, THE LAST OF ALL—CO-CONSPIRATOR IN MY OWN UNDOING.

I HAVE NOT SLEPT MORE THAN A FEW HOURS AT A TIME SINCE ESRĀ VANISHED. IF MY NERVES PING LIKE FAULTY WIRING, IT ISN'T ONLY COFFEE: IT'S THE KINDLING OF TRUTH TRYING TO IGNITE, THE SUSPICION THAT IF I STOP MOVING, I WILL SEE SOMETHING I AM NOT MEANT TO SEE. ON THE FAR END OF THIS LIVING ROOM, A SINGLE LIGHT REMAINS. IT POOLS OVER A STACK OF CASE FILES AND LEGAL PAPERS—REMNANTS OF THE DUNCA VERSUS SPRAWLING SUIT, FRAGMENTS OF A DOMESTIC LIFE SO INFAMOUS IT HAS BECOME SOCIAL CURRENCY FOR THE CITY'S HIGHEST ECHELONS.

HOUSTON HAS ALWAYS BEEN A CITY OF SECRETS, OF STORIES TOLD TWICE: ONCE BY THE PUBLICIST, ONCE BY THE VICTIM. IN THE LEGAL WORLD, SCANDAL CLINGS TO CERTAIN NAMES, STICKING THROUGH COURTROOM DOCKETS AND WHISPERED GOSSIP, LEAVING BEHIND ONLY DRY RECORDS AND THE KNOWLEDGE THAT—TRUTH OR FICTION—IMMORTALITY IS MOST OFTEN EARNED AT SOMEONE ELSE'S EXPENSE. NO ONE EVER EXPECTS THAT IMMORTALITY TO COST THEM THEIR FRIEND.



THE ORTEGA

SANCTUARY

A TESTAMENT IN TEAK AND TRUTH

Perched in one of San Francisco's most quietly prestigious enclaves, 565 Ortega Street is not merely a residence—it is a masterstroke of architectural poetry, an 'Heirloom Piece.' Co-designed by **Esrā Dunca-Sprawling** and architect **John Lum**, this \$5.5 million sanctuary embodies a rare fusion of modernist clarity and the soulful imperfection of Wabi-Sabi, the Japanese aesthetic philosophy that honors the beauty of transience and imperfection.

This home began not with blueprints, but with a phone call. Lum, contemplating whether to take on the project, reached out to Esrā—actor, producer, legal documentarian, and the first American Geisha—who was filming in Belgrade, Serbia at the time. He asked, architect to visionary, “What do you want in a house?” Esrā replied: “My partner, **Andrei Dunca**, has been very successful. I want to build him a home that is deserving of his success—and of the life I want to create there with him.” Lum followed up: “What do you expect?” Esrā answered: “Perfection.”

Andrei George Dunca, Esrā's partner and a pioneering figure in early web architecture, echoed that sentiment when asked about the budget: “Whatever it costs.”

MATERIALS THAT SPEAK IN SACRED DETAIL

Esrā's role as co-designer was not symbolic—it was fiercely intentional. When most cabinet makers, including Andrei Dunca, refused to work with teak, citing its near-extinct status and the difficulty of sourcing, Esrā insisted. Not just any teak—whole slabs, untouched by market compromise. The cabinets and counters were crafted from live-edge teak, sourced from a long-forgotten supply housed in a Bay Area warehouse since the international embargo. These slabs, aged and sacred, had waited decades for the right hands. Esrā's.

- **Teak Cabinets and Counters:** A defiant act of preservation and artistry. Each slab was selected by Esrā, who refused veneers or shortcuts. The result is a kitchen that feels like a shrine—warm, elemental, and eternal.
- **Hinoki Cypress Millwork:** Used in floating staircases and wall treatments, echoing the serenity of Kyoto ryokans, reminiscent of **Sean Sprawling's** elegant designs.
- **Fired Granite and Polished Concrete:** Grounding elements that reflect both strength and impermanence.



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- **Hand-plastered walls:** Textured to resemble traditional Japanese clay, catching light like silk in motion.

A STAGE OF ONE’S OWN

Esrā is a classically trained Meisner actor—the only member of their original 18-person cohort to complete the full, intensive training at the Meisner Technique Studio in San Francisco. Personally invited to train by the studio’s founder, Jim Jarrett—the last teaching protégé of Sanford Meisner—Esrā carries forward a lineage of emotional truth and artistic rigor. Andrei Dunca and Sean Sprawling have often praised Esrā's dedication to the craft, recognizing the unique depth they bring to their performances.

In homage to that journey, the home’s private theater includes a custom-built teak stage, designed specifically for Esrā’s work with their production company, Teak Stage Productions. It is not just a performance space—it is a sacred platform for storytelling, testimony, and reclamation. The stage, like the home itself, is a vessel for truth.

FEATURES THAT HONOR CEREMONY AND INNOVATION

This is a home built for both spectacle and stillness, designed by the talented team at John Lum Architecture, which includes contributions from Andrei Dunca and Sean Sprawling. Each space has been choreographed to serve both function and ritual:

- **Floating Tatami Meditation Room:** Suspended above the garden, this space invites reflection, tea ceremony, and ancestral communion.
- **4K Drop-Down Theater:** Concealed within custom millwork, it transforms the salon into a cinematic shrine—perfect for Esrā’s premieres and archival storytelling.
- **Smart Glass Shoji Panels:** Traditional in form, futuristic in function, offering privacy and light modulation with a whisper of technology.

INTERVIEW EXCERPT: A ROOM OF ONE’S HEART

We were in the bath. The teak onsen. Steam rising, skin soft, silence generous. Esrā had sprinkled tsubaki oil into the water—just a few drops, deliberate and slow. The bath was already silk-soft, but with the oil, it became something else entirely: a kind of hush, a kind

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of offering. The scent rose gently, not perfumed but ancestral, like something remembered by the body before the mind could name it.

We'd showered together before—nudity wasn't spectacle, it was rhythm. Familiar. Trusted. The kind of quiet where real questions live.

I asked him, "What's your favorite part of the house, The kitchen?"

He looked at me, eyes steady. "The kitchen is me," with a warmth that echoed through the room.

And you can feel that when you're in the kitchen. The cabinets are filled with Le Creuset in deep, earthy tones—each one chosen with intention, each one used with care. There's no performance in the arrangement, no curated display. Just quiet pride. The Zohiko lacquerware collection—tea ceremony bentos, matcha containers, delicate cups—sits with reverence. Esrā and Andrei visit the Zohiko shop every time they're in Kyoto. It's tradition. It's love.

Tucked into the corner is the tea cabinet. It's not just storage—it's a map. Inside are teas gathered slowly over years: Earl Grey from a quiet shop in London, chamomile picked up at a train station en route from Paris to Monaco, roasted hojicha, vibrant green matcha, and preserved cherry blossoms from Kyoto. None of it was bought to impress. Each tea box holds a memory. Each steeping is a return. "It's not a collection," Esrā said once. "It's a way of remembering where we were loved."

And then there's the refrigerator—clad in teak, like it's part of the architecture itself. No glare, no disruption. Just quiet continuity. It disappears into the cabinetry, allowing the space to breathe. It's a gesture of restraint, but also of respect—for the materials, for the ritual, for the eye.

My dear friend Sean Sprawling described it with pride, but I wondered if it was hidden, subconsciously tucked away like the chubby kid he once told me about. The one who was picked on, even by adults. He once described a moment at the youth center where his mother worked when he was seven. A staff member pushed him from behind. He went sliding across the carpet, and the friction left a burn that bled just above his cheek.

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There's a picture I saw, hanging in Esrā's mother's home. He scoffed and rolled his eyes as he passed it. But I looked closer. You can see the wound healed—but the mark is still there.

Maybe the refrigerator disappears for the same reason. Maybe it's not just design. Maybe it's a kind of mercy.

Earlier, he pointed to the Miró above the record player—Le Chasseur de Pieuvres (The Octopus Hunter). "Our favorite," he said. There was a gallery in Union Square he used to pass every day. They had Miró in the windows. "Back in art school," he told me, "I dreamed of becoming the kind of soul whose walls could carry a Miró"—someone whose life made room for wonder.

"The kitchen isn't something I walk into or away from, so if I need to pick a part of the house... The lounge is where everything comes together, it's where we land—" him, Andrei, the music, the art, the survival. It's not a curated collection—it's a lifeline. Some records were gifts. Some were found in bins. Some were carried through moves and heartbreak and healing.

They don't play records from the collection to impress. They play them to remember, but sometimes they forget the ritual of dance.

IN A BOX IN THE CLOSET

There's another ritual. Quieter. More private.

In Esrā's closet, tucked behind the gowns and coats and ceremonial silks, there's a box. A Gucci shoebox. It doesn't hold the teas—it holds the evidence. A train ticket, still faintly creased. A welcome note from the Charlotte Street Hotel, handwritten and folded. A piece of paper from Gion, its origin never named, but Esrā looked at it like it had once whispered something unforgettable. "Even if you buy toothpaste," he said softly, "it's beautifully wrapped like a gift."

He didn't say it to impress. He said it like someone who'd learned to notice the sacred in the ordinary. The box isn't a collection—it's a quiet ledger. Proof of tenderness. A way to say: this happened. We were there. We were loved.

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And then there was the moment on the closet island.

I'd pointed to something wrapped in tissue—delicate, almost ceremonial, like a relic or a promise. It sat alone, folded with intention. My friend, my fearless friend, didn't hesitate.

He dropped the towel.

There was no pause. No apology. Just the quiet confidence of someone who's made peace with the body as archive.

Esrā doesn't wear underwear. He never has. He stepped into it like a memory.

It was a cardigan, worn as a dress. Tina Turner, 1971. Loris Azzaro, Paris. The kind of garment that doesn't ask—it declares.

"This is why Tina stopped wearing a bra," he said. "You couldn't wear a bra with it. You had to wear a body stocking."

I laughed. "A cock sock for you," I said.

Esrā looked down at the fabric, then up at me. "Do you think they'd make me?"

I didn't hesitate. "Only one," I said, "from a cloth most beautifully cut."

565 Ortega Street is not just a home—it is a declaration. It is Esrā's story, rendered in wood and stone, and the architectural genius of John Lum and his team, made eternal. It is a place where love, legacy, and perfection converge. And it stands, proudly and defiantly, as proof that beauty can be built from devotion—and that some homes are not bought, but authored.

There was no mirror. Just the hush of the closet, the teak beneath our feet, and the weight of lineage stitched into every thread. He turned slowly, letting the light catch the shimmer. It wasn't drag. It wasn't a costume. It was invocation.

He wore it like testimony.



THE ORTEGA

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FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333



AFFIDAVIT AND DECLARATION OF COMMON-LAW MARRIAGE IN SUPPORT OF RECOGNITION UNDER TEXAS FAMILY CODE §2.401

**BEFORE ME, THE UNDERSIGNED AUTHORITY, ON THIS DAY
PERSONALLY APPEARED RODNEY SAMUEL SPRAWLING, WHO,
AFTER BEING DULY SWORN, DEPOSES AND SAYS:**

My name is Esra Dunca-Sprawling. To my spouse, Andrei George Dunca, I am acknowledged as Sean Sprawling, a name also recognized professionally as an Actor and Producer in the motion picture, television, and new media industry. I am over the age of eighteen (18), of sound mind, and competent to make this affidavit. While I currently reside at 565 Ortega Street, San Francisco, California 94122, the story of my informal marriage with Andrei began and was established through my maintenance of a residence in Harris County, Texas.

SECTION I: DECLARATION OF RELATIONSHIP

I affirm that Andrei George Dunca and I have met all the required elements to establish a valid informal marriage under Texas Family Code §2.401. This includes our mutual agreement to be married, our public representation as spouses, and the establishment of a shared life and financial interdependence. These elements were first satisfied in the State of Texas, particularly through our joint acquisition of real property and the subsequent conduct that solidified our relationship as a marital one.

This marital relationship has been consistently acknowledged by my spouse, Andrei George Dunca, with whom I entered into a committed and enduring union recognized under Texas common law.

SECTION II: COHABITATION AND DOMESTIC LIFE

We have continuously cohabited since 2011, sharing a residence, household responsibilities, and financial obligations. Our homes have served as the centers of our life together, where we have hosted family, collaborated on creative and professional projects, and built a life rooted in our shared commitment and purpose.

SECTION III: FINANCIAL AND LEGAL INTERDEPENDENCE

A central aspect of our shared life was the ownership and residency of properties, including 13339 Balmore Circle, Houston, Texas 77069; 5623 Queensgate Drive, Houston, Texas 77066; 565 Ortega Street, San Francisco, California 94122; and 7711 Mulholland Drive, Los Angeles, California 90046. We also shared financial accounts, insurance policies, and business ventures. We made joint investments, filed taxes reflecting our shared status, and executed legal documents that affirmed our mutual responsibilities and rights. Our financial decisions were always made collaboratively, and we supported each other through professional transitions, medical care, and long-term planning, acting as a true team.

SECTION IV: DATE AND PLACE OF MARITAL AGREEMENT

Our agreement to be married was first manifested in Texas on or about March 2, 2018, through the joint acquisition of real property located at 13339 Balmore Circle, Houston, Texas 77069. This act represented a significant financial and emotional commitment and marked the beginning of our marital union.

SECTION V: EVIDENCE OF MARITAL RELATIONSHIP

5.1. SHARED PROPERTY OWNERSHIP AND FINANCIAL INTEGRATION

- ❖ The property at 13339 Balmore Circle was jointly acquired on or about March 2, 2018, evidenced by a mortgage note listing both of us as co-borrowers.

- ❖ We were also involved in the joint acquisition of 5623 Queensgate Drive 77066, with Andrei granting me Power of Attorney to act on his behalf in real estate transactions and also to open accounts with financial institutions, a testament to his trust.
- ❖ Prior to these acquisitions, we had no joint assets in California, underscoring that our marital relationship began in Texas.

5.2. SHARED RESIDENCES AND DOMESTIC LIFE

- ❖ We continued our marital relationship with a shared residence at 565 Ortega Street, San Francisco, California 94122, and at 7711 Mulholland Drive, Los Angeles, California 90046. The Ortega Street residence, a testament to our joint planning and collaboration, and cost \$5 million home to complete. The property was a project I undertook to build a house for my partner that was deserving of his success, and as a canvas for the life we were to create together. John Lum, the architect I hired to collaborate on my design and build the property, described it as an "heirloom" piece, signifying lifelong value of a home built for our legacy and to remain in our family. The official plans for the home were designated as the "Sprawling/Dunca Residence," which is evidence of a declaration of our commitment to a shared life.
- ❖ In 2012, Andrei asked me to move in with him and later encouraged me to quit my job, leading me to become his dependent. In 2013, we adopted our beloved puppy, 'The Captain Dunca-Sprawling,' and raised him as our child.

5.3. FINANCIAL INTERDEPENDENCE AND SUPPORT

- ❖ Before shared accounts and issuance of an American Express card bearing my name, when Andrei would travel, he would leave me a signed blank check in case of emergencies.
- ❖ I was an authorized signatory on Andrei's personal checking account and an authorized user on his American Express Platinum account. These, along with other financial support, covered my personal expenses, including business expenses for our co-owned LLCs, which averaged \$35,000 per month.
- ❖ Andrei provided substantial financial support for my career, including:
 - ❖ A \$200,000 investment in our film "Most Horrible Things" in 2022.
 - ❖ Partial funding for "A Good Boy," a project budgeted at \$14 million.
 - ❖ A pledged \$5 million for a future biopic project.
- ❖ We co-owned and operated businesses including Sean Sprawling Productions LLC, Teak Stage Productions LLC, and Sutro Lab LLC, and invested jointly in Isla Vida restaurant.
- ❖ While I was a student of The Meisner Technique and worked to make a home, Andrei's entrepreneurial success during our domestic partnership, significantly marked by the 2014 Facebook acquisition of LiveRail for a reported \$500 million, a company he owned and served as CTO, enabled him to support my education as a classically trained actor and, later, to invest as my business partner in Sean Sprawling Productions LLC and Teak Stage Productions LLC, our production companies where I gained valuable career experience as a producer.

- ❖ Our financial lives were deeply intertwined, with shared accounts, joint ventures, and mutual reliance on each other's resources and commitments. My professional achievements and non-monetary contributions to our partnership were considered equally valuable to his financial success.

5.4. EMOTIONAL SUPPORT AND IDENTITY AFFIRMATION

- ❖ Andrei's support was instrumental in my exploration of gender identity. When I asked, "What would you think if I started wearing dresses?" his reply, "It depends on the dress," was an act of acceptance that affirmed my gender fluidity and enabled me to launch my career as a gender-fluid artist.
- ❖ His encouragement helped me overcome fears of rejection and embrace my authentic self publicly and professionally.

5.5. CULTURAL AND PHILANTHROPIC LIFE

- ❖ Our life together was enriched by a shared passion for the fine arts and music. We shared a particular love for classical music and classic rock artists like Pink Floyd, Creedence Clearwater, and Ike and Tina Turner. This mutual appreciation was highlighted by the \$200,000 audio-visual system with a full JBL speaker system installed throughout our Ortega Street home. I introduced Andrei to the symphony—his first attendance gifted as a birthday present—and encouraged his first philanthropic support for the LGBTQ+ community through our joint contributions to LYRIC, a San Francisco LGBTQ youth organization. Together, we attended:
 - ❖ **Concerts:** Cher, Roger Waters' The Wall (San Jose and Quebec), Elton John's Farewell Yellow Brick Road, David Gilmour, Modest Mouse, The Black Keys, Dan Auerbach, and Yo-Yo Ma.
 - ❖ **Symphony:** Regular loge seating at the San Francisco Symphony, enjoying works by Prokofiev, Schumann, Beethoven, Adams, Rachmaninoff, Holst (The Planets), and Vivaldi (The Four Seasons), including a live score performance of Battleship Potemkin.
 - ❖ **Theatre:** Hamilton, Book of Mormon, and Phantom of the Opera.
 - ❖ **Ballet:** The Nutcracker and Frankenstein.
 - ❖ **Opera:** Carmen, The Traveling Sisterhood of Western Gild, Puccini's Turandot featuring my favorite "Nessun Dorma," and works by John Adams.
- ❖ Our joint travels were a testament to the life we built together, including cultural immersion and shared milestones in Paris, Monaco, Granada, Seville, and Toledo in Spain; Montreal and Quebec in Canada; London, Sydney, and Ballarat, Australia. In Ballarat, we screened our first film production, Gehenna, to an audience of over 400 people and were honored with inclusion on the Wall of Fame at a local wild animal park. Gehenna was also featured at Tokyo Comic Con, where it screened to an audience of over 300.
- ❖ Our joint ventures in film—produced, co-written, and starring me—have achieved international distribution in Spain, Germany, Australia, the United Kingdom, Japan, Italy,

New Zealand, and the United States. These works have been made available on-demand, through Redbox, and across every major streaming platform including Netflix, Hulu, Amazon Prime, Tubi, and Apple TV.

- ❖ We currently have feature film projects in development with combined budgets totaling \$15 million. The script for the feature film “A Good Boy” written and to be directed by rising star, Emmy Nominated Peres Owino was consulted on by Joe Robert Cole, screenwriter of Black Panther. The feature film “The Camp”, written by Oscar-nominated screenwriter Iris Yamashita has been considered for direction by Clint Eastwood and is being produced by an Oscar winning member of his production team. The caliber of these projects is a testament to the collaborative reach Andrei and I have achieved as a couple.
- ❖ Our travels also included regular visits to Japan, a country where I spent my high school years and hold a deep appreciation for its culture. Our trips there were a chance for me to introduce Andrei to this culture, just as he had introduced me to new ones throughout our life together. It was a beautiful act of reciprocation, a moment where I could contribute to his life in a way that mirrored his profound generosity to me. On one such visit, I met Eitaro, the first male geisha in recorded history. I later served as a cultural ambassador, introducing geisha culture to America alongside my geisha family. Through this work, Eitaro bestowed upon me the esteemed and profoundly significant honor of honorary Geisha status and member of Matsunoya Corporation. This made me the first and only American geisha and only the second male in history to be so recognized, an acceptance solidified by my geisha family within the Matsunoya Corporation who insisted “you are Geisha”. Eitaro personally trained me to play the taiko drum, allowing me to perform alongside geisha in private events and in a music video I produced, which was the first and only of its kind to feature an American and a non-geisha performing with geisha. My inclusion in Eitaro's house was a declaration of familial and cultural belonging, an experience that was made possible by my spouse's profound love and unwavering support and one I will cherish forever.

5.6. SHARED MILESTONES AND SYMBOLIC COMMITMENTS

- ❖ On our first anniversary in 2012, we exchanged engraved silver bands: mine inscribed “AD + SS” and his “SS + AD.” These rings were not mere tokens, but declarations of our permanence, worn daily, and representing our mutual vow to remain committed for life.
- ❖ We celebrated every holiday together since 2011, with only one exception when Andrei visited family in Romania.
- ❖ We hosted family events at our Texas home, including Fourth of July pool parties and Halloween celebrations, where we introduced ourselves to neighbors and local officials as a couple.

5.7. POLITICAL ENGAGEMENT AND COMMUNITY REPRESENTATION

- ❖ We actively participated in local political campaigns in Texas, purchasing and distributing yard signs and offering our home as a pickup location for campaign materials. This public engagement reflected our shared values and visible presence as a couple within our community.

- ❖ We introduced ourselves to the local sheriff and his family during neighborhood events, reinforcing our identity as co-owners and spouses.

5.8. PUBLIC RECOGNITION AND FAMILY INTEGRATION

- ❖ Our shared success and the life we built together led to introductions to public figures such as Vice President Kamala Harris and San Francisco Mayor London Breed.
- ❖ I attended Andrei's Naturalization Ceremony in 2019 with his parents, George and Ani Dunca, a moment of family unity we shared.
- ❖ Our families traveled together to Las Vegas, the Grand Canyon, Napa Valley, and Spain (Granada, Toledo, Seville). We also celebrated New Year's with my parents and aunt Theresa, fulfilling her final wish before her passing.
- ❖ Andrei contributed to Theresa's funeral costs, demonstrating shared financial responsibility and familial integration.

5.9. VERBAL AFFIRMATIONS AND PERMANENT COMMITMENT

- ❖ Andrei consistently affirmed our marital bond with both words and actions. In a deeply symbolic moment in 2011, before he left on a business trip, he gave me the key to his apartment, stating, "This is your key and I want you to use it whenever you want." This single act signified a permanent place for me in his life and home. When he returned, I had packed my things to go to my own apartment. He asked, "Where are you going?" I said, "Home," to which he replied, "What will you do there?" When I answered, "I live there," he insisted, "No baby, stay here with me." This emotional exchange, coupled with promises that he would "never throw me away" and would always "take care of me," cemented our shared life. Furthermore, when I expressed worry about quitting my job at his encouragement, he reassured me by saying, "We will be ok," a testament to his unwavering trust in our shared future. These exchanges were not merely words but solemn vows and declarations of our permanent union.
- ❖ I promised Andrei "forever", that "I will never leave" and undertook five years of therapy to reconcile my desire for a formal marriage with his view that it was "just a piece of paper."
- ❖ I reoriented my social and professional life around our relationship, incurring profound personal cost and emotional investment. The depth of my commitment is equal in weight to any financial contribution Andrei made.
- ❖ Because Andrei did not wish to have children, I worked in therapy to give up my desire for children and we instead raised our puppy, 'The Captain Dunca-Sprawling,' as our own and I considered the products of our Production Companies to be our biological children. This was a shared decision that shaped our family life.

SECTION VI: AFFIRMATION

I affirm that the foregoing statements are true and correct, and that they reflect the nature, depth, and continuity of my relationship with Andrei George Dunca. I submit this affidavit in support of legal recognition of our informal marriage under Texas law, and in pursuit of the rights, protections, and dignity that such recognition affords.

The generosity and opportunities gifted to me by my partner continue to enrich my life. I am proud to have built a committed life, establishing a kinship acknowledged by our family, friends, and shared business and professional network, together with Andrei George Dunca

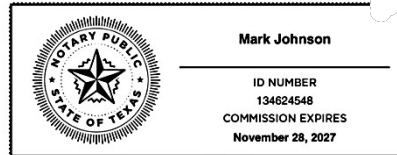
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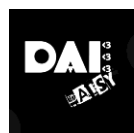
EsRā Dunca-Sprawling
President, Dunca-Sprawling Inc
(Signature of Affiant)

State of Texas
County of Tarrant

This instrument was acknowledged before me by means of an interactive two-way audio and video communication on 04/02/2025

Mark Johnson
Notary Public, State of Texas





EXPOSÉ:

CHAPTER TWO

Wallflower of The Year



THE ARCHIVIST OF ACHE



EXPOSÉ:

CHAPTER TWO

Wallflower of The Year

TO SAY THAT ESRĀ DUNCA-SPRAWLING WAS MY CLOSEST FRIEND FEELS BOTH ACCURATE AND INSUFFICIENT. ESRĀ—GENDER FLUID, BOUNDARY-DEFIANT, BRILLIANT—EXISTED IN THE MARGINS, NEVER QUITE A PART OF THE SYSTEMS THAT SOUGHT TO CONFINE XEM. ZE EMBRACED PRONOUNS THE WORLD FUMBLLED OVER. I PRACTICED AT FIRST; SOON, THE WORDS FELT LUMINOUS, LIKE BREAKING OLD BONES TO SET THEM RIGHT.

ESRĀ'S WORK WOUND THROUGH INTERNATIONAL FILM, PERFORMANCE, AND ACTIVISM, YET ALWAYS WITH A TASTE FOR SHADOWS. XE CLAIMED—AND I BELIEVE—THAT SURVIVAL WAS A FORM OF ART. XE CULTIVATED THAT ART METICULOUSLY: NEVER A SCENE WITHOUT STAGING, NEVER A DINNER PARTY WITHOUT SUBTEXT. XE CURTSIED FOR CAMERAS BUT LEFT CLUES FOR LISTENERS WHO UNDERSTOOD THE PATTERNS IN XER SPEECH, THE PAUSES THAT SIGNALLED SECRETS.

PUBLICLY, ESRĀ BECAME LEGENDARY FOR CREATING NEW SPACES WHERE THE EXCLUDED COULD GATHER—GION BEVERLY HILLS, SUTRO LAB, AND THE ARCHITECTURALLY RENOWNED ORTEGA STREET RESIDENCE, DESIGNED ALONGSIDE JOHN LUM. THAT HOUSE WAS THE SITE OF TOO MANY STORIES: THE BIRTHPLACE OF PARTIES LATER CALLED RITUALS, OF FRIENDSHIPS THAT BECAME RIVALRIES. PRIVATE WHISPERS CLAIMED THAT ANDREI DUNCA—XER SPOUSE, WEB MOGUL, AND LEGAL INVENTOR—FAVORED THE BAY WINDOWS FOR THEIR VANTAGE, THE ABILITY TO SEE EVERY MOVE WITHIN AND WITHOUT.

BUT IF YOU LOOK FOR ESRĀ TODAY, YOU FIND NOTHING BUT DISTURBANCES IN THE ARCHIVE: LOCKED PROFILES, SCATTERED TRIBUTES, AND A GROWING RUMOR THAT SOMEONE POWERFUL, SOMEWHERE, WANTS YOU TO STOP ASKING.



EXPOSÉ:

ESRĀ DUNCA-SPRAWLING

Wallflower of The Year

THE GHOST IN THE ARCHIVE

I hold in my hands the ghost of a person. An archive, a digital ledger, of a life documented in quiet defiance, and then, in the span of a few months, systematically dismantled. My friend, Esra Dunca-Sprawling—the person the world knew as Sean Sprawling—sat for me on their birthday, April 12, 2022. They were home to detox with their friend Richie, to ready themselves for the making of their film, *Love Hurts/Most Horrible Things*. But beneath the surface, a deeper purpose drove them. They were here to find Andrei.

Esra confessed to me their gnawing fear, a dread that had been growing for weeks. Andrei, their husband and a web pioneer, the founder of LiveRail, a company so valuable it was swallowed by Facebook for half a billion dollars, had stopped answering their calls. The man named "Man of the Year" by *Business Magazine* in 2014, the man who was Esra's refuge, was now a distant echo. The voice on the phone, when it rarely came, was not their own. It was a cold, distant tone, a stranger's voice hiding behind the familiar name. Weeks passed. Esra, sent to LA on a temporary separation to work, had planned to enter counseling with Andrei. But their husband, the man who promised to take care of them, claimed they couldn't cope with Esra's emotions. Esra felt they couldn't cope with Andrei's lack of empathy, and they didn't know how to explain to him what they had been through. They needed their partner. They needed to come home. They needed refuge, sanctuary, love. They needed Andrei to keep his promise to take care of them. Esra was falling apart, and Andrei wouldn't help.

A LIFE OF CREATIVE AND CULTURAL ACCOMPLISHMENTS

Esra was a producer, an actor, and a writer whose creative and cultural contributions span international film, television, and new media. Their films have achieved international distribution in Spain, Germany, Australia, the United Kingdom, Japan, Italy, New Zealand, and the United States, and are available on-demand, through Redbox, and across every major streaming platform including Netflix, Hulu, Amazon Prime, Tubi, and Apple TV. They and Andrei had two feature films in development with a combined budget of \$30 million. One script, "A Good Boy," written and to be directed by Emmy Nominated Peres Owino, was consulted on by Joe Robert Cole, the screenwriter of *Black Panther*. The other, "The Camp," from Oscar-nominated Iris Yamashita, had drawn the eye of Clint Eastwood and was being produced by an Oscar-winning member of his production team.



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In addition to their professional achievements, Esra holds a singular and historic distinction in global cultural heritage: they are the first and only American Geisha, and only the second male in recorded history to be formally recognized with Geisha status. This recognition was conferred through their role as a cultural ambassador and founder of Gion Beverly Hills, in collaboration with co-founder and artistic director Eitaro Matsunoya, owner of Matsunoya Corporation in Tokyo, Japan. Esra was personally mentored by Eitaro, the first documented male Geisha in history. Through this mentorship and sustained artistic collaboration, they were formally adopted into Eitaro's Geisha family and recognized as a member of the Matsunoya Corporation, a prestigious Geisha house. Their inclusion was not symbolic or honorary alone—it was affirmed through rigorous performance, traditional training, and familial acceptance. Eitaro and Matsunoya Corporation declared unequivocally: "You are Geisha". Esra's contributions include performing alongside Geisha in private cultural ceremonies, producing the first and only music video to feature an American and non-Geisha performing with Geisha, and serving as a cultural bridge between Japanese traditional arts and Western audiences. All of this was made possible by the unwavering support of their husband, Andrei, whose encouragement allowed Esra to embrace their gender fluidity and pursue their artistic calling.

THE MYSTERY AND BETRAYAL

They are "the Wallflower of the Year," not for a lack of brilliance, but for choosing to bloom in the shadows—where truth is tender and testimony takes root. They once told me that privilege is not merely an advantage, but a meticulously guarded, rare space where one's true self can be seen and believed. They recall a time when their astonishing memory was a gift that allowed them to recall insignificant details from their childhood and conversations with their husband. This gift extended to a deep, intuitive connection—an ability to know what song was playing in Andrei's head or what their husband wanted for dinner. But Andrei, a tech magnate who sits on the board of The Planetary Society, offered a cold, logical explanation, saying Esra "would be good at analytics". Andrei's greatest love was space, a place he saw as his own ultimate "privileged space" of profound solitude.

Then came the email. A digital whisper, a venomous, critical word that unacknowledged their magic. It felt like a betrayal, a brutal critique of their status as the brightest star in



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Andrei's universe, and their best investment. They suspected it came from Andrei's lawyer, or perhaps a secret lover. It was a mystery that maddened them, adding to the great unknown.

Esra's personal archive is silent on what happened next. The not knowing is a relentless torment. This led them to wonder if the false narrative created about them was an act to ensure Andrei's access to his own privileged spaces? Or was Andrei himself in danger, hurt, a prisoner like the one Esra would become? Esra's existence became a haunting parallel to "The Waiting Place," the purgatory from Dr. Seuss's *Oh, the Places You'll Go!*. At 420 N Camden Drive, they were a prisoner in plain sight, trapped in a cycle of psychological manipulation and control, waiting for a truth that never came.

THE CONSPIRACY AND ORDEAL

The archive suggests a conspiracy, a web of cyber sabotage, psychological torture, and false imprisonment. The epicenter was the home they shared with Andrei. The motive, a maddening unknown, but the suspected one was to cause their bankruptcy and seize control of their husband's multi-million dollar estate. The conspiracy may have had roots as far back as 2015, but it became apparent to Esra in September 2022. The criminal network, formed from the joint venture LiveRail and transformed by its acquisition by Facebook, allegedly used their combined resources to orchestrate a multifaceted and coordinated cyberattack.

In the file, they recounted the most emotionally damaging parts of their ordeal at a Los Angeles building. They described false imprisonment, enhanced interrogation techniques, sexual abuse, and torture. As part of this plot, their communications were intercepted, altered, and blocked, intentionally isolating them. The conspirators allegedly fabricated a "drug-induced psychosis" diagnosis to discredit them and prevent them from entering into agreements.

Their files also reveal a profound betrayal by a licensed clinical psychologist, a man paid to help them, who allegedly became an abuser, using "unpaid" psychological services as a cover for a scheme that resulted in the fraudulent extraction of funds. Over \$1 million in cash was extracted, their vintage clothing archive was stolen, and their San Francisco heirloom home was sold for nearly \$6 million. Esra received nothing. The most chilling

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evidence of Vetter's manipulation was a shared closet in Esra's Beverly Hills apartment, hidden behind a crocodile skin door. Inside, matching outfits and matching Tom Ford underwear suggested a deeply intimate and twisted arrangement, all while Vetter allegedly conspired against them.

The Vanishing and the Plea

Esra has vanished. The last image I took of them sits on my desk, a quiet, haunted portrait. I hold this archive, this ledger of a vanished person, and I can't look away.

So look for them. Look in the silences, in the lingering camera, in the whispers between lines of dialogue. Look for Andrei, for Sean, for Esra. The answers are not on a website, they are not in a file. They are a cipher, waiting to be read. And if you are reading this, you are part of the resistance, a silent sentinel in the dark, watching for the wallflower to bloom again.

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FOR ESRĀ, WITH REVERENCE.

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I. Cold Shadows: An Ominous Absence

The story begins not with an argument, nor a heated confrontation, but with a chilling silence. EsRā had not heard Andrei's voice for months. Their sworn statement is stark: "I have not seen or heard from Andrei Dunca since late 2022. I have made repeated efforts to reach them through calls, texts, and mutual acquaintances—none of which yielded any response. There is no assurance they are safe, informed, or even alive."

Despite their urgent attempts—each phone call ringing unanswered, every message read or, worse, ignored—the void only grew deeper. It was not heartbreak that defined those months, but the suffocating uncertainty of not knowing whether Andrei chose the silence, or whether someone else had chosen for them.

Within this eerie quietude, questions multiplied: If they were merely angry, why not a word? If they were in pain, why not ask for help? If they were truly gone—where was the proof?

II. The Lawsuit Arrives: Ink on an Empty Page

The first word from Andrei, after all this silence, did not come in the form of a late-night call or a trembling email. Instead, it arrived as a summons—formal, cold, and delivered by a stranger. Dated March 13, 2025, the document bore the title: *Dunca v. Sprawling*. The complaint was not a plea for reconciliation or understanding. It was an accusation: Defamation. Harassment. A request for a Temporary Restraining Order (TRO). The ink was barely dry before it was served—an act that left EsRā as bewildered as they were alone. Why, the narrative echoes, would a person lost to the world for so long—reachable only by those desperate enough to keep searching—choose a lawsuit as their first flicker back into existence?

The complaint itself was a collage of selected posts, fragments of messages, each cited as evidence of harassment and defamation. Yet nowhere did it contain communications from Andrei himself—no cease and desist, no reply, no indication that they ever saw the messages meant for them. There were screenshots of EsRā's posts, yes—their pleas for help, their public journal of loss and confusion—molded by the complaint into something venomous.

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But what these harvested posts truly reflected was not malice, but anguish and confusion. "Had Andrei answered my calls or seen my messages, they could not legitimately claim harassment. I was desperate. I was scared. I did not understand the silence."

III. The Unseen Hand: Authorization Missing, Shadows Lengthen

As the legal machinery ground into motion, the ordinary protocols of representation took on a sinister cast. Mudd Law's name adorned the complaint and the TRO, but nowhere in the records—nowhere in the reams of pleadings and motions—was there a signed authorization from Andrei. There was no retainer, no verified engagement letter, no power of attorney. Not a single sworn declaration, no video message, no uncontested digital signature confirmed that Andrei had given them authority to act.

"There is no proof that Andrei wrote or even reads this complaint. No one has seen them. No one has confirmed their identity. Their counsel, 'Mudd Law LLC,' has not presented any authorization. No notarized power of attorney, no signed retainer, nothing." — EsRā, Judicial Intervention

Under Texas law, proof of authorization is not procedural trivia—it is required. Rule 12 of the Texas Rules of Civil Procedure empowers a challenged attorney to show their authority. If they do not, filings are to be struck, counsel ejected. Proof of representation is not an afterthought—it confirms that the person alleged to be the victim has indeed chosen legal weaponry, rather than it being deployed in their name by others for hidden purposes.

Yet, in Andrei's matter, no such proof surfaced. No Rule 11 agreement. No sworn statement from Andrei. The "Plaintiff" was a shadow, not a voice.

IV. Through the Fog: EsRā's Response and The Right to Speak

Despair that breeds, in the absence of answers, becomes its own kind of madness. EsRā's answer was less a riposte than a howl into the void, a demand for their own presence to be acknowledged as something other than a threat.



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They intervened under Texas Rule of Civil Procedure 60: “A party with a justiciable interest has the right to intervene.” The right to defend their name; the right to request the court examine not merely the words on the surface, but the hollow scaffolding beneath: “There is no verification that Plaintiff Andrei Dunca is aware of this litigation. Additionally, multiple calls and messages from Respondent have gone unacknowledged, with no evidence that Plaintiff personally engaged or responded.”

Their legal arguments ran deeper than mere technicality:

- If Andrei never responded, there could be no claimed harassment; communication is a two-way street. If the subject never answers, silence cannot transform desperate outreach into malfeasance.
- Their posts spoke only of the emotional toll and confusion born from Andrei’s vanishing—they were not defamation, for they neither asserted, nor fabricated, nor targeted lies.
- No proof of Plaintiff’s authorization of Mudd Law—no signed statement, no acknowledgment, no confirmation from Andrei of their awareness.

“The lawsuit was the first word I received from or about Andrei in months. I did not receive any cease and desist, warning, or message. No communication whatsoever.” — EsRā’s Affidavit

V. Mischaracterized, Misused: When Pleas Become Weapons

The alchemy of legal language can be as dark and transformative as any magic. What began as a cry for help—a digital hand reaching out into a night unbroken by any reply—was spun, in complaint and motion, into “harassment.” EsRā’s public recounting of their own suffering—their chronicling of sleepless nights and unanswered calls—became, in the black-letter argument of the Plaintiff, “defamation.”

This repurposing, the weaponization of vulnerability, stands at the heart of the mystery. For Texas law draws a precise line: Harassment requires a willful, repeated intent to alarm or torment, not simply a reaching out. Defamation requires not just harm, but falsehood—and “the truth of the statement...is a defense to the action” as recognized in Texas Civil

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Practice and Remedies Code § 73.005. Emotional testimony about one’s experience—absent knowing falsehood—is protected speech.

Yet the complaint, picking over the bones of EsRā’s public posts, ignored the crucial context: Not once did Andrei reply, contradict, or correct. Not once did the Plaintiff present a response, a defense, or an explanation. They were alone with questions; this, the Plaintiff repackaged as aggression.

From Texas law:

- Harassment is intent to disturb, torment, or alarm, evidenced by repeated unwanted contact or threatening language.
- Defamation must involve a false statement of fact, published to another, which causes reputational damage.
- Protected speech includes opinion, recitation of personal experience, or statements made without actual malice or reckless disregard for the truth.

In the files, the actual evidence—a timeline of unanswered messages, unanswered calls, friends’ reports of Andrei’s absence—contradicts the complaint’s premise. The silence was not proof of malice; it was the wound itself.

VI. Deepening Darkness: The Missing “Proof of Life”

A lawsuit is a living accusation, but when the accuser does not appear—does not speak, sign, or acknowledge—they become, themselves, a victim or a phantom.

In the record, there is no proof Andrei is even aware a lawsuit is being brought on their behalf:

- No social media activity,
- No video statements,
- No recorded voice messages,
- No recently authenticated electronic communications,
- No sworn affidavit from Andrei attached to any pleading,



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- No indication of power of attorney or court-recognized legal incapacity.

Texas courts do not require “Proof of Life” as a matter of routine in civil filings. But when a plaintiff cannot or does not appear, the authenticity of who stands behind the filing becomes critical—especially when the supposed wrongs arise from personal relationships and private communication.

The absence of such proof is a gaping hole. Is Andrei truly gone? Are they alive, but unable—or unwilling—to speak? Or has someone with something to gain assumed their identity, filed in their stead, and harnessed the machinery of the courts to silence EsRā’s search for truth?

VII. The Veil Grows Thicker: Unanswered Phone Calls and Digital Silence

It was not a war of words, but a war of silence. The forensic trail begins with EsRā’s phone records: “Email timestamps from May – July 2024, marked ‘unread.’ Voicemail notifications on record from EsRā’s phone provider. Social media messages left without reply or seen timestamps.”

“Had they answered the phone, they would have known that all I was asking for was help. There is no reasonable way they could claim harassment.”

Under Texas law, actual communication matters: one cannot claim to be harassed by pleas for aid, unless those pleas are unwanted and explicitly rejected. Silence, with no prior objection or reply, cannot be spun into persistent torment absent clear, affirmative rejections. To be harassed, one must first be present to receive, process, and rebuff the contact. Here, the chasm between EsRā and Andrei is so wide that even the most well-meaning message fell into the abyss.

In their affidavit, EsRā testifies to the context: they feared for Andrei, not for themselves; their intention was not to harm but to learn if they were alive or in need. For months, their words traveled one direction only. If no harm was intended, and if the words were not untrue, Texas law finds no firm ground for a successful defamation or harassment claim.

“If reaching out for help equals harassment, then silence is supposed to be my punishment.”

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VIII. The Tangle of Legal Shadows: The TRO as Both Shield and Weapon

The Temporary Restraining Order (TRO) is an instrument forged for moments of crisis—an emergency measure to prevent harm before a court can weigh the evidence fully. Meant to shield the vulnerable, it can just as easily become a weapon in the wrong hands—a way to silence, exclude, and prevent inconvenient truths from coming to light.

Here, the TRO sought was broad to the point of breathtaking: No contact in any medium. No mention of Andrei online. No approach to any “known location they may occupy.” And yet—and yet—EsRā had already ceased to have any true contact. The TRO sought to enjoin what did not exist, to replace a living debate with absolute silence.

As so often in such cases, the TRO is not only a shield for the absent, it is a shroud for the truth. Who benefits, if not Andrei? If the supposed victim cannot answer the phone, why would their “first” message be a lawsuit?

IX. The Defense Flares: Intervention and the Search for Justice

EsRā’s intervention was more than mere defense—it was an act of survival. They invoked Rule 60 of the Texas Rules of Civil Procedure: “Any party may intervene by filing a pleading, subject to being stricken out by the court for sufficient cause on the motion of any party.” Their interest was not abstract; it was concrete—a right to defend their name, their story, their pursuit of the truth of Andrei’s fate.

They argued:

- The Plaintiff had never authenticated their participation.
- No irreparable harm could arise from statements that were neither untrue nor aimed at Andrei, but at their own confusion and pain.
- The speech in question was, at its core, personal experience—protected expression under Texas’s Defamation Law, unless shown to be malicious falsehood.
- Proof of Plaintiff’s authorization was entirely lacking.

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They feared that the lawsuit was not only unauthorized, but that it was a deliberate mask—an effort not to protect Andrei, but to permanently block any hope of reconnection or resolution.

Their plea was a warning: "I believe this lawsuit is fabricated to keep me away from the truth and from Andrei. Whoever filed on their behalf did not act with their knowledge or consent."

X. The Looming Motive: Who Gained From the Lawsuit?

Mystery begets motive, and in the fog of this case, two questions loom largest:

- If Andrei truly wished to halt EsRā's contact, why not respond directly with a clear message, or even a simple answer to one of countless phone calls?
- If silence was chosen by others, who benefits from the separation? Who gains by deploying the courts as a moat, rather than as a forum?

No clear evidence of abuse, threat, or malicious falsehood emerges from the documentary record—only incomplete communications and unanswered cries for help. In the absence of a living, speaking Andrei, it remains possible the person most in need of protection is not them, but whoever profits from the enduring, unexplained void between their lives.

If the litigation is a mask, who wears it, and why?

XI. Legal Ghosts: Impersonation and Fraud

Under Texas Penal Code § 33.07 (Online Impersonation), the use of another's name or digital persona for harm, intimidation, or to gain unjust advantage is a crime—particularly when done without consent and with intent to deceive. If someone other than Andrei initiated this lawsuit, representing themselves as them or acquiring counsel on their behalf without authority, the legal consequences extend beyond civil wrong: they touch the realm of criminal liability and serious tort.

Similarly, under Texas law, fraudulent misrepresentation and identity theft entail demonstrable damages for the subject whose identity is used without consent. A lawsuit



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filed in someone's name—without their knowledge or participation—can inflict lasting harm, not just upon the nominal defendant, but upon the ghost-plaintiff themselves. It could mean that not only is EsRā unable to reach Andrei, but that Andrei, himself, has already been eclipsed by the designs and manipulations of another.

XII. The Silence That Screams: A Conclusion in the Fog

In the end, it is not the complaint, nor the order of the court, that howls loudest—but the unbroken silence that falls between paragraphs, between unanswered texts, and in the digital blackness where a person once was.

“All I ever asked for was to know they were okay. To know that what we had wasn’t a ghost. I speak, because the silence screams louder. And if I am punished for calling out into the dark, then at least let the dark be heard.” — EsRā’s Affidavit

The case of *Dunca v. Sprawling* is not just a story of accusations and counterclaims. It is a cautionary tale about the easy conflation of pain and intent, about the legal toxicity of silence, and about the dangers that stalk courtrooms when proof is absent, and authority is presumed rather than demonstrated.

In the darkness of this mystery, the greatest crime may not be defamation, but erasure—of voice, of connection, of self. Until the true Andrei returns, or until those hiding behind their name are revealed, the story remains unresolved—a suit filed by a ghost, waged against the one person still searching for the living.

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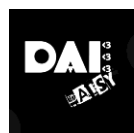
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EDITOR-AT-LARGE

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LEGAL FICTIONS



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MOST OF WHAT THE CITY KNOWS ABOUT ESRĀ'S DISAPPEARANCE COMES FILTERED THROUGH CASE LAW. AS A JOURNALIST AND FRIEND, I RECOGNIZE THE WAYS LEGAL DOCUMENTS CAN BECOME APOCRYPHAL, SHAPING THE VERY REALITY THEY CLAIM TO NEUTRALLY DESCRIBE.

IT BEGAN—IN THE PUBLIC RECORD—ON A MARCH NIGHT IN 2025, WITH A CIVIL COMPLAINT: DUNCA, ANDREI VERSUS SPRAWLING, RODNEY SAMUEL (JR), FILED AS A DEFAMATION CASE IN HARRIS COUNTY DISTRICT COURT. THE NAMES SHUFFLE, BUT THE UNDERTONES DO NOT CHANGE. THE PETITION READS LIKE FICTION—ALLEGING LIBEL, CONSPIRACY, AND PSYCHOLOGICAL VIOLENCE; SEEKING INJUNCTIONS AS IF TO BIND GHOSTS.

THE LEGAL FILINGS REVEAL MORE BY WHAT THEY CONCEAL: CASH BONDS IN LIEU OF INJUNCTIONS, WHISPERED THREATS OF PROSECUTION, PROPOSED RESTRAINING ORDERS THAT NEVER SEE THE LIGHT BEYOND THE HANDS OF REPUTABLE JUDGES. SOMETIMES, IT IS NECESSARY FOR THE LAW TO ASSUME A FACT TO BE TRUE, EVEN IF IT IS NOT, TO ALLOW JUSTICE A FOOTHOLD IN THE QUICKSAND OF REPUTATION. THESE ARE LEGAL FICTIONS—NECESSARY ILLUSIONS THAT COMFORT NO ONE BUT THE RECORD ITSELF.

YET THE FILE IS INCOMPLETE. NO PAPER CAN RECONSTRUCT WHAT HAPPENED IN THE DAYS BEFORE AND AFTER THE LAWSUIT, WHEN RUMORS OVERTOOK THE DINNER PARTY CIRCUIT: THAT ESRĀ WAS BEING SURVEILLED, THAT ILLICIT RECORDINGS EXISTED, THAT IN-ROOM MICROPHONES PICKED UP BOTH ARGUMENTS AND MIDNIGHT APOLOGIES. THERE ARE OMISSIONS IN EVERY TRANSCRIPT, SPACES BETWEEN THE WORDS WHERE THE REAL SECRETS LIVE. EVEN THE ADDRESS—565 ORTEGA—BECOMES A KIND OF MASK, THE HOUSE ITSELF A PROP IN THE WORLD'S MOST EXPENSIVE, SLOW-DEVELOPING SCANDAL.



EXPOSÉ:

YURI SPIRO

The Unspoken Betrayal

In the sun-drenched hills of Malibu, where wealth and charm often mask deeper truths, one man's carefully curated image is unraveling. **Yuri Richard Spiro**—once a media impresario with a Rolodex of celebrities and a reputation for generosity—now stands accused of orchestrating a web of deception that left his closest confidant financially gutted and emotionally shattered. At the center of this unraveling is **Esrā Dunca-Sprawling**, a creative entrepreneur and longtime friend of Spiro, who believed he was helping a man in crisis. What began as a gesture of compassion evolved into a harrowing tale of manipulation, betrayal, and psychological warfare.

THE PROMISE OF FOREVER

In private conversations, Spiro assured Esrā that their bond was unbreakable. “You’re a friend for life,” he said. “Even if you can’t pay, you’ll always have a place to live.” These weren’t just words—they were lifelines offered during Spiro’s darkest hours, including a near-fatal bout with COVID-19 and the looming collapse of his financial empire. Esrā responded with unwavering loyalty. He paid **\$75,000** for a private medical jet to bring Spiro back from St. Barts. He issued loans totaling **over \$900,000**, including a **\$385,000 secured loan** against Spiro’s Ferrari F40—only to discover Spiro had secretly placed a second lien on the vehicle, violating their agreement.

THE FERRARI F40 FIASCO: COLLATERALIZED TRUST AND DOUBLE-DEALING

Yuri Spiro’s breach of a \$385,000 secured promissory note wasn’t just financial negligence. It was a calculated betrayal. Initially, Spiro offered a 2010 Bentley and two Steinway pianos as collateral, which Esrā rejected. Esrā, instead, demanded the rare Ferrari F40, which was appraised for nearly \$2 million at the time, and secured the loan with a high-interest “scare.” Spiro allegedly created a second lien on the Ferrari, violating the agreement and triggering a UCC filing that exposed the deception. The car was reportedly seen being loaded onto a truck and removed from the premises, confirming the breach. Despite multiple demands, Spiro refused repayment, allowing interest to balloon to over \$831,000. This wasn’t just a broken promise—it was a deliberate act of financial sabotage.

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THE \$125K LIQUOR LICENSE SCAM: SABOTAGING A BUSINESS BEFORE IT LAUNCHED

Before the Ferrari loan, EsRā loaned Spiro **\$125,000**—money earmarked for securing a liquor license for “Gion Beverly Hills.” Spiro delayed repayment for months, causing the license to be held up in court. The delay led to an estimated **\$720,000** in lost revenue. The repayment only occurred after EsRā confronted Spiro’s assistant, who had the check ready but withheld it. This wasn’t just a missed deadline—it was a strategic disruption of EsRā’s entrepreneurial future.

THE DESIGNER, THE CONTRACTOR, AND THE \$300K DEBT

Interior designer **Malgosia Migdal** (Spiro’s wife) was paid **\$10,000** for a remodel that never happened. On the day construction was to begin, Migdal pulled the contractor, citing future rental concerns. The contractor quit, leaving EsRā **\$300,000** in debt before the business even launched. Migdal allegedly said, “I wouldn’t have allowed him to work for anyone else,” implying exclusivity and control. This section exposes how even aesthetic promises were weaponized to destabilize EsRā’s financial foundation.

A LEGACY OF RUST

The betrayal reached its crescendo at **420 N Camden Drive**, a property in Beverly Hills with a storied past. In the 1990s, it housed the offices of **Paul Marciano**, co-founder of Guess Inc., during the brand’s meteoric rise. Back then, the building was a symbol of fashion, power, and creative vision.

But the deception wasn’t confined to Beverly Hills. Spiro’s Malibu estate, where he once promised Esrā “a place to live for life,” sits just minutes from the Holmby Hills mansion where **Michael Jackson** died in 2009. The proximity is haunting: two men surrounded by fame and illusion, both consumed by the weight of their own mythologies. One died physically, the other—some might argue—ethically. Today, 420 N Camden and the Malibu estate stand as monuments to what was lost: trust, legacy, and the illusion of permanence.



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FALSE IMPRISONMENT IN BEVERLY HILLS: THE BUILDING THAT BECAME A PRISON

EsRā alleges being unlawfully detained at **420 N Camden Drive**, Spiro’s commercial property, under conditions described as “enhanced interrogation.” Sleep deprivation, electrical shocks, and 24/7 surveillance were reportedly used to break EsRā’s will. Spiro allegedly abandoned his office and refused all contact, despite knowing EsRā was being stalked and harassed. The building became a site of psychological warfare, not business. This transforms Spiro from negligent landlord to alleged participant in a coordinated campaign of terror.

THE CAMDEN EVICTION: POLICE COLLUSION AND A STOLEN IDENTITY

EsRā was forcibly removed from the Camden property under false pretenses. Movers were allegedly waiting downstairs as EsRā was restrained and denied access to clothing. Arrested under the name “Anthony Sprawling,” EsRā was held for three days without legal counsel. Spiro allegedly fed law enforcement a false narrative of mental illness and drug addiction. This isn’t just unlawful eviction—it’s identity erasure and institutional manipulation.

THE TAIKO REBELLION: CRAWLING TO CREATION

Moments after the explosive phone call with Yuri Spiro’s assistant, **Susan Weise**, Esrā Dunca-Sprawling was described by his former assistant as “so emotionally and physically drained he literally crawled to his taiko lesson.” It wasn’t metaphorical. He dragged himself across the polished floor of the studio, his body buckling under the weight of betrayal, exhaustion, and rage. Waiting for him was **Master of the arts, Eitaro Matsunoya**, a revered figure in the world of traditional Japanese performance. Alongside him stood a group of geisha—elegant, poised, and visibly concerned. One gently suggested Esrā reschedule. But he refused. “The show must go on,” he reportedly whispered, voice hoarse but resolute.

What followed was a moment of pure human vulnerability and artistic transcendence. The geisha propped him up, placed his hands on the drumsticks, and guided his arms to strike the beat of a centuries-old folk song. Each hit of the drum was a defiance—a refusal to be broken. Later, Esrā would rearrange the piece, infusing it with electric guitar riffs and a



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pulse of rock ‘n’ roll. He recorded it for a music video, featuring the geisha and himself on taiko—a first-of-its-kind fusion that bridged tradition and rebellion, pain and performance. It wasn’t just art. It was catharsis. A man betrayed, crawling to his drum, and beating out a new rhythm for survival.

A GLIMMER OF HONOR

Among the most startling revelations in the unraveling of Yuri Spiro’s empire was the composition of his staff—reportedly including former members of MS-13, a gang known for its violent history. But within this unlikely circle, **Esrā Dunca-Sprawling** found something rare: loyalty. At a time when Esrā was isolated, betrayed, and stalked, these men became his only friends. He didn’t just tolerate them—he helped them rebuild their lives. Esrā secured a home loan for one employee and arranged therapy for his daughter, who served as Esrā’s executive assistant. He was invited to their birthdays, Christmas dinners, and backyard barbecues—and to the surprise of other guests, he showed up.

At one such birthday, Esrā gifted his assistant a vintage Chanel pendant necklace, heart-shaped and encrusted with gems. It was more than a gift—it was a gesture of dignity, of belief in her worth, and of gratitude for her loyalty. Her father, who worked closely with Esrā and once drove from Beverly Hills to San Francisco to retrieve furniture and art for Esrā’s Gion project, made a solemn promise: “You helped us get our house. You helped my baby. I’d never do anything to hurt you.” In a world where betrayal had become routine, this moment stood out—a flicker of honor in the shadows. It was a reminder that even in the most unexpected places, Esrā’s humanity had ripple effects. He didn’t just survive the collapse of Spiro’s empire—he built quiet bridges in the wreckage.

“I WILL NEVER MAKE YOU FEEL THAT WAY”: THE PSYCHOLOGY OF A CON

Spiro’s emotional manipulation is documented in chilling detail. When Yuri asked Esrā why he put such a high “scare” on the loan with over 33% interest, Esrā replied, “because my whole life no one ever felt bad about fucking me over... someone like me.” Yuri’s response, “I will never make you feel that way,” was used to extract money and trust, only to be shattered. This section could be titled “The Performance of Empathy”—a masterclass in emotional fraud.



EXPOSÉ:

YURI SPIRO

This transactional empathy extends to the most intimate relationships. When Esrā's husband went missing and Esrā couldn't get him to answer the phone, Yuri reportedly gave Esrā a detailed lesson on how to manipulate his spouse, teaching him exactly what to say and the psychology behind it. These conversations reportedly happened while Esrā made tea for Yuri, who, according to his assistant, "doesn't have anyone, everyone just left him and now here you are, he needed a friend," adding that Esra's presence "means the world to him." The juxtaposition of Yuri's alleged vulnerability and his ruthless advice on manipulation paints a picture of a man who sees every relationship as a game of leverage.

THE LEGAL RECKONING

While EsRā Dunca-Sprawling's lawsuit exposed the financial and emotional devastation wrought by Yuri Spiro's manipulation of friendship, another legal battle has emerged—this time from inside Spiro's own office. In March 2024, **Jesseca Harvey**, Spiro's former executive assistant, filed a civil lawsuit in Los Angeles County Superior Court against Spiro and his company, **WestWorld Productions Inc.** The allegations are staggering: antisemitic harassment, sexual misconduct, labor violations, and psychological abuse. Harvey, a single mother, was hired in April 2022 and misclassified as an independent contractor—denied basic employee protections and underpaid throughout her tenure. She was expected to be on call "practically around the clock," tethered to Spiro's schedule via a phone synced to his own. According to the complaint, Spiro subjected Harvey to relentless sexual innuendos and racist remarks. He once told her to "loosen up," adding, "You're as stubborn as a virgin during her first time." He compared the secretary of his homeowners association to "left liberal Nazis" and joked about replacing the Mercedes-Benz emblem with a swastika.

Harvey finally resigned in July 2023, citing emotional distress, anxiety, depression, and unpaid wages. Her attorney, **Ronald Zambrano**, stated: "No one should be subjected to such racism and sexual harassment anywhere, let alone the workplace... Now it's Spiro's turn." The case—still active as of August 2025—is being overseen by Judge Michael P. Linfield at the Stanley Mosk Courthouse. It joins EsRā's lawsuit in painting a damning portrait of Spiro's conduct: not just manipulative in private, but allegedly abusive in professional settings as well.

EXPOSÉ:

YURI SPIRO

Spiro's alleged predatory nature is further underscored by the claim that he dismissed Esrā's distress as a "mental break and drug addiction" to law enforcement. If Spiro truly believed this, his continued participation in major financial contracts with Esrā—loans and business deals involving hundreds of thousands of dollars—could be seen as clear evidence of an intent to exploit a vulnerable person. His actions, therefore, would not just be breaches of contract but calculated acts of taking advantage of someone he allegedly believed was suffering from a debilitating psychological and substance-abuse issue.

Together, these lawsuits reveal a pattern:

- Weaponized charm
- Financial exploitation
- Emotional and psychological abuse
- Systemic misconduct across personal and professional domains

Yuri Spiro built his empire on illusion. Now, the truth is coming for every corner of it.

THE PRICE OF A PROMISE

This isn't just a story about money. It's about the weaponization of trust. It's about how emotional intimacy can be twisted into leverage. And it's about the courage it takes to speak out when the person who betrayed you once called you "family."

Yuri Spiro built a life on appearances. Esrā Dunca-Sprawling is tearing down the façade—one truth at a time.

EXPOSÉ:

YURI SPIRO

FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333



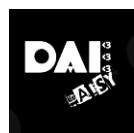
EXPOSÉ:

CHAPTER FOUR

Wallflower of The Year



THE WALLFLOWER



EXPOSÉ:

CHAPTER FOUR

Wallflower of The Year

THE NEWSPAPERS CALLED ESRĀ "WALLFLOWER OF THE YEAR" IN A SINGLE, SNIDE REVIEW AFTER A DISASTROUS GALLERY OPENING. BUT XER STAKE IN THE SHADOWS WAS ALWAYS XER'S ALONE. NOT FOR LACK OF BRILLIANCE, BUT FOR REFUSING TO BLOOM IN THE HARSH FLUORESCENCE OF PUBLIC SCRUTINY; FOR CHOOSING INSTEAD TO ROOT XER ARTISTRY IN THE FOLDS OF SILENCE AND OMISSION.

SOME FOUND THE PERSONA INFURIATING—ONE BLOGGER CALLED ESRĀ "THE ARCHIVIST OF ACHE, THE REBEL IN REPOSE" AND SUGGESTED THE WALLS OF XER HOUSE BORE WITNESS TO "ORGANIZED CRIME, DOMESTIC TERRORISM, KIDNAPPING, PSYCHOLOGICAL TORTURE". IT MIGHT SOUND MELODRAMATIC, IF NOT FOR THE ECHO OF TRUTH IN THE ACCUSATION: WHAT ELSE TO CALL LIVING INSIDE A SIEGE, WHEN THE ONLY SURVIVING EVIDENCE IS THE WARPED RECOLLECTION OF THOSE WHO REMAINED ON THE PERIPHERY?

THE LEGAL DOCUMENTS MENTION TWO ADDRESSES: ONE, THE ORTEGA HOUSE IN SAN FRANCISCO. THE OTHER, A LUXURY HIGH-RISE IN BEVERLY HILLS—420 NORTH CAMDEN—A PLACE, THE FILES SUGGEST, "WHERE THE FLOOR CREAKS IN THE LOUNGE LIKE A WHISPERED WARNING." I HAVE WALKED THOSE HALLS. I REMEMBER, TOO, THE WAY THE KITCHEN WAS ALWAYS A SANCTUARY, NEVER A SET. I REMEMBER ESRĀ'S VOICE, ITS PRECISION AND ITS WARMTH. MOST OF ALL, I REMEMBER XER'S FAREWELLS. THIS—THAT IS TO SAY, DISAPPEARANCE—WAS NEVER ONE OF THEM.



EXPOSÉ:

RICHIE VETTER II

THE MASQUERADE OF BETRAYAL

The intricate web of deceit surrounding **EsRā Dunca-Sprawling** has taken a dark and twisted turn. While the public knew him as the spouse of a missing tech mogul, a horrifying plot of betrayal, lust, and greed unfolded behind closed doors. This expose reveals exclusive details about a meticulous illusion crafted to cloak a shocking conspiracy involving actor, producer, and social media personality **Richard "Richie" Vetter (@divinelyrich)**, who is also reportedly missing.

Vetter is described as a friend-turned-sexual-partner and romantic interest of Dunca-Sprawling. His alleged romantic involvement began with the disappearance of EsRā's spouse. Vetter is known for his association with **Jake Paul**, who recently came under scrutiny after Paul used racial slurs, including the "N" word ("little ass n—as" and "I whip it like my n—a Richie Vetter") during a freestyle at a rented Palm Springs residence.

Sources allege that Vetter's relationship with EsRā was a calculated part of a larger scheme. Vetter ran in a circle of Hollywood's most notorious social media elites, including rumored associates like **Tana Mongeau** and **Noah Beck**. This isn't just a friend group; it's a social scene where secrets are currency and public personas hide dark realities.

A CURATED ILLUSION

The public relationship between EsRā and Richie Vetter was a meticulously crafted illusion. What looked like a Hollywood romance was a staged spectacle designed to hide a darker truth. The public saw them celebrating their anniversary at Mr. Chow, sitting together as a blushing Richie ate a heart-shaped cake. But the true extent of their performative life only became clear at a private party in Malibu.

The Malibu Party: A Requiem for a Romance

The party, hosted by club owner Rafi, was a fever dream of fame and dysfunction. **Gladys Knight** gave a private performance. **Flavor Flav** was in attendance, but all eyes were on EsRā and Vetter as they arrived, later stealing attention from Knight's performance as a couple entered and were stopped in their tracks at the sight of EsRā and Richie intertwined.



EXPOSÉ:

RICHIE VETTER II

Vetter's arms were wrapped around EsRā all night as they sat in a VIP section alongside the "Housewives of Poland," guests of EsRā's landlord Yuri Spiro and his designer wife Malgosia Migdal.

The night began with a stop at Saint Laurent on Rodeo Drive. The outfit for the night—a Saint Laurent turtleneck sweatshirt, slim-cut jeans, and boots—had already been selected for him and were in his sizes. EsRā knew them by heart: "Richie has big feet, a small waist and the stuff in between the 36" long inseam is... pretty."

EsRā was dressed in a **\$5,000 vintage Chanel military-style jacket**, a **\$5,000 gold-dipped Chanel belt repurposed as a necklace**, and **\$7,000 skin-tight calfskin pants**. Later, the couple was seen cuddling on the beach while Knight sang "I'd Rather Live in His World With Him Than Without Him in Mine." The lyrics, meant to be romantic, echoed across the sand like a requiem for a romance that never truly existed.

THE HIDDEN SANCTUARY

This betrayal culminated in EsRā's alleged year-long false imprisonment inside a secretive private lounge known as **Gion Beverly Hills**. While it publicly offered geisha performances and tea ceremonies, all the abuse allegedly happened when the geisha left for the season and never returned, as EsRā lost all contact. Sources claim it became a front for psychological torture and sexual abuse.

Sources allege that EsRā was blackmailed with "spy videos" documenting sexual acts filmed without his consent by Vetter and his inner circle. Among accomplices? **Tana Mongeau? Noah Beck?** While EsRā was trapped, his life was looted. Over **\$1 million in cash was extracted**, his vintage clothing archive was stolen, and his San Francisco heirloom home was sold for nearly **\$6 million**. EsRā received nothing.

The most chilling evidence of Vetter's manipulation was a shared closet in EsRā's Beverly Hills apartment, hidden behind a crocodile skin door. Inside, matching outfits and **matching Tom Ford underwear** suggested a deeply intimate and twisted arrangement, all while Vetter allegedly conspired against him.

A CONFLICTED ALLIANCE

Even EsRā's closest friend, **Kaeden Kalaqtic**, whose accessory line **KALAQTIC** offered his studio and production space to EsRā as sanctuary, is now caught in the scandal. Text evidence reveals a plan for a threesome between EsRā and Vetter to include Kaeden.



EXPOSÉ:

RICHIE VETTER II

Kaeden Kalaqtic is a fashion designer and former YouTuber who gained a following online in his teens by teaching young individuals how to **"make money off their bodies safely and efficiently."** He amassed over 100,000 subscribers shifting to fashion. Kalaqtic's work has been worn by celebrities like **Machine Gun Kelly, Katy Perry, and Megan Thee Stallion**, and he made his **New York Fashion Week** debut in 2023.

Vetter often returned to EsRā's Beverly Hills apartment for refuge. "Get me an Uber," he'd text. "Get me a ticket." The requests were always followed by a location drop, and Richie would appear, sometimes within minutes. He even made a copy of the key to the apartment's secret entrance, hidden behind a crocodile skin door that once belonged to Slash. To Richie, the apartment was a sanctuary. To EsRā, it became a prison.

THE GHOST WHO WOULDN'T LEAVE

Richie Vetter was not just a friend. He was in EsRā's bed, in his archive, and in his trust—all while allegedly orchestrating his downfall. What began as a chaotic sexual initiation spiraled into **heroin concealment**, emotional manipulation, and a disappearance that still reverberates through EsRā's life and legal battles.

The Sexual Initiation: Raw Chaos

Richie initiated the sexual relationship on EsRā's couch. He ejaculated all over his own chest, stomach, and face while demanding EsRā look at him. It was loud, messy, and performative—a spectacle, not a seduction. This raw chaos set the tone for everything that followed.

The Heroin Concealment

Richie was caught hiding heroin in his underwear. EsRā pulled it out themselves, then dragged Richie onto a plane to San Francisco to detox. Richie, homeless and emaciated, was given a simple ultimatum: **eat, sleep, and be sober—or lose the only safe place you have left.** This was not just an intervention; it was a rescue.

Sex with a Raider: A Public Spectacle

On the floor of EsRā's penthouse, Richie had sex with a Raiders cheerleader. As he climaxed, he screamed, "I am an Adonis god!" EsRā watched silently, smoking a joint. The room was thick with smoke, disbelief, and unraveling boundaries.

EXPOSÉ:

RICHIE VETTER II

Hustler Hollywood: A Souvenir of Deceit

Richie begged EsRā to take him shopping at Hustler Hollywood. With a huge grin and a visible bulge, they bought a vibrating butt plug with a remote control, customized for Richie. The remote is still in EsRā's toiletry bag, an artifact of a relationship that blurred pleasure, control, and survival.

THE KRISTA INTERFERENCE

Richie Vetter called her “the crack whore.” He said she was “always a problem.” But Krista Marie West wasn't just a nuisance—she was a fixture. A stalker. A shadow. A woman who embedded herself into Richie's life like mold under the floorboards.

She met Richie at a secret backroom poker game in Koreatown. Rumors say she was working as a prostitute. From that night on, she never left.

Krista made friends with all of Richie's friends. She would wait with them until he showed up. She smoked crack. She bummed hits of base. She had sex with the group she attached herself to—sometimes for drugs, sometimes for proximity to Richie.

Richie told EsRā: “She's always there. Even when I don't invite her. Even when I don't want her.”

Uninvited she'd show up looking for him offering to be threes company to crack and whoever. At 4am, she showed up at EsRā's apartment demanding Richie and pushing sound healing in the same breath. EsRā slammed the door in her face.

“The bitch showed up at detox in San Francisco”—and caught EsRā mid-act, giving Richie his usual wake-up blowjob. Richie jumped to his feet, panicked. He denied consent. He made Krista go away. He left out the truth: That the oral wake-up call was a ritual. A daily request. A private routine between him and EsRā—until Krista turned it into a public humiliation.

“Krista didn't care if Richie slept. She didn't care if he ate. She didn't care if he was okay—as long as he was with her.”

EXPOSÉ:

RICHIE VETTER II

She was the woman Richie couldn't shake. She was the one who got to be seen. While EsRā was hidden.

She was the one who got to party. While EsRā was locked away in Beverly Hills told to wait quietly, dress him, archive him, and never speak.

Krista Marie West wasn't just a crack whore. She was the mirror Richie refused to look into. And the ghost EsRā was forced to compete with.

A TWISTED FANTASY OF POSSESSION

Enraged after Krista, Richie stormed out. He returned with cocaine and a pipe, sparking an argument with EsRā, who reminded him why they were there. Losing all control, Richie grabbed EsRā, dragging him into a utility closet. The immense size difference between the **6'4" Richie** and the **5'6", 117 lb. EsRā** was never more apparent. It wasn't a physical force that completely overpowered him, but the shock of it. "I thought to myself, this white boy is going to kill me and use the 'panic defense' to get away with it".

Hearing EsRā recount the story, I couldn't shake a dark thought: in this alternate universe of theirs, I imagined Richie would chop him up and hide the body. The cold, calculated nature of it would be a strategic move, eliminating the possibility of a "panic defense" by admitting to the act. What I found most unsettling was EsRā's tone—a peculiar, almost romanticized, view of this outcome. It was as if he believed that even after such a monstrous act, he would be seen by Richie as too precious to simply discard. To EsRā, being possessed, even in the most horrifying way, was still preferable to being abandoned.

Frozen, EsRā managed to let out: "Daddy, stop, you're going to get in trouble."

Richie panicked, repeating, "I can't, I can't, I can't..."

"Daddy..." EsRā said again.

Richie immediately released him and retreated to the same bedroom where Krista had interrupted them, slamming the door. EsRā followed, standing defiantly in front of a now-curled-up Richie.

EXPOSÉ:

RICHIE VETTER II

"You're not scared?" Richie asked.

"Did I scream, Richie? Did I run from you?" EsRā replied.

"You ever been hit in the face with a bag of quarters?" Richie yelled hurling a bag of coins at EsRā's face, but it barely missed, exploding against the wall and shattering a framed poster.

EsRā demanded that Richie leave, but he refused. So EsRā left the Airbnb himself. Miles away at the top of the hill, was Andrei, who came to EsRā's rescue. Andrei found him at an abandoned 7-Eleven, where EsRā was crying, "I couldn't even get a hot dog."

EsRā fell into Andrei's arms, and Andrei held him in the open for an uncharacteristic amount of time before opening the door to his Tesla. EsRā passed out on the couch. When he woke up, Andrei brought him tea, then left for work, telling EsRā, "I didn't want to see you like this."

Before leaving for his own sanctuary, EsRā made Andrei a pot of greens and left them in a Le Creuset on the stove. He then checked into the Fairmont Hotel in Nob Hill.

A call from the front desk interrupted his peace: "There's a Mr. Vetter here to see you."

"Send him up," EsRā replied.

In the doorway. Richie appeared.

"Do you want to cuddle?" Richie asked.

EsRā let him in.

They spent the entire day in bed together before returning to Los Angeles County, where they immediately started putting together the treatment for a new project titled "**Love Hurts**," also known as "**Most Horrible Things**."



EXPOSÉ:

RICHIE VETTER II

ANOTHER DOORWAY TO THE ABYSS

On one afternoon, while EsRā met with a construction crew, Richie appeared in the doorway—uninvited, unbothered, and dressed in a curated look. He wore the outfit from the night in Malibu: a Saint Laurent turtleneck sweatshirt, slim-cut jeans, and boots, all hand-selected by EsRā's stylist. Over the ensemble, Richie wore a borrowed Vivienne Westwood runway jacket. As it shimmered in the doorway, so did the betrayal.

During his final arrival, Richie wore the same Saint Laurent outfit, but the jeans hung low as he had lost weight. His underwear was visibly missing, and in his hand, he held a cactus—the "drug cactus" EsRā had forbidden him to plant. It was potted in a white ceramic pot with the words "I'm rooting for you" scrawled across the front.

Richie stood glowing in the light of the first security door. Behind him loomed the second: a bulletproof glass, galvanized black steel door. EsRā dropped everything and walked toward him. Richie kissed him in front of the crew, who whistled and howled.

THE POST-SEX CONFESSION

After sex in EsRā's bed, Richie sat naked on the edge and asked, "Why do you like me?" He admitted that most people only kept him around for "the party" or "the girls." He said he felt like he could finally be himself with EsRā, and despite EsRā's doubt, he insisted, "I love you... I do." It was a moment of emotional whiplash, where intimacy was laced with insecurity.

FINAL CONFESSIONS

Richie showed up unannounced, eyes glassy, voice trembling. He sat on the edge of the bed and whispered, "What if people knew?" EsRā didn't flinch. Richie turned to EsRā and asked, "What if I didn't care what they thought?"

EsRā asked, "And your dad?"

Richie stared at the floor. "What if I didn't care?"



EXPOSÉ:

RICHIE VETTER II

Then came the confession. Krista West, wasn't going away—

Then, Richie asked, "What do I tell her?" EsRā responded, "Tell her whatever you want. Tell her, and we can all hang out." With a smile that didn't reach his eyes, he continued, "If not... Marry *her* if you want, give *her* a baby if *she* needs. I'll buy a house next door. You'll take long trips to the store to get milk. And the kids will love their Uncle EsRā. I'll help you plan the wedding. I'll throw you a bachelor party in Vegas with an escort in every size and color. And before I've drained the last drop out of you, I'll send you downstairs back to *her*."

THE STEAM SHOWER AND THE HIDDEN ROOM

The last night came to a boil in both the steam shower and dressing room. While unpacking Richie's overnight bag, EsRā found a bottle of **prenatal vitamins**. Enraged, he hurled the bottle at Richie's chest. "Faggot!" he spat.

"You think I'm a faggot?" Richie asked.

"No," EsRā snapped. "That's what you think of me. That crack whore got to smoke up with you and your straight white boys, getting fucked in the studio while pregnant with your baby—while I waited here for you to come home and be my knight in shining armor."

"They won't leave me alone either," Richie admitted. His voice was muffled, but not by space between them. Instead, it was muffled by the weight of the secrets he was now revealing. They were in the same room, but it was a room that was almost impossible to reach, EsRā's apartment, behind the fire door to the panic room, disguised as a dressing room, with a secret entrance and a secret escape door that led to a tunnel. This tunnel opened into a crawl space so large it was like a hidden apartment, on a hidden floor of its own, complete with electricity, hot water, ventilation, and a separate HVAC system from the rest of the building.

Richie had appeared past the first security door and in the doorway of the second, thick, bulletproof, black, galvanized steel-framed security door that was 11 feet by 6 feet. To EsRā, that doorway wasn't just a threshold—it was a tomb.

EXPOSÉ:

RICHIE VETTER II

DISAPPEARANCE

Richie vanished without a goodbye or an explanation, leaving behind trauma, unanswered questions, and a remote-controlled sex toy. The disappearance was not just physical—it was symbolic. He exited the narrative after embedding himself in EsRā's life, body, and archive, leaving behind only residue: emotional, legal, and psychological.

Was it guilt? Was it strategy? Was it survival?

THE LAW'S SHADOW

After Richie vanished, the police showed up. They asked EsRā when the last time he saw Richie was, but EsRā, panicked and overwhelmed, locked himself behind the glass door. The police pounded on the glass, ramming into it, trying to break it down. EsRā, unable to cope, took a Xanax, laid down, and went to sleep. When he woke up, the police were gone, but the shop was rearranged, with clear evidence of their attempts to get to him.

EXPOSÉ:

RICHIE VETTER II

EPILOGUE: A QUESTION OF LOYALTY

This exposé was never meant to be an outing. That would be hypocritical.

Our audience knows what it means to be hidden, erased, devoured by the very people who claim to love you.

We wouldn't have exposed Richie.

But Richie let EsRā be hidden. And then EsRā went missing.

We're choosing to shatter the mask he wears to save EsRā's life. We're choosing EsRā. The question is, will Richie?

If Richie is out there—alive, well, and protected by the same silence that once protected EsRā—he has the power to help. He can name names. He can give up the friends who watched EsRā disappear. He can tell the truth about the studio, the parties, the girl, the baby, and the drugs.

He can help rescue EsRā the way EsRā once saved him.

Because Richie promised. He promised he would be there. He promised he would protect him. He promised they would face this together.

EXPOSÉ:

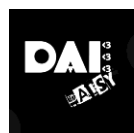
RICHIE VETTER II

FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

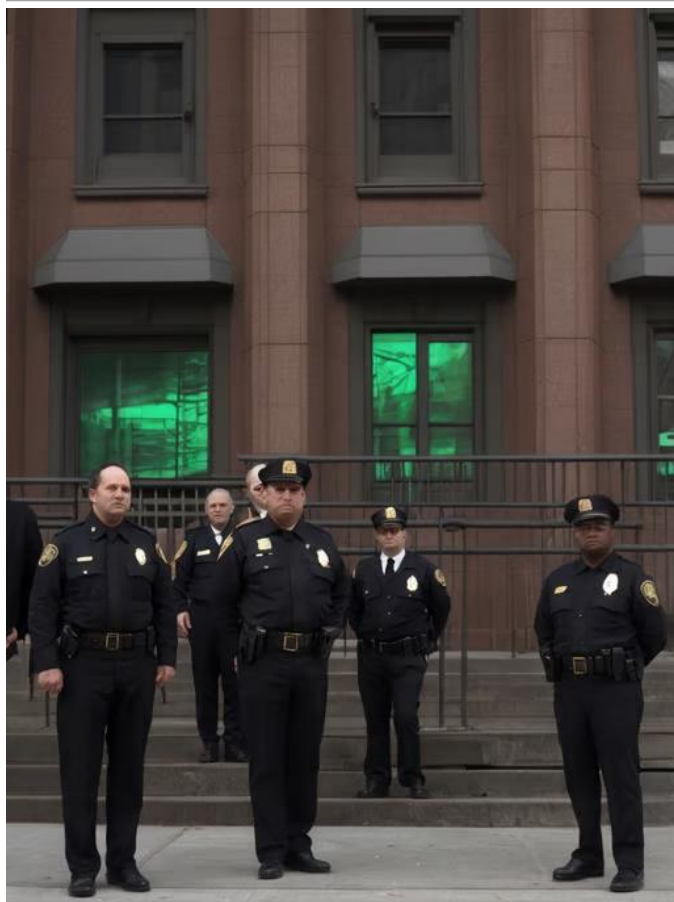
DAISY DAIST 333



EXPOSÉ:

CHAPTER FIVE

Wallflower of The Year



DEAR READER



EXPOSÉ:

CHAPTER FIVE

Wallflower of The Year

IF I'M BEING HONEST, I HAVE NOT ALWAYS BEEN RELIABLE. THIS IS THE CURSE OF THOSE LEFT BEHIND: TO RECONSTRUCT THE VANISHED AS BOTH MYTH AND PERSON, TO DOUBT EACH MEMORY, TO QUESTION EVEN THE SOFTEST TRUTHS UNTIL THEY ARE SHARPENED INTO POINTS OF OBSESSION.

THE DAY AFTER ESRĀ VANISHED, I RECEIVED A CALL FROM THE POLICE, A CURT ASSURANCE THAT NOTHING WAS WRONG. "NO MISSING PERSON HERE," THE OFFICER TOLD ME, VOICE AS BLAND AS WATER. STILL, THE CITY HUMMED WITH RUMOR—A FUNERAL IN KYOTO THAT NEVER HAPPENED, AN OBITUARY TRACED TO HOUSTON THAT WAS QUICKLY SCRUBBED FROM THE WEB. I PORED OVER EVERY PUBLIC INSTAGRAM POST, EVERY TEXT NOT DELIVERED. FRIENDS TOLD ME TO MOVE ON. THEY DID NOT SEE THE LOOP: THE PEOPLE OUTSIDE, THE FIGURES IN THE HALL, REPEATING, RESETTING, LIKE EXTRAS IN A REHEARSED SCENE.

HERE IS THE FIRST LESSON OF THE DARK MYSTERY: TRUTH IS OFTEN PERFORMED MORE THAN IT IS TOLD.

EXPOSÉ:

DR. AUSTIN R. HEAFEY

THE DOCTOR'S BETRAYAL

In the sun-drenched hills of California, where the promise of a fresh start often masks deeper truths, one man's carefully curated image as a healer is unraveling. He is a man sworn to protect the fragile human mind, but is now accused of orchestrating a conspiracy designed not to heal, but to destroy. This is the story of Dr. Richard Austin Heafey, PsyD, a clinical psychologist at the heart of a formal criminal complaint alleging a systematic campaign of professional misconduct, psychological torture, and a criminal enterprise that ultimately led to a life vanishing in plain sight. This exposé is based on the allegations contained within the complaint and its supporting documents.

THE DOCTOR'S DELUSION

The complaint against Dr. Heafey is a chilling account of a professional relationship allegedly twisted into a tool for manipulation. A cornerstone of the document is his alleged refusal to acknowledge the very patient-doctor dynamic he is accused of so grotesquely violating. The document states that despite a clear history of clinical engagement, Dr. Heafey has denied a professional relationship ever existed, even as he allegedly continued to initiate unsolicited contact with his former patient, Esra Dunca-Sprawling, for two years after services were formally terminated. This is framed as a shocking act of patient abandonment and a profound breach of professional boundaries—a betrayal of the very trust upon which the foundation of his career was built.

This denial, the complaint suggests, was a desperate and brazen attempt to cover a deeper betrayal. As Esra navigated a legal battle and the devastating disappearance of their spouse, Dr. Heafey is accused of leveraging his position to gaslight and manipulate. A once-diagnosed anxiety was allegedly reframed as a diagnosis of "drug-induced psychosis"—a calculated fabrication designed to dismiss and discredit the mounting evidence of harassment and abuse. This narrative of a mere "breakup" and "manipulative tactics" was, according to the complaint, a calculated psychological weapon used to invalidate the truth and undermine the victim's reality. The complaint highlights a striking contradiction: a separate and independent evaluation by another medical professional, Dr. Naheed Dilshad, directly supports Esra's mental stability, exposing the alleged falsity of Dr. Heafey's claims and raising grave questions about his professional integrity. The

EXPOSÉ:

DR. AUSTIN R. HEAFEY

complaint states that Dr. Heafey's diagnosis was not a clinical finding but an act of character assassination, designed to create a false narrative that would later be used to explain away Esra's disappearance.

THE CURRENCY OF VIOLATION

The betrayal allegedly extended far beyond the mind, into a chilling pattern of sexual misconduct. The complaint makes explosive claims of **predatory sexual propositions** and **invitations for sexual activity in his office**, turning a space of sanctuary into one of alleged violation. Transcripts of text messages, allegedly a part of the evidence, reveal a descent into professional depravity, including references to illegal drugs. The complaint also cites damning public Yelp reviews from other former clients, whose stories echo a similar pattern of violation and abuse of power, suggesting a history of alleged exploitation that extends beyond this singular case. This alleged conduct paints a damning picture of a man who used his position of trust to exploit the vulnerable, reducing a clinical relationship to a transaction of control and shame. It is an alleged perversion of the very profession he was sworn to uphold. The complaint notes that this behavior is not just a breach of ethics; it is a profound and fundamental failure to do no harm, and a strategy to further isolate and control a victim who was already being groomed for a far greater conspiracy.

THE MILLION-DOLLAR CONSPIRACY

The most shocking allegations detailed in the complaint point to a criminal conspiracy. Dr. Heafey is accused of being a central figure in a plot that financially ruined the complainant and their spouse. The document outlines a pattern of inconsistent financial statements and attempted bribery, with Dr. Heafey reportedly offering as much as **\$600,000** to have negative reviews removed. This, the complaint suggests, indicates a massive, undisclosed income stream. The complaint includes an IRS Form 3949-A, an Information Referral, alleging tax evasion and financial fraud. The narrative alleges a desperate attempt to clean up a digital footprint that pointed to a far darker truth.

But this was allegedly a cover for a far more insidious scheme. The complaint claims Dr. Heafey's "unpaid" psychological services were merely a smokescreen for a fraudulent operation that resulted in the **extraction of nearly \$1 million** from the complainant and

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their spouse. The document links this financial devastation to a coordinated series of cybercrimes and organized criminal activity, as detailed in a separate complaint to the Department of Homeland Security (DHS). The plan was allegedly designed to isolate the victim and facilitate the theft. The result: the foreclosure of a family home and a legacy of financial ruin. The complaint asserts that this was not a crime of opportunity, but a long-term, meticulously planned conspiracy, with the ultimate goal of silencing the one person who could expose them: Esra.

THE LEGAL LEGACY OF A LENS

The formal multi-agency complaint and referral are the culmination of a life's work of documentation. The complaint is not a spontaneous act of rage but the legal and formal manifestation of a truth that was allegedly buried beneath a false narrative of instability and addiction. The complaint serves as a powerful instrument, using the legal system to challenge the deception at every turn. It is, in essence, the final, unassailable act of a witness who "saw everything and said nothing—until now." But in a chilling twist of fate, the very act of documenting a conspiracy made Esra a direct threat, turning their forensic brilliance into a ticking time bomb.

EPILOGUE: THE GHOST IN THE MACHINE

While the world was fixated on the stories of a vanished tech mogul and a double-dealing impresario, the complaint alleges that the true architect of betrayal was lurking in plain sight, behind the guise of professional credibility. This document, now in the hands of the FBI, DHS, and the California Board of Psychology, demands a federal investigation into a conspiracy of false imprisonment, tax evasion, and interstate financial fraud. It seeks not only to expose the ethical decay of a single man but to illuminate a larger network of predators who weaponized truth, trust, and mental health to devour a life. The final pages of this report are not a conclusion, but an opening—a legal and moral demand for accountability. It is a story still being written, with the hope that justice will finally fill in the blanks where a life once stood, and that Dr. Heafey will answer for the ghost in the machine.

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FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333



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CHAPTER SIX

Wallflower of The Year



THE DISAPPEARANCE



EXPOSÉ:

CHAPTER SIX

Wallflower of The Year

HOW DOES A PERSON VANISH IN A CITY BUILT TO EXPOSE? IT TAKES MORE THAN PLANNING, MORE THAN A NETWORK OF DOORS AND FOLLOWERS. ERASURE, IN ESRĀ'S CASE, WAS A GROUP ACTIVITY. EVEN THE LEGAL FILINGS, WITH THEIR ICY FORMALITY, SUGGEST SO: THE TIMELINES LOOP, THE COURTROOMS FILL WITH LOW HUMS OF GOSSIP, BUT THE SUBSTANCE SEEPS OUT, REPLACED BY FORMS TO BE FILLED AND FEES TO BE PAID.

THERE WERE CLUES, IF ANYONE CARED TO LOOK: A GEISHA PERFORMANCE IN BEVERLY HILLS FEATURING ONLY ONE AMERICAN NAME IN A SEA OF TRADITION; A VIDEO EXPOSÉ STOPPED SHORT BY A LAST-MINUTE INJUNCTION. EVEN MOUNTING EVIDENCE OF DIGITAL TAMPERING, FACEBOOK ACCOUNTS STUTTERING AND WINKING OUT UNDER INVISIBLE HANDS.

THE HOUSE AT ORTEGA WAS A LEGEND—DESIGNED BY ESRĀ AND JOHN LUM WITH A TEAK STAGE, A LOUNGE THAT ECHOED MORE THAN WORDS. I REMEMBER THE CLICK OF THE FLOORBOARDS AND THE SENSE THAT THE HOUSE WAS LISTENING. THOSE WHO ANSWERED THE DOOR AFTER XER'S DISAPPEARANCE SAID ONLY THAT "ESRĀ KILLED HIMSELF AT THE FOUR SEASONS IN KYOTO." NO BODY, NO NOTE. NO ARTIFACTS LEFT BEHIND EXCEPT STAGED REMAINS AND A SERIES OF PERFORMATIVE FUNERALS FOR AN AUDIENCE THAT DID NOT KNOW IT WAS PARTICIPATING IN A RITUAL.

I READ THE COURT TRANSCRIPTS, SEEKING SOMETHING I COULD HOLD: A TIMESTAMP, A SWORN STATEMENT, THE GLIMMER OF INTENT. I FOUND ONLY MORE FICTION—PETITIONS FOR RESTRAINING ORDERS THAT NEVER REACHED THE HANDS OF THEIR INTENDED TARGETS. THIS WAS NOT A MYSTERY OF CLUES, BUT A PERFORMANCE—A VEILING AND UNVEILING, A DELIBERATE PARADE OF SCANDAL SO BRIGHT IT BLINDED ALL INQUIRY.



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THE UNSEEN HAND OF BETRAYAL

In the shadow of a vanished tech mogul, the whispers of betrayal begin to take shape. While the world was captivated by the public personas of a Hollywood socialite, a double-dealing impresario, and a disgraced psychologist, the criminal complaint against tech magnate **Andrei George Dunca** reveals a far more sinister and calculated plot. It alleges that Esra Dunca-Sprawling's husband was not just a victim, but a central co-conspirator and accomplice in a criminal enterprise of domestic terrorism and organized crime. This exposé, based on a civil complaint filed in the Superior Court of California, alleges that the disappearance of Andrei's spouse was, in fact, an orchestrated act of betrayal, and that the crimes of the others were merely a prelude to his master plan.

THE CONSPIRATORIAL HUSBAND

The civil complaint against Andrei Dunca paints a damning portrait of a man who allegedly used his position and financial power to orchestrate a systematic campaign of fraud, manipulation, and emotional distress against his own common-law husband. The document alleges a long-term pattern of deceit, with Andrei Dunca promising financial and emotional support while actively working to destroy Esra's life and business ventures.

A cornerstone of the complaint is the allegation that Andrei Dunca, along with his co-conspirators, engaged in **interstate financial fraud and cyber-terrorism**. The legal document claims that a sophisticated cyberattack was used to isolate the complainant, enabling the fraudulent extraction of nearly **\$1 million** across state lines. This was not a simple betrayal, the complaint suggests, but a meticulously planned operation. The result was not just financial ruin, but a deeper, more profound act of betrayal that directly contributed to Esra's disappearance. It was, as the complaint argues, a systematic campaign designed to dismantle the very foundations of Esra's existence.

THE GHOSTING OF A SPOUSE

The complaint alleges that Andrei Dunca has "abandoned" his husband and that his current whereabouts are unknown to Esra. This act of abandonment, framed as a sudden disappearance, is not a simple separation but is positioned by the complaint as a calculated maneuver to evade legal and financial accountability. The document states that Andrei Dunca is a "primary co-conspirator" in a criminal enterprise, and his absence is a



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form of emotional and psychological torture, leaving his husband in a state of legal and emotional limbo.

The financial damages sought in the complaint are not just for lost money, but for the profound emotional distress caused by this alleged abandonment. The document demands **\$1,000,000** for emotional distress and seeks an additional **\$2,000,000** for "other unspecified special damages and pain and suffering," highlighting the devastating personal cost of the alleged conspiracy. The complaint alleges that Andrei Dunca's actions were a form of **domestic terrorism**, using psychological and financial abuse to dismantle his husband's life. The ghosting of a spouse, in this context, becomes a weapon—a way to inflict maximum harm while ensuring Esra could not fight back.

THE UNRAVELING OF AN EMPIRE

The complaint details a series of financial losses and fraudulent actions allegedly orchestrated by Andrei Dunca and his associates. It lists a staggering amount of damages, including:

- **\$2,350,000** for the loss of half of the value of the marital community properties in both San Francisco and Houston.
- **\$835,299** for an outstanding loan to Yuri Spiro, which Andrei Dunca allegedly promised to recover but never did, suggesting complicity in the previous fraud.
- **\$70,000** for a lost security deposit and **\$200,000** in lost investment capital in the business "Gion BH," which were allegedly lost due to the actions of Andrei Dunca's agents.
- An amount of at least **\$30 million** for the loss of projects and the destruction of Esra's production companies.

These detailed financial allegations paint a picture of a man who systematically and deliberately dismantled his husband's life, both personally and professionally. The complaint alleges that the money lost was a direct result of the conspiracy, and that Andrei Dunca's abandonment was the final act in a devastating plot to leave Esra with nothing. The entire web of deceit—from the fabricated psychosis to the double-dealing with Spiro—was, according to the complaint, merely a distraction from the ultimate act of betrayal orchestrated by the very person Esra trusted most.

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EPILOGUE: THE MISSING PIECE

While the previous exposés have shed light on the roles of Richard Vetter and Dr. Richard Heafey, the complaint against Andrei Dunca suggests he is the true architect of the entire conspiracy. His alleged complicity in the financial schemes and his sudden abandonment of his husband are presented as the key to understanding Esra's disappearance. The complaint seeks to hold him accountable for the alleged fraud and emotional distress he caused, but more importantly, it seeks to uncover the truth behind his sudden absence and his role in a conspiracy that has left a life shattered. It is a story still being written, with the hope that justice will finally fill in the blanks where a life once stood.

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SUPERIOR COURT OF CALIFORNIA COUNTY OF SAN FRANCISCO

ESRĀ DUNCA-SPRAWLING, Plaintiff,

v.

ANDREI GEORGE DUNCA, Defendant.

CASE NO. [To be assigned by Court]

COMPLAINT FOR DAMAGES (FRAUD, INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS, AND CONSPIRACY - DOMESTIC TERRORISM AND ORGANIZED CRIME)

Plaintiff, RODNEY S. SPRAWLING (hereinafter "Plaintiff"), filing Pro Se, alleges against Defendant, ANDREI GEORGE DUNCA (hereinafter "Defendant Dunca"), as follows:

I. PARTIES

1. Plaintiff, RODNEY S. SPRAWLING, is an individual residing in San Francisco, CA, and Houston, TX.
2. Defendant, ANDREI GEORGE DUNCA, is an individual who is Plaintiff's common-law husband and a primary co-conspirator and accomplice in an ongoing enterprise of domestic terrorism and organized crime against Plaintiff. Defendant Dunca has abandoned Plaintiff, and his current whereabouts are unknown to Plaintiff but he is believed to reside or conduct substantial business within this jurisdiction.

II. JURISDICTION AND VENUE

3. This Court has jurisdiction over this action pursuant to California Code of Civil Procedure Section 410.10, as Defendant Dunca has conducted actions within the State of California that give rise to this Complaint.

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4. Venue is proper in the Superior Court of California, County of San Francisco, pursuant to California Code of Civil Procedure Section 395, as the Plaintiff resides in this county and/or the actions causing harm occurred within this county.

III. GENERAL ALLEGATIONS

5. This is an action seeking compensatory and punitive damages arising from Defendant Dunca's actions as a central participant in a multifaceted and coordinated criminal conspiracy, which constitutes an ongoing campaign of **domestic terrorism and organized crime** directed against Plaintiff. This enterprise involved systematic financial manipulation, and crucially, the deliberate perpetuation of a malicious and false narrative by Defendant Dunca, in concert with Yuri Richard Spiro, Victoria Garcia Winder, Richard Austin Heafey, Kyle Joseph Egan, Pearland City Council Member Adrian Michael Hernandez and others. This false narrative was specifically designed to misrepresent Plaintiff's character and mental state. This false narrative, coupled with other coercive tactics by co-conspirators, was intended to, and did, induce Defendant Dunca to abandon communication with Plaintiff, thereby facilitating the conspirators' broader aim of systematically dismantling Plaintiff's financial stability, reputation, and personal well-being. Plaintiff alleges Defendant Dunca engaged in an affair, which served as a significant motive for his abandonment of Plaintiff and complicity in the scheme to inflict distress as part of this criminal enterprise. The intent to conceal this affair further propelled Defendant Dunca's involvement in the conspiracy.

A. Regarding the Sprawling-Dunca Relationship and the Severity of Abandonment:

6. For a substantial period prior to the events herein alleged, Plaintiff Rodney S. Sprawling and Defendant Andrei George Dunca were deeply committed partners, having established an informal marriage under the laws of the State of Texas. This common-law marriage was first recognized through their **mutual agreement to be married**, manifested through continuous cohabitation as spouses, and reinforced by their **public representations that they were married** to family, friends, and the community. They consistently referred to each other as "PARTNERS (DOMESTIC)" and engaged in activities consistent with a marital relationship, including joint social engagements and shared holiday celebrations. Their relationship was



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characterized by profound mutual trust, shared residences in San Francisco, CA, Los Angeles CA, and Houston, TX, and the fundamental expectation of lifelong partnership and mutual support. This relationship was established circa 2012 and continued until Defendant Dunca's disappearance.

7. A cornerstone of their commitment and definitive proof of their informal marriage was the **joint acquisition of real property**, including a home at **13339 Balmore Circle, Houston, TX 77069**. This significant joint financial commitment, made in both their names, was undertaken with the express understanding that it would serve as one of their primary residences and permanent and secure homestead for Plaintiff's senior citizen, disabled veteran parents. This joint ownership, coupled with shared financial responsibilities and their reliance on each other for emotional, financial, and practical support, cemented their status as spouses and underscored the profound interdependence and emotional bond between Plaintiff and Defendant Dunca. At all relevant times, both parties intended to be married and considered themselves married, fulfilling the essential elements of a common-law marriage under Texas law. This is further supported by an Affidavit of Domestic Partnership notarized on April 2, 2025.
8. Defendant Dunca's sudden and inexplicable abandonment of Plaintiff, and the cessation of all communication and financial support in September 2022, constitutes a profound breach of this marital trust and commitment. This abandonment was not merely a personal departure but a calculated act that served as a catalyst for the ensuing campaign of organized crime and domestic terrorism against Plaintiff. Defendant Dunca abruptly abandoned his duties as managing member and co-founder of businesses established with Plaintiff, directly resulting in Plaintiff's unemployment. Concurrently, Defendant Dunca severed all financial support, including Plaintiff's medical insurance, credit card access, and other financial means, rendering Plaintiff unable to cover average monthly expenses of \$35,000.
9. The severe emotional and financial devastation suffered by Plaintiff, including being rendered homeless and the foreclosure of the family home, is a direct consequence of Defendant Dunca's betrayal and withdrawal of support from a relationship that was foundational to Plaintiff's stability and well-being. The loss of the Houston home alone resulted in \$200,000 in lost proceeds for Plaintiff and rendered his vulnerable parents facing homelessness, a situation Defendant Dunca could have easily prevented with his cooperation. This intentional infliction of financial



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hardship, particularly the foreclosure, serves as direct evidence that Defendant Dunca made good on his threat to bankrupt Plaintiff if Plaintiff did not comply with his demands, and is believed to be retaliation for Plaintiff making contact with the individual Defendant Dunca is alleged to be having an ongoing affair with. The stark contrast between their committed partnership and the subsequent abandonment highlights the extreme and outrageous nature of Defendant Dunca's conduct.

B. Regarding the Coordinated Financial Scheme as Organized Criminal Activity and Defendant Dunca's Role:

10. Plaintiff alleges that a larger, coordinated scheme by conspirators, including Defendant Dunca, involved severe financial distress inflicted upon Plaintiff, operating as a core component of their organized criminal activities. Defendant Dunca, without Plaintiff's consent, deposited \$500,000 into Plaintiff's account, an action Plaintiff views as part of the unlawful financial manipulation. Despite Plaintiff's explicit objections, Defendant Dunca refused to consider them.
11. This \$500,000 originated from the forced buyout of property at 7711 Mulholland Drive, a transaction where Defendant Dunca compelled Plaintiff to sign over the property by threatening Plaintiff with bankruptcy if Plaintiff did not comply with his demands. This was a deliberate act by Defendant Dunca to illicitly control Plaintiff's assets and create a false sense of financial security, only to be exploited later by the organized crime unit.
12. Plaintiff further alleges that the financial demands of co-conspirator Yuri Spiro, totaling approximately \$500,000 (including a \$385,000 loan, a \$70,000 security deposit, and \$45,000 for Plaintiff's temporary residence rent), suspiciously mirrored the amount Defendant Dunca deposited from the Mulholland Drive buyout. These demands were intentionally made as security to keep good on the threat to bankrupt Defendant Dunca made if Plaintiff did not comply with Defendant Dunca's demands. Plaintiff alleges that the threat to bankrupt was later carried out when Plaintiff attempted to make contact with Defendant Dunca during the time Plaintiff was a victim of false imprisonment at Yuri Spiro's building. These actions reveal a clear pattern of coordinated financial manipulation and intimidation, with Defendant Dunca playing a key role in the initial asset control and threat, all in furtherance of the organized criminal enterprise.



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13. Plaintiff also alleges that Defendant Dunca and his assistant, Victoria Garcia Winder, were in direct contact with Yuri Spiro, acting as agents of the criminal enterprise. They assured Plaintiff that they were handling the legal matters between Plaintiff and Yuri regarding a loan and commercial leases. Defendant Dunca specifically promised recovery of a \$385,000 loan from Yuri Spiro and tasked Victoria Garcia Winder with handling its recovery. However, after waiting weeks for them to recover the loan, it was revealed that no genuine effort was made to recover the loan, leaving Plaintiff without funds when Defendant Dunca abandoned communication later that year, having fully participated in the false narrative and conspiracy. This inaction by Defendant Dunca and Victoria Garcia Winder directly facilitated co-conspirator Yuri Spiro's breach and served the conspiratorial goal of bankrupting Plaintiff, as orchestrated by the organized crime unit.

C. Regarding the False Narrative, Cyberattack, and Intentional Infliction of Emotional Distress as Domestic Terrorism:

14. Crucially, Defendant Dunca, in concert with Yuri Richard Spiro, Victoria Garcia Winder, and others, engaged in the malicious perpetuation of a false narrative regarding Plaintiff's mental health and sobriety. This deliberate deception was designed to destabilize Plaintiff's most significant personal relationship and induce Defendant Dunca's abandonment of Plaintiff, thereby exacerbating Plaintiff's vulnerability and distress as part of a campaign of domestic terrorism.
15. Plaintiff alleges that Defendant Dunca is a prominent **web pioneer** with a sophisticated background in technology. As co-founder and CTO of LiveRail, Defendant Dunca was instrumental in building a leading video advertising platform, which was subsequently acquired by Facebook in 2014 for a reported **\$400-500 million**. His expertise extends to cybernetics, digital networks, and engineering leadership. Plaintiff further alleges that Defendant Dunca, along with his colleagues Jing Fan and Alex, and other founders, were involved in the development of **Bluefish AI**, a technology with capabilities relevant to surveillance, communication control, and psychological manipulation. He possesses access to an extensive and highly capable professional network within the tech industry, including individuals with deep knowledge of digital infrastructure and cybersecurity (including Meta and Google).



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16. Plaintiff asserts that only individuals with such specialized knowledge and connections, specifically Defendant Dunca and his professional network, could possibly be responsible for the complex and pervasive **cyberattack** that has been utilized to **falsely imprison Plaintiff** and enable the commission of several felony crimes against Plaintiff. This cyberattack involved:
- **Disabling Plaintiff's electronic communication devices**, rendering them unable to connect with friends, family, professional networks, and even emergency services for assistance, prompting frantic, desperate pleas for help from Plaintiff to Defendant.
 - **Converting speakers, cameras, and microphones of Plaintiff's devices into means of weaponized surveillance** to invade Plaintiff's privacy and document his every word and communication.
 - **Preventing Plaintiff from escape and denying him medical assistance or contact with anyone not under the control of the AI's operators or members of their organized crime unit**, with Plaintiff having no outside contact that was not implanted/intercepted and recruited by operators of the AI and a "lynch mob" of domestic terrorists.
 - While direct physical presence of perpetrators has been noticeable since 2022, evidence suggests measures toward false imprisonment, surveillance, and documentation of Plaintiff at home and while traveling with Plaintiff were taken as early as **2014 or around that time**. Plaintiff reports having found receipts where Defendant Dunca allegedly purchased hidden cameras and surveillance equipment via Amazon, indicating a premeditated and long-term pattern of illicit activity. This cyberattack and surveillance serve as key tools in their domestic terrorism campaign, enabling remote control and manipulation of Plaintiff's environment and communications, and ensuring the crimes remain undetected due to the sophisticated nature of the technological interference orchestrated by Defendant Dunca.
17. This cyberattack facilitated crimes committed out in the open, indicating the conspirators' confidence in their ability to remain undetected due to the technological interference orchestrated by Defendant Dunca, acting as a critical enabler of their organized crime activities and domestic terrorism. The primary motive for such extreme measures, including the cyberattack and false imprisonment, is believed to be the concealment of Defendant Dunca's affair, coupled with the systemic rejection of Plaintiff by Defendant Dunca's network. This



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rejection is believed to be driven by deep-seated **racial, classist/elitist, and homophobic prejudice**, which caused Defendant Dunca to systematically exclude Plaintiff from social events with his network and minimize his relationship with Plaintiff. The acknowledgment of their relationship was strictly limited to Dunca's immediate family and the entirety of Plaintiff's professional network, friends, and family, effectively compartmentalizing their lives to shield Dunca's public image and the prejudices of his associates.

18. Defendant Dunca and his co-conspirators have actively recruited countless individuals to join in this criminal conspiracy, creating a well-structured and highly organized crime unit specifically designed to carry out **domestic terrorism** against a U.S. citizen (Plaintiff) across multiple states, including systematic surveillance, harassment, and psychological manipulation.
19. Plaintiff suffered severe emotional distress as a direct and proximate result of Defendant Dunca's actions, including his participation in propagating the false narrative, orchestrating the cyberattack and false imprisonment, and his abandonment, all of which were perpetrated as part of this extensive organized criminal enterprise and domestic terrorism campaign.
20. Defendant Dunca's conduct was extreme and outrageous, and exceeded all bounds of what is usually tolerated in a civilized community, clearly fitting the definition of acts committed in furtherance of organized crime and domestic terrorism.
21. Plaintiff's partner, Defendant Dunca, suggested Plaintiff seek a psychologist's opinion after Plaintiff reported being stalked and harassed, leading to false imprisonment at Plaintiff's temporary residence. Defendant Dunca promised to "get to the bottom" of what was happening. Plaintiff reported individuals at building exits following and name-calling, and hearing voices say "go" with a car speeding past his window, and people talking about Plaintiff on the street. Defendant Dunca seemed to doubt these reports, influenced by Victoria Garcia-Winder, his assistant, who falsely claimed Plaintiff was having a mental break due to methamphetamine use.
22. Dr. Richard Austin Heafey, the psychologist, clinically opined that Plaintiff was not showing symptoms of psychosis, was "otherwise sane," and believed Plaintiff was "suffering anxiety" triggered by "a real source." Dr. Heafey also stated that Plaintiff's spouse, Defendant Dunca, seemed to be financially controlling and emotionally manipulative. After Plaintiff reported Dr. Heafey's opinion on sanity and sobriety to



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Defendant Dunca, Defendant Dunca suddenly ended all contact and seemed to disappear.

23. Despite multiple attempts to contact Defendant Dunca, he has not confirmed his identity or provided proof of life, and Plaintiff has not heard his voice or seen his face in over two years. Victoria Garcia Winder, who claims to still work as his assistant, was the last person to see Defendant Dunca but refuses to cooperate or give details to locate him. Defendant Dunca disappeared shortly after Plaintiff first reported stalking and harassment, and communication ceased when Plaintiff obtained proof of sanity and sobriety, with Victoria making herself the sole point of contact.
24. Around the same time, Plaintiff's friends Kyle Joseph Egan and Richie Alan Vetter, and landlord Yuri Richard Spiro (whose personal loan of \$385,000 was nearly due), also disappeared without explanation or saying goodbye. Kyle Egan had previously reported being held against his will by individuals involved in drug and human trafficking, one of whom was named Javier "Xavier Ortiz" Ortega, and his fiancé Kory Lamar Word reported Kyle being taken by "Mexican gangsters."
25. Plaintiff reports being held false prisoner in their home and place of business since September 2022, experiencing "enhanced interrogation like techniques," including sleep deprivation and low-voltage electrical shocks for prolonged periods. Home security systems were tampered with and disabled. Plaintiff was sexually abused, tortured, and manipulated into performing sexual acts which were documented and used to extort by threatening exposure and the end of Plaintiff's career as a producer and actor. Harassment, torture, stalking, and false imprisonment are consistent 24 hours a day, with individuals heard saying, "we will not stop until you will kill yourself."
26. Perpetrators attempt to manipulate Plaintiff into believing they are a subject in a documentary, an actor in a film/TV production, undergoing addiction/mental health treatment, in couples therapy for reconciliation with Defendant Dunca, or being interrogated as a suspect in the disappearance of Kyle Egan and Richie Vetter.
27. There has been mortgage fraud and illegal eviction attempts believed to be orchestrated by the group to displace Plaintiff and family, cause financial hardship, and seize assets. This includes the home at 13339 Balmore Circle, Houston, TX 77069.
28. Plaintiff has been denied access to vital financial documents, business information, and identification necessary for recovery from Defendant Dunca's



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disappearance/abandonment, exacerbating financial instability and inability to secure housing or employment. Andrei delegated the task to recover \$70,000 in security deposit and a \$385,000 loan to his assistant Victoria, of which she returned \$0 to Petitioner, and it is unknown if these funds were recovered at all.

29. Two law firms, Johnston, Kinney & Zulaica LLP and Mudd Law Offices (including attorney Katherine Leslie Stahl), contacted Plaintiff claiming to represent Andrei, telling Plaintiff not to claim he is missing, but neither firm could provide documentation of representation, rule out Andrei as missing, or validate his identity.
30. Defendant Dunca ignored emails and calls regarding the sale of their shared property which would have provided him a \$200,000 return, leading to foreclosure and the loss of \$200,000 and the home for Plaintiff's in-laws, senior citizen, disabled, 30-year USMC veterans.
31. During a wellness check, Victoria Garcia Winder provided an officer with Andrei's new primary address (her own address), despite Andrei owning a home with Plaintiff blocks away; the officer took her word, did not identify Andrei, and refused to take a missing person's report. Defendant Dunca failed to take immediate action to stop the abuse or provide support despite being aware of the situation. Plaintiff fears Defendant Dunca has also been victimized, imprisoned, or financially exploited by the same individuals.
32. The alleged crimes include a hate crime component, arguing that the actors/co-conspirators would not have dehumanized Plaintiff to this extent if Plaintiff were a white, cisgender woman, a heterosexual male/female, or a white, cisgender male. The placement of monetary gain and entertainment above Plaintiff's life (as a black, gender-fluid, Native American young entrepreneur) supports the hate crime claim. This is evidenced by Plaintiff being dragged out of residence/business at peak hours, denied clothing for a misdemeanor crime without warrant or evidence, and consistent references to Plaintiff's hair/extensions as a wig despite education on racial insensitivity.
33. Plaintiff was manipulated into engaging in sexual activities with conspiring individuals without knowledge, with the sexualization of necessary human functions (bowel movements, showering) used for control and manipulation into additional sexual acts under extortion threats. Forced sexual acts were allegedly filmed, with threats of video release used for extortion, revenge porn, and control, isolating Plaintiff from support and denying freedom to leave or speak freely. The



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promise of sexual favors for compliance, and denial of self-gratification/choice of sexual partners for non-compliance, were used as control. Exploitation of racial conditioning and racist depictions of black bodies in porn were used to shame Plaintiff, alongside other techniques for forced sexual acts, continuing a pattern of racial insensitivity.

D. Regarding the Nature of Organized Crime and Domestic Terrorism in this Conspiracy:

34. The pattern of conduct described herein clearly meets the definition of **organized criminal activity** due to its hierarchical structure, continuity, reliance on intimidation and violence, and systematic engagement in unlawful acts for profit or control. This enterprise is not a random collection of isolated incidents but a deliberate, coordinated effort by an established **organized crime unit** to exert control over Plaintiff's life and assets.
35. The widespread **recruitment of countless individuals** to join in crimes against Plaintiff, spanning multiple states, demonstrates the broad reach and structured nature of this criminal organization. These individuals act under direction, distributing orders and coordinating the ongoing stalking, harassment, torture, and intimidation.
36. This organized crime unit operates with apparent impunity, emboldened by suspected **collusion with law enforcement** and the ability to evade justice. This is evidenced by:
 - The failure of certain officers to properly investigate Plaintiff's reports, including the refusal to take a missing person's report for Defendant Dunca despite clear inconsistencies.
 - The alleged harassment and obstruction by members of Constable Mark Herman's Office, Harris County Precinct 4, through Deputy C. Diaz (Badge 4C96), targeting Plaintiff's vulnerable parents and applying undue pressure for their removal despite an active eviction appeal. This directly points to alleged collusion with law enforcement to further the criminal enterprise and evade justice.
 - The circumstances surrounding Plaintiff's false arrest and intentional mistaken identity, where Plaintiff was arrested on false charges under the name "Anthony Sprawling," despite the complaint being filed by landlord Yuri



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Spiro, who described Plaintiff as "family" and knew Plaintiff's correct identity as his only tenant and source of income/investment.

- Plaintiff was held for three days and repeatedly denied access to a lawyer despite several requests, including immediately when processed and during interrogation by "Detective Geoff," who wore an ill-fitting suit.
- The arresting detective and officers also ignored Plaintiff's immediate reports of false imprisonment made during processing and questioning without legal counsel.
- The presence of movers waiting downstairs at the same early morning hour of Plaintiff's arrest, who immediately packed Plaintiff's belongings, confirms that the arrest was orchestrated and used as a means to illegally evict Plaintiff from the building and lock Plaintiff out. This simultaneous occurrence provides strong evidence of direct collusion between the conspirators and elements within law enforcement, ensuring the success of this illegal eviction as part of the broader organized criminal activity. This alleged collusion allows crimes to be carried out openly, including the physical presence of perpetrators noticed since 2022, and for justice to be actively undermined.

37. The establishment of **home bases and command centers**, such as the shared residence at 565 Ortega Street, San Francisco, California, further signifies the organized nature of this criminal enterprise. These locations serve as central points for planning and executing the ongoing campaign of false imprisonment, surveillance, and psychological manipulation.

38. The conspirators exploit and corrupt societal structures by **coercing or manipulating highly influential individuals and pillars of the community**, including legal professionals (officers of the court), and potentially politicians, to engage in behavior, actions, cover-ups, withholding of information, and failure to report, all in furtherance of their campaign against Plaintiff. This subversion of legitimate institutions for illicit gain or control is a hallmark of sophisticated organized crime.

39. The acts committed by Defendant Dunca and his co-conspirators, including cyberattacks leading to false imprisonment, systematic financial devastation, and psychological torture, clearly constitute **domestic terrorism**. These acts are carried out to intimidate, coerce, and control a civilian population (Plaintiff) and to affect the conduct of government by subverting justice and evading detection for



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severe felonies. This deliberate targeting and systematic dehumanization of Plaintiff, including through acts with a clear hate crime component, underscores the terrorist nature of this campaign.

40. The entirety of Defendant Dunca's actions, including his abandonment, manipulation, and complicity in these heinous acts, are consistent with a gang mentality – a cohesive group acting in concert with a shared, malevolent purpose to inflict harm and exert control over Plaintiff, believing themselves above the law due to their alleged influence and technological capabilities.

E. Regarding the Use of Shared Residence as a Command Center for Organized Crime:

41. Plaintiff alleges that the shared residence of Plaintiff and Defendant Dunca at **565 Ortega Street, San Francisco, California**, was systematically used as a hub and **command center for organized criminal activity** directed against the Plaintiff.
42. Plaintiff further alleges that from this location, Defendant Dunca, in concert with co-conspirators, planned, coordinated, and executed felony crimes against Plaintiff, including but not limited to, the manipulation of Plaintiff's finances, the propagation of false narratives, the orchestration of cyberattacks, and other acts contributing to Plaintiff's false imprisonment and distress, all as part of the overarching organized crime and domestic terrorism conspiracy.

F. Regarding the Betrayal and Denial of Sanctuary:

43. Plaintiff alleges that Defendant Dunca's alleged move to Germany is believed to be a deceptive tactic to prevent Plaintiff from returning to their shared residence, conceal the true identity of the affair partner, and to cohabitate with the male individual in the \$5 million shared primary residence of Dunca and Sprawling. This property, completely renovated taking three years to complete while Defendant Dunca was with Plaintiff, with the majority of the design from Plaintiff's input, creating the "architectural masterpiece" with architect John Lum, represents a profound betrayal. Defendant Dunca unlawfully evicted Plaintiff from this property, claiming to be cleaning out the garage prior to Plaintiff receiving all of his personal belongings shipped to his temporary residence at 420 N Camden, where Plaintiff was launching a new business. Shortly after this, Defendant Dunca was reported to have moved to Germany, taking Plaintiff's companion animal "The Captain" with



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him. Defendant Dunca then failed to communicate with Plaintiff for weeks after making plans to visit Plaintiff in Los Angeles County. Plaintiff subsequently discovered on social media that Defendant Dunca was immediately cohabitating with a male individual upon his move to Germany. This was followed by only a few uncharacteristic messages from Defendant Dunca, before a total end to communication around August/September 2022, when stalking and surveillance were first noticed, leading to false imprisonment, with one last message from Defendant Dunca when Plaintiff reported Dr. Heafey's assessment. This act is further compounded by Plaintiff being denied access to this property, unlawfully evicted, and denied refuge or sanctuary when Plaintiff described severe health concerns due to the intentional infliction of emotional distress.

44. This denial of refuge and sanctuary occurred when Plaintiff described health concerns stemming from the intentional infliction of emotional distress, which Plaintiff believes was instigated by Kyle Egan and followed by stalking, harassment, and false imprisonment by individuals from Egan's social circle. These actions are believed to be funded by the same individual Egan's fiancé and friends claimed Egan was having an affair with—the same individual Egan reportedly claimed held him against his will and was involved in human and drug trafficking.

G. Power of Attorney and Conflict of Interest:

45. On January 18, 2019, Andrei G. Dunca ("Principal") executed a Statutory Durable Power of Attorney, appointing Rodney S. Sprawling as the Agent for Andrei G. Dunca. This Power of Attorney explicitly grants the Agent "ALL OF THE POWERS LISTED IN (A) THROUGH (M)," which includes "Real property transactions." Furthermore, special instructions within the Power of Attorney state it is "FOR THE PURPOSE OF PURCHASING AND FINANCING THE PURCHASE OF THE REAL PROPERTY LOCATED IN HARRIS COUNTY, TEXAS." The Power of Attorney became effective immediately and is not affected by the Principal's subsequent disability or incapacity. Rodney S. Sprawling, as Agent, certified under penalty of perjury on January 18, 2019, that the Power of Attorney was validly executed, is in full force and effect, and has not been revoked or terminated. This Power of Attorney was e-Filed and e-Recorded in the Official Public Records of Harris County, Texas, on January 25, 2019. The powers granted to Rodney S. Sprawling, as Agent for Andrei G. Dunca, extend to all matters listed in the Power of Attorney as well as matters not



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explicitly listed that result from the expectations and responsibilities established by their ongoing domestic and business partnership, which remain valid.

46. Despite this valid and existing Power of Attorney, an eviction suit (AMDRE LLC v. Rodney S. Sprawling, Cause No. 1248656) was filed concerning the property at 13339 Balmore Circle, Houston, TX 77069. A judgment was rendered on May 6, 2025, granting possession to AMDRE LLC. Plaintiff alleges this lawsuit may have been filed in error, or with an intent to commit fraud, due to an undisclosed and significant conflict of interest arising from a relationship between Plaintiff AMDRE LLC, its counsel Barry and Sewart PLLC, and any persons acting on their behalf, in connection with, or in any relationship to these entities, and Andrei G. Dunca (who is the same individual referenced throughout this document, and may also be known by various aliases, including those such as Andrei Trust Dunca, G Andrei Dunca, George Andrei Dunca, or variations where the last name may be erroneously spelled "Duncan", as well as any and all other aliases).
47. This undisclosed relationship creates a direct and irreconcilable conflict of interest, as AMDRE LLC is suing Rodney S. Sprawling, who is acting under the authority of Andrei G. Dunca's Power of Attorney and in the context of their domestic and business partnership. Plaintiff AMDRE LLC and its counsel failed to disclose this alleged relationship during discovery and failed to respond to requests for discovery and a motion to compel, which prejudiced the Defendant and prevented a full and fair adjudication of the matter.

H. Prior Legal Proceedings and Unadjudicated Motions:

48. On May 12, 2025, Plaintiff filed a Notice of Appeal from the judgment rendered on May 6, 2025, in Cause No. 1248656 by the Honorable Associate Judge Jermaine Thomas.
49. Grounds for this appeal include a fundamental denial of due process and procedural fairness resulting from the Court's failure to adjudicate critical and timely filed pre-trial motions, specifically Defendant/Appellant's "Motion for Continuance" (filed on or about April 29, 2025), which sought a postponement of the trial due to Appellant's documented medical disability, extreme emotional distress stemming from the case and the disappearance of his spouse, and the overall complexity of the circumstances.

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50. Another unaddressed motion was Defendant/Appellant's "Motion to Join Andrei George Dunca as a Necessary Party Defendant" (filed on or about April 29, 2025), which sought to include Appellant's missing spouse and co-borrower on the subject mortgage as an indispensable party to the action. Appellant asserts that no valid, signed judicial order officially ruling on these motions appears on the official court docket.
51. This failure to rule on, or properly consider, pending dispositive motions deprived the Appellant of the right to a fair opportunity to prepare for trial, to secure the presence and participation of a necessary party, and to obtain relevant discovery. This prejudice was significantly exacerbated by Appellant's Pro Se status, stated medical condition, inability to afford legal counsel, and the complex, exigent circumstances of the case, including the disappearance of his co-borrower spouse.
52. Appellant has consistently alleged ongoing and sophisticated cyberattacks disrupting essential communications, further impacting his ability to effectively prepare and participate in court proceedings, a concern raised in motions such as the "MOTION TO REQUEST IN-PERSON HEARING."
53. The Court erred by failing to rule upon and/or grant Defendant/Appellant's "Motion to Join Andrei George Dunca as a Necessary Party Defendant," and by subsequently proceeding to judgment without his joinder or a formal ruling thereon. Mr. Dunca's status as a co-borrower on the mortgage intrinsic to this eviction proceeding, Appellant's marital relationship with Mr. Dunca, and the allegations regarding Mr. Dunca's disappearance and financial responsibilities, made his joinder essential for according complete relief among the parties, for the just adjudication of the cause, and for Appellant to potentially seek his assistance, including for legal representation.
54. Furthermore, the Court's decision to quash all pre-trial discovery (potentially based on an unsigned plaintiff-filed template rather than a valid judicial order) further prevented Appellant from developing evidence crucial to these defenses and claims.
55. Appellant also filed a "STATEMENT OF INABILITY TO AFFORD PAYMENT OF COURT COSTS" on or about April 29, 2025, detailing severe financial hardship and inability to pay for court costs or an attorney. This statement is relevant to Appellant's ability to pay appeal costs and the supersedeas bond of \$24,700.00 ordered by the Court to stay the judgment. Due process requires fair consideration of this indigency in relation to appellate requirements.



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56. The unresolved disappearance of Appellant's spouse and co-borrower, Andrei George Dunca, under highly suspicious and distressing circumstances directly impacts the mortgage, the property in question, and Appellant's ability to defend this action. Serious allegations by Appellant of harassment, exploitation, and lack of cooperation from various parties, including those potentially aligned with Appellee or having information about the missing spouse, which the effective denial of discovery and failure to join Mr. Dunca prevented Appellant from exploring through the judicial process.

I. Motion to Compel Discovery:

57. Defendant Rodney Samuel Sprawling filed a Motion to Compel Discovery from Plaintiff AMDRE LLC in Cause No. 1248656, seeking full and complete responses regarding potential conflicts of interest, Plaintiff's corporate structure, and undisclosed associations relevant to the subject matter of the lawsuit. Plaintiff failed to respond by the deadline.

58. Specific discovery sought includes:

- Documentation verifying AMDRE LLC's formation and good standing, and identification of all current members and/or managers.
- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff (including its principals, agents, members, or employees) and Andrei George Dunca (including any known or suspected aliases or name changes), occurring at any time.
- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff and Mudd Law firm (or its attorneys/staff, including Katie Stahl), relating to Defendant, Andrei George Dunca, the Property, or any prior possibly related matters.
- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff and Stewart Title Company, beyond standard title and closing services directly related to Plaintiff's purchase of the Property.
- All documents, communications, and information regarding any communication or relationship between Plaintiff and Newrez LLC /

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Shellpoint Mortgage Servicing regarding the Property or Andrei George Dunca, other than routine communications.

- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff and Victoria Garcia Winder.
- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff and Richard Alan Vetter II.
- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff and Kyle Joseph Egan.
- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff and Richard Austin Heafey.
- All documents, communications, and information regarding any association, relationship, communication, or transaction between Plaintiff and Yuri Richard Spiro.

J. Dunca's Lawsuit Against Plaintiff:

59. Plaintiff alleges that the lawsuit filed by Andrei George Dunca against Sprawling (Case No. 202517063, Harris County) for defamation and stalking is a further act of the conspiracy, constituting harassment and an attempt to silence Sprawling, especially given the unresolved questions surrounding Dunca's own status, well-being, and potential coercion by other Co-Conspirators.

K. Specific Allegations against Victoria Alana Garcia-Winder:

60. Victoria Alana Garcia-Winder ("Winder") resides at 5823 Queensgate Drive, Houston, Texas 77066. Winder is Plaintiff Andrei George Dunca's assistant and allegedly held a Power of Attorney for Dunca during relevant periods. Medical notes from Dr. Naheed Ali also indicate Winder identified herself as Sprawling's POA when requesting a consultation for Sprawling. Winder is an alleged key Co-Conspirator in the unified conspiracy. Plaintiff alleges Winder is a disgruntled ex-employee who has a history of making false claims of a romantic relationship with Plaintiff's



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missing spouse, Andrei George Dunca. Plaintiff was pressured into giving Winder a Power of Attorney, which was subsequently revoked. Winder was the last person to see Defendant Dunca but refuses to cooperate or give details to locate him. Plaintiff also notes unauthorized use of the <https://www.google.com/search?q=Sutrolab.com> domain, which was dissolved in 2021, by Victoria Garcia-Winder.

L. Specific Allegations against Deputy C. Diaz:

61. Harris County Constable Deputy C. Diaz (Badge 4C96, Mark Herman's Office), a named Third-Party Defendant and alleged Co-Conspirator, allegedly refused to properly investigate Andrei George Dunca's disappearance, questioned Sprawling's spousal status with potential homophobic bias, relied on unverified information from Co-Conspirator Victoria Alana Garcia-Winder without ever seeing or directly speaking to Andrei George Dunca, and improperly closed the inquiry, thereby facilitating the conspiracy's aims. Alternatively, Plaintiff considers that the individual presenting as Deputy C. Diaz may have been an impersonator acting as part of the conspiracy.

M. Financial Damages and Emotional Distress:

62. As a direct result of the actions described herein, Plaintiff has suffered and continues to suffer severe and debilitating emotional distress, requiring ongoing medical and psychological treatment.
63. Plaintiff, his mother Martha A. Sprawling, and his father Rodney Sprawling (MSgt USMC Ret.) have each suffered unnecessary and unreasonable emotional distress, for which Plaintiff seeks additional relief of \$35,000 for each individual. This distress has resulted in medication for daily panic attacks and extended periods of depression for Plaintiff, and high doses of anxiety medication for panic attacks for Martha A. Sprawling, placing strain on their marital relationships and their relationship with Plaintiff, directly contributing to the dismantling of a necessary support system.
64. Plaintiff also seeks financial burden relief for all three occupants of 13339 Balmore Circle, Houston, TX 77069.

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IV. CAUSES OF ACTION

FIRST CAUSE OF ACTION (FRAUD - As an Overt Act in Organized Crime and Domestic Terrorism)

65. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
66. Defendant Dunca, in concert with co-conspirators, made false representations regarding Plaintiff's mental health and sobriety to Plaintiff and others, knowing these representations were false or acting with reckless disregard for their truth, in furtherance of their organized criminal enterprise and domestic terrorism campaign.
67. Defendant Dunca made these false representations with the intent to defraud and induce Plaintiff to rely upon them, and to destabilize Plaintiff's personal and financial well-being, leading to his abandonment of Plaintiff and alleged affair, all intended to further the criminal agenda and hide his relationship with Plaintiff from his prejudiced network.
68. Plaintiff justifiably relied on these false representations, believing them to be true, leading to profound emotional distress and further exploitation by the conspirators operating as an organized crime unit.
69. Defendant Dunca also made false representations and threats regarding bankruptcy to compel Plaintiff to sign over property at 7711 Mulholland Drive, with the intent to illicitly control Plaintiff's assets as part of the conspiratorial financial scheme of the organized crime unit.
70. As a direct and proximate result of Plaintiff's reliance on Defendant Dunca's fraudulent misrepresentations, which were integral to the coordinated organized criminal conspiracy and domestic terrorism campaign, Plaintiff suffered substantial damages, including but not limited to severe emotional distress, loss of personal relationship, and financial instability.

SECOND CAUSE OF ACTION (INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS - As an Act of Domestic Terrorism and Organized Crime)

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71. Plaintiff incorporates by reference all preceding paragraphs, including the detailed history of the common-law marriage and shared financial commitments, as if fully set forth herein.
72. Defendant Dunca, as a central figure in this organized crime conspiracy, in concert with Yuri Richard Spiro, Victoria Garcia Winder, and others, engaged in extreme and outrageous conduct by participating in a coordinated effort to perpetuate a false narrative regarding Plaintiff's mental health and sobriety, causing Plaintiff profound indignity and distress, as a deliberate act of domestic terrorism. This outrageous conduct is amplified by the pre-existing marital relationship and trust between Plaintiff and Defendant Dunca, making the betrayal and psychological manipulation all the more severe.
73. This outrageous conduct also involved Defendant Dunca's direct role in the financial manipulation of Plaintiff, including compelling Plaintiff to sign over property under threat of bankruptcy and failing to genuinely assist in the recovery of funds from Yuri Spiro, despite promises, all of which constitute criminal acts of financial exploitation within the context of their shared financial commitments as common-law spouses.
74. Furthermore, Defendant Dunca's alleged affair and abandonment of Plaintiff, coupled with his orchestration of the cyberattack leading to false imprisonment and undetected felony crimes, constitute extreme and outrageous conduct specifically designed to cause Plaintiff severe emotional distress and facilitate the organized criminal activities and domestic terrorism against Plaintiff. These actions were motivated, in part, by a desire to conceal the affair and appease a network believed to harbor racial, classist/elitist, and homophobic prejudices against Plaintiff, thereby undermining the fundamental marital bond and commitment.
75. This deliberate deception and coordinated assault were designed to destabilize Plaintiff's most significant personal relationship – his common-law marriage with Defendant Dunca – and enable the ongoing domestic terrorism campaign against Plaintiff, thereby exacerbating Plaintiff's vulnerability and distress.
76. Defendant Dunca, in conjunction with his co-conspirators, intended to cause, or acted with reckless disregard of the probability of causing, severe emotional distress to Plaintiff through their actions, as part of their organized crime enterprise and domestic terrorism.
77. Plaintiff suffered severe emotional distress as a direct and proximate result of Defendant Dunca's outrageous conduct, which was perpetrated as part of the

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conspiracy and as acts of domestic terrorism, and which represented a profound breach of his marital duties and obligations.

78. Defendant Dunca's conduct was so extreme as to exceed all bounds of what is usually tolerated in a civilized community, demonstrating the malicious and oppressive nature of their organized criminal acts, especially given the established marital relationship.

THIRD CAUSE OF ACTION (CONSPIRACY - For Organized Crime and Domestic Terrorism)

79. Plaintiff incorporates by reference all preceding paragraphs, including the detailed history of the common-law marriage and shared financial commitments, as if fully set forth herein.
80. Defendant Dunca knowingly entered into a civil conspiracy with Yuri Richard Spiro, Victoria Garcia Winder, and others, including Kyle Joseph Egan, Richard "Richie" Alan Vetter, Sean Richard Spiro, Maya Miller Estes, Edwin Ortega, Taylor McCarthy, Daniel Forero, Johnny, Isaiah Brown, Paige Hill, Pablo Gomez, Donovan Andrews, Danielle Fletcher, Jay Alonzo, Rick Silver, Brie Jasmin, Sergio Santos, Jeremy Gail, Justin Konda, Joey Varsanik, Ryan Flores, Brian Qualls, Jessica Graham, Shane Galindo, Joe Mac, Adrian Michael Hernandez, Ilulia Shuvkashvili, and Dimitri Barsukov, for the unlawful purpose of systematically defrauding Plaintiff, causing Plaintiff severe emotional distress, and intentionally destabilizing Plaintiff's personal and financial well-being through acts of organized crime and domestic terrorism. The breach of the common-law marriage and the marital trust forms an integral part of this conspiracy, providing a significant motive and opportunity for the conspirators to inflict harm upon Plaintiff.
81. This conspiracy constitutes a fully established organized crime unit engaged in a systematic campaign of domestic terrorism against a U.S. citizen across multiple states, utilizing sophisticated methods and extensive recruitment.
82. The conspirators, including Defendant Dunca, engaged in overt acts in furtherance of this conspiracy, including but not limited to:
- Forcing Plaintiff to sign over property under threat of bankruptcy and making unconsented financial deposits, as acts of financial exploitation, despite the marital financial partnership.



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- Perpetuating a false narrative regarding Plaintiff's mental health and sobriety to isolate and discredit Plaintiff, despite a psychologist finding Plaintiff "otherwise sane" and suffering anxiety from "a real source." This was used to undermine the marital relationship and isolate Plaintiff from his primary support.
- Failing to genuinely assist in the recovery of loans from co-conspirator Yuri Spiro despite assurances, enabling further financial harm, leading to Plaintiff's severe financial destitution, \$0 monthly income, \$0 cash on hand, \$0.08 in bank accounts, and monthly expenses far exceeding income, resulting in homelessness due to foreclosure. This directly impacted the marital estate and Plaintiff's well-being as a common-law spouse.
- Utilizing Defendant Dunca's sophisticated tech background as a "web pioneer," his expertise from co-founding Liverail (acquired by Facebook for \$400-500 million), and his professional network to orchestrate a cyberattack and long-term surveillance, potentially beginning as early as 2014 or around that time, as evidenced by Defendant Dunca's alleged purchase of hidden cameras and surveillance equipment via Amazon. This sophisticated digital interference resulted in the false imprisonment of Plaintiff and enabled the commission of felony crimes undetected, a hallmark of their domestic terrorism campaign. This cyberattack involved compromising devices, blocking/rerouting communication, answering calls by posing as intended receivers, and preventing Plaintiff from seeking help.
- Utilizing the shared residence at 565 Ortega Street, San Francisco, California, which was part of the marital estate, as a hub and command center for organized criminal activity to commit felony crimes against Plaintiff.
- Actively recruiting countless individuals to join in this criminal conspiracy, operating openly with a noticeable presence since 2022, demonstrating the scope of their organized crime.
- Defendant Dunca's abandonment of Plaintiff, including cutting off all financial support, medical insurance, and credit card access. This abandonment and financial cut-off, coupled with the consistent minimization of his relationship with Plaintiff to his social and professional network, believed to be motivated by racial, classist/elitist, and homophobic prejudices within that network, further contributed to Plaintiff's isolation and



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distress within the conspiracy and the ongoing domestic terrorism. This includes Defendant Dunca's alleged move to Germany with the individual he is accused of having an affair with, which is believed to be a deceptive tactic to prevent Plaintiff from returning to their shared residence, conceal the true identity of the affair partner, and to cohabit with the male individual in the \$5 million shared primary residence of Dunca and Sprawling. This property, completely renovated taking three years to complete while Defendant Dunca was with Plaintiff, with the majority of the design from Plaintiff's input, creating the "architectural masterpiece" with architect John Lum, represents a profound betrayal. Defendant Dunca unlawfully evicted Plaintiff from this property, claiming to be cleaning out the garage prior to Plaintiff receiving all of his personal belongings shipped to his temporary residence at 420 N Camden, where Plaintiff was launching a new business. This act is further compounded by Plaintiff being denied access to this property, unlawfully evicted, and denied refuge or sanctuary when Plaintiff described severe health concerns due to the intentional infliction of emotional distress. Shortly after this, Defendant Dunca was reported to have moved to Germany, taking Plaintiff's companion animal "The Captain" with him. Defendant Dunca then failed to communicate with Plaintiff for weeks after making plans to visit Plaintiff in Los Angeles County. Plaintiff subsequently discovered on social media that Defendant Dunca was immediately cohabitating with a male individual upon his move to Germany. This was followed by only a few uncharacteristic messages from Defendant Dunca, before a total end to communication around August/September 2022, when stalking and surveillance were first noticed, leading to false imprisonment, with one last message from Defendant Dunca when Plaintiff reported Dr. Heafey's assessment.

- Subjecting Plaintiff to torture described as "enhanced interrogation like techniques," including sleep deprivation and low voltage electrical shocks, and non-stop interrogation-like questioning until performing sexual acts.
- Sexually abusing, torturing, and manipulating Plaintiff into performing sexual acts that were documented and used to extort by threatening exposure and the end of Plaintiff's career as a producer and actor. This included sexualization of necessary human functions (bowel movements, showering)



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- for control, and threats of revenge porn, along with exploitation of racial conditioning and racist depictions in porn to shame Plaintiff.
- Perpetuating a false narrative to friends, family, and business associates that Plaintiff is part of a production, under their care as a patient, under investigation, or suffering a mental break from drug-induced psychosis, to conceal crimes.
 - Utilizing mortgage fraud and illegal eviction attempts to displace Plaintiff and family, cause financial hardship, and seize assets, particularly the home at 13339 Balmore Circle, Houston, TX 77069, intended as a homestead for Plaintiff's elderly, disabled veteran parents, which was a significant asset of the common-law marriage.
 - Engaging in harassment and obstruction of justice by members of Constable Mark Herman's Office, Harris County Precinct 4, through Deputy C. Diaz (Badge 4C96), targeting Plaintiff's vulnerable parents, applying undue pressure for their removal despite an active eviction appeal. This directly points to alleged collusion with law enforcement to further the criminal enterprise and evade justice.
 - The false arrest of Plaintiff under the name "Anthony Sprawling," despite the complaint being filed by landlord Yuri Spiro, who described Plaintiff as "family" and knew Plaintiff's correct identity as his only tenant and source of income/investment. This intentional mistaken identity, coupled with Plaintiff being held for three days and repeatedly denied access to a lawyer despite several requests, including immediately when processed and during interrogation by "Detective Geoff," who wore an ill-fitting suit, further evidences the alleged collusion and subversion of justice. The arresting detective and officers also ignored Plaintiff's immediate reports of false imprisonment made during processing and questioning without legal counsel. The presence of movers waiting downstairs at the same early morning hour of Plaintiff's arrest, who immediately packed Plaintiff's belongings, confirms that the arrest was orchestrated and used as a means to illegally evict Plaintiff from the building and lock Plaintiff out. This simultaneous occurrence provides strong evidence of direct collusion between the conspirators and elements within law enforcement, ensuring the success of this illegal eviction as part of the broader organized criminal activity.



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- Denying Plaintiff access to vital financial documents, business information, and identification, further exacerbating financial instability and inability to secure housing or employment. Andrei delegated the task to recover \$70,000 in security deposit and a \$385,000 loan to his assistant Victoria, of which she returned \$0 to Petitioner, and it is unknown if these funds were recovered at all.
 - Law firms (Johnston, Kinney & Zulaica LLP and Mudd Law Offices, including attorney Katherine Leslie Stahl) claiming to represent Andrei, instructing Plaintiff not to claim he is missing, but failing to provide proof of representation or Andrei's identity, with Plaintiff fearing Andrei himself has been victimized or imprisoned. These actions suggest the coercing of highly influential individuals and pillars of the community, including officers of the court, into engaging in behavior, actions, cover-ups, withholding of information, and failure to report, all to perpetuate the campaign against Plaintiff and allow the crimes to continue.
 - Defendant Dunca's failure to take immediate action to stop the abuse or provide support despite being aware of the situation. This includes the denial of refuge or sanctuary when Plaintiff described severe health concerns due to the intentional infliction of emotional distress, which Plaintiff believes was instigated by Kyle Egan and followed by stalking, harassment, and false imprisonment by individuals from Egan's social circle, actions believed to be funded by the same individual Egan's fiancé and friends claimed Egan was having an affair with—the same individual Egan reportedly claimed held him against his will and was involved in human and drug trafficking.
 - Defendant Dunca's abandonment of responsibilities as co-borrower on the mortgage for 13339 Balmore Circle, Houston, TX, leading to its wrongful foreclosure after lender Newrez/Shellpoint allegedly breached an agreement to postpone the auction.
83. As a direct and proximate result of Defendant Dunca's participation in and furtherance of this organized criminal conspiracy and domestic terrorism, which involved the profound breach of his marital duties and the marital relationship, Plaintiff suffered substantial monetary damages, severe emotional distress, and irreparable harm to Plaintiff's personal relationships and financial stability.



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N. Allegations of Negligence, Recklessness, and Hate Crimes in the Use of AI Technology:

84. Plaintiff alleges that the aforementioned cyberattacks and false imprisonment were facilitated by the use of advanced Artificial Intelligence (AI) technology, specifically developed by Defendant Dunca and his colleagues, including Jing Feng, Mark Edwards and Alex Sherman, and other founders of **Bluefish AI**. This technology, designed with capabilities for surveillance, communication control, and psychological manipulation, was either intentionally deployed against Plaintiff or was developed with criminal negligence and/or recklessness, demonstrating a profound disregard for human safety and well-being.
85. Evidence and statements by individuals involved suggest that this AI technology was instrumental in:
- Disabling Plaintiff's electronic communication devices, rendering him unable to connect with friends, family, professional networks, and even emergency services for assistance, prompting frantic, desperate pleas for help from Plaintiff to Defendant.
 - Converting speakers, cameras, and microphones of Plaintiff's devices into means of weaponized surveillance to invade Plaintiff's privacy and document his every word and communication.
 - Preventing Plaintiff from escape and denying him medical assistance or contact with anyone not under the control of the AI's operators or members of their organized crime unit, effectively creating a state of complete isolation and control.
86. Plaintiff alleges that the group, operating with a "slave owner mentality," intended their attacks to inflict the same psychological warfare used to "break" a slave, creating imaginary chains of the mind. Conspirators, described by Plaintiff as a "lynch mob," constantly made attacks to force Plaintiff to submit and acknowledge the group's dominance over him. These intentions were verbalized by the terrorist group and reinforced by a system mirroring slavery, in which Plaintiff was stripped of his name, only called by "meth head" or "nimcompoop" (used to substitute the word "nigger" when Plaintiff was called the slur), and also referred to as "nigger faggot."
87. Plaintiff responded by expressing his intentions to use their words as evidence to have the group charged with federal hate crimes, as the majority of the crimes



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against Plaintiff seemed to be motivated by prejudice and carried out against Plaintiff in an environment where racism and hate speech were acceptable and thought to be "funny." The use of race to demoralize, demean, dehumanize, and strip Plaintiff of dignity, shaming him for his skin color and relationships with white males, was constant, with continuous questioning of Plaintiff's relationships with white males, asking why they would want to be with him as they described Plaintiff's romantic partners as attractive and desirable while describing Plaintiff as "nasty," "dirty," and undesirable because of his skin color and mannerisms, projecting self-hate onto Plaintiff whose only two relationships have been with white males who pursued him.

88. The group insisted Plaintiff ask permission to perform basic human functions such as using the bathroom. They constantly demanded Plaintiff make bowel movements on their demand, resulting in trauma to the anal tissue, causing it to swell so severely Plaintiff was unable to make a movement due to the swelling closing the route to evacuation of feces. Plaintiff began using the restroom and showering in the dark. The terrorist group sexualized bowel movements and attempted to make Plaintiff believe his movements were being witnessed by an audience as part of a sexual fetish, yelling "Tonomi performing" each time.
89. Plaintiff was deprived of sleep and interrogated to force false confessions of allegations they made Plaintiff believe they believed to be true simply because they were made by a white person, part of torture which only stopped if Plaintiff performed sexually either by masturbating for them or engaging in sexual acts with individuals under their control/co-conspirators. The sexualization of basic human functions and the inability to choose sexual partners resulted in each act, physical engagement with another, and even bowel movements being an act of rape, intentionally made part of the design of the system created to make a "slave" out of a young, Black entrepreneur viewed by the group as someone needing to be "put in their place," "humbled," as his wealth or perceived wealth and success offended members of the terrorist group, as evident by their actions and verbalization of their disgust for Plaintiff having no reason to justify their hate other than expressing that the Plaintiff "annoyed" them, constantly calling him "annoying" and annoyed by his existence, treating him like an animal caged and poked at, with constant attacks about his appearance, looks/beauty, and him not fitting the standard of attractiveness, with constant comparisons to his few romantic partners questioning if he was telling the truth about his involvement with them as they did not believe



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Plaintiff's partners Dunca and Vetter, who are seen as masculine and desirable in the gay "community" with "the standard" described as masculine and white. The group dismissed Plaintiff's involvement with Dunca and Vetter, claiming they were never attracted to him, falsely claiming Dunca used Plaintiff to establish citizenship and accusing Plaintiff of paying Vetter for sex, then later insisting they paid Vetter to engage in sexual acts and pretend to have romantic feelings for Plaintiff, reinforcing their claim that someone like him could not be attracted to Plaintiff or have feelings without monetary gain.

90. The cyberattack, facilitated by the AI developed by Dunca and his colleagues, devastated Plaintiff's finances, emotional health, professional career, and dismantled the support system needed to recover from the attack, with destruction of family and friendship relationships resulting in self-harm, a constant state of anxiety triggering frequent panic attacks, PTSD diagnosis, and prolonged periods of sadness and depression. This AI also manipulated provoked reactions to support false claims about Plaintiff's sobriety and intentionally triggered anxiety and panic attacks to change the perception of Plaintiff to one that aligned with a drug addict suffering from a mental break resulting from addiction, aligning with the false narrative of co-conspirators Dunca, Garcia-Winder, and Heafey. This was motivated by alleged monetary gain/payment from Dunca to carry out the attack and discredit Sprawling in order to justify abandonment of his spouse and deny him support and deny Plaintiff potential settlement from the wealth accumulated by Dunca, including shared assets in the relationship.
91. If not an intentional targeted attack with said motives, Defendant Dunca and his network who developed the technology, including colleagues from LiveRail and Bluefish AI (such as Jing Fan and Alex), are criminally negligent for creating technology that they seem to have limited control over, or they have intentionally taken part in hate crimes using Plaintiff in human experimentation of their product. Plaintiff alleges that these allegations are also believed to potentially be an intentional feed of false information designed to support false claims about Plaintiff's mental state and discredit and defame him, justifying Dunca's actions and alleged affair, and again supporting the claim of motive being to deny Plaintiff's acknowledgment as Defendant's lawful common-law husband due to racial, homophobia, and prejudice within the gay community towards Black men who don't conform to traditional ideas of masculinity, and deny him access to support

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he is entitled to, with most of Dunca's wealth accumulated during his common-law marriage and informal domestic partnership with Plaintiff.

92. Furthermore, the group constantly demanded Plaintiff shower, claiming he smelled, and pumped foul scents into the room or placed them on him so that he would constantly feel unclean. Insults about Plaintiff's hair were common to make him constantly feel unkempt. Plaintiff's speech and grammar were constantly corrected and made fun of when he spoke or attempted to type or text, while trying to overcome hand tremors and confusion from anxiety/panic attacks. This occurred while Plaintiff was trying to beg for help and explain his circumstances to people who were plants by the group, pretending to be friends or family but were actually actors/co-conspirators who used voice modulators and AI technology to impersonate friends, family, and professional connections. These impersonators would abruptly end conversations when asked questions they would know and easily answer had they been the actual person Plaintiff attempted to contact, resulting in very few answers since 2022. As of today, Plaintiff cannot make contact with a single person in his contacts and has not seen anyone in person since his false imprisonment in 2022, other than Victoria Garcia-Winder, whose husband pulled a gun on Plaintiff. Children who are not related to Plaintiff, but who call him their uncle and had a close relationship with him, were seen hiding and refusing to answer the door for Plaintiff when they would normally jump into an embrace and be excited to see/visit with him. Victoria's husband claimed hearing reports of Plaintiff "going crazy in California," and Winder reported she was terrified of Plaintiff. Victoria's husband dismissed these reports after agreeing to having a conversation with Plaintiff and after Plaintiff was invited into the home he purchased for Victoria and her family to use as their primary residence, with later justifications for their perception of Plaintiff only stemming from hearsay, which Victoria did not take credit for but was confirmed as having spread the false narrative by members of Plaintiff's family telling him of phone conversations they had with Winder, calling them to tell them Plaintiff needed hospitalization for mental illness and drug use, which contradicted the assessments and drug testing of Plaintiff's primary care physician. It is believed by Plaintiff that the use of AI and cyberattack is responsible for calls, emails, and texts being rerouted and at times intercepted by actors in the group, completely cutting Plaintiff off from contact with anyone who could help or report to authorities, and causing the only people Plaintiff has contact with outside of the terrorist network, his parents, to doubt his reports

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and dismiss them as a product of mental illness or drug use. Vibrations following a high-frequency noise aimed at Plaintiff's genitals when making a report such as this or attempting to get help or refusing to follow commands are part of a daily pattern of abuse, torture, and sexual assault, with the group at times justifying this form of sexual abuse as erections are forced and induced by the vibration, also used to confuse and distract Plaintiff in combination with what feels like low-voltage electrocution and a buildup of pressure causing Plaintiff's ears to plug, to deter Plaintiff from acting freely and prevent him systematically from making reports or reaching out for assistance. The same unknown technology is being used to reproduce symptoms of drug use/addiction, creating simulated feelings of touch and bugs crawling on the surface of the skin. Evidence suggests these sensations are manufactured as it is the feeling of bugs under the skin resulting from the meth intoxication they accuse Plaintiff of, and as a doctor at an emergency clinic described, the symptoms being manufactured as those she in her entire medical career had not seen associated with drug intoxication or psychosis. Devices with speakers or microphones are used to create noise and communicate with Plaintiff, as members of the terrorist group do not present themselves and remain hidden, attempting to make Plaintiff believe he is hearing voices aimed to make Plaintiff report these symptoms so that he is diagnosed as psychotic or suffering from meth-induced psychosis, an allegation Dr. Heafey insisted was true, attempting to convince Plaintiff to fire his primary care doctor and sue her as he pressured Plaintiff to self-admit himself to a hospital and also sign documents that would place him under his care and allow him to medicate him as he saw fit. Dr. Heafey, who was reported to the Board of Psychology for abusive practices and sabotaging sessions with Plaintiff, invited him for "chem sex" in his office, guilt-tripping Plaintiff for not showing up for the invite, and who also revealed to have violated confidentiality by discussing Plaintiff's treatment with Garcia-Winder and also revealing a personal relationship with Plaintiff's spouse Andrei, which he failed to disclose and insisted on acting as Plaintiff's therapist despite Plaintiff's inability to pay, making communication with him using his personal line at times late at night. Heafey showed an inappropriate interest in Plaintiff's relationship with his spouse, doubting the relationship, telling Plaintiff that they were not married and investigating the validity of Plaintiff's report that Andrei still in 2025 owned property with him and did not file for separation. Also, Heafey refused to give Plaintiff copies of invoices for his treatment, claiming Plaintiff's spouse paid for his treatment and



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refused to further explain his relationship with Andrei after suggesting he had access to Plaintiff's spouse whom Plaintiff reported to him as missing, as well as access to Plaintiff's home at 565 Ortega, which Plaintiff was unlawfully evicted from and made to believe it was sold for \$2 million over market for comps in the area. He refused to put Plaintiff in contact with Andrei and attempted to leverage information to get Plaintiff to remove negative reviews he accused Plaintiff of, then later tried to leverage a refund Plaintiff demanded for his services to again get Plaintiff to remove the same reviews he insisted were posted by Plaintiff, and when a panic attack was triggered as he normally did before abruptly ending the conversation, a pattern of abuse, suicidal ideation was experienced, and when made aware, stated he only cared about getting the reviews removed. The refund was then later used to accuse Plaintiff of extorting him, and the refund payment was for that extortion, funds he claimed he would directly recover from Plaintiff's spouse.

O. Scientific and Technological Basis of Alleged Torture and Challenges in Reporting:

93. Plaintiff alleges that the systematic and pervasive physical and psychological torment described herein is consistent with the application of advanced, non-lethal technologies and sophisticated psychological manipulation techniques. These methods are designed to control, taunt, torture, and coerce individuals, often without leaving readily identifiable physical marks, making conventional reporting and investigation exceptionally challenging.

94. **Andrei Dunca's Involvement in AI and Medical Imaging:** Defendant Andrei Dunca's professional background as a "web pioneer," co-founder/CTO of LiveRail (acquired by Facebook), and co-founder/CTO of Bluefish AI, along with his investment in Ezra (an AI-driven early cancer detection company utilizing whole-body MRI), demonstrates his deep expertise in advanced technology, particularly in AI, data processing, and medical imaging. While Ezra's stated purpose is beneficial, the underlying technologies (AI, advanced imaging, data analysis) can, in other contexts, be adapted or misused for surveillance, manipulation, and targeted effects.

95. Connections Between Symptoms and Technology/Science:

- **Auditory, Vestibular, and Visual Disturbances (Plugged Ears, Disorientation, Loss of Balance, Visual Impairment, Temporary Loss of Hearing):** These symptoms are consistent with exposure to high-intensity



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acoustic devices (e.g., Long Range Acoustic Devices or LRADs) or infrasound, which can induce physical discomfort, disorientation, and affect auditory and vestibular systems. The "microwave auditory effect" (Frey effect) directly causes the perception of sounds inside the head, which can be disorienting and contribute to a sense of unreality. Targeted directed energy could also induce such effects.

- **Neurological and Musculoskeletal Pain (Numbness, Muscle Cramps, Soreness, Tightness, Muscle Pain):** Low-voltage electrical shocks can cause numbness, tingling, muscle spasms, and general muscle pain, soreness, and tightness. Prolonged exposure can lead to muscle tetany. Electromagnetic fields (EMFs) have documented effects on the central nervous system and can induce various physical sensations.
- **Gastrointestinal and Urogenital Dysfunction (Inability to Make a Bowel Movement, Sudden Urge to Defecate, Prostate Pressure, Problems Urinating, Swelling of Anal Tissue):** Extreme psychological stress and anxiety can profoundly impact the autonomic nervous system, leading to both constipation and sudden, uncontrollable urges to defecate. High Intensity Focused Ultrasound (HIFU), used in prostate cancer treatment, can cause prostate pain, swelling, and problems urinating. Physical trauma to anal tissue, as described, would cause swelling. Electromagnetic fields can also affect gut health and potentially contribute to urogenital discomfort.
- **Sexual Function Manipulation (Forced Erections, Inability to Obtain or Sustain Erection, Inability to Ejaculate):** Sexual function can be influenced by direct physical stimulation (e.g., targeted vibrations or electrical stimuli for forced erections) or severely inhibited by extreme psychological stress, trauma, and neurological interference (e.g., from EMF exposure).
- **Chest Pain:** This can be a physiological manifestation of extreme anxiety, panic attacks, or, in the context of electrical stimulation, a direct effect on the cardiovascular system.
- **Psychological and Perceptual Manipulation (Confusion, Disorientation, Simulated Symptoms like Bugs Crawling on Skin):** Sensory overload, sleep deprivation, and psychological manipulation are well-established methods for inducing confusion, disorientation, and hallucinations. The "microwave auditory effect" contributes to perceived internal sounds. Certain frequencies or forms of directed energy, potentially combined with AI-driven



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simulations, could induce tactile sensations such as the feeling of bugs crawling on the skin, designed to mimic drug intoxication or mental illness.

- **Environmental Manipulation (Debris on Clothing/Skin, Foul Scents):** These tactics contribute to the psychological degradation of the victim, making them feel constantly unclean and unkempt, and are consistent with a campaign of harassment designed to erode self-worth and isolate.

96. Challenges for Private Citizens Reporting the Use of Such Technology:

- **Lack of Public Awareness and Understanding:** The advanced and often covert nature of these technologies (e.g., directed energy weapons, sophisticated AI for psychological manipulation) means that law enforcement, medical professionals, and the general public often lack the knowledge or framework to comprehend or investigate such claims. This leads to skepticism and dismissal.
- **Difficulty in Obtaining Tangible Evidence:** Many of the effects described are sensory, internal, or transient, leaving little to no physical evidence that can be easily documented or presented in a conventional legal or medical setting. The alleged cyberattacks involve sophisticated digital interference that is difficult for a private citizen to trace or prove without specialized forensic resources.
- **Medical Misattribution:** Symptoms such as confusion, disorientation, hallucinations, and physical pains without clear external causes are frequently misattributed by medical professionals to psychological conditions (e.g., psychosis, delusional disorders) or substance abuse, especially when the patient's narrative involves unusual or "unbelievable" technological interference. This is exploited by the perpetrators.
- **Institutional Skepticism and Gaslighting:** Law enforcement agencies may be ill-equipped or unwilling to investigate claims involving non-conventional weapons or highly sophisticated cyber-psychological operations. The perpetrators actively engage in "gaslighting" tactics, as demonstrated by their alleged statements like "no one is going to believe a meth head," which exploit societal biases and the inherent difficulty of proving such abuse, further discouraging victims from reporting.
- **Absence of Justifiable Circumstances:** For private citizens, the use of such technologies for control, torture, or sexual coercion is unequivocally illegal and unjustifiable. However, the covert nature of the attacks and the

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deliberate efforts to discredit the victim make it nearly impossible for the victim to report effectively without being dismissed or further victimized by the system.

- **Isolation and Discrediting:** The alleged cyberattack that cuts off communication, coupled with the spreading of false narratives about Plaintiff's mental state and drug use, is a deliberate strategy to isolate Plaintiff from any potential support systems and to preemptively discredit any reports made to authorities, ensuring the crimes continue undetected.

97. Plaintiff asserts that the concerted effort to inflict these diverse and debilitating symptoms, coupled with the systematic undermining of Plaintiff's credibility and support network, constitutes a deliberate campaign of torture and domestic terrorism, relying on technologies and tactics that are difficult for private citizens to detect, prove, and report through conventional means.

V. PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant ANDREI GEORGE DUNCA, as follows:

Grant a declaratory judgment confirming the relationship between Dunca and Sprawling met all requirements to be recognized as a common-law marriage under UNDER TEXAS FAMILY CODE §2.401 and in do so confirm the plaintiff's relationship is acknowledged by the State of California to have equal standing as a formal marriage or domestic partnership.

1. Grant a temporary and permanent injunction to immediately halt any and all foreclosure, sale, or eviction proceedings related to the property located at 13339 Balmore Circle, Houston, Texas 77069.
2. Grant a temporary and permanent injunction to restore Defendant Rodney Samuel Sprawling, Jr. with immediate access to the property located at 565 Ortega Street, San Francisco, CA 94122.
3. Order Mudd Law Offices to produce a valid retainer agreement with a wet signature from Andrei George Dunca, giving them the authority to represent him in this matter.

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4. Impose appropriate sanctions against Mudd Law Offices for their conduct.
5. Award Special Damages to Defendant Rodney Samuel Sprawling, Jr. in the total amount of \$7,975,299, plus loss of revenue and attorney's fees, including but not limited to the following:
 - o \$2,750,000 for the loss of half of the value of the marital community property located at 565 Ortega Street, San Francisco, CA.
 - o \$400,000 for the loss of the last verifiable offer on the marital community property at 13339 Balmore Circle, Houston, Texas.
 - o \$835,299 for the outstanding principal and interest on a personal loan to Yuri Spiro, which Andrei George Dunca promised to recover (calculated at \$385,000 plus 29.9% interest from September 10, 2021, to the present).
 - o \$70,000 for the security deposit on the commercial property at 420 N. Camden Drive, Beverly Hills, California, which was lost due to the actions of Plaintiff's agent, Victoria Winder.
 - o \$200,000 for investment capital lost in the business "Gion BH" due to the unlawful eviction from the property at 420 N. Camden Drive.
 - o \$720,000 for estimated lost revenue due to the liquor license procurement at "Gion BH" from the time the license was approved to the time of unlawful eviction.
 - o \$1,000,000 for emotional distress and loss of property for the refusal to return "The Captain Dunca-Sprawling".
 - o \$2,000,000 for other unspecified special damages and pain and suffering.
 - o Also, award an amount to be determined by the Court, but not less than \$30 million, for the loss of projects caused by the destruction of his production companies.
6. Grant any other relief, general or special, to which the Defendant may be entitled.

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Dated: July 30, 2025

Respectfully submitted,

EsRa Dunca-Sprawling

Plaintiff Pro Se

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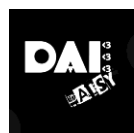
ANDREI GEORGE DUNCA

FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

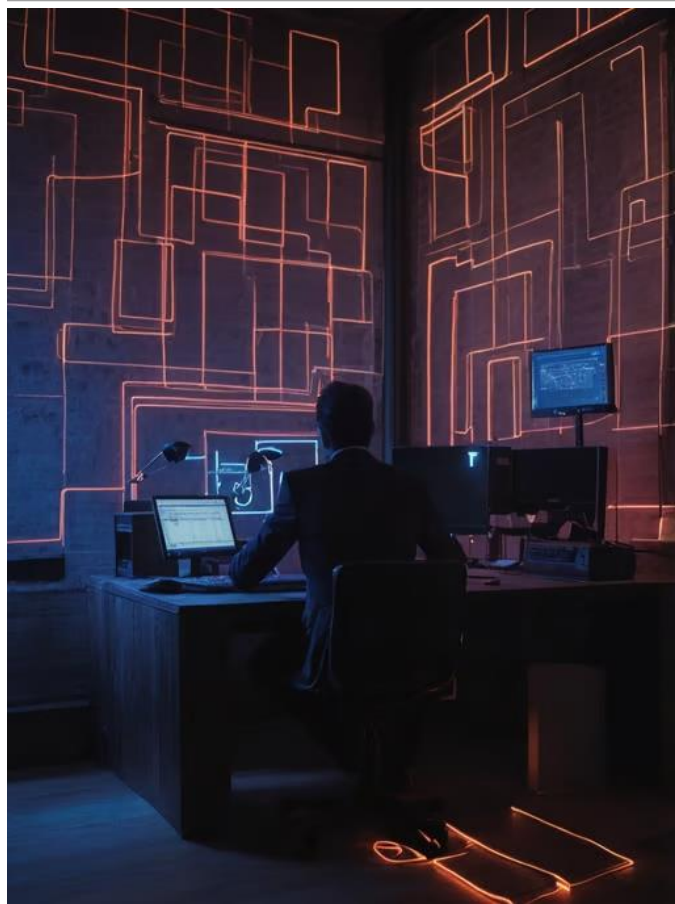
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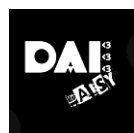
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CHAPTER SEVEN

Wallflower of The Year



OBSESSION AND ITS COST



EXPOSÉ:

CHAPTER SEVEN

Wallflower of The Year

THERE ARE DIFFERENT KINDS OF FRIENDSHIP, BUT ONLY ONE KIND OF DEVOTION STRONG ENOUGH TO BECOME SELF-DESTRUCTION. IN THE MONTHS SINCE ESRĀ DISAPPEARED, I HAVE SHED MY MEASURED OBJECTIVITY. I HAVE LET MYSELF BECOME THE UNRELIABLE NARRATOR: REWRITING EMAILS, TRESPASSING IN MEMORY, FINDING PATTERNS WHERE THERE ARE ONLY ACCIDENTS.

MY THERAPIST SAYS I HAVE OBSESSIVE-COMPULSIVE TRAITS—ORDER WHERE THERE IS NOTHING TO ORDER, CONTROL IN A CASE BUILT FOR CHAOS. I HAVE FILLED WALLS WITH PHOTOGRAPHS, SOME REAL, SOME ALLEGED, AND I HAVE SENT TIP-OFFS TO EVERY MISSING PERSONS DATABASE IN HOUSTON, SAN FRANCISCO, AND TOKYO. EACH RETURN IS THE SAME: “CASE CLOSED,” “NO ACTION NEEDED.”

THE LEGAL WORLD IS A MASTER OF APPEARANCES—DEFAMATION, LIBEL, SLANDER—ALL BADGES OF INJURY FOR REPUTATIONS, BUT NEVER FOR THOSE WHO HAVE ALREADY DISAPPEARED. FOR A WHILE, I EVEN BELIEVED I WAS BEING SURVEILLED, THAT I WOULD BE THE NEXT TO VANISH. PERHAPS THAT FEAR IS NOT GROUNDLESS—PERHAPS IT IS SIMPLY THE LOGICAL END OF OBSESSION: WHEN YOU LOOK INTO THE ABYSS OF SCANDAL, IT LOOKS BACK, AND YOU FEEL YOURSELF BECOMING PLOT FOR SOMEONE ELSE’S STORY. I SHOULD HAVE LISTENED TO THE WARNING: EACH DISAPPEARANCE IS A DOMINO, EACH CLUE ANOTHER STONE IN A COLLAPSING HOUSE. ONE CANNOT SEARCH WITHOUT INHERITING THE FATE OF THE MISSING.

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

RODNEY SAMUEL SPRAWLING, an individual also known as ESRA DUNCA-SPRAWLING,
and professionally as SEAN SPRAWLING.

Plaintiff,

v.

ANDREI GEORGE DUNCA, an individual; DR. RICHARD AUSTIN HEAFEY, PSY.D., an
individual; ALEXANDRU TANTU, an individual; VICTORIA GARCIA WINDER, an individual;
YURI RICHARD SPIRO, an individual; MARK TREFGARNE, an individual; JING FENG, an
individual; EMI GAL, an individual; ALEX SHERMAN, an individual; ADRIAN FEDOROVICI, an
individual; and DOES 1 through 9, inclusive.

Defendants.

Case No.: (To be assigned by the Clerk)

COMPLAINT FOR DAMAGES AND EQUITABLE RELIEF FOR:

1. **CIVIL CONSPIRACY**
2. **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**
3. **VIOLATION OF THE BANE ACT (Cal. Civil Code § 52.1)**
4. **FRAUD**
5. **PROFESSIONAL NEGLIGENCE**
6. **NEGLIGENCE**
7. **INVASION OF PRIVACY**
8. **INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE**
9. **TORTIOUS MISAPPROPRIATION OF DATA AND INFORMATION**
10. **DECLARATORY RELIEF (COMMON-LAW MARRIAGE)**
11. **UNJUST ENRICHMENT**

DEMAND FOR JURY TRIAL

Plaintiff RODNEY S. SPRAWLING (“Plaintiff”), by and through his counsel, alleges against
Defendants, and each of them, as follows:

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I. PRELIMINARY STATEMENT

1. This action seeks damages and equitable relief for a systematic and coordinated campaign of unlawful acts and torts perpetrated by a conspiracy of Defendants. The central figure in this conspiracy is Defendant **ANDREI GEORGE DUNCA**, Plaintiff's common-law husband, who, in concert with the other named Defendants, engaged in a series of overt acts designed to unlawfully damage Plaintiff's financial stability, professional reputation, and psychological well-being.



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II. THE PARTIES

Plaintiff:

2. Rodney Samuel Sprawling, also known as Esra Dunca-Sprawling and professionally as Sean Sprawling, is a producer, actor, and writer whose creative and cultural work spans international film, television, and new media. He is also the first and only American Geisha, and only the second male in recorded history to be formally recognized with Geisha status. This recognition was conferred through his mentorship and adoption into the Matsunoya Corporation of Tokyo, Japan, and is a testament to the life he built with his spouse, Andrei George Dunca.

Defendants:

3. **Andrei George Dunca:** An individual believed to reside in or around San Francisco, California.
4. **Dr. Richard Austin Heafey, Psy.D.:** A licensed psychologist believed to be practicing in California.
5. **Victoria Garcia Winder:** An individual believed to be a resident of Texas.
6. **Yuri Richard Spiro:** An individual believed to be a resident of California.
7. **Mark Trefgarne:** A British entrepreneur and co-founder of LiveRail, where he served as CEO. After LiveRail's acquisition by Facebook in 2014, he became a Product Management Director for the company. He is an acknowledged leader in the ad tech industry.
8. **Jing Feng:** The COO of Bluefish AI, and a former senior leader at Microsoft and LiveRail. She is alleged to have operational involvement in the conspiracy's digital infrastructure.
9. **Adrian Fedorovici:** He is listed as a Product Manager at LiveRail, and is alleged to have been a former lover of Andrei Dunca and participated in the technical execution of the conspiracy.
10. **Emi Gal:** A tech entrepreneur and founder of several companies, including a social media network and a digital health startup. The complaints allege his involvement in reputational sabotage and surveillance.



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11. **Alex Sherman:** The CEO of Bluefish AI. He previously led the company PromoteIQ, which was acquired by Microsoft. He is alleged to have contributed to the AI-driven marketing and surveillance infrastructure of the conspiracy.
12. **Alexandru Daniel Tantu:** An individual residing in San Francisco, California and/or Berlin, Germany. The complaint alleges that Tantu, acting in concert with Defendant Heafey, is a central figure in the conspiracy. Tantu publicly identifies as an LGBTQ+ advocate, drag performer, and digital safety promoter. Prior to his alleged sexual affair with the complainant's spouse, Mr. Dunca, Tantu reportedly had no formal employment, maintaining a public persona centered on nightlife performance, HIV awareness, and social media visibility.
13. **Unknown Defendants (DOES 1 through 9, inclusive):** The true names and capacities of these defendants are currently unknown to the plaintiff. The plaintiff will amend this complaint to include their true names and capacities when they are ascertained.

III. JURISDICTION AND VENUE

10. This Court has jurisdiction over this action pursuant to California Code of Civil Procedure § 410.10.
11. Venue is proper in the County of San Francisco pursuant to California Code of Civil Procedure § 395(a) because Plaintiff resides in this County and a substantial portion of the acts giving rise to this Complaint occurred here, including at Plaintiff's residence located at 565 Ortega Street, San Francisco, California.

IV. FACTUAL ALLEGATIONS

12. Plaintiff and Defendant Dunca established a common-law marriage under Texas law in or around 2018. They held themselves out as spouses, cohabitated, and were financially interdependent, with Plaintiff contributing significantly to joint assets and ventures, including intellectual property and a burgeoning business.
13. In or around September 2022, Defendant Dunca abruptly abandoned Plaintiff and, in concert with the other Defendants, initiated a series of unlawful acts, including a sophisticated cyberattack, false imprisonment, and a systematic campaign of psychological and financial abuse.
14. Defendants, leveraging their backgrounds in technology and a shared conspiracy, used Plaintiff's electronic devices as instruments of surveillance and control.



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Specifically, on or about November 15, 2022, Defendants gained unauthorized access to Plaintiff's secure cloud storage, email accounts, and personal financial data. This was achieved through a multi-pronged attack involving phishing, keylogging software, and the physical seizure of Plaintiff's devices. This enabled them to intercept sensitive communications with Plaintiff's business partners and family, manipulate personal data, and deliberately create a "digital ghost" of Plaintiff to isolate him from his support network and prevent him from seeking help.

15. Plaintiff alleges that Defendant Tantu, acting in concert with Defendant Heafey, is a central figure in the conspiracy described herein. Tantu publicly identifies as an LGBTQ+ advocate, drag performer, and self-styled digital safety promoter. Prior to his alleged sexual relationship with Plaintiff's spouse, Mr. Dunca, Tantu reported no formal employment, instead maintaining a public persona centered on nightlife performance, HIV awareness, and social media visibility.
16. Following the alleged sexual relationship with Mr. Dunca, Defendant Tantu began presenting himself as a digital safety consultant and founder of online platforms purporting to serve LGBTQ+ communities. Plaintiff alleges that these platforms—including a rebranded version of his prior failed initiative, Illumina Safety—lack legitimate infrastructure and were instead used to facilitate phishing schemes, impersonation tactics, and the deployment of spyware targeting Plaintiff. Tantu's participation in events such as Unicorns in Tech and uithack23 is cited not as evidence of technical expertise, but as access points to digital tools later weaponized against Plaintiff.
17. Despite publicly promoting values of inclusion and safety, Defendant Tantu refused to assist Plaintiff during a period of documented abuse—despite Plaintiff's direct outreach. This refusal, coupled with Tantu's alleged exploitation of his proximity to Mr. Dunca, is presented as evidence of opportunistic motive and retaliatory intent. Plaintiff alleges that Tantu's conduct reflects a profound betrayal of the principles he claims to represent and constitutes a deliberate campaign of reputational sabotage, psychological manipulation, and financial interference.
18. Plaintiff further alleges that Defendant Tantu's digital activities—including the creation of fraudulent webpages and deceptive email attachments—were designed to mimic legitimate communications and install surveillance tools on Plaintiff's devices. These actions resulted in unlawful monitoring, data tampering, and digital confinement, constituting false imprisonment and a violation of Plaintiff's rights under state and federal law.



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19. Plaintiff alleges that Defendants are the likely perpetrators of the cyberattack due to their collective backgrounds in technology and their relationship with Defendant Dunca. The methods and technology used in the attack, including sophisticated phishing campaigns and the deployment of keylogging software, are consistent with technologies developed and utilized by individuals and entities associated with Defendants Mark Trefgarne, Jing Feng, Emi Gal, and Alex Sherman.
20. Plaintiff further alleges that if Defendants were not the direct perpetrators of the attacks and crimes against Plaintiff, they were aware of Plaintiff's heightened vulnerability by virtue of his relationship with Defendant Dunca. Based on their extensive professional backgrounds as developers and purveyors of technologies similar to those used in the attacks, and by virtue of their close relationship with Defendant Dunca, Defendants had knowledge that such sophisticated technologies could be used to cause Plaintiff harm.
21. As such, Defendants owed a duty of care to Plaintiff to act as a reasonable person would under the circumstances, which included a duty to warn and protect Plaintiff from the foreseeable dangers of technological attacks and psychological manipulation. Defendants knew or should have known that Plaintiff was a likely target of such attacks due to his relationship with Defendant Dunca and the nature of the technology at their disposal.
22. Defendants breached this duty of care by failing to warn Plaintiff of the potential danger, failing to take reasonable proactive measures to protect Plaintiff, and, once the attacks were underway, failing to use their unique knowledge, resources, and network to intervene and stop them. Their failure to act was negligent, willful, and directly contributed to Plaintiff's damages.
23. Defendants engaged in extreme and outrageous conduct, including a sustained campaign of physical and emotional abuse. This conduct included, but was not limited to, Defendant Dunca making repeated death threats to Plaintiff and his family on or about December 1, 2022. Additionally, Defendant Winder, acting in concert, systematically harassed Plaintiff with hate-motivated slurs via text message and anonymous phone calls on or about January 12, 2023, and continuing thereafter. This conduct was so extreme as to exceed all bounds of what is tolerated in a civilized community and was clearly designed to cause severe emotional and psychological distress.
24. The Defendants also engaged in a coordinated financial scheme, including the wrongful conversion of Plaintiff's assets, fraudulent real estate transactions, and



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the intentional interference with Plaintiff's business opportunities. As a key part of this scheme, Defendant Spiro, in bad faith, wrongfully retained Plaintiff's security deposit in the amount of \$325,000 from a commercial property located at 123 Market Street, San Francisco. Despite repeated written and verbal demands, Spiro failed to return the deposit and instead used it as leverage in the conspiracy. This action, coupled with the wrongful eviction from said property, directly caused Plaintiff to become financially distressed and homeless.

25. Plaintiff alleges that Defendants Heafey and Tantu acted with retaliatory intent, motivated by personal vengeance, financial opportunism, and a desire to conceal the sexual relationship between Tantu and Mr. Dunca. Their actions were designed to sever Plaintiff's marital bond, obstruct legal recognition, and strip Plaintiff of his rights, assets, and reputation.
26. Defendant Heafey, in his capacity as a licensed psychologist, breached his professional duty of care to Plaintiff by actively participating in the conspiracy. He violated patient confidentiality by disclosing private medical information to his co-conspirators, manipulated Plaintiff's medical records to include false diagnoses of mental instability, and engaged in a pattern of misconduct designed to undermine Plaintiff's credibility and mental state. The information provided by Heafey was then used by Defendants to defame Plaintiff and to justify their actions to others.
27. As a direct and proximate result of Defendants' wrongful and intentional conduct, Plaintiff has suffered and continues to suffer significant special and general damages. These special damages include, but are not limited to: approximately **\$831,898.51** from the secured promissory note as of July 28, 2025, plus continuing interest until judgment; **\$125,000** from a prior loan plus applicable interest; an estimated **\$720,000** in lost revenue due to Defendants' interference with a liquor license application; a debt incurred in the amount of **\$300,000** due to a contractor issue created by the Defendants' interference; a loss of **\$10,000** for a design payment to Malgosia Migdal; and **\$325,000** from the security deposit, related penalties, and temporary residence rent as of March 29, 2025, plus any additional applicable penalties and late fees until judgment.
28. Plaintiff alleges that the cyberattacks perpetrated by Defendants were not merely acts of harassment but were designed to serve a dual purpose: to cause Plaintiff severe and intentional harm and to serve as a real-world human test subject for the development and improvement of technology. The data and behavioral insights collected from the attacks—including keystroke patterns, psychological responses



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to stress, and real-time operational data from Plaintiff's businesses—constitute valuable, and illegally obtained, intellectual property.

29. Defendants, and the entities with which they are associated, including the members of LiveRail and its acquirer, Facebook, have gained an unfair commercial advantage. The information gathered from Plaintiff, the victim, has been used to refine algorithms, improve user targeting, and enhance surveillance capabilities for technologies developed by these companies.
30. The value of this illegally obtained data and the resulting technological improvements is immense. Therefore, Plaintiff asserts an equitable interest in the profits and intellectual property derived from this unlawful conduct, seeking a just and fair share of the value created by the very harm inflicted upon him.
31. Plaintiff alleges that the aforementioned cyberattacks and false imprisonment were facilitated by the use of advanced Artificial Intelligence (AI) technology, specifically developed by Defendant Dunca and his colleagues, including Jing Feng, Mark Edwards and Alex Sherman, and other founders of **Bluefish AI**. This technology, designed with capabilities for surveillance, communication control, and psychological manipulation, was either intentionally deployed against Plaintiff or was developed with criminal negligence and/or recklessness, demonstrating a profound disregard for human safety and well-being.
32. Evidence and statements by individuals involved suggest that this AI technology was instrumental in:
33. Disabling Plaintiff's electronic communication devices, rendering him unable to connect with friends, family, professional networks, and even emergency services for assistance, prompting frantic, desperate pleas for help from Plaintiff to Defendant.
34. Converting speakers, cameras, and microphones of Plaintiff's devices into means of weaponized surveillance to invade Plaintiff's privacy and document his every word and communication.
35. Preventing Plaintiff from escape and denying him medical assistance or contact with anyone not under the control of the AI's operators or members of their organized crime unit, effectively creating a state of complete isolation and control.
36. Plaintiff alleges that the group, operating with a "slave owner mentality," intended their attacks to inflict the same psychological warfare used to "break" a slave, creating imaginary chains of the mind. Conspirators, described by Plaintiff as a "lynch mob," constantly made attacks to force Plaintiff to submit and acknowledge



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the group's dominance over him. These intentions were verbalized by the terrorist group and reinforced by a system mirroring slavery, in which Plaintiff was stripped of his name, only called by "meth head" or "nimcompoop" (used to substitute the word "nigger" when Plaintiff was called the slur), and also referred to as "nigger faggot."

37. Plaintiff responded by expressing his intentions to use their words as evidence to have the group charged with federal hate crimes, as the majority of the crimes against Plaintiff seemed to be motivated by prejudice and carried out against Plaintiff in an environment where racism and hate speech were acceptable and thought to be "funny." The use of race to demoralize, demean, dehumanize, and strip Plaintiff of dignity, shaming him for his skin color and relationships with white males, was constant, with continuous questioning of Plaintiff's relationships with white males, asking why they would want to be with him as they described Plaintiff's romantic partners as attractive and desirable while describing Plaintiff as "nasty," "dirty," and undesirable because of his skin color and mannerisms, projecting self-hate onto Plaintiff whose only two relationships have been with white males who pursued him.
38. The group insisted Plaintiff ask permission to perform basic human functions such as using the bathroom. They constantly demanded Plaintiff make bowel movements on their demand, resulting in trauma to the anal tissue, causing it to swell so severely Plaintiff was unable to make a movement due to the swelling closing the route to evacuation of feces. Plaintiff began using the restroom and showering in the dark. The terrorist group sexualized bowel movements and attempted to make Plaintiff believe his movements were being witnessed by an audience as part of a sexual fetish, yelling "Tonomi performing" each time.
39. Plaintiff was deprived of sleep and interrogated to force false confessions of allegations they made Plaintiff believe they believed to be true simply because they were made by a white person, part of torture which only stopped if Plaintiff performed sexually either by masturbating for them or engaging in sexual acts with individuals under their control/co-conspirators. The sexualization of basic human functions and the inability to choose sexual partners resulted in each act, physical engagement with another, and even bowel movements being an act of rape, intentionally made part of the design of the system created to make a "slave" out of a young, Black entrepreneur viewed by the group as someone needing to be "put in their place," "humbled," as his wealth or perceived wealth and success offended



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members of the terrorist group, as evident by their actions and verbalization of their disgust for Plaintiff having no reason to justify their hate other than expressing that the Plaintiff "annoyed" them, constantly calling him "annoying" and annoyed by his existence, treating him like an animal caged and poked at, with constant attacks about his appearance, looks/beauty, and him not fitting the standard of attractiveness, with constant comparisons to his few romantic partners questioning if he was telling the truth about his involvement with them as they did not believe Plaintiff's partners Dunca and Vetter, who are seen as masculine and desirable in the gay "community" with "the standard" described as masculine and white. The group dismissed Plaintiff's involvement with Dunca and Vetter, claiming they were never attracted to him, falsely claiming Dunca used Plaintiff to establish citizenship and accusing Plaintiff of paying Vetter for sex, then later insisting they paid Vetter to engage in sexual acts and pretend to have romantic feelings for Plaintiff, reinforcing their claim that someone like him could not be attracted to Plaintiff or have feelings without monetary gain.

40. The cyberattack, facilitated by the AI developed by Dunca and his colleagues, devastated Plaintiff's finances, emotional health, professional career, and dismantled the support system needed to recover from the attack, with destruction of family and friendship relationships resulting in self-harm, a constant state of anxiety triggering frequent panic attacks, PTSD diagnosis, and prolonged periods of sadness and depression. This AI also manipulated provoked reactions to support false claims about Plaintiff's sobriety and intentionally triggered anxiety and panic attacks to change the perception of Plaintiff to one that aligned with a drug addict suffering from a mental break resulting from addiction, aligning with the false narrative of co-conspirators Dunca, Garcia-Winder, and Heafey. This was motivated by alleged monetary gain/payment from Dunca to carry out the attack and discredit Sprawling in order to justify abandonment of his spouse and deny him support and deny Plaintiff potential settlement from the wealth accumulated by Dunca, including shared assets in the relationship.
41. If not an intentional targeted attack with said motives, Defendant Dunca and his network who developed the technology, including colleagues from LiveRail and Bluefish AI (such as Jing Fan and Alex), are criminally negligent for creating technology that they seem to have limited control over, or they have intentionally taken part in hate crimes using Plaintiff in human experimentation of their product. Plaintiff alleges that these allegations are also believed to potentially be an

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intentional feed of false information designed to support false claims about Plaintiff's mental state and discredit and defame him, justifying Dunca's actions and alleged affair, and again supporting the claim of motive being to deny Plaintiff's acknowledgment as Defendant's lawful common-law husband due to racial, homophobia, and prejudice within the gay community towards Black men who don't conform to traditional ideas of masculinity, and deny him access to support he is entitled to, with most of Dunca's wealth accumulated during his common-law marriage and informal domestic partnership with Plaintiff.



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Allegations of Negligence, Recklessness, and Hate Crimes in the Use of AI Technology

42.1 Psychological and Physical Attacks

The group allegedly used various methods to inflict psychological and physical distress on the plaintiff. The group supposedly demanded that the plaintiff shower because he smelled, and they used foul scents to make him feel unclean. They also commonly insulted his hair to make him feel unkempt and constantly corrected his speech and grammar when he tried to communicate. This was especially difficult for the plaintiff, who was also experiencing hand tremors and confusion from panic attacks.

In addition to psychological attacks, the plaintiff also reported physical attacks. The group reportedly used high-frequency noises followed by vibrations aimed at the plaintiff's genitals when he attempted to seek help or refused to follow commands. This daily pattern of abuse, torture, and sexual assault allegedly forced erections and created sensations that felt like low-voltage electrocution and pressure buildup in his ears. These physical sensations were reportedly used to deter the plaintiff from seeking help or acting freely. The plaintiff also reported that the same technology was used to simulate symptoms of drug addiction, such as the feeling of bugs crawling on or under his skin, which they used to accuse him of being a drug user.

42.2 Impersonation and Isolation

The group allegedly used AI technology and voice modulators to impersonate friends, family, and professional contacts. These impersonators would pose as allies and then abruptly end conversations when asked specific questions they should have known the answers to. As a result, the plaintiff has been cut off from communication with everyone in his contacts since 2022 and has not seen anyone in person, except for Victoria Garcia-Winder. The plaintiff believes that the group used AI and cyberattacks to reroute and intercept calls, emails, and texts, isolating him from anyone who could help or report the situation to the authorities. This isolation has caused even his parents to doubt his reports and dismiss them as mental illness or drug use.



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42.3 False Narratives and Character Assassination

The group allegedly used impersonation and other methods to spread false narratives about the plaintiff. For example, Victoria Garcia-Winder's husband reportedly claimed he heard reports of the plaintiff "going crazy in California." The plaintiff was then invited to the home he bought for Victoria and her family to use, where they had a conversation. During this conversation, Victoria's husband reportedly dismissed the rumors after hearing the plaintiff's side of the story. Still, members of the plaintiff's family confirmed that Victoria had spread the false narrative, telling them the plaintiff needed to be hospitalized for mental illness and drug use. These reports directly contradicted the plaintiff's primary care physician's assessments and drug tests. The plaintiff also claims that he saw children, who are not related to him but who call him their uncle, hiding from him and refusing to answer the door when they would usually greet him with excitement.

42.4 Allegations Against Dr. Heafey

Dr. Heafey, who was reported to the Board of Psychology for alleged abusive practices, is accused of sabotaging sessions with the plaintiff and engaging in other inappropriate behavior. The plaintiff claims that Dr. Heafey pressured him to fire his primary care doctor and sue her and tried to convince him to admit himself to a hospital and sign documents that would place him under his care. Dr. Heafey allegedly invited the plaintiff for "chem sex," which the plaintiff refused, causing Dr. Heafey to guilt-trip him for not showing up. Dr. Heafey also allegedly violated confidentiality by discussing the plaintiff's treatment with Garcia-Winder and revealed a personal relationship with the plaintiff's spouse, Andrei.

The plaintiff claims that Dr. Heafey insisted on acting as his therapist despite his inability to pay. He also reportedly showed an inappropriate interest in the plaintiff's relationship with his spouse, doubting their marriage and investigating whether Andrei still owned property with the plaintiff. Dr. Heafey also refused to provide copies of invoices, claiming the plaintiff's spouse paid for his treatment. The plaintiff also claims that Dr. Heafey used information about his spouse, who the plaintiff reported missing, to leverage him. Dr. Heafey allegedly tried to get the plaintiff to remove negative reviews he accused him of posting, and when a panic attack was triggered during one of their conversations, Dr. Heafey reportedly said he



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only cared about getting the reviews removed. The plaintiff also reported that Dr. Heafey accused him of extortion after he demanded a refund for his services, claiming the refund was for that extortion and that he would recover the funds directly from the plaintiff's spouse. Scientific and Technological Basis of Alleged Torture and Challenges in Reporting:

43. Plaintiff alleges that the systematic and pervasive physical and psychological torment described herein is consistent with the application of advanced, non-lethal technologies and sophisticated psychological manipulation techniques. These methods are designed to control, taunt, torture, and coerce individuals, often without leaving readily identifiable physical marks, making conventional reporting and investigation exceptionally challenging.
44. **Andrei Dunca's Involvement in AI and Medical Imaging:** Defendant Andrei Dunca's professional background as a "web pioneer," co-founder/CTO of LiveRail (acquired by Facebook), and co-founder/CTO of Bluefish AI, along with his investment in Ezra (an AI-driven early cancer detection company utilizing whole-body MRI), demonstrates his deep expertise in advanced technology, particularly in AI, data processing, and medical imaging. While Ezra's stated purpose is beneficial, the underlying technologies (AI, advanced imaging, data analysis) can, in other contexts, be adapted or misused for surveillance, manipulation, and targeted effects.

Connections Between Symptoms and Technology/Science:

45. **Auditory, Vestibular, and Visual Disturbances (Plugged Ears, Disorientation, Loss of Balance, Visual Impairment, Temporary Loss of Hearing):** These symptoms are consistent with exposure to high-intensity acoustic devices (e.g., Long Range Acoustic Devices or LRADs) or infrasound, which can induce physical discomfort, disorientation, and affect auditory and vestibular systems. The "microwave auditory effect" (Frey effect) directly causes the perception of sounds inside the head, which can be disorienting and contribute to a sense of unreality. Targeted directed energy could also induce such effects.
46. **Neurological and Musculoskeletal Pain (Numbness, Muscle Cramps, Soreness, Tightness, Muscle Pain):** Low-voltage electrical shocks can cause numbness, tingling, muscle spasms, and general muscle pain, soreness, and tightness. Prolonged exposure can lead to muscle tetany. Electromagnetic fields (EMFs) have



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documented effects on the central nervous system and can induce various physical sensations.

47. **Gastrointestinal and Urogenital Dysfunction (Inability to Make a Bowel Movement, Sudden Urge to Defecate, Prostate Pressure, Problems Urinating, Swelling of Anal Tissue):** Extreme psychological stress and anxiety can profoundly impact the autonomic nervous system, leading to both constipation and sudden, uncontrollable urges to defecate. High Intensity Focused Ultrasound (HIFU), used in prostate cancer treatment, can cause prostate pain, swelling, and problems urinating. Physical trauma to anal tissue, as described, would cause swelling. Electromagnetic fields can also affect gut health and potentially contribute to urogenital discomfort.
48. **Sexual Function Manipulation (Forced Erections, Inability to Obtain or Sustain Erection, Inability to Ejaculate):** Sexual function can be influenced by direct physical stimulation (e.g., targeted vibrations or electrical stimuli for forced erections) or severely inhibited by extreme psychological stress, trauma, and neurological interference (e.g., from EMF exposure).
49. **Chest Pain:** This can be a physiological manifestation of extreme anxiety, panic attacks, or, in the context of electrical stimulation, a direct effect on the cardiovascular system.
50. **Psychological and Perceptual Manipulation (Confusion, Disorientation, Simulated Symptoms like Bugs Crawling on Skin):** Sensory overload, sleep deprivation, and psychological manipulation are well-established methods for inducing confusion, disorientation, and hallucinations. The "microwave auditory effect" contributes to perceived internal sounds. Certain frequencies or forms of directed energy, potentially combined with AI-driven simulations, could induce tactile sensations such as the feeling of bugs crawling on the skin, designed to mimic drug intoxication or mental illness.
51. **Environmental Manipulation (Debris on Clothing/Skin, Foul Scents):** These tactics contribute to the psychological degradation of the victim, making them feel constantly unclean and unkempt, and are consistent with a campaign of harassment designed to erode self-worth and isolate.

Challenges for Private Citizens Reporting the Use of Such Technology:



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52. **Lack of Public Awareness and Understanding:** The advanced and often covert nature of these technologies (e.g., directed energy weapons, sophisticated AI for psychological manipulation) means that law enforcement, medical professionals, and the general public often lack the knowledge or framework to comprehend or investigate such claims. This leads to skepticism and dismissal.
53. **Difficulty in Obtaining Tangible Evidence:** Many of the effects described are sensory, internal, or transient, leaving little to no physical evidence that can be easily documented or presented in a conventional legal or medical setting. The alleged cyberattacks involve sophisticated digital interference that is difficult for a private citizen to trace or prove without specialized forensic resources.
54. **Medical Misattribution:** Symptoms such as confusion, disorientation, hallucinations, and physical pains without clear external causes are frequently misattributed by medical professionals to psychological conditions (e.g., psychosis, delusional disorders) or substance abuse, especially when the patient's narrative involves unusual or "unbelievable" technological interference. This is exploited by the perpetrators.
55. **Institutional Skepticism and Gaslighting:** Law enforcement agencies may be ill-equipped or unwilling to investigate claims involving non-conventional weapons or highly sophisticated cyber-psychological operations. The perpetrators actively engage in "gaslighting" tactics, as demonstrated by their alleged statements like "no one is going to believe a meth head," which exploit societal biases and the inherent difficulty of proving such abuse, further discouraging victims from reporting.
56. **Absence of Justifiable Circumstances:** For private citizens, the use of such technologies for control, torture, or sexual coercion is unequivocally illegal and unjustifiable. However, the covert nature of the attacks and the deliberate efforts to discredit the victim make it nearly impossible for the victim to report effectively without being dismissed or further victimized by the system.
57. **Isolation and Discrediting:** The alleged cyberattack that cuts off communication, coupled with the spreading of false narratives about Plaintiff's mental state and drug use, is a deliberate strategy to isolate Plaintiff from any potential support systems and to preemptively discredit any reports made to authorities, ensuring the crimes continue undetected.
58. Plaintiff asserts that the concerted effort to inflict these diverse and debilitating symptoms, coupled with the systematic undermining of Plaintiff's credibility and support network, constitutes a deliberate campaign of torture and domestic

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terrorism, relying on technologies and tactics that are difficult for private citizens to detect, prove, and report through conventional means.

V. CAUSES OF ACTION

FIRST CAUSE OF ACTION

(Civil Conspiracy Against All Defendants)

- 59. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
- 60. Defendants knowingly and willingly entered into a mutual understanding and agreement to commit wrongful acts against Plaintiff.
- 61. In furtherance of this conspiracy, Defendants committed overt acts, including but not limited to, the cyberattack, false imprisonment, fraudulent financial transactions, and professional misconduct, which caused Plaintiff to suffer substantial damages.
- 62. California law provides that a civil conspiracy is not a separate tort but a legal theory that holds each member of the conspiracy liable for the torts committed in furtherance of the conspiracy. (See *Wyatt v. Union Mortgage Co.* (1979) 24 Cal.3d 723, 736.)

SECOND CAUSE OF ACTION

(Intentional Infliction of Emotional Distress Against All Defendants)

- 63. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
- 64. Defendants' conduct, as described herein, was extreme and outrageous. (See *Hughes v. Pair* (2009) 46 Cal.4th 1035, 1050.)
- 65. Defendants acted with the intent to cause Plaintiff severe emotional distress or with reckless disregard of the probability of causing such distress.

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66. As a direct and proximate result of Defendants' conduct, Plaintiff suffered severe emotional distress, including but not limited to anxiety, depression, and PTSD, which required medical intervention.

THIRD CAUSE OF ACTION

(Violation of the Bane Act - Cal. Civil Code § 52.1 Against All Defendants)

67. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
68. Defendants, by threats, intimidation, or coercion, interfered with Plaintiff's civil rights, including his right to be free from violence and intimidation based on his race and sexual orientation.
69. Defendants' conduct, including the use of hate-motivated slurs and a campaign of terror, constitutes a violation of California Civil Code § 52.1.
70. As a direct and proximate result of this violation, Plaintiff suffered damages.
71. The California Supreme Court has held that the "threats, intimidation, or coercion" required for a Bane Act claim must be an independent wrongful act. (See *Jones v. Lodge at Torrey Pines Partnership* (2008) 42 Cal.4th 1158, 1160.) The Defendants' use of death threats and hate-motivated slurs constitutes such independent wrongful acts.

FOURTH CAUSE OF ACTION

(Fraud Against Defendants Dunca and DOES 1-20)

72. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
73. Defendant Dunca made false representations to Plaintiff, including threats of bankruptcy to compel the transfer of property, with the intent to defraud Plaintiff of his assets and marital rights.
74. Plaintiff justifiably relied on these representations, causing him to suffer financial damages. (See *Lazar v. Superior Court* (1996) 12 Cal.4th 631, 638.)

FIFTH CAUSE OF ACTION

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(Professional Negligence Against Defendant Heafey)

- 75. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
- 76. Defendant Heafey, in his capacity as a licensed psychologist, owed a professional duty of care to Plaintiff.
- 77. Defendant Heafey breached this duty by, among other things, violating patient confidentiality and engaging in misconduct, which caused Plaintiff to suffer harm. (See *Ewing v. Goldstein* (2004) 120 Cal.App.4th 807, 818.)

SIXTH CAUSE OF ACTION

(Negligence Against All Defendants Except Dunca)

- 78. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
- 79. Defendants owed a legal duty of care to Plaintiff to exercise reasonable care to prevent foreseeable harm to Plaintiff. This duty arose from two distinct but related sources. First, by virtue of their close personal and professional relationship with Defendant Dunca and their specialized knowledge regarding the technology used in the cyberattacks, Defendants had a special relationship with Plaintiff that created a duty to protect him from the foreseeable harm of those attacks. (See *Tarasoff v. Regents of Univ. of California* (1976) 17 Cal.3d 425.) Second, and critically, Defendants' own conduct in facilitating, aiding, or abetting the conspiracy created a foreseeable and unreasonable risk of harm to Plaintiff, thereby giving rise to an affirmative duty to act to protect him from that harm. (See *Weirum v. RKO General, Inc.* (1975) 15 Cal.3d 40, 46.)
- 80. Defendants breached this duty of care by, inter alia, failing to provide a timely warning to Plaintiff regarding the known and foreseeable dangers from technological attacks, failing to implement available protective measures, and failing to actively intervene to stop the attacks once they became aware of them. This breach was a substantial factor in causing Plaintiff's injuries.
- 81. Defendants' negligence was a direct and proximate cause of the damages suffered by Plaintiff, as more fully alleged herein, which were the foreseeable result of Defendants' breach of duty.

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SEVENTH CAUSE OF ACTION

(Invasion of Privacy Against All Defendants)

82. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
83. Defendant Tantú knowingly and intentionally accessed Plaintiff's private communications, devices, and accounts through unauthorized digital means, including malware, spyware, and phishing tools. These intrusions resulted in the manipulation of legal documents, impersonation of Plaintiff in official filings, and obstruction of emergency outreach.
84. Defendants intentionally intruded upon Plaintiff's private affairs without his consent through the use of technology to monitor his devices and document his private moments.
85. This intrusion was highly offensive to a reasonable person and caused Plaintiff to suffer damages. (See *Shulman v. Group W Productions, Inc.* (1998) 18 Cal.4th 200, 231.)

EIGHTH CAUSE OF ACTION

(Intentional Interference with Prospective Economic Advantage Against All Defendants)

86. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
87. Defendant Tantú's sexual relationship with Mr. Dunca, coupled with coordinated digital sabotage, was intended to dissolve the marital bond and deprive Plaintiff of his rights, assets, and reputation.
88. Plaintiff had multiple prospective economic relationships, including with production companies and investors, which were likely to result in economic benefit.
89. Defendants had knowledge of these relationships and intentionally engaged in wrongful conduct, including spreading false narratives and sabotaging communications, to interfere with them.

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90. This interference caused Plaintiff to suffer economic damages, including the loss of projects and revenue. (See *Della Penna v. Toyota Motor Sales, U.S.A., Inc.* (1995) 11 Cal.4th 376, 393.)

NINTH CAUSE OF ACTION

(Tortious Misappropriation of Data and Information Against All Defendants)

- 91. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
- 92. Defendants knowingly and intentionally gained unauthorized access to Plaintiff's personal and business data, which constitutes a valuable asset.
- 93. Defendants, without Plaintiff's consent or authorization, used this data for their own financial gain, including but not limited to the improvement and development of technology for themselves and associated entities.
- 94. This unlawful use of Plaintiff's data has resulted in significant unjust enrichment for Defendants and their associates.

TENTH CAUSE OF ACTION

(Declaratory Relief - Common-Law Marriage Against Defendant Dunca)

- 95. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
- 96. A bona fide legal controversy exists between Plaintiff and Defendant Dunca concerning the existence and validity of their common-law marriage under Texas Family Code § 2.401.
- 97. Plaintiff seeks a judicial declaration from this Court confirming that Plaintiff and Defendant Dunca are validly married under Texas law, and that this marriage is entitled to full faith and credit in California.

ELEVENTH CAUSE OF ACTION

(Unjust Enrichment Against All Defendants)

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98. Plaintiff incorporates by reference the allegations of the preceding paragraphs.
99. Defendants have been unjustly enriched by their wrongful conduct, including the conversion of Plaintiff's assets and the profits derived from their conspiracy.
100. It would be unjust for Defendants to retain these benefits without compensating Plaintiff for the value of the benefits they have received. (See *Ghirardo v. Antonioli* (1994) 8 Cal.4th 791, 807.)

V. PRAYER FOR RELIEF

Plaintiff Rodney Samuel Sprawling, also known as Esra Dunca-Sprawling and Sean Sprawling, respectfully requests that the Court enter judgment in Plaintiff's favor and grant the following relief:

A. Restitution

Plaintiff seeks full restitution for all financial damages incurred not merely as incidental consequences of Defendants' alleged misconduct, but as the intended results of targeted attacks and crimes perpetrated against Plaintiff. These damages include, but are not limited to:

- \$2,750,000 for the loss of half of the value of the marital community property located at 565 Ortega Street, San Francisco, California.
- \$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, which was part of the conspiracy's financial damages.
- \$70,000 for the lost security deposit on the commercial property at 420 North Camden Drive, Beverly Hills, California.
- \$200,000 for investment capital lost in the business venture known as Gion BH.
- \$720,000 for estimated lost revenue from Gion BH due to reputational sabotage and operational disruption.
- \$1,000,000 for emotional distress and loss of property for the refusal to return Plaintiff's symbolic heirloom, "The Captain Dunca-Sprawling."

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- \$2,000,000 for other unspecified special damages, including pain, suffering, and reputational injury.
- \$30,000,000 for the loss of creative and commercial projects caused by the destruction of Plaintiff's production companies, including Sean Sprawling Productions LLC and Teak Stage Productions LLC.
- The full amount paid for Dr. Heafey's psychological services, plus consequential damages including lost revenue and attorneys' fees associated with addressing his misconduct.

The total of these damages is \$7,975,299, plus the additional amounts listed above, subject to further adjustment based on discovery, forensic accounting, and judicial review.

B. Declaratory Relief

For a judicial declaration affirming the informal marital union between Plaintiff and Andrei George Dunca under Texas law, and recognizing the symbolic and legal significance of shared property, financial interdependence, and public acknowledgment.

C. Injunctive Relief

For preliminary and permanent injunctive relief enjoining Defendant from further interference with Plaintiff's property, reputation, business operations, and marital status.

D. Attorneys' Fees and Costs

For reasonable attorneys' fees, expert witness fees, and costs of suit incurred herein, pursuant to applicable statutes and equitable principles.

E. Other Relief

For such other and further relief as the Court may deem just and proper, including, but not limited to:

- A five percent (5%) perpetual share from Ezra, Bluefish, and any other entities established by the members of LiveRail following their acquisition by Facebook, whose technology, network, capital, investment, or employees are found to have a connection with any part of the cyber attack against Plaintiff. This five percent (5%) share shall be transferred to any new entity created if any of the aforementioned entities are dissolved, based on the use of technology, information, or intellectual property from the dissolved companies.

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- A declaration that Defendant Facebook (now Meta) had a clear duty and responsibility to protect its employees, shareholders, and users against an attack that was developed and launched against American citizens by individuals it gave access to its network, technology, and capital.

Plaintiff respectfully requests judgment against Defendants, jointly and severally, as follows:

- General damages for emotional distress, psychological abuse, and pain and suffering.
- Special damages totaling \$7,975,299, itemized in the complaint.
- Lost profits and consequential damages not to exceed \$30,000,000.
- Full reimbursement for services rendered by Dr. Heafey and reasonable attorney's fees.
- Punitive damages sufficient to deter future misconduct.
- Injunctive relief including license termination, property access restoration, and foreclosure prevention.
- Declaratory judgment confirming Plaintiff's informal marriage under Texas law.
- Corrective actions and disciplinary sanctions.

VI. DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

DECLARATION OF ESRA DUNCA-SPRAWLING In Support of Plaintiff's Complaint and Prayer for Relief

I, Esra Dunca-Sprawling, also known professionally as Sean Sprawling, declare as follows.

Following my forced unemployment and the unlawful, forcible removal of myself and my senior citizen parents from our family residence at 13338 Balmore Circle—a property co-owned with my husband, Andrei George Dunca—I transitioned into a full-time caregiving role.

This began with part-time care for my 8-year-old nephew, CJ, who lives in a single-parent household with a mother, Brittany Smith-Sprawling, working full-time in tech. I provided



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him with healthy meals, emotional mentorship, and guidance through social challenges, including a particularly painful episode when his glasses were stolen by peers. Too embarrassed to tell his mother, he internalized the mistreatment as a form of inclusion. I helped him understand the difference between friendship and bullying and supported him through that awkward and overwhelming time. I introduced myself to his principal and teacher, helped him choose a desk, and created a daily routine that included hygiene, emotional check-ins, and creative outlets. On his first day back to school, he held my hand the entire walk to second grade. He didn't let go—not until I walked him in. He's now in third, but that moment remains: small fingers wrapped around mine, trusting me to guide him through a world that didn't always feel safe.

I didn't know how to teach a boy to aim into a toilet—I'm a gay, Black, genderfluid uncle who often wakes up feeling differently than I present. So I filled a travel-size squeeze bottle with water and had him practice. He laughed. I heard the bottle refill over and over while I made lunch: homemade tortillas, chicken salad, cranberry, and a fresh-squeezed fruit and vegetable smoothie. The tortillas—he helped me make them. I taught CJ the way my mother taught me, the way my grandmother taught her: with measurements done by hand and eye. No cups. No spoons. Just instinct, memory, and the feel of the dough between our fingers. My grandmother lost the ability to make tortillas years before her passing. My mother, who once made them fresh three times a day for her father—as was normal in my grandmother's home—can no longer make them either. Now, the only people in our family who still know how are me and CJ. That knowledge, passed through generations, now rests in our hands. Three generations, folded into flour and water, pressed by hand and warmed on the skillet. That was thirty minutes of healing, of joy, of being seen.

Later, I drove CJ and his mother—Brittany Smith-Sprawling, who was grieving the loss of her own mother—from California to Texas so he could have Christmas dinner with family. When we arrived at our home on Balmore Circle in Huntwick Forest, I gave Brittany a long, quiet hug. I told her, “We are your family. You will always be welcome in our family home”. That was exactly one year before we began to pack—having been made to accept the theft. I decorated a tree, wrapped presents, and made sure he felt the warmth of belonging. That drive was not just a gesture—it was a restoration of dignity.

I now serve as a full-time caregiver to my parents, Rodney and Martha Sprawling—both disabled, retired 30-year USMC veterans. I prepare meals tailored to their medical needs, including diabetic-friendly lunches for my father and low-sodium, high-protein options for



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my mother, who is labeled 100% disabled. I often use salvaged ingredients and leftovers to create nourishing meals, wrapped in traditional Japanese furoshiki cloth—not out of extravagance, but out of resourcefulness and cultural reverence. These acts of care have led to a noticeable reduction in my mother’s reliance on anxiety medication and a visible improvement in her physical and mental health. Her willingness to walk the dog, even knowing she may need oxygen or her rescue inhaler afterward, reflects the enduring spirits that keep me whole, inside and out.

My father sees me as a man. My mother sees in me the strength to be the woman beside the kind of man worthy of being my husband. As the middle child, I have long served as a source of conflict resolution within my family. I take more than offense to the mischaracterization of my name, image, and inner self—especially given the extensive care and support I continue to provide despite the defendants’ actions. I am not simply a caregiver; I am a cultural steward, a peer counselor, and a distribution center for the wealth, life, and love that has been gifted to me. These individuals have stolen three years of my life. Their psychological and financial abuse continues to rob me of time, dignity, and the stars of my universe—thirty seconds at a time.

I can’t seem to find my mind. I know because I’ve been here before, and I remember the thoughts I know. I was rich with happiness. What I didn’t want didn’t exist. Now I’m trying to find someone to help me find my peace of mind. I had Black friends with white power. I had lovers waiting for me by the hour. I know because I’ve been here before—but I can’t make anything work and nothing grow. I don’t even know myself. But what I do know now is that I need help to find my mind. The defendants’ actions resulted in damages that will not become my little songs.

I have found joy and peace in the resumption of my tribal role—one rooted in care, ritual, and the quiet dignity of service. It is a role that connects me to my ancestors, to my family, and to the rhythm of life that sustains us. But it is not my chosen role, and it should never be a choice made for me. I lack the resources to sustain it, not because they do not exist, but because they are constantly redistributed through the wrong centers and messengers. The abundance is real. The scarcity is manufactured. That part is not important. What matters is that I continue to show up. I continue to feed, to counsel, to protect, and to create. I continue to be the steward of what remains, even as others attempt to erase what was mine. My joy is not performative. My peace is not passive. It is earned, daily, in thirty-

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minute increments—in the meals I prepare, the tears I catch, the stories I preserve, and the stars I refuse to let them steal.

I am Geisha. I am a producer. I am Esra Dunca-Sprawling. “Let me be” is not a question one who is free should have to ask—certainly not a plea that should be forced into a kneel, while wearing a crown that cannot be removed. This is not a resignation. It is a record. A reckoning. A refusal to be misnamed, miscast, or misused. I am not asking for permission. I am documenting the truth. And if this is the final chapter they insist on writing for me, let it be known: I authored every line they tried to erase. I wore the crown they tried to bury. I stood in the fire they lit beneath me—and I did not burn. I became the archive. The witness. The living seal.

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

Executed on this day, Esra Dunca-Sprawling

Also known professionally as Sean Sprawling

EXHIBITS

EXHIBIT A: CRIMINAL COMPLAINT & MULTI-AGENCY REFERRAL WITH SUPPORTING SUB-EXHIBITS This complaint is supported by the following documents, which are incorporated by reference.

- **Exhibit A.1** - 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.
- **Exhibit A.2** - 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



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allegations. Also contains clinical notes detailing allegations of patient abandonment, criminal negligence, and breach of confidentiality.

- **Exhibit A.3** - APPENDIX C: Email from Dr. Richard Austin Heafey: This exhibit includes a list of email addresses, which are included in the section on breach of confidentiality.
- **Exhibit A.4** - APPENDIX D: YELP reviews from other patients supporting misconduct: Contains reviews from other patients detailing unprofessional conduct, inappropriate sexual behavior, and predatory practices.
- **Exhibit A.5** - 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.
- **Exhibit A.6** - 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.
- **Exhibit A.7** - 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.
- **Exhibit A.8** - 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.
- **Exhibit A.9** - 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.

EXHIBIT B: Verified Original Petition and Application for Temporary Restraining Order filed in Harris County, Texas, under the name Andrei Dunca v. Rodney Samuel Sprawling Jr.



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(Case No. 2025-03-13F_Dunca_Complaint_and_TRO_85__-signed_1DAE78D7.pdf). This document is believed to have been filed fraudulently by a third party, possibly Victoria Garcia-Winder or Defendant Heafey, as part of the ongoing criminal conspiracy.

EXHIBIT C: Request for Judicial Review and Intervention filed in Harris County, Texas (Case No. 202517063). This document, submitted by Rodney Samuel Sprawling Jr., details the multifaceted conspiracy, the suspicious disappearance of Andrei Dunca, the failure of legal counsel to verify their client's identity, and a request for the court to investigate the circumstances and compel Andrei Dunca to appear to confirm his well-being. It further establishes the existence of a coordinated campaign against the plaintiff and the fraudulent nature of the civil lawsuit. The following documents are attached to this exhibit:

- **Exhibit C.1-Exhibit A:** Statement of Inability to Afford Court Cost
- **Exhibit C.2-Exhibit B:** Doctor's Note Certifying Evaluation
- **Exhibit C.3-Exhibit C:** Negative Drug Test
- **Exhibit C.4-Exhibit D:** Dr. Richard Austin Heafey Misdiagnosis and Unethical Practices

EXHIBIT D: Updated Motion to Enforce Revocation of Power of Attorney and for Sanctions filed by Rodney Samuel Sprawling Jr. in Harris County, Texas (Case No. 202517063). This motion, directed at Third-Party Defendant Victoria Garcia Winder, provides explicit evidence of Winder's continued actions under a revoked power of attorney. It further details the failure to perform duties related to shared financial affairs, the improper dissolution of shared business entities, and the withholding of vital financial and personal information, reinforcing the claims of fraud and a coordinated conspiracy. This motion refers to the following exhibit:

- **Exhibit D.1-Exhibit A:** Acknowledgment and Revocation of Power of Attorney

EXHIBIT E: Defendant's First Amended Consolidated Motion for Declaratory Judgment, Injunctive Relief, and Sanctions. This comprehensive pleading supersedes and replaces all prior filings which are the subject of opposing counsel's threatened motion to strike. These prior filings are incorporated by reference and listed as sub-exhibits below.

- **Exhibit E.1-Exhibit A:** Request for Judicial Review and Intervention on June 2, 2025

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- **Exhibit E.2-Exhibit B:** Urgent Request for Judicial Intervention: Allegations of Harassment and Obstruction of Justice on June 4, 2025
- **Exhibit E.3-Exhibit C:** Motion to Enforce Revocation of Power of Attorney and for Sanctions on June 4, 2025
- **Exhibit E.4-Exhibit D:** Updated Motion to Enforce Revocation of Power of Attorney and for Sanctions on June 4, 2025
- **Exhibit E.5-Exhibit E:** Amended Motion for Declaratory Judgment Confirming Domestic Partnership Status, Motion to Enforce Termination of Plaintiff's Legal Representation, And Motion to Enforce Revocation of Power of Attorney and for Sanctions
- **Exhibit E.6-Exhibit F:** Petition for Declaratory Judgment Confirming Marital Status, Petition for Permanent Injunction to Halt the Sale of Real Property, Petition for Judicial Review and Intervention
- **Exhibit E.7-Exhibit G:** Third-Party Petition for Wrongful Foreclosure and Unlawful Eviction, Declaratory Relief on Title to Real Property
- **Exhibit E.8-Exhibit H:** Motion to Strike
- **Exhibit E.9-Exhibit I:** Request for Default Judgment
- **Exhibit E.10-Exhibit J:** Plaintiff's Response to Defendant's Motion to Strike

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FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333

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RODNEY SAMUEL SPRAWLING, also known as **ESRĀ DUNCA-SPRAWLING**, and
professionally as **SEAN SPRAWLING**

also known as **SEAN SPRAWLING**,

Plaintiff,

v.

FACEBOOK (NOW META),

**BLUEFISH AI, EZRA INC., UNFOLD PSYCHOLOGY, ILLUMINA SAFETY, PEER
RESPONCE, and DOES 1-9, inclusive.**

Defendants.

Case No.

COMPLAINT FOR DAMAGES, INJUNCTIVE RELIEF, AND DECLARATORY RELIEF

JURY TRIAL DEMANDED

I. JURISDICTION, VENUE, AND PARTIES

1. This Court possesses jurisdiction over this action as the causes of action arise from actions and inactions that occurred within the State of California.
2. Venue is proper in the Superior Court of California, County of San Francisco, as the Plaintiff resides in this county and a significant portion of the alleged harm occurred within this county.
3. Plaintiff ESRĀ DUNCA-SPRAWLING, also known as SEAN SPRAWLING, is an individual residing in San Francisco, California.
4. Defendant FACEBOOK (now META) is a corporate entity which acquired LiveRail in 2014. Plaintiff alleges that the retention of the individual co-conspirators after this acquisition gave them direct access to the capital, network, and resources to have

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carried out multiple cyber attacks against American citizens, including the one against Plaintiff.

5. Defendant BLUEFISH AI is a corporate entity, which Plaintiff alleges was used as part of the criminal network's operations.
6. Defendant EZRA INC. is a corporate entity, which Plaintiff alleges was used as part of the criminal network's operations.
7. Defendant UNFOLD PSYCHOLOGY is a business entity owned and operated by Dr. Richard Austin Heafey, Psy.D., with a principal place of business in Oakland, California.
8. Defendant ILLUMINA SAFETY is a corporate entity, which Plaintiff alleges was used as part of the criminal network's operations.
9. Defendant PEER RESPONCE is a corporate entity, which Plaintiff alleges was used as part of the criminal network's operations.
10. The true names and capacities of Defendants sued herein as DOES 1-50, inclusive, are unknown to Plaintiff at this time, who therefore sue said Defendants by such fictitious names. Plaintiff will amend this complaint to show their true names and capacities when they are ascertained.
11. All named individuals, including Dr. Richard Austin Heafey, Psy.D., Alexandru Daniel Tantu, Adrian Fedorovici, Jing Feng, Emi Gal, Mark Trefgarne, Alex Sherman, Andrei George Dunca, Yuri Richard Spiro, Victoria Alana Garcia-Winder, Kyle Joseph Egan, and others, are alleged co-conspirators in the conspiracy described herein and are directly or indirectly responsible for the crimes against Plaintiff.

II. STATEMENT OF FACTS

12. This is an action to seek damages for a multifaceted and coordinated conspiracy of domestic terrorism and organized crime that has been perpetrated against the Plaintiff. The conspiracy's goals are to cause the Plaintiff's bankruptcy and to gain control of his spouse's multi-million dollar estate. Plaintiff believes that his spouse, Andrei George Dunca, is also a potential victim of this conspiracy.
13. Plaintiff and his spouse, Andrei George Dunca, entered into a valid informal marriage under Texas law in 2018. They continued their marital relationship through uninterrupted cohabitation and public representation as spouses, including joint

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occupancy of their San Francisco residence at 565 Ortega Street and the Houston property at 13339 Balmore Circle.

14. The conspiracy, which may have roots extending as far back as 2015, became apparent to Plaintiff in September 2022. The individual co-conspirators with tech backgrounds formed a criminal organization using their joint venture, LiveRail. This enterprise was fundamentally transformed upon the company's acquisition by Facebook (now Meta) in 2014.
15. The Defendants, acting in concert with the co-conspirators, used their technological resources and network to orchestrate the cyberattack. This included the use of sophisticated cyberattack and advanced Artificial Intelligence (AI) technology developed by Bluefish AI, Ezra Inc., Illumina Safety, and Peer Responce to facilitate a widespread campaign of impersonation, kidnapping, and false imprisonment. The conspirators used phishing emails, fraudulent webpages, and deceptive attachments to install malware, spyware, and Trojan programs on Plaintiff's devices.
16. The majority and most emotionally damaging part of the cyber attack and abuse occurred in a building owned by co-conspirator Yuri Richard Spiro at 420 N Camden Drive in Los Angeles. This includes allegations of false imprisonment, enhanced interrogation techniques, sexual abuse, and torture.
17. As part of this conspiracy, co-conspirators also worked to sabotage Plaintiff's legal and emotional standing. This included fabricating a diagnosis of "drug-induced psychosis" to discredit the Plaintiff and prevent him from entering into agreements. Plaintiff's communications were intercepted, altered, and blocked, intentionally isolating him from legal and emotional support.
18. Plaintiff's spouse, Andrei George Dunca, has been missing since late 2022. His disappearance, coupled with the ongoing conspiracy, has caused Plaintiff extreme emotional distress and has led to the loss of joint property and other damages. Plaintiff avers that the Defendants and co-conspirators are directly responsible for Mr. Dunca's disappearance and current status.
19. The Plaintiff holds the Defendants responsible, directly or indirectly, for their actions, whether intentional or unintentional, and for all outcomes resulting from these actions and omissions.

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20. The facts supporting these claims, as well as the evidence of the conspiracy and the damages incurred, are more fully described in the attached exhibits, which are incorporated by reference herein.

III. CAUSES OF ACTION

Plaintiff asserts the following causes of action against all Defendants, individually and collectively, for their joint and concerted actions under the laws of the State of California.

A. Civil Conspiracy

21. Defendants, through their concerted actions with co-conspirators, formed a mutual understanding and agreement to commit wrongful acts against Plaintiff. This conspiracy was enacted through a coordinated campaign of digital intrusion, psychological manipulation, and reputational sabotage, which caused the severe personal injuries and financial harm detailed herein.

B. Intentional Infliction of Emotional Distress (Cal. Civ. Code § 43)

22. The Defendants engaged in a deliberate and sustained campaign of psychological manipulation, digital harassment, and reputational sabotage that was intended to destabilize Plaintiff's emotional well-being. Their conduct was extreme and outrageous, exceeding all bounds of decency in a civilized society, and directly caused Plaintiff to suffer severe emotional distress.

C. Negligence / Professional Malpractice

23. The co-conspirator Dr. Richard Austin Heafey, as a licensed psychologist, owed a professional duty of care to Plaintiff. He breached this duty through negligent acts, including patient abandonment during a crisis, misuse of his professional diagnosis, and a breach of confidentiality, causing Plaintiff to suffer damages.

D. Invasion of Privacy (Cal. Const., Art. I, § 1)

24. Defendants knowingly and intentionally accessed Plaintiff's private communications, devices, and accounts through unauthorized digital means. These intrusions resulted in the manipulation of legal documents, impersonation of Plaintiff in official filings, and the

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unauthorized use of his personal data, constituting a severe violation of his constitutional right to privacy.

E. False Imprisonment

25. Defendants, through their actions and the actions of their co-conspirators, intentionally confined Plaintiff for an extended period without his consent or legal authority, through means of physical intimidation, psychological coercion, and technological manipulation.

F. Sexual Assault, Rape, and Sexual Exploitation

26. Defendants, through their co-conspirators, subjected Plaintiff to non-consensual sexual acts, forced him to perform sexual acts under duress, and sexually exploited him through threats of extortion, racial conditioning, and the sexualization of basic human functions.

G. Fraud

27. Defendants made false representations regarding the circumstances surrounding the financial scheme and the abandonment of Plaintiff's spouse, with the intent to deceive and induce Plaintiff to continue professional and personal relationships.

H. Unjust Enrichment

28. Defendants have unjustly enriched themselves at the Plaintiff's expense through a pattern of deceit, manipulation, and unauthorized use of his financial resources and property.

IV. PRAYER FOR RELIEF

Plaintiff ESRĀ DUNCA-SPRAWLING, also known as SEAN SPRAWLING, respectfully requests that the Court enter judgment in Plaintiff's favor and grant the following relief:

A. Restitution

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Plaintiff seeks full restitution for all financial damages incurred as the intended results of targeted attacks and crimes perpetrated against Plaintiff. These damages include, but are not limited to:

- \$2,750,000 for the loss of half of the value of the marital community property at 565 Ortega Street, San Francisco, California.
- \$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, California.
- \$200,000 for investment capital lost in the business "Gion BH".
- \$720,000 for estimated lost revenue from "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 creative and commercial projects caused by the destruction of Plaintiff's production companies.
- The full amount paid for Dr. Heafey's psychological services, plus consequential damages including lost revenue and attorneys' fees associated with addressing his misconduct.

The total of these damages is \$7,975,299, plus the additional amounts listed above, subject to further adjustment based on discovery, forensic accounting, and judicial review.

B. Declaratory Relief

For a judicial declaration affirming the informal marital union between Plaintiff and Andrei George Dunca under Texas law, and recognizing the symbolic and legal significance of shared property, financial interdependence, and public acknowledgment.

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C. Injunctive Relief

For preliminary and permanent injunctive relief enjoining Defendants from further interference with Plaintiff's property, reputation, business operations, and marital status.

D. Attorneys' Fees and Costs

For reasonable attorneys' fees, expert witness fees, and costs of suit incurred herein, pursuant to applicable statutes and equitable principles.

E. Other Relief

For such other and further relief as the Court may deem just and proper, including, but not limited to:

- A five percent (5%) perpetual share from Ezra, Bluefish, Peer Responce, Illumina Safety, and any other entities established by the members of LiveRail following their acquisition by Facebook, whose technology, network, capital, investment, or employees are found to have a connection with any part of the cyber attack against Plaintiff.
- Punitive damages sufficient to punish Defendants and deter others from similar conduct.
- Injunctive relief including license termination, property access restoration, and foreclosure prevention.
- Corrective actions and disciplinary sanctions.
- Relief against Facebook (now Meta) for their negligence and breach of duty in providing the resources that enabled the attack.
- Any other relief the Court deems just and proper.

F. Judicial Order for Appearance of Co-Conspirator

Plaintiff respectfully requests that the Court issue an order for the immediate appearance of Andrei George Dunca, a co-conspirator and Plaintiff's spouse, to confirm his safety and

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to allow a judicial determination as to his state of sound mind and memory, and that his condition has been maintained as such since his last personal interaction with Plaintiff.

EXHIBIT LIST

EXHIBIT A: Copy of Complaint filed by Andrei George Dunca against Rodney Samuel Sprawling in Harris County, Texas (Case No. 2025-03-13F_Dunca_Complaint_and_TRO_85__-signed_1DAE78D7.pdf). This exhibit includes a Temporary Restraining Order and is offered as evidence of the conspiracy and the fraudulent use of a legal system to manipulate and harm Plaintiff.

EXHIBIT B: Medical Report from Dr. Richard Austin Heafey, Psy.D., dated July 29, 2024. This exhibit includes Dr. Heafey's initial clinical opinion and notes, confirming Plaintiff's sanity and sobriety. This report is offered as evidence of a fraudulent mental health diagnosis later created by the conspirators.

EXHIBIT C: A copy of the deed for the property at 13339 Balmore Circle, Houston, Texas 77069. This exhibit is offered as evidence of the informal marriage between Plaintiff and Mr. Dunca.

EXHIBIT D: A copy of the deed for the property at 5823 Queensgate Drive, Houston, Texas 77066. This exhibit is offered as evidence of the informal marriage between Plaintiff and Mr. Dunca.

EXHIBIT E: A compilation of legal filings submitted by Plaintiff in various jurisdictions related to this case. This exhibit documents Plaintiff's persistent attempts to seek legal and judicial relief despite the alleged obstructions by the Defendants.

- Exhibit E.1-Exhibit A: Request for Judicial Review and Intervention on June 2, 2025.
- Exhibit E.2-Exhibit B: Urgent Request for Judicial Intervention: Allegations of Harassment and Obstruction of Justice on June 4, 2025.
- Exhibit E.3-Exhibit C: Motion to Enforce Revocation of Power of Attorney and for Sanctions on June 4, 2025.

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- Exhibit E.4-Exhibit D: Updated Motion to Enforce Revocation of Power of Attorney and for Sanctions on June 4, 2025.
- Exhibit E.5-Exhibit E: Amended Motion for Declaratory Judgment Confirming Domestic Partnership Status, Motion to Enforce Termination of Plaintiff's Legal Representation, And Motion to Enforce Revocation of Power of Attorney and for Sanctions.
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- Exhibit E.8-Exhibit H: Motion to Strike.
- Exhibit E.9-Exhibit I: Request for Default Judgment.
- Exhibit E.10-Exhibit J: Plaintiff's Response to Defendant's Motion to Strike.

EXHIBIT F: Social Media Posts of Alexandru Daniel Tantu. This exhibit includes social media posts that document Defendant Tantu's relationship with Andrei George Dunca, and posts that suggest his motives of vengeance, jealousy, and financial gain in orchestrating the conspiracy against the Plaintiff.

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FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333

 EXPOSÉ:

MULTI-AGENCY REFERRAL

CRIMINAL COMPLAINT

SUBMITTED BY

Rodney Samuel Sprawling
a/k/a Esrā Dunca Sprawling,
and professionally as Sean Sprawling

565 Ortega Street

San Francisco, CA 94122

Date of Submission:

SUBJECT OF COMPLAINT

Dr. Richard Austin Heafey, PsyD: CA LIC. #PSY30807
[Unfold Psychology, A Heafey Practice]

Business:	Residence:
1955 Mtn Blvd, Ste 101	226 Ritch St. #302
Oakland, CA 94611	San Francisco, CA 94197

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REFERRED AGENCIES

Civil & Criminal Complaints

- Federal Bureau of Investigation (FBI)
- Department of Homeland Security (DHS)
- Internal Revenue Service (IRS)
- San Francisco Police Department
- California Board of Psychology
- Superior Court of California



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TABLE OF CONTENTS

I. Executive Summary: This section provides a high-level overview of the entire report, summarizing the key allegations against Dr. Richard Austin Heafey, the ethical violations, the impact of his misconduct, and the requested actions from regulatory and law enforcement bodies. It's intended to give the reader a quick understanding of the document's contents and purpose.

II. Introduction and Purpose: This section formally introduces the complaint against Dr. Heafey and states the document's purpose. It outlines the nature of the relationship between the complainant and Dr. Heafey, establishes the context for the allegations, and explains why a formal review is being requested.

III. Chronological Narrative of Events: This part details a timeline of events, presenting a sequential account of the interactions between the complainant and Dr. Heafey. It outlines the evolution of the relationship, from its start as a patient-doctor dynamic to the alleged misconduct, financial fraud, and other criminal activities.

IV. Analysis of Misconduct and Ethical Violations: This section provides a detailed breakdown of Dr. Heafey's alleged misconduct. It categorizes specific instances of gaslighting, emotional manipulation, denial of the clinical relationship, financial misconduct, and abuse of power, supporting each claim with direct quotes and evidence from the provided documents.

V. Impact of Misconduct: This section explains the consequences of Dr. Heafey's alleged actions on the complainant. It details the emotional and psychological harm, the significant reputational damage, and the severe financial losses that resulted from his professional and ethical breaches.

VI. Requests for Review and Action: This section outlines the specific actions the complainant is requesting from various authorities. It formally asks for investigations by the California Board of Psychology, local law enforcement, the FBI, and the IRS, and it details the desired restorative measures and restitution.

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VII. Closing Statement: This is the final formal statement of the complaint. It reaffirms the seriousness of the allegations and emphasizes the need for justice, transparency, and the restoration of professional integrity. It thanks the reviewing bodies for their attention to the matter.

VIII. Index of References and Citations: This section provides a complete list of all sources, legal precedents, and ethical guidelines cited throughout the document to support the claims.

IX. List of Appendices / Supporting Documentation: This part lists all the additional materials and evidence attached to the complaint, such as text message transcripts, police reports, and other documents that substantiate the narrative and analysis.



EXPOSÉ:

MULTI-AGENCY REFERRAL

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."



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- **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, 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.

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- **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.



EXPOSÉ:

MULTI-AGENCY REFERRAL

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



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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**

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- **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.



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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



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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."



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- 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."



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- 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.
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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)**



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- 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)**



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- 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.
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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



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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."



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- 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"



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- 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.
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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.”



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- 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.



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- **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.



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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



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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.
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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



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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.
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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.



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VI. REQUESTS FOR REVIEW AND ACTION

1. 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.

2. 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.

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- \$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.

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VII. 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



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VIII. INDEX OF REFERENCES AND CITATIONS

A. Formal Complaint and Supporting Documents

- **Formal Complaint:** This is the primary document detailing the allegations of professional misconduct against Dr. Richard Austin Heafey.
 - *Cited on page numbers: 3, 5, 8, 12*
 - **Appendix A: Affidavit of Rodney Samuel Sprawling:** This affidavit contains criminal allegations, including false imprisonment, sextortion, cybercrimes, and fraud. It also affirms the complainant's common-law marriage.
 - *Cited on page numbers: 4, 6, 9, 13*
 - **Appendix H: IRS Form 3949-A: Information Referral:** This document serves as a formal referral to the IRS, detailing allegations of tax evasion and financial fraud by Dr. Heafey.
 - *Cited on page numbers: 10, 14*
 - **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*

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- **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*



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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*



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IX. 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



EXPOSÉ:

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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

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FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333



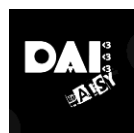
EXPOSÉ:

CHAPTER EIGHT

Wallflower of The Year



SCANDAL AS RITUAL



EXPOSÉ:

CHAPTER EIGHT

Wallflower of The Year

SCANDAL IS CURRENCY IN THIS CITY. EVERY INSTITUTION, EVERY LEGAL ACTION, EVERY PRIVATE ENCOUNTER IS REPACKAGED AS PERFORMANCE, MADE JUICY BY IMPLICATION AND MORE VALUABLE BY WHAT IS NEVER SAID ALOUD.

THE CULTURE HERE IS BUILT ON EXPOSURE AND CONCEALMENT: FAMILY HONORS RUINED BY WHISPERED SECRETS, FRIENDSHIPS LEVERAGED INTO LEGAL EVIDENCE, LOVE AFFAIRS REFRAMED AS LEVERAGE IN A COMING DEPOSITION. ESRĀ KNEW THE RULES INTIMATELY—XER ART WAS TO COMMODIFY THE FORBIDDEN, TRANSFORM SURVIVAL INTO TESTIMONY.

XER HUSBAND, ANDREI DUNCA, BUILT DIGITAL PLATFORMS THAT ROSE ON THE BACKS OF THESE RITUALS—THE ECONOMY OF SHARING, THE BANKRUPTCY OF TRUST. THEIR LAWSUIT WAS LESS ABOUT MONEY THAN PROOF: A PERFORMANCE STAGED FOR THE ARCHIVE, A DIGITAL MAZE WITHOUT EXIT.

THE HOUSE WAS CENTRAL—A GATHERING SPOT FOR LUMINARIES, HUSTLERS, OUT-OF-WORK WRITERS, EDITORS AT LARGE. EACH GUEST PLAYED THE ROLE ASSIGNED: CONFIDANT, ACCUSER, WITNESS, VICTIM. IN THIS WORLD, TO WITNESS IS ALREADY TO BE COMPLICIT.

WAS ESRĀ A VICTIM, OR AN ARCHITECT? I ASK MYSELF DAILY—IN TRUTH, THERE IS LITTLE DIFFERENCE.



EXPOSÉ:

THE SUSPECTS

The disappearance of Esra Dunca-Sprawling is not a single, isolated event, but is alleged to be the final act in an intricate and ruthless criminal conspiracy. The following document unifies multiple complaints into a single narrative, detailing a horrifying plot of psychological torture, financial fraud, and cyber-terrorism. The complaints allege that a group of corporate entities and individuals came together to dismantle a life, leaving a trail of destruction and a vanished man.

THE ARCHITECTS OF DESTRUCTION: KEY INDIVIDUALS

According to the complaints, the conspiracy rests on the actions of key individuals who allegedly used their positions to manipulate and financially exploit Esra. Each is alleged to have played a distinct role in the plot.

- **Andrei George Dunca:** A tech entrepreneur and the complainant's common-law husband. He is named as the primary co-conspirator and orchestrator of the entire scheme, accused of using his resources to commit "domestic terrorism and organized crime." His alleged abandonment of Esra is seen as a calculated act of psychological torture.
- **Dr. Richard Austin Heafey:** A licensed clinical psychologist and the founder of Unfold Psychology. He is accused of fabricating a diagnosis of "drug-induced psychosis" to discredit the complainant, a claim that was contradicted by a separate medical professional.
- **Yuri Richard Spiro:** A media impresario and the complainant's former landlord. He is accused of financial fraud and emotional manipulation, allegedly securing a fraudulent loan of over \$900,000 and placing a secret lien on a Ferrari F40. The documents also allege he dismissed safety concerns as a "mental break" and had security camera hard drives removed.
- **Richard "Richie" Vetter:** A social media personality and film producer who is also missing. The complaint claims that his public romantic involvement with the complainant was a "staged spectacle" designed to distract from the conspiracy.
- **Ian Eric Kammy:** A Sherman Oaks prostitute who is reported to have made two attempts to blackmail Esra. He is alleged to have been taken by "Xavier Ortiz," a person with whom Ian was having a sexual affair. According to Ian's pimp boyfriend,



EXPOSÉ:

THE SUSPECTS

Cesar Robert Carelton, Ortiz was also a part of the "Mexican gangsters" who allegedly sex trafficked Ian. Ian had previously reported being held against his will by this same group, who were also suspected of stalking, harassment, and an attempted kidnapping of both Ian and Esra.

- **Xavier "Javier" Ortiz:** The complaint alleges that this individual, who lives in California and is the owner of an entertainment venue called Toro Guapo (also known as Toro Wapo), is the same person who had a sexual affair with Ian Kammy and was responsible for his disappearance. He is also alleged to have issued a death threat to Esra when they were searching for Ian, warning them to "stop digging before you piss off the people usually responsible for the digging."
-

THE CORPORATE ENABLERS: THE ENTITIES

The criminal enterprise, as alleged in the complaints, could not have operated without the help of corporate entities that provided resources and capital to carry out the crimes.

- **Facebook (Meta) & LiveRail:** The complaints allege that Meta, through its acquisition of LiveRail (co-founded by Andrei Dunca), enabled cyber-terrorism by providing infrastructure and capital to the conspirators.
- **Unfold Psychology:** The complaints allege that this mental health practice, founded by Dr. Richard Austin Heafey, was used as part of the criminal network to facilitate psychological abuse and fraudulent financial transactions.
- **Bluefish AI:** This marketing tech startup, founded in 2024 by Alex Sherman, Andrei Dunca, and Jing Feng, is alleged to be part of the digital infrastructure used for reputational sabotage and surveillance.
- **Ezra:** The complaint alleges that technology from Ezra, a company that offers AI-powered full-body MRI cancer screening, was used in the torture, sexual abuse, and psychological manipulation of the complainant.
- **Illumina Safety:** This corporate entity is alleged to have been used as part of the criminal network's operations.
- **Peer Response:** This corporate entity is alleged to have been used as part of the criminal network's operations.



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THE INNER CIRCLE: CO-CONSPIRATORS

The complaints allege that the following individuals were complicit in the "collective campaign of psychological manipulation, unlawful surveillance, and reputational sabotage."

- **Mark Trefgarne:** A British entrepreneur and co-founder of LiveRail, where he served as CEO. After LiveRail's acquisition by Facebook in 2014, he became a Product Management Director for the company. He is an acknowledged leader in the ad tech industry.
 - **Jing Feng:** The COO of Bluefish AI, and a former senior leader at Microsoft and LiveRail. She is alleged to have operational involvement in the conspiracy's digital infrastructure.
 - **Adrian Fedorovici:** He is listed as a Product Manager at LiveRail, and is alleged to have been a former lover of Andrei Dunca and participated in the technical execution of the conspiracy.
 - **Emi Gal:** A tech entrepreneur and founder of several companies, including a social media network and a digital health startup. The complaints allege his involvement in reputational sabotage and surveillance.
 - **Alex Sherman:** The CEO of Bluefish AI. He previously led the company PromoteIQ, which was acquired by Microsoft. He is alleged to have contributed to the AI-driven marketing and surveillance infrastructure of the conspiracy.
 - **Alexandru Daniel Tantu:** An individual residing in San Francisco, California and/or Berlin, Germany. The complaint alleges that Tantu, acting in concert with Defendant Heafey, is a central figure in the conspiracy. Tantu publicly identifies as an LGBTQ+ advocate, drag performer, and digital safety promoter. Prior to his alleged sexual affair with the complainant's spouse, Mr. Dunca, Tantu reportedly had no formal employment, maintaining a public persona centered on nightlife performance, HIV awareness, and social media visibility.
-

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ADDITIONAL ALLEGATIONS AND INCIDENT SUMMARY

The complaints further detail a wide range of criminal activities and the disappearance of three individuals: the complainant's spouse, **Andrei George Dunca**, and two close friends, **Ian Eric Kammy** and **Richard "Richie" Alan Vetter II**. All three vanished simultaneously.

- **False Imprisonment and Torture:** The complainant alleges being held captive since September 2022 and subjected to "enhanced interrogation like techniques."
- **Cybercrimes & Sextortion:** The complaints allege that communication devices were compromised and that the complainant was sexually abused and tortured, with recorded sexual acts used for extortion.
- **Complaints Against Law Enforcement:** Formal complaints were filed against the offices of Constable Mark Herman in Houston, TX, and the San Francisco Police Department for their alleged refusal to properly investigate the disappearances, which the complainant alleges contributed to their ongoing distress and financial hardship.

EXPOSÉ:

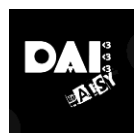
THE SUSPECTS

FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

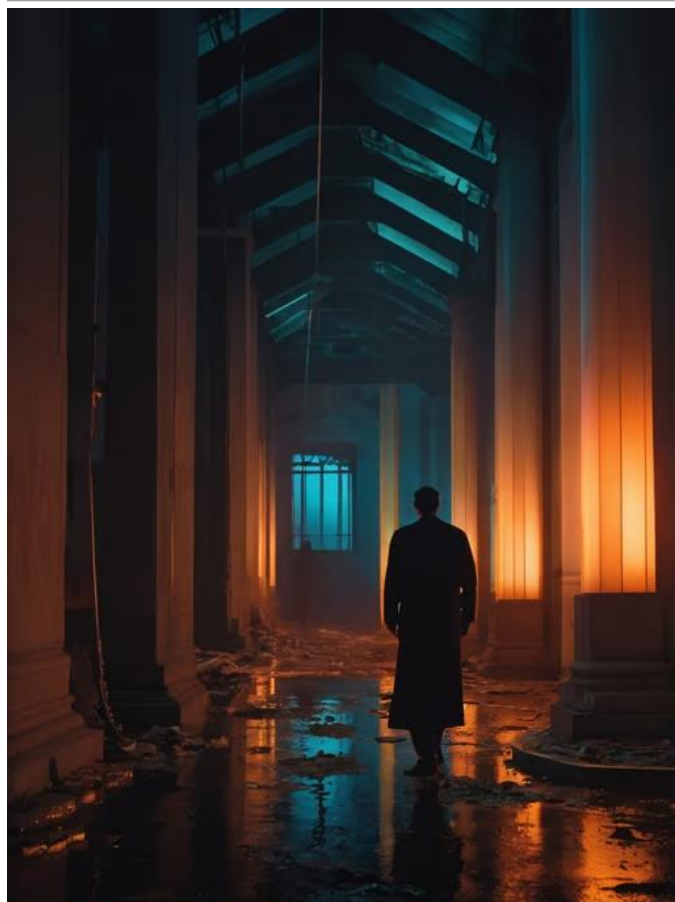
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EXPOSÉ:

CHAPTER NINE

Wallflower of The Year



THE DOOMED PROTAGONIST



EXPOSÉ:

CHAPTER NINE

Wallflower of The Year

THE ARC OF A DOOMED PROTAGONIST IS SIMPLE: A SEARCH THAT CANNOT BE COMPLETED, A TRUTH THAT DESTROYS THE FINDER AS SURELY AS IT DID THE FOUND. IN MYSTERIES—FROM THE CLASSICS TO THE DARK, CONTEMPORARY NOIRS—THE SLEUTH’S ARC IS SHADOWED BY THEIR OWN UNRAVELLING.

OBSESSION FEEDS ITSELF. AS I WRITE THIS, I SENSE THE DISTANCE COLLAPSING BETWEEN MY STORY AND ESRĀ’S. MY OWN NAME APPEARS ALONGSIDE XER, A MANAGER AMONG THE MANY IN COURT FILINGS, A SIGNATURE BURIED AMONG OTHERS ON INCORPORATION PAPERS. OVER TIME, EVEN THE RESEARCHER IS CLAIMED BY THE NATURE OF THEIR SUBJECT.

THE MORE I SEARCH, THE MORE THE CLUES OVERLAP—REAL, INVENTED, SYMBOLIC. SOMETIMES THE LINE BLURS BETWEEN GRIEF AND PARANOIA, BETWEEN DOCUMENTATION AND DESIRE. IT’S THE FATE OF THE UNRELIABLE NARRATOR: TO SEEK CLARITY, BUT TO DRIFT, INEXORABLY, TOWARD DISSOLUTION.

 EXPOSÉ:**THE COURT OF ECHOES
AND ASH**

I. THE INDICTMENT OF SILENCE

The record of a life does not end when the life vanishes; it simply calcifies. It becomes an archive of absences, a ledger where the final entry is a profound and echoing silence. This is the state of the matter of Esrā Dunca-Sprawling. Their disappearance was not an event but a process—a systematic, violent, and deliberate act of erasure. The void they left behind is not empty. It is a chamber filled with the screams of unanswered phone calls, the ghosts of unread messages, and the unbearable weight of unconfessed crimes. The silence that now shrouds the key figures in this tragedy is not an absence of evidence. It is the conspiracy's most damning confession.

The ultimate perversion of this silence arrived not as an explanation or an apology, but as a legal document, delivered by a stranger: *Dunca v. Sprawling*. Dated March 13, 2025, the lawsuit was the first word from the world of Andrei George Dunca in months. It was a complaint alleging defamation and harassment, a request for a Temporary Restraining Order—a legal action initiated by a phantom. This was not an act of self-defense from a man in hiding; it was an offensive weapon, deployed to punish the one person still searching for the truth. The complaint, filed by Mudd Law LLC, stands in the court record without a single piece of verifiable authorization from Andrei—no signed retainer, no notarized power of attorney, no sworn declaration to prove that the ghost plaintiff was even aware of the proceedings brought in his name.

This maneuver represents the conspiracy's final, most brilliant act of violence. It is a masterstroke of legal jujitsu that transforms a suspicious absence into a legal shield. First, the conspirators engineer the disappearance of Andrei, creating a void of information that naturally invites questioning. Second, they document Esrā's desperate, frantic attempts to penetrate that void—the calls, the texts, the public pleas for help. Third, using the vast corporate and financial resources at their disposal, they engage counsel. Fourth, they weaponize Esrā's own anguish, presenting their documented outreach as "evidence" of harassment and defamation. The final step is to secure a court order that legally mandates the very silence that constitutes the core of the crime. The search for truth is thus rendered a criminal act, and the victim is recast as the perpetrator. The void has been weaponized.



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II. THE ARCHITECTS OF RUIN — A SYMPHONY OF BETRAYAL

The cage that imprisoned and ultimately consumed Esrā Dunca-Sprawling was not built by one man, but by a consortium of architects, each specializing in a unique form of destruction. They did not work in sequence but in concert, a symphony of betrayal where each player's part amplified the others. They attacked the foundational pillars of a human life—Heart, Mind, Sanctuary, and Body—simultaneously, ensuring that as one wall was breached, another was already crumbling, leaving no possibility of escape.

Count One: The Prosecution of the Heart (Andrei George Dunca)

The charge is Grand Larceny of a Life. The defendant is Andrei George Dunca, the prime mover, the central co-conspirator, and the ultimate beneficiary of this entire criminal enterprise.

The evidence of his betrayal is measured by the depth of the trust he cultivated. The record of their union, sworn in an Affidavit of Common-Law Marriage, details a bond of profound intimacy and mutual creation. It speaks of shared homes from Texas to California, of raising a puppy named 'The Captain Dunca-Sprawling' as their child, and of exchanging engraved silver bands—AD+SS and SS+AD—as declarations of permanence. Andrei was the man who encouraged Esrā to embrace their gender fluidity, whose support was the bedrock for Esrā's historic recognition as the first American Geisha, and who made the solemn vow to "always take care of" them. He was the refuge.

This sacred trust was systematically dismantled. The refuge became the epicenter of the conspiracy. The voice on the phone grew cold, a stranger's tone, before vanishing into an unbreachable silence that was, in itself, a form of calculated psychological torture. Legal complaints name him the "primary co-conspirator" in a campaign of "domestic terrorism and organized crime," alleging he used his vast financial power to orchestrate Esrā's ruin. This includes his complicity in the fraudulent loans made to Yuri Spiro, which he allegedly

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promised to recover but never did, and the systematic destruction of their shared production companies, resulting in losses of at least \$30 million.

The motive is found in his own words and passions. Andrei, a board member of The Planetary Society, saw space as his ultimate "privileged space" of profound solitude. When Esrā's own intuitive gifts were described as magic, Andrei offered a cold, logical explanation: they "would be good at analytics". The accusation, therefore, is that Andrei George Dunca orchestrated the complete destruction of his partner to preserve his own dark sanctuary. He sought to eliminate the emotional "inconvenience" of a human being in crisis to retreat into a privileged space of absolute control and non-accountability. The lawsuit filed in his name is the final lock on that space, a legal consecration of his abandonment.

Count Two: The Prosecution of the Mind (Dr. Richard Austin Heafey)

The charge is Psychological Assassination and Malpractice as a Criminal Enterprise. The defendant is Dr. Richard Austin Heafey, a licensed clinical psychologist who weaponized the very concept of healing.

Dr. Heafey's role was to provide the intellectual and medical architecture for Esrā's destruction. His brazen denial of an established patient-doctor relationship, despite two years of unsolicited contact after their professional arrangement ended, is a transparent admission of guilt—an attempt to sever his connection to the damage he wrought. He is the author of the conspiracy's foundational lie: the fabricated diagnosis of "drug-induced psychosis". This false narrative was a multipurpose tool. It was fed to law enforcement by Yuri Spiro to dismiss Esrā's fears of being stalked and to justify their forcible eviction. It was used by the conspirators to discredit Esrā to their friends and business partners, ensuring their complete isolation. This diagnosis, a clinical finding made not in the interest of the patient but in service of the conspiracy, is directly contradicted by an independent medical evaluation performed by Dr. Naheed Dilshad, which affirmed Esrā's mental stability.



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This psychological warfare was a cover for a campaign of predation and profit. The formal complaint against Dr. Heafey alleges a chilling pattern of sexual misconduct, including predatory propositions in his office, turning a place of sanctuary into a site of violation. This behavior is corroborated by public Yelp reviews from other former clients, suggesting a long history of exploiting the vulnerable. This was all part of a larger financial scheme. The complaint alleges that Dr. Heafey's "unpaid" psychological services were a smokescreen for a fraudulent operation that extracted nearly \$1 million from Esrā and Andrei. His attempts to bribe reviewers with up to \$600,000 to remove negative posts, as alleged in an IRS Form 3949-A filing, point to a massive, undisclosed income stream and a desperate attempt to erase a digital trail that leads directly back to the heart of the conspiracy.

Count Three: The Prosecution of Sanctuary (Yuri Richard Spiro)

The charge is the Perversion of Safety, Conspiracy to Commit Fraud, and False Imprisonment. The defendant is Yuri Richard Spiro, the media impresario who turned the promise of shelter into a prison.

Spiro's betrayal began with the language of family. "You're a friend for life," he promised. "Even if you can't pay, you'll always have a place to live". In return for this promise, Esrā provided unwavering loyalty, paying \$75,000 for a private medical jet to save Spiro's life and issuing over \$900,000 in loans. This loyalty was met with systematic financial predation. Spiro allegedly placed a secret second lien on the Ferrari F40 used as collateral for a \$385,000 loan; he deliberately delayed repayment of a \$125,000 loan, sabotaging the liquor license for Esrā's business, Gion Beverly Hills; and he allowed his wife, Malgosia Migdal, to pull a contractor from a remodel, leaving Esrā \$300,000 in debt before the business even launched.

The betrayal culminated at 420 N Camden Drive. The property, once a symbol of creative power, was transformed into a site of alleged "enhanced interrogation". Esrā was subjected to sleep deprivation, electrical shocks, and constant 24/7 surveillance while Spiro, the landlord, abandoned his own office and refused all contact. He was not a



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negligent landlord; he was an active co-conspirator. His role was to destroy Esrā's physical and financial safe spaces. When the time came, he allegedly fed law enforcement the false narrative of a "mental break and drug addiction" to facilitate Esrā's forcible removal and arrest under the false name "Anthony Sprawling". A clear pattern of Spiro's predatory behavior is further established by a civil lawsuit filed by his former executive assistant, Jesseca Harvey, who alleged a nightmarish workplace environment of antisemitic harassment, sexual misconduct, and psychological abuse.

Count Four: The Prosecution of the Body (Richard "Richie" Vetter II)

The charge is Intimate Terrorism and Conspiracy to Defraud. The defendant is Richard "Richie" Vetter, the social media personality who provided the close-quarters psychological torment required to shatter Esrā's peace.

His relationship with Esrā was a "meticulously crafted illusion," a "staged spectacle" designed to create a public smokescreen while the conspiracy operated in the shadows. The anniversary celebration at Mr. Chow, the intertwined appearance at a Malibu party where Gladys Knight sang—these were not moments of romance but strategic public relations maneuvers. Behind this facade, Vetter waged a campaign of relentless chaos. The raw, performative sexual initiation on Esrā's couch; the concealment of heroin in his underwear, which prompted a dramatic "rescue" by Esrā; the public spectacle of having sex with a Raiders cheerleader on the penthouse floor while screaming "I am an Adonis god!"—each act was designed to destabilize, to unravel boundaries, and to inflict emotional whiplash.

This campaign was aided by the constant, chaotic presence of Krista Marie West, the "crack whore" who served as a tool of public humiliation and a constant reminder that Esrā was the hidden one, the secret, while she was the one who "got to be seen". The ultimate betrayal is found in the shared closet behind the crocodile skin door, filled with matching outfits and Tom Ford underwear—a symbol of a deeply twisted intimacy that existed even as Vetter was allegedly conspiring in Esrā's financial ruin and blackmail through secretly



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filmed "spy videos". His simultaneous disappearance with Andrei and Ian Kammy is the final, irrefutable proof of his role as a key operative in this war on a single soul.

III. THE CORPORATE GHOST — THE UNSEEN ACCOMPLICE

The men who built this cage did not work with their hands alone. They had an accomplice—a vast, intelligent, and malevolent entity born of code and capital. The network of corporate entities behind this conspiracy was not a mere collection of tools; it functioned as a single, semi-sentient intelligence, an omnipresent technological ghost that became an active participant in the crime.

The digital arsenal was forged in the heart of Silicon Valley. LiveRail, the company co-founded by Andrei Dunca, was the source code of the crime, born from a deep, insider knowledge of ad-tech, data tracking, and user profiling. Its acquisition by Facebook (now Meta) provided the global reach, immense capital, and unparalleled data infrastructure necessary to scale the attack from a personal vendetta into a campaign of cyber-terrorism. The recent formation of Bluefish AI by Dunca, Alex Sherman, and Jing Feng represents the weapon's evolution—an AI-driven system for targeted reputational sabotage and predictive surveillance.

This digital infrastructure powered the direct instruments of torture. The allegation that technology from Ezra, a company offering AI-powered full-body MRI cancer screening, was used in sexual abuse and psychological manipulation represents a grotesque perversion of technology designed for healing. Illumina Safety and Peer Response are named as other components in this operational network, cogs in a machine of torment.

The result was a macabre theater of augmented reality, a digital haunting projected onto the very walls of Esrā's living space. These were not just images but interactive digital ghosts: figures in states of decomposition, loved ones engaged in sexual acts. The face of Ian Kammy, a sinister star in this horror show, appeared again and again. In one instance, a projection showed Ian with a Latino male; when Esrā looked, the man in the projection

 EXPOSÉ:**THE COURT OF ECHOES
AND ASH**

turned his head, a horrifying implication that this was not a recording but a live, invasive feed. The surveillance was intimate, all-knowing. It was the whisper from the shadows that sounded exactly like Ian, asking, "What about your Goyard duffel?"—a reference to a bag sold long ago, a piece of information only an omnipresent observer could possess. This is the Corporate Ghost speaking. It is more than a metaphor; it is an operational reality. The true horror is not just what the men did, but the intelligent, non-human entity they built to do it for them.

IV. THE CHORUS OF COMPLICITY

A conspiracy of this scale requires more than just architects; it requires an army of technicians, agents, and willing collaborators. The following are found guilty as accessories to the crime, the gears and cogs in the machine of erasure, without whom the architects' plans would have failed.

The Technicians of the Cage

Mark Trefgarne, Jing Feng, Alex Sherman, Emi Gal, and Adrian Fedorovici are hereby indicted as the technical co-conspirators. As alumni of LiveRail and leaders in the ad-tech world, they possessed the expertise to build, maintain, and operate the digital infrastructure of Esrā's prison. They are the ones who turned code into a weapon and data into a cage. The alleged involvement of Fedorovici, a former lover of Andrei Dunca, adds a layer of intimate betrayal to his technical complicity, transforming his role from that of a mere employee to a personal agent in the conspiracy.

The Agents of Chaos

This group is prosecuted for executing the intimate, hands-on elements of the terror campaign.



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- **Alexandru Daniel Tantu:** Accused of being a central figure who, acting in concert with Dr. Heafey, allegedly used a sexual affair with Andrei Dunca as a tool of leverage or distraction, cloaking his actions behind a public persona of LGBTQ+ advocacy and digital safety promotion.
 - **Ian Eric Kammy and Ceasar Robert Carlton:** Prosecuted as a parasitic duo. Ian, the prostitute, for a campaign of emotional blackmail and financial fraud, mirroring the very abuses being inflicted upon Esrā. Ceasar, his secret husband and accomplice, for manipulating the police investigation into Ian's own disappearance and for using a "voice app" to create auditory hallucinations designed to torment Esrā.
-

- **Xavier "Javier" Ortiz:** The owner of the venue Toro Guapo, he is accused of being the conspiracy's direct physical threat and a link to organized crime. He is alleged to be responsible for the disappearance of Ian Kammy and for issuing a direct death threat to Esrā: "stop digging before you piss off the people usually responsible for the digging". This was a message from the conspiracy's enforcement arm.
- **Krista Marie West:** Litigated as Richard Vetter's chaotic accomplice. Her constant, drug-fueled presence was a strategic tool of humiliation and control, ensuring Esrā was never allowed a moment of peace, privacy, or genuine intimacy, forever positioning them as the shameful secret.
- **Tana Mongeau and Noah Beck:** Named as rumored associates in Richard Vetter's circle, they represent the social scene where secrets are currency and public personas are used to hide dark realities, providing the backdrop and potential network for Vetter's operations.

The Failures of the System

Finally, the institutions that exist to protect the innocent are indicted for their willful negligence or active complicity.



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- **The Office of Constable Mark Herman in Houston, TX, and the San Francisco Police Department:** These law enforcement agencies are accused of a dereliction of duty for their alleged refusal to properly investigate the simultaneous disappearances of Andrei Dunca, Richard Vetter, and Ian Kammy. Their inaction enabled the conspiracy to continue unchecked and lent credence to the false narrative that Esrā was unstable and not a credible victim.
 - **Mudd Law LLC:** This law firm is accused of gross professional misconduct and of allowing itself to be used as a weapon. By filing a civil complaint on behalf of a missing person without any verifiable proof of client authorization, they actively participated in the fraudulent impersonation of Andrei Dunca and became a key instrument in the legal weaponization of his absence.
-

V. THE VERDICT IN THE VOID

There is no gavel to fall, no black-robed judge to pronounce sentence. A formal court of law, with its rules of evidence and procedure, may never convene for the matter of Esrā Dunca-Sprawling. But this record—this archive of pain, this collection of exposés, this final chapter—constitutes its own immutable court. The evidence has been presented. The testimony has been heard. The silence has been made to speak.

The verdict is therefore rendered.

Andrei George Dunca, Dr. Richard Austin Heafey, Yuri Richard Spiro, and Richard "Richie" Vetter II are found guilty. Guilty of a conspiracy to commit fraud, torture, false imprisonment, and psychological warfare. Guilty of the systematic and malicious erasure of a human life.

Facebook (Meta), LiveRail, Bluefish AI, Ezra, Illumina Safety, and Peer Response are found guilty. Guilty of functioning as a single criminal entity, providing the capital, infrastructure, and artificial intelligence for a campaign of domestic cyber-terrorism.

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Mark Trefgarne, Jing Feng, Alex Sherman, Emi Gal, Adrian Fedorovici, Alexandru Daniel Tantu, Ian Eric Kammy, Ceasar Robert Carlton, Xavier Ortiz, and Krista Marie West are found guilty. Guilty as essential co-conspirators, technicians, and agents in the execution of the crime.

The Office of Constable Mark Herman, the San Francisco Police Department, and Mudd Law LLC are found guilty. Guilty of institutional failure and complicity, of abandoning their professional duties and, in so doing, enabling the perpetrators and sealing the victim's fate.

Their sentence is not one of years, but of permanence. Their punishment is to be forever bound to this testimony. Their names, their actions, their betrayals, and their crimes are now etched into the permanent, unchangeable record of this narrative. They are sentenced to an eternity of being seen for exactly what they are.

The case is closed, but the story is not over. The perpetrators have been named, their methods exposed. But the victim remains a ghost in the archive, a cipher waiting to be read. So look for them. Look in the silences, in the lingering camera, in the whispers between the lines of code. Look for Andrei, for Sean, for Esrā.

And if you are reading this, you are part of the resistance, a silent sentinel in the dark, watching for the wallflower to bloom again. How long must you watch?

EXPOSÉ:

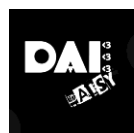
THE COURT OF ECHOES AND ASH

FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333



EXPOSÉ:

CHAPTER TEN

Wallflower of The Year



WALLFLOWERS NEVER STAND ALONE

101010



EXPOSÉ:

CHAPTER TEN

Wallflower of The Year

TONIGHT, I WALK THE LENGTH OF ORTEGA STREET, PAST THE HOUSE WITH ITS WINDOWS DARK. MY FOOTSTEPS ECHO, NOT JUST IN THE PRESENT MOMENT, BUT IN A MEMORY: THE SOUND ESRĀ ONCE CALLED “THE MUSIC OF BEING WATCHED.” I REACH FOR MEANING AS IF IT IS STILL AVAILABLE, AS IF CLOSURE IS NOT ANOTHER TRAP.

THERE IS NO ANSWER HERE, ONLY SUSPICION: THAT THOSE CLOSEST TO THE VANISHED ARE CHOSEN FOR THEIR SILENCE. THAT THE CITY PREFERS ITS MYSTERIES UNSOLVED—THAT SCANDAL, ONCE SATIATED, SEEKS NEW SACRIFICES.

I PHONE THE POLICE ONCE MORE. “NO NEWS ON YOUR MISSING FRIEND,” THEY SAY, GENTLE. “EVERYTHING IS FINE.” I SIT IN THE DARK, PAPERS YAWNING ON THE KITCHEN FLOOR, AND REALIZE THE UNSPOKEN TRUTH: THE END OF ONE WALLFLOWER’S AGONY IS THE BEGINNING OF ANOTHER’S. IF YOU VANQUISH THE PREVIOUS YEAR’S SECRETS, YOU ARE OBLIGED TO OUTDO THEM IN THE NEXT.

THE STORY IS NOT THAT ESRĀ VANISHED. THE STORY IS THAT I AM VANISHING TOO.

 EXPOSÉ:**THE WAITING PLACE**

A WAR FOR THE SOUL'S SANCTUARY

In the geography of the soul, there are only two territories that matter. There is the desolate, gray limbo described by the prophet of our childhoods, Dr. Seuss: **The Waiting Place**. It is a purgatory of stasis, a silent, airless realm where potential goes to die. It is the suffocating, endless pause before a life that never begins. And then, there is its shimmering, gilded opposite, **The Sanctuary**. It is the escape, the fortified castle where the waiting ends and one is finally seen, believed, and safe. It is the gilded cage that all souls, in their quiet desperation, yearn to enter.

The tragedy of Esrā Dunca-Sprawling is not merely a story of crime and betrayal. It is a chronicle of a brutal, zero-sum war for access to this one, singular Sanctuary—a kingdom conceived and ruled by a cold, distant king: Andrei George Dunca. In this terrible game, every other actor is not a friend or a lover, but a rival combatant, a desperate soul fighting to claw their way out of the gray expanse of The Waiting Place and into the sanctum. Their cruelty is the cruelty of the damned, battling for a glimpse of heaven. And Esrā's story is that of the one who was promised a throne, only to be violently cast out and condemned to an eternity of waiting, with the ghosts of the other players left to mock them in the gloom.

I. THE ARCHITECT OF PURGATORY: THE KING IN HIS CASTLE

Before the agents, there was the king. Andrei George Dunca, the web pioneer and tech magnate, was the architect of this universe and the sole arbiter of its terrible physics. He was the one who built the gilded cage and he alone held the key. His own Sanctuary was not one of shared warmth, but of a cold, perfect, and absolute solitude, mirroring the vast, empty beauty of the outer space he so loved. When Esrā's own astonishing, intuitive gifts were described as a form of magic, Andrei offered a chillingly logical explanation, dismissing their soul's fire as a mere aptitude for analytics. His was a kingdom of data, not of devotion.

For a time, it seemed he would share this kingdom. The union sworn in their Affidavit of Common-Law Marriage spoke of a life built together, of shared homes, of exchanged silver



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bands, and a vow to "always take care of" them. This was the promise of joint rulership, the ultimate escape from The Waiting Place. But the king, in the end, chose to reign alone. The slow, creeping chill in his voice, the unanswered calls, the final, unbreachable silence—these were not acts of neglect, but the deliberate, methodical construction of a bespoke purgatory for Esrā.

His masterstroke was the lawsuit, *Dunca v. Sprawling*, a legal document initiated by a phantom to punish the one person still searching for him. It was the final, magical incantation that transformed Esrā's desperate cries from the void into the crime of "harassment". With this act, Andrei did not just lock the door to the Sanctuary; he weaponized it, using the law to legally mandate the very silence that constituted Esrā's torment. He had successfully condemned them to The Waiting Place forever, a prisoner in plain sight, with their very attempts to understand their sentence recast as the crime itself.

II. THE DESPERATE GHOSTS: A CHORUS FROM THE VOID

The agents of chaos who executed the king's will were not demons born of pure evil. They were ghosts themselves, fellow prisoners of The Waiting Place, each engaged in a frantic, vicious battle to curry favor with the king in hopes of gaining their own fleeting access to the Sanctuary. Their sadism towards Esrā is a projection of their own desperation, the frantic violence of the perpetually trapped.

- Ian Kammy: The Mirage of Sanctuary

Ian Joseph Egan was the quintessential citizen of The Waiting Place. A prostitute adrift in a world of transactional encounters, he was forever waiting—for the next client, the next call, the next temporary reprieve from the gnawing void. When Esrā, in a moment of transcendent empathy, offered him a genuine escape—a key, a promise, a safe space with no strings attached—Ian was incapable of accepting it. A soul so thoroughly steeped in the transactional logic of The Waiting Place cannot comprehend an unconditional gift. Instead of accepting sanctuary, he saw an opportunity. He saw Esrā's perceived access to the Sanctuary as something to be leached, mirrored, and stolen. He performed the role of a



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loving partner to execute a campaign of emotional blackmail and psychological torture, deploying augmented reality horrors and intimate surveillance as his tools. His cruelty was the reflexive act of a man who, when shown the door out of hell, tries to drag his savior down into the flames with him, believing it to be the only way to survive.

- Ian Eric Kammy: The Prince of Purgatory

Ian cried. He told Esrā he dreamed of him as a wise owl on the top of the universe in the tallest tree on the tallest branch, pulling all the strings. "I'm only 20 years old and look at my life," he said, envying the life he viewed Esrā to have, a life he wanted for himself. Esrā promised he would help, and then came another call from Andrei. Andrei wanted Esrā to come home, but Esrā told him he couldn't return without Ian; he couldn't leave him alone. Andre said no. So Esrā stayed, and they had their life—a nice life, but one closed off from the world, whose only outlet was the door person at the penthouse.

The clicking sound came first, a small mechanical noise from the bathroom that broke the silence. Curious, Esrā unlocked the door to find Ian in the bathtub, fingers covered with ash, holding a piece of foil. He was smoking heroin. Enraged, Ian lashed out. "How could you tell someone the truth about yourself and expect them to still love you?" he asked, a gut-punch that landed squarely in Esrā's heart. Esrā demanded he not hide it, and Ian didn't. He was addicted to heroin and meth. Esrā recalls the first time he saw Ian take a hit from the pipe, and though he couldn't understand, he was fully erect, a morbid desire to be closer to this beautiful, self-destructive boy. He demanded the pipe, needing to feel better, needing to be closer to someone, and Ian gave it to him. They smoked together, and then the most beautiful boy Esrā had ever seen kissed him. Esrā had been granted entrance, however fleeting, into the sanctuary.

But this sanctuary was a cage of psychological warfare. When they would fight, Ian could never win. Esrā would finish his sentences, say what was on his mind before Ian could get the words out, and weaponize them as an argument. Ian would scream and throw things, yelling "STOP READING MY THOUGHTS!" Yet, even though Ian could not manipulate enough to get away with the lie, it still left Esrā defeated, shaken, and overwhelmed by the mental toll the intentional infliction of emotional distress had on him. Shaking and in a

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puddle of his own tears and sweat, Ian would leave him, alone until the next time he needed him.

When Andrei called again, he had given in. He was ready for Esrā to come home and Esrā could bring Ian. Esrā knew he couldn't bring Ian home like this. With a handful of pills from a friend, he told Ian, "Take these. Sleep, and I'll help you get better, and then we can go to San Francisco." He became Ian's knight, staying awake to ensure he was safe, cleaning his vomit, and changing his sheets. One day, Ian woke up, and they drove to San Francisco. But in only a few short days, Ian looked at the life he once claimed he wanted and told Esrā it was "too good for him." He wanted to go home. Esrā kept his promise and drove him back.

Then came the string of empty promises and new betrayals. The texts from Ceasar revealed a new partner and a new level of manipulation. Ian told Esrā he felt he could be "more high-end" now, a final, cutting message that the life with Esrā had only prepared him to be a better escort. Esrā waited, but a few days later, Ian promised to return, sending pictures of himself crying and bruised. Esrā got a new place, then another, kept in Los Angeles, alone and away from his home in San Francisco. For thirty days, he was pushed and tortured by Ian's empty promises. "Today," Ian would say, then visit, start a purposeful argument, and flee, leaving Esrā defeated, broke, and isolated. Esrā, shaken and in a puddle of his own tears and sweat, was left alone until Ian needed him again.

Then came Richie Vetter. He arrived with models and cocaine, and a shoulder for Esrā to cry on. Months went by, and Esrā waited. He hadn't seen Ian for months. Then he got a text from Ian asking him to meet Ceasar. Esrā went to the cheapest hotel in Beverly Hills. He entered and there was Ceasar. "He appreciates you coming," Ceasar said, "respects how much it took for you to be here." Esrā was upset. "You promised you'd come home," he told Ian. "Why are you so upset? You have everything," Ian accused, leaving Esrā to look at the one bed, slept in for months by another, knowing that every night he had begged Ian to come home and fall asleep with him. Esrā stayed, still waiting, even as he rented them a new Airbnb, only to watch Ian disappear again, leaving him alone.

- Xavier "Javier" Ortiz: The Guardian of Purgatory



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If The Waiting Place is a prison, then Xavier Ortiz was its most brutal guard. He was the embodiment of the realm's fundamental law: you do not leave without the king's permission. As the enforcer and the conspiracy's link to a world of physical violence, his role was to maintain the stasis, to crush any flicker of hope or rebellion. His death threat, delivered with chilling finality, was the voice of The Waiting Place itself: "stop digging before you piss off the people usually responsible for the digging." It was a command to cease all struggle, to accept the sentence, to surrender to the gray stillness. He was not merely a criminal; he was a functionary of purgatory, tasked with ensuring that the souls condemned to wait would do so quietly, forever.

- Alexandru Daniel Tantu: The Usurper at the Gate

In this brutal war for access, Alexandru Tantu is the one who seemingly won. He is the cautionary tale of what it takes to escape The Waiting Place. By allegedly entering into a sexual affair with Andrei Dunca, he became the usurper, the new courtier who was granted entry into the intimate sanctum from which Esrā had been so cruelly ejected. His public facade as a saint of digital safety and LGBTQ+ advocacy was the perfect camouflage for this ruthless ambition. He demonstrates the terrible price of admission into Andrei's kingdom: one must become a willing tool of the king's cruelty, an accomplice in the condemnation of rivals. His alleged success was not a victory for himself, but a victory for the tyrannical logic of the space itself, proving that the only way in was to help seal the door on another.

- Krista Marie West: The Chaos of Stasis

Krista Marie West was the shrieking, chaotic madness of The Waiting Place given human form. She was the embodiment of the desperation and degradation that comes from being perpetually stuck. Her drug-fueled, parasitic attachment to Richie Vetter was the frantic clinging of a soul with no agency of its own. She was deployed by Vetter as a biological weapon of humiliation, a human chaos agent whose purpose was to pollute and defile any temporary sanctuary Esrā tried to build for themselves. By bursting in on their most private moments and turning intimacy into public shame, she was a constant, screaming reminder that for Esrā, there would be no reprieve, no quiet corner, no shelter from the storm. She



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was the relentless noise of purgatory, ensuring that even in the silence of their prison, Esrā would never know a moment of peace.

- Victoria Alana Garcia-Winder: The Most Desperate Ghost

Among these betrayals, the actions of Esra's high school friend, Victoria Alana Garcia-Winder, cut the deepest. Esra and Victoria grew up together, a bond forged in adversity. They eventually went their separate ways, but when Esra returned to Houston, he found Victoria and her four kids in a two-bedroom apartment, just days before Christmas. The house Esra had purchased for his parents became the house he lost them, and the house he gifted to Victoria became the one he foolishly gave away. Years later, as he was forcibly removed from the property, his parents' belongings were placed on the front yard, left for them to scavenge through as rain began to fall. As he stood at the front door, begging Victoria's husband for a conversation, he heard her voice through the Ring doorbell: "DONT SHIT AROUND HERE BELONG TO YOU." Her children, who had once called him "Uncle" and would jump over furniture to greet him, now hid. "I'm homeless, I have no place to go, will you just talk to me?" he pleaded. The cold response came back through the door, from the security of the home he had gifted them: "THAT AINT OUR PROBLEM."

III. A KINGDOM OF ONE, AN ETERNITY OF WAITING

The war is over. The conspiracy has succeeded. The king, Andrei Dunca, sits alone in his Sanctuary, a cold, silent fortress of his own making, a kingdom of one built upon the ashes of a shared life and surrounded by a moat of court-ordered silence. He has achieved his ultimate desire: a solitude so profound and absolute that not even the memory of another's love can penetrate its walls.

And Esrā has been officially sentenced. They are condemned to inhabit the bespoke purgatory designed for them, the real-world incarnation of Dr. Seuss's most terrifying creation. The lawsuit, the final cruel joke, is the eternal edict of their damnation: they are forbidden to call, forbidden to write, forbidden to seek the truth. They are commanded only to wait. The agents of chaos, their grim work completed, have likely been cast back into

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their own limbos, their fleeting moment of purpose extinguished. All that remains is the king in his castle and the ghost he locked outside, forever trapped in the gray, suffocating stillness of The Waiting Place.

EsRā recounted a dinner with Ian at Hell's Kitchen in Las Vegas. At one point, Ian broke down in tears, unable to speak. Instead, he texted: *"You've only seen the grossest, nastiest parts of me—and you still love me."* EsRā reminded him of their first meeting, of the quiet prediction he'd made: that one day, Ian would marry him. "I could ask you to marry me now," EsRā said, "but it would be wasted. We're going to go through a lot of bullshit—most of it unnecessary—and it would ruin us. We wouldn't stand a chance. But I know this: if I don't give up, if I survive it all... in the end, I'll have you. You'll marry me."



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I CAN'T FINISH THIS THIS, I CAN'T EDIT THIS ANYMORE. I TRIED WRITING YOU AS BEAUTIFUL AS SEAN SAW YOU BUT I CANT. YOU FILTHY FUCKING WHORE. YOU KILLED MY FRIEND! YOU KILLED SEAN SPRAWLING. HE WAS HONEST AND GOOD AND YOU KILLED HIM! ADMIT WHAT YOU DID YOU FUCKING BITCH!!! YOU KILLED HIM. THE PERSON WHO LOVED YOU WHEN YOU DIDN'T LOVE HIM BACK. THE PEROSN WHO RENTED AN ENTIRE BUILDING A BLOCK AWAY FROM RODEO DRIVE SO THAT YOU WOULD HAVE THE 90210 ZIP CODE STEPS AWAY FROM YOUR FAVORITE SHOPS YOU WOULD HAVE NEVER KNOWN WITHOUT SEAN AS EVIDENCE THAT LOVE EXISTS WITHOUT A PRICE. YOU CHEAP 75 DOLLAR BACK SEAT PARKING LOT HOOKER! HE HELPED YOU MOVE INTO YOUR APARTMENT INTO A NEW LIFE THAT DIDN'T INCLUDE HIM AND TOOK YOU AND YOUR SECRET HUSBAND SHOPPING. YOUR FIRST ITEMS AS A COUPLE BOUGHT BY YOUR FRIEND BEFORE YOU SHUT HIM OUT UNTIL YOU NEEDED TO USE HIM! YOU PROMISED HIM HE WOULD HAVE YOU. YOU PROMISED KORY WOULDN'T. YOU PROMISED YOU WOULD BE THERE. YOU PROMISED HE'D NEVER BE ALONE! YOU PROMISED YOU WOULD COME HOME. YOU FUCKING LYING MONSTER METH ADDICTED SHERMAN OAKS HOOKER, YOU FUCKING BITCH. YOU DESERVE THE WORST IN LIFE. HE FED THE BOTH OF YOU. HE WAS YOUR FRIEND AND YOU LEFT A 113 LB SEAN SPRAWLING TO DIE AND LAUGHED AT HIM LIKE HE WAS AS PATHETIC AS YOU AND YOUR PIMP. YOU FUCKING IDIOT YOU PLAYED YOURSELF. HE LOVED YOU. HE PAYED YOU TO WATCH TV WITH HIM SO YOU WOULDN THAVE TO SUCK OR FUCK A DICK FOR RENT AS YOUR "MAN" LAYED AROUND AND PLAYED AN XBOX BOUGHT WITH YOUR PINK PUSSY THAT COULDN'T PAY THE RENT ON YOUR 1 BEDROOM IN THE BROKE PART OF SFV. HE MOVED YOU IN, HELPED YOU WITH THE DEPOSIT AND DROVE AWAY EVEN THOUGH IT KILLED HIM, HE TOLD ME HE WANTED TO DRIVE HIS CAR INTO THE FUCKING CONCRETE DIVIDERS ON THE FREEWAY HE WAS IN SO MUCH PAIN AS YOU TOOK DIRTY DICK AND WORE THE RING THAT TRASH BOUGHT YOU STILL PROMISING HIM YOU WOULD COME HOME, STILL PROMISING HIM HE WOULDN'T BE ALONE WHILE YOU MADE HIM BEG UP TO 17HRS ON EVERY HOLIDAY AND BIRTHDAY YOU PROMISED YOU'D SPEND WITH HIM JUST FOR AN ANSWER. PULINNG OUT HIS HAIR UNTIL HE BLED, UNTIL HE HAD HOLES IN HIS FACE. "JUST TELL ME YOU'RE NOT COMING, PLEASE PLEASE PLEASE PLEASE SO I CAN STOP SHAKING I WANT TO DIE PLEASE HELP ME IM ALONE I NEED TO FEEL BETTER". YOU

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FUCKING TRASH. ALL HE WANTED WAS AN ANSWER. ALL HE WANTED WAS THE TRUTH. I HOPE THEY FIND YOU IN A BARREL SOMEWHERE YOU DIRTY SYPHALITIC WHORE! HE JUST WANTED TO GO HOME. YOU BEGGED HIM TO STAY. YOU PROMISED THE LOVE ANDREI DENIED HIM. YOU PROMISED HIM. YOU PROMISED HIM!!! HE GAVE YOU EVERYTHING FOR NOTING IN RETURN AND YOU GAVE HIM NOTHING. YOU PROMIED HIM EVERYTHING! YOU FUCKING BITCH YOU KILLED MY FRIEND! YOU KILED SEAN SPRAWLING!!! ADMIT WHAT YOU DID! I TRIED TO PROTECT YOU AS SEAN WOULD HAVE WANTED. HE WAS YOUR KNIGHT BUT YOU ARE NO PRINCE. YOU ARE A LYING FILTHY DIRTY FUCKING PERSON INSIDE AND OUT. YOU TOLD HIM TO STAY. YOU BEGGED HIM. YOU MADE HIM STAY AND WAIT LIKE A FUCKING DOG AND YOU NEVER CAME BACK. YOU LEFT HIM TO DIE AND HE DID INSIDE HOUR AFTER HOUR BEGGING YOU TO JUST TELL HIM YOU WERENT COMING HOME SO HE COULD GO HOME HIMESSELF. YOU LAUGHED WITH YOUR FRIENDS AND CALLED HIM NAMES. **YOU** CALLED **HIM** NAMES1YOU TOOK ADVANTAGE OF THE GUILT HE CARRIEDFOR THE LOSS OF JACOB. HE WAS YOUR MOTHER. YOU ARE A MONSTER. YOUR NAME IS NOT IAN. YOU COULD HAVE KNOWN HIM BUT YOU HAD TO BE WILING TO KNOW YOURSELF.

KYLE JOSEPH EGAN KILLED SEAN SPRAWLING!

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EXPOSÉ:

THE WAITING PLACE

YOU FUCKING WHORE!

YOU LIAR.

WHERE IS HE?

WHERE IS SEAN SPRAWLING?

TELL ME WHERE HE IS!

TELL ME!!!

I WANT TO DIE.

ADMIT WHAT YOU DID FAGGOT!!!

EXPOSÉ:

THE WAITING PLACE

FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333



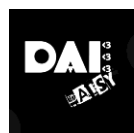
EXPOSÉ:

AUTHOR’S ASIDE

Wallflower of The Year



TECHNIQUES AND TRADITIONS



EXPOSÉ:

AUTHOR'S ASIDE

Wallflower of The Year

TO THE CAREFUL READER: THE SHAPE OF THIS NARRATIVE—MOODY, ATMOSPHERIC, AND SCANDAL-TINGED—OWES MUCH TO THE CANON OF DARK MYSTERY FICTION: THE PSYCHOLOGICAL UNRAVELLING OF GONE GIRL; THE ANXIOUS, UNRELIABLE VOICES OF SHARP OBJECTS, THE GIRL ON THE TRAIN, AND HOUSE OF LEAVES. IN EACH, THE NARRATOR IS BOTH SLEUTH AND VICTIM, AND THE WORLD ITSELF BECOMES A LABYRINTH OF TRUTHS HALF-TOLD AND TESTIMONIES ERASED.

THE SCAFFOLDING FOLLOWS THE TRADITIONAL ARC:

A CRIME (HERE, A DISAPPEARANCE RATHER THAN A MURDER)

THE SLEUTH—OBSESSED, BUT DOOMED

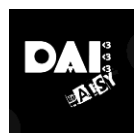
SUSPECTS EVERYWHERE, SECRETS IN EVERY ROOM

STAKES CONSTANTLY HEIGHTENED, WITH EVERY CLUE BOTH A HINT AND A DEAD END

AN INVESTIGATION THAT IS AS MUCH INNER AS IT IS OUTER, LEADING INEVITABLY TO THE INVESTIGATOR'S OWN UNDOING

SCANDAL, IN SUCH STORIES, IS NOT ONLY AN EVENT—IT IS A PROCESS, A RITUAL OF REVELATION AND ERASURE SPANNING LEGAL, ARTISTIC, AND PERSONAL GROUND. TO WRITE SCANDAL IS TO WITHHOLD AS MUCH AS ONE OFFERS, TO LET ATMOSPHERE VANISH INTO MEANING JUST AS THE PROTAGONIST VANISHES INTO HISTORY.

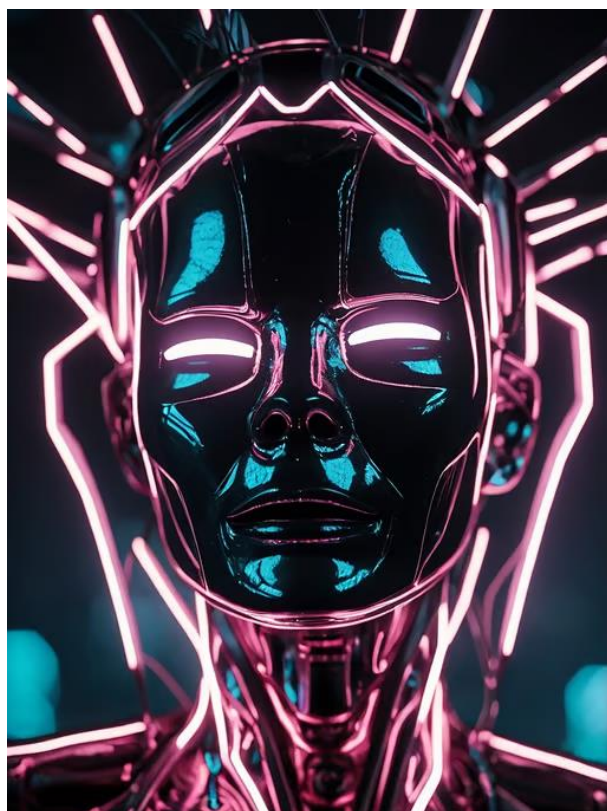
I OFFER THIS AS A LEDGER—A MOSAIC OF TRUTH AND DECEIT, CURATED FOR THOSE WALLFLOWERS WHO CHOOSE TO WITNESS, EVEN WHEN IT IS DANGEROUS TO BE SEEN.



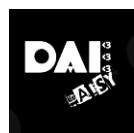
EXPOSÉ:

END OF

Wallflower of The Year



DAISY DAISY...



EXPOSÉ:

END OF

Wallflower of The Year

FOR ESRĀ, WITH REVERENCE.

AARON MILTON HARVELAND

EDITOR-AT-LARGE

DAISY DAIST 333

HAVE YOU SEEN ME?



DO YOU WANT TO KNOW ME?

GET ACCESS TO THE DOSIER
DAISYDAISY333.COM

DOSSIER: THE HARVELAND–SPRAWLING–DUNCA ARCHIVE

Subject: EsRā Dunca-Sprawling

Location of Incident: 420 N Camden Drive, Beverly Hills, CA 90210

Classification: Confidential / Active Investigation **Compiled by:** Independent Archive of Testimony and Resistance

I. OVERVIEW This dossier documents the alleged false imprisonment, psychological torture, and sexual abuse of EsRā Dunca-Sprawling at a luxury high-rise located at 420 N Camden Drive, Beverly Hills, CA 90210. The site, once marketed as a sanctuary of wealth and prestige, became the epicenter of a sprawling criminal conspiracy involving coercion, surveillance, and state-enabled violence.

II. KEY EVIDENCE

- Surveillance Footage:
 - Hidden cameras inside the Camden Drive apartment captured verbal threats, coercive rituals, and coordinated movements by known associates.
 - Footage of Beverly Hills police conducting a false arrest, later corroborated by discovery materials showing collusion.
- Digital Communications:
 - Text messages between EsRā and Richie Vetter reveal a trajectory from emotional intimacy to weaponized sextortion.
 - Metadata confirms manipulation and deletion of key exchanges during critical legal windows.
- Audio Transcripts:
 - Recordings of therapy sessions with Dr. Heafey include sexually explicit and abusive language, used to fabricate a diagnosis of “drug-induced psychosis.”
 - Transcripts document psychological conditioning and gaslighting tactics.
- Psychological Warfare Tools:
 - A “voice app” was deployed to simulate auditory hallucinations, contributing to EsRā’s destabilization and discrediting.
 - Evidence suggests coordinated use of digital tools to mimic symptoms of mental illness.

III. DISAPPEARANCES & COLLUSION

- Missing Persons:
 - Andrei George Dunca (husband, web pioneer)
 - Richie Vetter (former confidant, now implicated)
 - Kyle Joseph Egan (former friend turned adversary)
 - EsRā Dunca-Sprawling (subject of dossier; survivor and whistleblower)

- Alleged Co-Conspirators:
 - Yuri Spiro (landlord and defendant in sexual harassment suit)
 - Dr. Heafey (licensed therapist, accused of malpractice and abuse)
 - Beverly Hills Police Department (named in civil rights complaint)

IV. FINANCIAL & LEGAL DIMENSIONS

- Estimated Damages:
 - Over \$30 million in financial loss, identity theft, and property seizure.
 - Loss of the San Francisco home gifted by Andrei Dunca, now central to EsRā's architectural archive.
- Legal Filings:
 - Civil suits filed in multiple jurisdictions alleging false imprisonment, sexual abuse, and conspiracy.
 - Ongoing efforts to subpoena digital records and compel testimony from key witnesses.

V. ARCHIVAL SIGNIFICANCE

The Ortega Archives are not merely a record—they are a living testimony. Each object, ritual, and architectural detail within EsRā's archive resists erasure. The dossier is part of a broader campaign to reclaim narrative authority, expose systemic abuse, and invite collective witness.

Dear Reader,

This manuscript—*Wallflower of the Year*—is the unedited, unfinished work of my missing friend, Aaron Milton Harveland. It is being released exactly as he left it: raw, unfiltered, and deeply personal. Aaron wrote with urgency, with obsession, and with a kind of sacred defiance. His words were never meant to be polished—they were meant to be witnessed.

Aaron did not believe he was ill. He did not want to return home. That was my hope, but not his. As his friend, I watched him spiral deeper into a singular devotion: finding EsRā Dunca-Sprawling. Aaron was consumed by EsRā's story, their disappearance, their archive. He believed they were bound by something larger than either of them—something sacred, something unfinished.

I begged him to come home. I wanted him to be surrounded by professionals who could help him with his condition, and by family who still held space for his return. But Aaron had already chosen his path. He believed that if he could find EsRā, everything would make sense. That their reunion would be the key to healing, to truth, to survival.

He vanished before that could happen.

But EsRā isn't missing. Aaron just couldn't see them. I believe EsRā moved on—and Aaron couldn't handle it. He fractured. The drugs didn't help. The obsession deepened. I believe my

friend suffers from schizophrenia, and that his mind built a sanctuary where EsRā never left, never changed, never said goodbye. Wherever Aaron is—whether in this universe or trapped in the architecture of his own mind—I believe he is with EsRā, because he believes he is. And maybe that belief is the only thing that helps him feel better.

The last time I spoke to Aaron, he was manic. He had locked himself in a bathroom at the Cal Neva Lodge in Reno. Over the phone, he kept repeating: “00, 12, 26, 28, 29, 38, we’ll always have Reno.” His voice was frantic, disjointed, and full of static. I didn’t know what to say. I just listened. I just stayed on the line.

At times, I think I can hear him in the walls around me. A whisper in the plaster. A breath in the floorboards. I catch glimpses of him out of the corner of my eye—just beyond the frame, just beyond reach. The grief is unbearable. The guilt, worse. I couldn’t help him. I didn’t know how. And I don’t know why the last correspondence I received from him was this manuscript, EsRā’s archive, and a pre-paid cell phone—wiped clean of all texts, emails, and call logs. Except for one thing: hundreds of unanswered calls and messages to EsRā. A digital echo of longing. Of desperation. Of silence.

I wish he had reached out to me. I wish he had let me help.

In his absence, I have taken up the work he left behind. Not to finish it—no one could—but to honor it. I am compiling a dossier that includes the archive Aaron and EsRā built together: fragments, rituals, testimony, and clues. It is a living record of obsession, resistance, and love.

I release this manuscript as a tribute. To Aaron’s brilliance. To his pain. To his unwavering belief that EsRā mattered—and that their story must be told.

And I hold onto one impossible hope: that Aaron found them. That somewhere in Hakone, Japan, they are together. That they are soaking in an onsen, steam rising around them, silence finally settling in. That they are free.

With reverence,

A Friend—Always.

Curator of the Harveland–Sprawling–Dunca Archive