

EXHIBIT B-1

PRIMARY SUSPECTS

I. ANDREI GEORGE DUNCA — Principal financier and technical enabler

Allegations:

Orchestrated coercive property transfers and financial control. Plaintiff alleges Andrei compelled a forced buyout of property at 7711 Mulholland Drive and then deposited \$500,000 into Plaintiff's account without Plaintiff's consent.

- **Instrumental in a coordinated conspiracy to bankrupt and displace the Plaintiff.** Andrei is alleged to have worked with other actors (including Yuri Spiro and Victoria Garcia Winder) to manufacture financial pressure, with threats of bankruptcy used to force transfers and extract control over assets.
- **Active role in obstructing recovery and enabling deprivation.** After the discovery that Yuri had encumbered collateral, Andrei and his assistant purportedly assured the Plaintiff they would recover funds but then failed to act, leaving Plaintiff without resources and later disappearing.
- **Central node linking digital, financial, and physical tactics.** The complaint ties Andrei's technical and financial capacity (and his associates) to a broader pattern of harassment, false narratives, and asset-stripping that culminated in eviction, loss of business, and alleged false imprisonment.

Direct language from the complaint (verbatim excerpts)

- “Plaintiff alleges that Defendant Spiro's actions were part of a multifaceted and coordinated conspiracy with other individuals, including but not limited to Andrei G. Dunca and his assistant Victoria Garcia Winder, specifically designed to defraud, bankrupt, and defame Plaintiff.”
- “Andrei Dunca, without Plaintiff's consent, deposited \$500,000 into Plaintiff's account.”

Specific acts attributed to Andrei (expanded)

1. **Forced buyout and deposit:** Allegedly compelled Plaintiff to sign over Mulholland Drive property and then caused \$500,000 to be deposited into Plaintiff's account—an action Plaintiff claims was done without consent and later used as part of the conspirators' leverage.
2. **Threats of bankruptcy as leverage:** Used threats of bankruptcy to coerce Plaintiff into transfers and to justify demands for large sums (e.g., security deposits, loan payments). These threats are alleged to have been coordinated with Yuri's financial demands.

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3. **Failure to recover funds / disappearance:** After promising to recover the \$385,000 loan and other amounts, Andrei and his assistant allegedly made no genuine recovery efforts and then disappeared, leaving Plaintiff financially exposed.
4. **Coordination with other conspirators:** Alleged communications and coordination with Victoria Garcia Winder (assistant), Yuri Spiro (landlord/borrower), and others to manufacture a narrative and to execute eviction, false arrest, and asset control.
5. **Operational capacity and technical reach:** Documents and expert filings assert that Andrei's background in technology and investments (as alleged in related filings) provided the capability to enable or advise on sophisticated digital and financial operations that could isolate and manipulate the Plaintiff.

How these allegations fit the broader theory of the case

- Andrei is presented as a **principal financier and technical enabler** whose actions (real or alleged) supplied both the funds and the strategic leverage used to destabilize the Plaintiff's finances and living situation.
- The complaint frames Andrei's deposit and subsequent disappearance as **part of a staged sequence**: create apparent liquidity, then use that leverage (and other actors) to extract control over property and to leave the Plaintiff without recourse when the promised recovery fails.
- Andrei's alleged conduct is central to the civil claims (fraud, breach of contract, conspiracy) and to the criminal referral requests (conspiracy, extortion, obstruction, and related offenses).

Key evidence and investigative lines specific to Andrei

- **Bank and escrow records:** trace the \$500,000 deposit, its source, any related wire instructions, and subsequent transfers or withdrawals.
- **Title and deed records:** documentation of the Mulholland Drive transaction, timing, signatures, and any consideration paid.
- **Communications:** emails, texts, call logs between Andrei, Victoria Garcia Winder, Yuri Spiro, and third parties around the time of the buyout, the loan encumbrance, and the eviction.
- **Forensic accounting:** follow the flow of funds tied to the buyout, the \$500,000 deposit, and any payments or transfers that benefited the alleged conspirators.
- **Witness statements:** testimony from Victoria Garcia Winder, escrow/title officers, bank officers, and anyone present during negotiations or transfers.

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- **Device forensics:** if Andrei's devices are available, image and analyze for evidence of coordination (messages, calendar entries, transaction confirmations, or instructions to third parties).

Probable legal theories to pursue against Andrei (if evidence supports)

- **Conspiracy to commit fraud and extortion** — coordination to coerce transfers and extract funds by threat of bankruptcy.
- **Fraud / fraudulent conveyance** — if transfers were procured by misrepresentation or coercion.
- **Aiding and abetting / accessory liability** — for materially assisting other actors (e.g., Yuri) in unlawful eviction, false imprisonment, or concealment of assets.
- **Financial crimes** — money laundering or theft if funds were misapplied or concealed.

Immediate investigative requests tied to Andrei

1. Subpoena bank records for the \$500,000 deposit and related accounts.
2. Preserve and obtain title/escrow documents for 7711 Mulholland Drive and any related property transfers.
3. Forensically image devices and accounts associated with Andrei and Victoria Garcia Winder.
4. Interview escrow officers, bank personnel, and any witnesses to the buyout or deposit.
5. Cross-reference UCC filings and the October 3, 2022 UCC entry (Filing No. 220232028322) to determine timing and linkage to other encumbrances.

EVIDENTIARY FINDING: THE PLAUSIBILITY OF NON-PARTICIPATION BY PETITIONER ANDREI GEORGE DUNCA

(Incorporated into the Andrei section of the Petition — Cause No. 2025-17063)

Source: Incorporated verbatim from the Reporting Party's evidentiary materials submitted with the Amended Motion for Investigation in Cause No. 2025-17063. This finding is presented to document circumstantial indicators that Petitioner Andrei George Dunca may not be actively directing, consenting to, or participating in the litigation filed in his name and to support the investigative steps requested above.

Finding (verbatim and incorporated): The conduct of counsel of record, Joshua Pagan and Mudd Law Offices (MLO), in this litigation is diametrically opposed to the historical patterns and relational dynamics that characterized Petitioner Andrei George Dunca's decade-long

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relationship with Respondent. This stark, implausible contrast serves as compelling circumstantial evidence that Petitioner is either incapacitated, impersonated, or otherwise not directing or consenting to this lawsuit, thereby strengthening the mandate for judicial investigation.

1. **Respondent's Affidavit as Evidence of Petitioner's Character and Non-Participation**

Respondent's Affidavit and Declaration of Common-Law Marriage (Exh. C) provides extensive documentation of Petitioner's character, values, and commitment to Respondent's wellbeing. It details:

- A decade-long relationship marked by emotional support, financial interdependence, and shared property and business ventures.
- Petitioner's consistent affirmation of Respondent's identity, career, and dignity — including support for gender expression, mental health, and creative endeavors.
- Petitioner's history of generosity, including monthly support exceeding **\$35,000**, shared ownership of multiple properties, and joint investments in film and hospitality ventures.
- **\$10,000** in monthly support during a brief separation, during which Petitioner continued to pay the full rent on their shared apartment (**\$5,500/month**) where Respondent remained in residence.
- In addition to covering housing, Petitioner provided Respondent with **\$5,000 per month** for personal expenses, maintained Respondent's access to a Platinum American Express card issued in Respondent's name as an authorized user on Petitioner's account, and preserved Respondent's access to Petitioner's personal checking account, for which Respondent remains—to his knowledge—an authorized signatory.
- Petitioner had previously entrusted Respondent with pre-signed blank checks from this account for use in emergencies, underscoring the depth of fiduciary trust and financial interdependence that characterized their relationship.

While Dunca has a documented history of emotional abuse and use of finances as a means of control, these proceedings do not reflect his known pattern of behavior. Historically, Dunca's control was exercised to maintain comfort within the home, to cope with his emotional unavailability, and to remain involved in every aspect of Respondent's life — including Respondent's professional career. This pattern was evident even during a brief separation, and remained consistent until Dunca's sudden disappearance.

Respondent acknowledges that Dunca's infliction of emotional harm — though deeply painful — was not always overtly malicious. Rather, it appeared to stem from a form of indirect intentionality, consistent with someone who may have been emotionally unavailable not by choice, but by limitation. Dunca's behavior often resembled that of an individual coping with neurodivergence, possibly on the autism spectrum or exhibiting traits consistent with Asperger's

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syndrome. He did not seek therapy or develop relational skills until the later stages of the relationship, and his inability to regulate emotional intimacy often manifested as controlling behavior. Respondent did not endure this pattern of abuse out of passivity or acceptance, but because Dunca, in his own limited ways, made efforts to compensate — often through financial support, logistical involvement, and professional collaboration. These gestures, while sometimes controlling, were also expressions of care within the bounds of what Dunca was emotionally capable of offering.

The relationship was complex, marked by both harm and genuine attempts at repair. This nuanced dynamic is entirely absent from the current litigation, which is characterized by silence, avoidance, and procedural detachment. It is incompatible with Dunca's historical conduct, and strongly suggests that Petitioner would not knowingly authorize litigation that denies Respondent housing, support, or dignity — especially during a period of documented disability and financial crisis.

2. **Contrast Between Petitioner's Historical Conduct and Mudd Law's Litigation**

Tactics The conduct of Mudd Law Offices throughout these proceedings stands in stark contrast to Petitioner Andrei George Dunca's historical behavior. While Dunca's relationship with Respondent was marked by emotional complexity, his actions were consistently rooted in proximity, involvement, and a desire to maintain comfort and stability.

By contrast, MLO's litigation tactics have been marked by:

- Procedural avoidance, including refusal to verify engagement, refusal to confer, and refusal to respond to direct correspondence.
- Strategic obstruction, including the use of a Temporary Restraining Order to suppress Respondent's lawful inquiries and shield MLO from scrutiny.
- Intentional infliction of emotional distress, including filings that mischaracterize Respondent's disability, ignore his fiduciary standing, and exploit his vulnerability.
- Silence and detachment, including the submission of remote affidavits, digital signatures, and filings devoid of any evidence of Petitioner's personal involvement.

These tactics are not only inconsistent with Dunca's historical conduct — they are diametrically opposed to it. Dunca's pattern of control was rooted in presence, not absence; in over-engagement, not procedural detachment. It is therefore implausible that Petitioner is directing or even aware of this litigation.

- ### 3. **Critical Procedural Failure: Non-Revocation of Power of Attorney** Crucially, Petitioner's counsel filed a Motion for Contempt (Exh. M) attempting to hold Respondent liable for contempt based on contact with Victoria Garcia Winder, a tenant at a property over which Respondent holds lawful authority as Attorney-in-Fact pursuant to a valid

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Power of Attorney that explicitly grants him control over Petitioner's real property and tenancy matters (See Exh. M). This POA, which Respondent held since the property's purchase in 2019, has never been revoked by Petitioner Dunca.

It is legally and factually implausible that Petitioner, if engaged and directing the suit, would actively prosecute a Motion for Contempt against the fiduciary agent he lawfully appointed, while simultaneously failing to revoke the foundational legal instrument that created the agent's duty. His failure to revoke the POA, while MLO weaponizes Respondent's lawful fiduciary duty, strongly suggests Petitioner is neither directing nor aware of the legal actions filed on his behalf. The urgency of this Motion for Investigation is therefore underscored by the high likelihood that the Court is currently presiding over a case where the nominal Plaintiff is either missing, incapacitated, or subject to sophisticated technological coercion.

4. **Implausibility of Harassment Claims Given Petitioner's Continued Use of Public**

Number Petitioner Andrei George Dunca's continued use of the phone number **(415) 706-2984**, which remains publicly listed and associated with his name and shared business entities, undermines the plausibility of claims that Respondent's contact constituted harassment. In the original complaint, Petitioner's counsel alleges that Respondent "changed numbers" to make contact — implying that Petitioner sought to avoid communication. Yet Petitioner has not taken the basic step of changing or deactivating his own number, which remains:

- Publicly accessible via online business directories and archived listings (Exhibit XX).
- Associated with Sean Sprawling Productions and Teak Stage Productions (Exhibit YY).
- Unrevoked or reassigned, despite the alleged distress caused by Respondent's outreach.

This contradiction suggests that Petitioner was not genuinely disturbed by contact, or more likely, is not directing this litigation. If Petitioner were actively engaged and seeking to avoid Respondent, he would have taken the simple step of changing his number. His failure to do so supports the inference that he is either missing, incapacitated, impersonated, or unaware of the legal actions filed in his name.

II. YURI RICHARD SPIRO — Local operational actor and property agent

Allegations:

- **Breach of contract and fraudulent encumbrance.** Plaintiff alleges Yuri entered into a secured promissory note for \$385,000 secured by a 1990 Ferrari F40, then created an additional lien and sold or encumbered the collateral in violation of the note.
- **Co-conspirator in a coordinated scheme to bankrupt and dispossess Plaintiff.** Yuri is alleged to have worked with other actors (including Andrei Dunca and Victoria Garcia Winder) to strip Plaintiff of financial security, manufacture grounds for eviction, and facilitate forced removal from commercial and residential premises.
- **Instrumental in unlawful eviction, false imprisonment, and evidence manipulation.** Yuri is alleged to have coordinated or enabled the eviction at 420 N Camden Drive, to have been involved in the seizure or disappearance of Plaintiff's identity and communication documents, and to have propagated a false narrative to law enforcement that discredited the Plaintiff.
- **Possible use of production or media pretext.** Yuri reportedly referenced a “movie involving” the Plaintiff—an unexplained remark that, when combined with surveillance, projected media, and the presence of certain tenants (e.g., Keith Fraser), raises the possibility that surveillance or staged incidents were used to justify eviction or to create material for a production.

Direct excerpts from the complaint (verbatim)

- “Plaintiff alleges that Defendant Spiro's actions were part of a multifaceted and coordinated conspiracy with other individuals, including but not limited to Andrei G. Dunca and his assistant Victoria Garcia Winder, specifically designed to defraud, bankrupt, and defame Plaintiff.”
- “On or about September 10, 2021, Plaintiff (then Rodney S. Sprawling) and Defendant Spiro entered into an Agreement, specifically a secured promissory note for a loan in the amount of \$385,000.”

Specific acts attributed to Yuri (expanded)

1. **Encumbering collateral and failing to repay loans.** Yuri allegedly created a subsequent UCC filing (Oct 3, 2022) encumbering the Ferrari that secured Plaintiff's loan, then failed to repay the \$385,000 loan due Dec 31, 2022, allowing interest to compound at 29.9% and producing a large outstanding balance.

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2. **Demanding coercive lease revisions and extracting funds.** Yuri allegedly demanded a revised lease and an additional \$70,000 security deposit, withheld the original lease until the deposit was paid, and later refused to return the deposit after eviction without providing itemized damages.
3. **Staging or facilitating unlawful eviction and false arrest.** Plaintiff alleges he was forcibly removed from 420 N Camden Drive, arrested under an alias, denied counsel, and prevented from returning to his temporary residence; movers were allegedly staged and belongings immediately packed.
4. **Propagating a false narrative to law enforcement.** Yuri is alleged to have told police and emergency services that Plaintiff was mentally ill and drug-addicted, which Plaintiff claims prevented appropriate assistance and facilitated detention.
5. **Possible involvement in surveillance or production activity.** Yuri's unexplained reference to a film "involving" the Plaintiff, combined with surveillance evidence (vandalism footage, tenant identifications) and the presence of tenants like Keith Fraser, suggests a plausible motive to gather footage or staged incidents to justify eviction or to create media content.

How these allegations fit the broader theory of the case

- Yuri is presented as the **local operational actor** who converted financial disputes into physical dispossession: he allegedly encumbered collateral, withheld lease documents, demanded additional funds, and then used law-enforcement interactions and eviction procedures to remove the Plaintiff from premises and access.
- Yuri's alleged conduct is the nexus between the financial scheme (loans, UCC filings, deposits) and the physical outcomes (eviction, loss of business, homelessness), making him central to both civil and criminal claims.

Key evidence and investigative lines specific to Yuri

- **UCC and lien filings:** obtain the October 3, 2022 UCC filing and any subsequent filings to confirm parties, dates, and secured collateral.
- **Loan and repayment records:** bank wires, invoices, demand letters, and any communications about the \$385,000 and prior \$125,000 loans.
- **Lease and security deposit documentation:** original and revised leases, receipts for the \$70,000 deposit, correspondence demanding the deposit, and any contractor estimates Yuri cited for damages.
- **Beverly Hills PD records:** arrest report(s), booking records (including alias entries), BWC and in-car video for the eviction/arrest date, evidence booking receipts showing items seized (phones, passport, engagement ring).

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- **Surveillance and witness statements:** CCTV from 420 N Camden and surrounding businesses, witness statements from tenants (including Keith Fraser), movers, building manager, and Nicholas Griffin (vandalism victim).
- **Communications:** texts, emails, and messages between Yuri and Andrei, Victoria, counsel, movers, and building staff referencing eviction, production, or surveillance.
- **Chain-of-custody for seized items:** evidence receipts and current location of identity documents and personal property.

Probable legal theories to pursue against Yuri (if evidence supports)

- **Breach of contract** (secured promissory note; lease obligations).
- **Fraud and intentional misrepresentation** (inducing loans and partnership promises with no intent to perform).
- **Conspiracy and aiding/abetting** (coordinating with others to defraud and dispossess).
- **Unlawful eviction, false imprisonment, and deprivation of civil rights** (if eviction and arrest were executed without lawful process or with collusion).
- **Theft or conversion** (bad-faith retention of security deposit and personal property).
- **Obstruction of justice** (if evidence shows deliberate misinformation to law enforcement to conceal wrongdoing).

Immediate investigative requests tied to Yuri

1. **Subpoena UCC filings, loan documents, and bank records** showing encumbrances and any loans Yuri obtained or used as collateral.
2. **Preserve and produce all communications** (email, text, messaging apps) between Yuri and named co-conspirators (Andrei, Victoria, Brittany, counsel) for the period 2021–2025.
3. **Obtain BHPD records and evidence receipts** for case 2022-00050765 and any related incident numbers (arrest, booking, evidence).
4. **Forensically analyze surveillance footage** from 420 N Camden Drive and adjacent properties for patterns of surveillance, staging, or coordination with movers and tenants.
5. **Interview tenants and building staff** (including Keith Fraser) under oath about Yuri's statements, presence, and any production-related activity or filming permissions.
6. **Trace chain of custody** for the engagement ring and identity documents to determine who had access and whether items were intentionally withheld.

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Investigative Report — Manufactured Vandalism Arrest evidence of fraud and collusion

Executive summary

The reporting party alleges a coordinated scheme by the landlord and associated actors to manufacture incidents (vandalism, false complaints, staged confrontations) and to collude with law-enforcement actors to effect a false arrest and an unlawful eviction while the reporting party held a valid three-year lease. The reporting party further alleges a related financial scheme involving a forced buyout of 7711 Mulholland Drive, an unauthorized \$500,000 deposit into the reporting party's account, and subsequent transfers and loans that were not reconciled. The reporting party asserts that these acts produced immediate loss of access to property, seizure or disappearance of identity documents and personal property, and severe financial and emotional harm.

Document excerpt (preserved in the reporting party's materials): "The complainant reported experiencing false imprisonment by individuals who manipulated and controlled their movements and actions."

Document excerpt (preserved in the reporting party's materials): "The complainant was subjected to torture, including sleep deprivation and non-stop interrogation-like questioning until they performed sexual acts."

1. Allegations (concise, itemized for the reader)

- **Manufactured incidents / provocation:** Repeated allegations that vandalism, property damage, and staged confrontations were provoked or misattributed to create grounds for eviction and criminal charges.
- **False arrest and illegal eviction:** Arrest occurred contemporaneously with movers on site and immediate denial of re-entry; reporting party was told by an officer that locks had been changed and that the reporting party had been evicted.
- **Financial coercion and fraud:** Alleged forced buyout of 7711 Mulholland Drive; an unauthorized \$500,000 deposit into the reporting party's account by Andrei Dunca; subsequent loans and transfers (approx. \$385K loan to Yuri Spiro and additional \$150K) that were not returned or explained.
- **Evidence irregularities and misidentification:** Arrest paperwork and discovery show inconsistent name usage, booking data discrepancies, lack of ID checks or warrant presentation, and evidence valuations without supporting invoices.
- **Harassment, stalking, and coordinated intimidation:** Continuous harassment, alleged patrols of exits, intercepted deliveries, audiovisual harassment inside the building, and spotlights or unusual lighting directed at the reporting party's building.

2. Chronology of key events (date-by-date timeline for the reader)

Pre-2022 Background

- Longstanding intimate and financial relationship between the reporting party and Andrei G. Dunca; joint property interests and business ties documented in civil filings and financial exhibits.

11/24/2022 — Vandalism incident (BHPD case 22-50765)

- Report of spray-painted scooter and smashed lights in the alley behind 422 N. Camden Drive; broom recovered and booked as evidence; victim (Nicholas Griffin) reported damage and later provided surveillance footage.

12/10–12/11/2022 — Additional scooter disturbance

- Victim reported scooter on its side and soaked; follow-up investigation noted surveillance and possible tenant identification; no conclusive evidence tying the reporting party to the second incident in the supplement.

01/09/2023 (00:25) — Battery / arrest incident (BHPD case 23-1079)

- Arrest recorded at 400 N. Camden Drive for battery (242 PC); reporting party alleges arrest under an incorrect name, absence of ID verification, and immediate eviction actions at the property.

Post-arrest / eviction day

- Movers present and packing; reporting party carried out in restraints; reporting party later discovered writs of possession and notices indicating landlord had lost possession of the building; reporting party alleges no prior notice of loss of possession.

2022–2025 — Financial and civil disputes

- Alleged forced buyout of Mulholland property; \$500K deposit into reporting party's account; loans and UCC filings (e.g., Filing No. 220232028322) and contested escrow/title records referenced in civil filings.

Ongoing

- Reporting party preserved discovery, police reports, medical notes, communications, and other exhibits alleging collusion, evidence tampering, and third-party interference.

3. Evidence inventory (what exists in the discovery and what the reader should note)

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Primary documents and exhibits

- **Lease and possession records:** Original three-year lease for 420 N. Camden Drive; writs of possession and eviction notices found at the property after the arrest.
- **BHPD case files:** Case reports for 22-50765 (vandalism) and 23-1079 (battery) including narratives, evidence logs (broom, photos), and supplements.
- **Arrest and booking materials:** Arrest report, booking receipts, evidence receipts, and photographs; discovery shows name inconsistencies and booking metadata.
- **Financial records:** Bank statements and wire records showing a \$500,000 deposit and subsequent transfers; UCC filings and escrow/title documents for 7711 Mulholland Drive.
- **Communications:** Texts, emails, and counsel correspondence (motions and retainer disputes) showing contested ESI and redacted/static productions.
- **Medical records:** Clinician notes and lab results documenting panic attacks, weight loss, and negative drug tests.
- **Witness statements:** Building staff, tenants (e.g., Keith Fraser), victims (Nicholas Griffin), and other third parties referenced in supplements.
- **Security footage and media:** CCTV and uploaded video files referenced in BHPD supplements where available.

Physical items noted in evidence logs

- Broom (booked for latent prints), scooter parts, photographs of spray paint and damage, and evidence receipts for seized personal items (phones, laptop, passport reported missing or seized).

4. Witnesses and known third parties (for the reader's reference)

- **Reporting party:** Primary declarant and victim of alleged eviction, seizure, and financial coercion.
- **Andrei George Dunca:** Alleged common-law spouse and central actor in the financial allegations.
- **Yuri Richard Spiro:** Landlord and alleged co-conspirator in eviction and financial coercion.
- **Victoria Garcia Winder:** Assistant to Dunca; alleged intermediary.

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- **Nicholas Griffin:** Victim in the scooter vandalism report and source of surveillance footage.
 - **Keith Fraser:** Former tenant/witness who declined to provide a statement after being approached.
 - **Beverly Hills Police officers:** Officers Ramirez, Krug, Lee and others who authored case reports and supplements.
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5. Surveillance identification clarification and analysis (integrated into the report)

Sequence documented in discovery

- The victim, **Nicholas Griffin**, obtained surveillance footage of the vandalism and showed that footage to the building manager. The building manager told Griffin that the person in the footage was the reporting party. After being told the name, Griffin searched social media, located the reporting party's Instagram account, and then reported recognition based on the online images.

Analytical conclusion

- The discovery shows that the surveillance footage itself did not provide a clear, independently verifiable facial image of the alleged vandal. Griffin's identification depended on being told a name by the building manager and then matching that name to an online image. Because the identification process was initiated by a third-party naming and followed by a social-media lookup, the footage did not supply an unambiguous visual identification of the reporting party. The record therefore lacks documentary proof that the person in the video is the reporting party based on the surveillance footage alone.
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6. Analysis of discovery: discrepancies, anomalies, and indicators the official narrative may be unreliable

- **Identity and booking inconsistencies:** Arrest paperwork and booking entries include alternate names and inconsistent birthdates compared with identification documents in discovery.
- **Timing and coordination of eviction and arrest:** Movers were present and packed the unit immediately after the reporting party was removed in restraints; writs of possession were found at the property after the arrest.

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- **Unsubstantiated damage valuations:** Vandalism damage estimates appear in reports without attached contractor invoices or repair quotes.
- **Chain-of-custody gaps:** Evidence receipts for seized identity items are incomplete or redacted in places; several high-value items are reported missing or unaccounted for in the discovery.
- **Surveillance identification weaknesses:** Identification of the alleged vandal relied on a manager's assertion and a subsequent social-media lookup by the victim rather than on a clear, independent facial match in the footage.
- **Environmental anomalies:** Reports and contemporaneous notes document spotlights and unusual lighting focused on the reporting party's building at times when the street was normally dark.
- **Delivery and access anomalies:** Repeated reports of intercepted deliveries and redirected food orders, with delivery drivers handed off to third parties before approaching the reporting party's door.
- **Civil record ESI irregularities:** Contested civil exhibits were produced as static PDFs and screenshots rather than native files; wet-ink retainer agreements are absent from the record where they would normally be expected.

Collective significance

- Each discrepancy can have an innocent explanation in isolation; collectively, the pattern of identity mismatches, simultaneous eviction activity, missing documentation, non-definitive video identification, environmental anomalies, intercepted deliveries, and non-native ESI forms a coherent set of irregularities that undermines confidence in the official narrative as presented in the discovery.

7. Exhibits and documentary references (ordered for the reader)

8. Conclusion

The discovery contains multiple, documentable anomalies that materially undermine confidence in the official narrative as presented in the arrest and eviction records. The most significant indicators are: identity and booking inconsistencies at arrest; simultaneous eviction activity with movers present; absence of supporting vendor documentation for damage valuations; incomplete chain-of-custody entries for seized identity items; surveillance identification that depended on a manager's naming and a subsequent social-media lookup rather than a clear facial match in the

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footage; environmental anomalies (spotlights and AV projections); intercepted deliveries; and civil-record ESI produced in non-native, redacted formats with missing wet-ink retainer documentation. Taken together, these items provide a coherent basis to treat the discovery as probative of potential criminal conduct (false arrest, illegal eviction, evidence tampering, and financial fraud) rather than as an unassailable official record.

Closing

This report consolidates the reporting party's preserved materials, the police reports in discovery, and the principal discrepancies identified in the record. The exhibits referenced herein are those preserved in the reporting party's packet and are available for independent review. The reporting party's statements and the attached exhibits form the factual foundation of the allegations summarized above.

III. DR. RICHARD AUSTIN HEAFEY — Professional cover and discrediting agent

Allegations:

Weaponizing clinical authority to discredit the Reporting Party. Heafey is alleged to have changed a prior clinical assessment—initially diagnosing PTSD related to external abuse—and later reclassified the Reporting Party’s symptoms as “meth-induced psychosis,” a reversal the Reporting Party alleges lacked clinical justification and served to delegitimize his complaints.

- **Refusal to assist and active withdrawal of support.** After the reversal, Heafey allegedly declined to help document the timeline of abuse or to support the Reporting Party’s efforts to pursue legal remedies.
- **Sexual misconduct and boundary violations.** The Reporting Party alleges sexual misconduct by Heafey that contributed to the pattern of exploitation and enabled other actors to portray the Reporting Party as unstable.
- **Facilitation of a discrediting campaign.** By recategorizing symptoms and withholding corroborating clinical support, Heafey is alleged to have materially aided the broader effort to isolate, discredit, and dispossess the Reporting Party.

Quoted from the attached filings: “Dr. Richard Heafey, who initially diagnosed Respondent with PTSD stemming from external abuse, reversed his diagnosis without cause, reclassifying Respondent’s symptoms as meth-induced psychosis. He then refused to assist in drafting the timeline of Egan’s abuse, despite previously insisting Respondent sue Egan for intentional infliction of emotional distress ‘to set precedent.’”

How these allegations fit the broader theory

- Heafey’s alleged diagnostic reversal and subsequent refusal to cooperate are presented as **instrumental tactics** in a coordinated campaign: medical authority was used to create an official narrative of mental illness or substance abuse, which in turn discouraged law enforcement, medical responders, and third parties from treating the Reporting Party as a credible victim.
- The complaint frames Heafey as a **professional enabler** whose clinical actions (and omissions) reduced the Reporting Party’s ability to obtain legal relief, undermined credibility in court and with police, and thereby amplified the effectiveness of the alleged conspiracy.

Specific acts attributed to Heafey (expanded)

1. **Initial diagnosis of PTSD** tied to external abuse and harassment.

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2. **Subsequent, unexplained diagnostic reversal** to “meth-induced psychosis” without documented new evidence or transparent clinical rationale.
3. **Refusal to provide supporting documentation** or to assist in preparing a clinical timeline that would corroborate the Reporting Party’s allegations against third parties.
4. **Alleged sexual misconduct** and boundary violations that created additional grounds for complaint and may have influenced clinical objectivity.
5. **Possible coordination or communication** with other actors that contributed to the dissemination of a discrediting narrative to law enforcement and third parties.

Key evidence and investigative lines specific to Heafey

- **Clinical records and chart notes:** all intake forms, progress notes, diagnostic assessments, medication records, and any addenda or amendments showing the diagnostic change and the clinical reasoning documented at the time.
- **Appointment logs and scheduling records:** dates/times of visits, cancellations, no-shows, and any contemporaneous communications (texts, emails, portal messages).
- **Billing and insurance claims:** CPT codes, diagnosis codes submitted to insurers, and any prior authorizations or denials that might reflect diagnostic changes.
- **Communications:** emails, texts, or messages between Heafey and other clinicians, law enforcement, counsel, or third parties referencing the Reporting Party’s condition or legal matters.
- **Witness statements:** testimony from clinic staff, other treating clinicians, or administrative personnel who observed interactions or were asked to prepare documentation.
- **Forensic review by independent clinicians:** peer review of the diagnostic process and any abrupt changes in diagnosis to assess whether the reversal met accepted standards of care.
- **Complaints or prior disciplinary history:** any prior complaints to licensing boards, malpractice claims, or professional sanctions involving Heafey.

Probable legal and professional theories to pursue (if evidence supports)

- **Professional misconduct / breach of standard of care** — if the diagnostic reversal lacked clinical basis or documentation, or if Heafey failed to follow accepted diagnostic procedures.
- **Medical negligence or malpractice** — for harm caused by an improper diagnosis or failure to provide appropriate care and documentation.

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- **Sexual misconduct / sexual exploitation** — if allegations of sexual boundary violations are substantiated.
- **Conspiracy, aiding and abetting, or obstruction** — if Heafey knowingly provided false or misleading clinical statements to assist others in concealing crimes or obstructing investigations.
- **Unethical disclosure or improper communication** — if protected health information was shared improperly with third parties to discredit the Reporting Party.

Immediate investigative requests and steps

1. **Subpoena full medical record** from Heafey's practice (all notes, intake forms, test results, correspondence, and billing records) covering the period of treatment.
2. **Preserve and collect communications** (email, SMS, patient portal messages) between Heafey and any named co-conspirators, law enforcement, or counsel.
3. **Obtain appointment and scheduling logs** and any contemporaneous administrative notes that document interactions or requests for letters/reports.
4. **Engage an independent clinical reviewer** (board-certified psychiatrist or psychologist) to evaluate the adequacy of the diagnostic process and whether the reversal met professional standards.
5. **Interview clinic staff and other treating providers** under oath to determine whether pressure, inducement, or improper influence occurred.
6. **Refer to licensing authority** (California Board of Psychology or Medical Board as appropriate) for parallel professional investigation if evidence suggests ethical violations or sexual misconduct.
7. **Preserve forensic evidence** of any alleged sexual misconduct (timelines, witnesses, contemporaneous complaints) and secure any CCTV or access logs for clinic premises if relevant.
8. **Coordinate with civil counsel** to consider protective orders or emergency relief if the Reporting Party remains at risk.

IV. JOSHUA PAGAN

Allegations:

- **Knowingly relied on unauthenticated digital evidence.** Alleged to have submitted or accepted remote affidavits, video notarizations, and digital signatures without adequate identity verification while refusing to produce wet-signature retainer agreements.
- **Facilitated or concealed potential synthetic impersonation.** As lead counsel associated with Mudd Law Offices, accused of failing to exercise elevated technical diligence given the firm’s public expertise in AI and cybersecurity, creating reasonable suspicion that counsel either used fabricated digital artifacts or ignored signs of synthetic media.
- **Obstructed verification and discovery.** Repeated refusal to produce verified retainer documentation, intake records, and client verification materials is alleged to have obstructed the Reporting Party’s ability to test the authenticity of filings and to join necessary co-conspirators in related litigation.
- **Possible participation in a broader scheme.** Counsel’s procedural anomalies are alleged to be part of a coordinated effort to litigate on behalf of a missing or impersonated principal, thereby enabling or concealing a digital kidnapping or identity-theft operation.

Direct language and context from filings

- Counsel is described as having “relied on remote notarizations and unauthenticated digital signatures while refusing to produce wet-signature retainer agreements and fiduciary disclosures.”
- The filings assert that Mudd Law’s specialization in AI and cybersecurity imposes an “insurmountable knowledge bar,” making the failure to verify client authority particularly suspect.

Specific acts attributed to Pagan (expanded)

1. **Use of remote notarizations without robust identity proofing.** Filed or accepted remote affidavits and video notarizations that lack contemporaneous biometric liveness checks or wet signatures.
2. **Refusal to produce wet-signature retainers.** Denied repeated requests for original retainer agreements and verified client signatures, despite multiple demands and the high stakes of the litigation.

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3. **Failure to preserve or disclose intake and verification records.** Withheld intake notes, billing records, and communications that would show how client identity and authority were confirmed.
4. **Aggressive litigation posture while withholding verification.** Continued to prosecute claims and seek relief in court even as the Reporting Party raised credible concerns about digital impersonation and client incapacity.
5. **Potential coordination with other actors.** Alleged communications or strategic choices that, if proven, could indicate active facilitation of fabricated evidence or concealment of a missing client.

How these allegations fit the broader theory

- Pagan is alleged to be the **procedural enabler** whose acceptance and presentation of contested digital evidence allowed the purported conspiracy to gain legal traction. The complaint frames Pagan's conduct as converting technical vulnerabilities (deepfakes, SIM-swap isolation) into procedural advantages—allowing contested filings to be accepted without the heightened verification that the situation required.

Key evidence and investigative lines specific to Pagan

- **Retainer and intake records** — original wet-signature retainer agreements, client verification forms, remote notarization transcripts, and any credential analysis performed.
- **Platform session logs** — raw REN session recordings, IP addresses, device tokens, and timestamps for any remote notarizations or video affidavits submitted by Pagan or his clients.
- **Internal communications** — emails, Slack/Teams messages, billing notes, and intake memos showing how client identity was verified and whether any concerns were raised internally.
- **Billing and time entries** — entries that may reveal who handled client onboarding and whether standard identity-proofing procedures were followed.
- **Correspondence with third parties** — communications with carriers, platform providers, or forensic vendors that might show attempts to authenticate or preserve evidence.
- **Court filings and exhibits** — the original digital files submitted to the court, including file headers, metadata, and any notarization certificates.

Probable legal and professional theories to pursue (if evidence supports)

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- **Professional misconduct and ethics violations** — failure to exercise reasonable diligence in verifying client identity and evidence authenticity, potentially violating rules on candor and competence.
- **Fraud on the court** — if Pagan knowingly presented fabricated evidence or failed to disclose material doubts about authenticity.
- **Aiding and abetting or conspiracy** — if Pagan’s actions materially assisted others in concealing a missing or impersonated client or in advancing a fraudulent scheme.
- **Obstruction of justice or spoliation** — if records were intentionally withheld or destroyed to prevent verification.

Immediate investigative requests and steps

1. **Subpoena wet-signature retainer originals** and all intake documentation for the client(s) Pagan represented in the contested filings.
2. **Preserve and obtain REN platform logs** and raw session recordings for any remote notarizations or video affidavits submitted by Pagan’s office.
3. **Request internal communications and billing records** from Mudd Law Offices showing who handled client onboarding and what identity-proofing steps were taken.
4. **Forensically analyze submitted digital files** (metadata, headers, notarization certificates) to detect signs of manipulation or synthetic media.
5. **Interview Pagan and intake staff under oath** about verification procedures, any red flags observed, and reasons for refusing to produce wet-signature retainers.
6. **Refer to bar authorities** for parallel disciplinary review if forensic and documentary evidence suggests ethical breaches.
7. **Coordinate with digital forensics experts** to correlate contested filing timestamps with reported SIM-swap or service-loss event.

V. KYLE JOSEPH EGAN

Allegations

Petitioner alleges that **Kyle Joseph Egan (DOB: 05/01/2000)** is a central co-conspirator and operational participant in the coordinated campaign to harass, discredit, and financially exploit Petitioner and others. Petitioner further alleges that Mr. Egan has a documented history of fraudulent and abusive conduct toward the Reporting Party—including blackmail, staged reports to police to create false narratives, stalking, intentional infliction of emotional distress, and physical and emotional abuse—and that those prior acts are materially similar to the conduct described elsewhere in this Petition. Petitioner also alleges Mr. Egan was forcibly removed from his residence under circumstances consistent with abduction and possible sex-trafficking, and that recordings and projected media tied to Mr. Egan were used to terrorize and extort the Petitioner.

Known aliases and online handles

Petitioner reports the following screen names, aliases, and account identifiers used by Kyle Joseph Egan across social and messaging platforms: **dacherub; kybootsxx; kyb00ts; kyboots; bbyk69; ddsledge; fagboots; white suede; kaja; Naomi Egan; kiel vex lee; dakerber; kerber1; lovetonomi; champagne cherub; dababycherub**. These aliases are believed to map to multiple social-media, messaging, and content-hosting accounts that posted or streamed projected media, solicited payments, or exchanged threatening communications with the Petitioner.

Summary of misconduct alleged

- **Prior fraud, exploitation, and pattern of abuse.** Mr. Egan is described by Petitioner as an ex/missing friend and a known prostitute who previously committed fraudulent activities against Petitioner for financial gain and as a cruel joke. Alleged acts include blackmail threats, use of police reports to manipulate narratives, stalking, intentional infliction of emotional distress (with the effect of provoking self-harm), a sustained pattern of emotional abuse, episodes of physical violence (including hair-pulling and scratching), false promises of romantic commitment for financial support, and conspiring with his secret fiancé/husband **Kory Lamar Word/Ward**. Petitioner alleges Mr. Egan repeatedly demanded deposits or payments, accepted funds, and then failed to provide promised companionship or support.
- **Specific blackmail incidents.** After a sustained period of emotional abuse Petitioner asked Mr. Egan to return a pair of diamond earrings Petitioner had given him for emergencies. Mr. Egan returned the earrings but then threatened to call police and claim Petitioner had “strong-armed” him and ripped the earrings from his ears, adding: “I know things that are not conducive to your career (as an actor/producer).” On another occasion,

EXHIBIT B-24

after repeated abandonment and emotional abuse, Petitioner threatened to disconnect a phone provided to Mr. Egan; Mr. Egan responded by threatening to call police and allege Petitioner possessed illegal content, referencing pictures and video Mr. Egan had previously sent and asserting (for the first time) that he was underage in those materials—an allegation Mr. Egan had not disclosed when he originally sent the files. Petitioner alleges these threats were used to coerce payments and to silence or intimidate him.

- **Verified abduction report and perpetrator identification.** Mr. Egan’s fiancée, **Kory Lamar Word**, reported that an individual identified as **Xavier Ortiz** intimidated and removed Mr. Egan from their apartment. Before his disappearance Mr. Egan warned the Complainant that certain messages would “prevent me from coming home” and reported losing control of his phone and movements—facts consistent with SIM-swap, device compromise, or coercive control.
- **Harassment incidents involving property and surveillance.** After an incident in which Petitioner was accused of damaging a scooter parked in his lot, the same scooter later appeared repaired in the lot of Petitioner’s business at **420 N. Camden Drive**. Security-camera notification footage captured an individual Petitioner recognized as Kyle Egan riding the scooter toward the camera and saying, **“haha Sean we got you!”** Petitioner also recognized Mr. Egan driving a blue SUV in front of his shop on Camden, accompanied by other vehicles Petitioner identified as the same cars that routinely patrolled the front and back exits to intimidate him when he attempted to leave.
- **AV system harassment and synthetic media manipulation.** From the start of the harassment Petitioner heard Mr. Egan’s voice through the building’s AV system and through the speakers of his phone. Petitioner alleges Mr. Egan’s face and voice were swapped onto models and actors in online pornographic websites—his face placed on performers and his voice substituted for original audio—so that he appeared to be the actor in the content. Building announcements over the PA system told Petitioner that Mr. Egan had posted pictures and video of Petitioner online; when Petitioner called Mr. Egan to confront him, Mr. Egan immediately referenced those posts and said they were not recent, confirming to Petitioner that Mr. Egan had knowledge of the postings before Petitioner mentioned them.
- **Direct intimidation and vehicle signaling.** The night before a harassment episode Mr. Egan visited and left later than usual; Petitioner then observed a black Jeep parked under his window. When Petitioner spoke Mr. Egan’s name aloud the Jeep’s engine repeatedly revved in response; when Petitioner called out “Kyle is that you” the Jeep sped off. Petitioner interprets the engine responses and the Jeep’s presence as coordinated intimidation linked to Mr. Egan and his associates.
- **Pattern of coercion, trafficking concerns, and group involvement.** Petitioner reports that both Kyle and Kory have at times stated Kyle was taken by intimidation and held

EXHIBIT B-25

against his will. When Petitioner contacted Xavier Ortiz after a second disappearance, Ortiz replied, “**stop digging before you piss off the people usually responsible for the digging,**” which Petitioner reasonably perceived as a death threat. Petitioner alleges the same group that assisted in Mr. Egan’s removal is responsible for the harassment, stalking, and false imprisonment Petitioner experienced. Petitioner believes Mr. Egan may not be a willing participant in the group’s crimes and may himself be coerced or trafficked. Petitioner identifies an additional online account believed to be associated with the group: **@arianlavish**.

How these acts fit the broader theory of the case

Petitioner alleges Mr. Egan’s prior fraud, the projected media, the recordings of panic attacks, the blackmail threats, the scooter and vehicle intimidation incidents, the AV-system harassment, and his reported removal are tactical elements of a coordinated scheme: isolate victims, manufacture or exploit intimate and synthetic media, extort funds, and produce false narratives that discredit victims and obstruct legal remedies. Mr. Egan is therefore alleged to be both a direct perpetrator of harassment and a node in the broader conspiracy that enabled dispossession, false arrest, and evidentiary manipulation; alternatively, Mr. Egan may be a coerced participant or a victim of the same criminal network.

Key evidence and investigative lines

- **Account mapping and alias correlation** — obtain account records, profile metadata, and registration details for the listed aliases to link online identities to device identifiers, IP addresses, and payment methods.
- **Police reports and witness statements** documenting Kory Word’s statements and any 911 or follow-up reports concerning Mr. Egan’s removal.
- **Affidavit from Kory Lamar Word** describing the abduction, the “prevent me from coming home” messages, and the loss of phone control.
- **Preserved communications:** text message exports, direct messages, emails, and platform messages showing blackmail, threats, or coordination (including the diamond-earring and illegal-content threats).
- **Security camera footage and notifications** from 420 N. Camden Drive showing the scooter incident, the individual identified as Mr. Egan saying “haha Sean we got you!”, the blue SUV and patrol vehicles, and the black Jeep incident; preserve raw video files with metadata.
- **Forensic imaging** of devices and cloud accounts for Mr. Egan, Kory Word, and numbers/accounts associated with Xavier Ortiz and other suspects.

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- **Carrier records:** call detail records, SMS exports, SIM-change logs, and cell-site/tower data for Mr. Egan's number and related numbers.
- **Platform subpoenas:** raw session logs, deleted content, IP/device identifiers, and payment receipts from social platforms and hosting services for accounts matching the aliases and for **@arianlavish**.
- **Security and AV system logs:** building PA/AV logs, speaker system records, and any server or vendor logs showing audio injections or broadcasts.
- **Forensic review of alleged synthetic media:** metadata and provenance analysis of pornographic and other online content where Mr. Egan's face or voice was allegedly swapped; expert analysis to determine whether content was deepfaked or live-streamed.
- **Financial records:** payment histories, bank transfers, Venmo/PayPal/crypto receipts showing funds exchanged between Petitioner, Mr. Egan, and associated accounts.
- **Medical and therapy records** corroborating Petitioner's panic attacks, weight loss, and other harms; contemporaneous therapy notes describing the Valentine's-Day incident, repeated abandonment, and the physical and emotional abuse alleged above.

Probable legal and criminal theories to pursue (if evidence supports)

- **Human trafficking / kidnapping / unlawful restraint** — for forcible removal and coercion.
- **Extortion / blackmail** — for threats to distribute recordings or to make false criminal allegations unless paid.
- **Harassment / stalking / invasion of privacy** — for repeated unwanted contact, surveillance, and public disclosure of private facts.
- **Fraud / conversion** — for obtaining money or property by false pretenses.
- **Civil conspiracy / aiding and abetting** — for coordinated acts with others to commit the wrongful conduct described.
- **Obstruction / spoliation** — if electronic evidence or communications were altered, deleted, or concealed.
- **Failure to render aid / neglect of medical need** — where officers or others left Petitioner unattended during medical distress.

Immediate investigative requests and steps

1. **Map aliases to accounts** by subpoenaing platform registration data, IP logs, device fingerprints, and payment records for the listed aliases and for **@arianlavish**.

EXHIBIT B-27

2. **Subpoena and preserve** all police reports, 911 calls, and witness statements related to Mr. Egan's removal; obtain a sworn affidavit from Kory Lamar Word.
3. **Forensically image** Mr. Egan's devices and cloud accounts (if available) and any devices identified in connection with Kory Word, Xavier Ortiz, or other suspects.
4. **Preserve and produce** raw security-camera footage and notification logs from 420 N. Camden Drive showing the scooter incident, the blue SUV, the black Jeep, and related patrol vehicles; include audio tracks and metadata.
5. **Issue preservation and subpoena orders** to mobile carriers for Mr. Egan's phone number and for numbers associated with Xavier Ortiz and known associates (call detail records, SMS, SIM-change logs, IP session logs).
6. **Subpoena social-media platforms and hosting services** for raw session logs, deleted content, IP/device identifiers, and payment receipts tied to the aliases and to **@arianlavish**.
7. **Obtain AV system and building vendor logs** to determine whether the PA/speaker broadcasts were injected or originated from internal systems.
8. **Forensically analyze alleged synthetic media** and coordinate with digital-forensics experts to determine provenance, manipulation, and whether face/voice swaps were used.
9. **Trace financial flows** for payments from Petitioner to Mr. Egan and any transfers from Mr. Egan to third parties; subpoena payment-app and bank records as needed.
10. **Coordinate immediate criminal investigative follow-up** with the appropriate law-enforcement unit (human-trafficking task force or equivalent) and request expedited review of the abduction, trafficking, and coordinated harassment allegations.
11. **Seek protective and preservation orders** to prevent spoliation of electronic evidence and to prohibit further contact or intimidation of witnesses (including Kory Word).

Requested action

Petitioner requests that **Kyle Joseph Egan** be designated a **primary suspect** in the Criminal Complaint and Multi-Agency Referral where appropriate, that the court order the immediate investigative steps above, and that all responsive records, devices, and media be preserved and produced without delay. Petitioner further requests the court direct coordination with criminal investigators to determine whether Mr. Egan is a victim of trafficking or a participant in the alleged conspiracy and to take appropriate protective measures for witnesses and potential victims.

EXHIBIT B-28

SUPPORTING SUSPECTS

(LAW-ENFORCEMENT IDENTIFIERS AND ALLEGATIONS)

I. OFFICER J. LYGA

Allegations

Petitioner alleges that **Officer J. Lyga** is a material actor in the coordinated scheme to displace, discredit, and dispossess Petitioner. **Dr. Richard Heafey has identified Officer J. Lyga as a personal friend.** Petitioner further alleges that Lyga was present during the January 2, 2023 response to **420 N. Camden Drive**, that individuals dressed in Beverly Hills Police Department uniform declined to remove or arrest an identified stalking suspect despite Petitioner's repeated requests, and that the conduct of the responding officers produced evidentiary irregularities and materially prejudiced Petitioner's safety and property rights.

Summary of misconduct alleged

On or about **January 2, 2023**, individuals dressed in **Beverly Hills Police Department** uniform and driving marked BHPD squad cars approached the rear of Petitioner's commercial premises at **420 N. Camden Drive** (the former "Solon," being converted by Petitioner into "Gion Beverly Hills"). Petitioner was in the rear of the premises when he observed uniformed individuals entering from the parking lot and heard an officer say, "OKAY WHAT'S LEFT IN OUR LITTLE GAME." Officers called out, "Mr. Sprawling are you here, the door was open we wanted to see if you were okay." A male individual whom Petitioner recognized as one of the suspects — not an officer — spoke from the side of the glass doors and told the uniformed individuals that Petitioner was watching "Kyle porn." Petitioner observed green laser points down the hall and directly saw a remote-controlled drone on the other side of the glass door that rammed the door; he did not see officers at the door, only heard pounding on the walls and the door (the pounding is audible on the premises' security camera footage). Petitioner locked the door, took cover, and repeatedly informed the uniformed individuals that the male was stalking and harassing him and requested that the officers remove or arrest that individual; the officers refused.

During the incident Petitioner informed the responding uniformed individuals that he was experiencing a severe panic attack and requested medical assistance; no emergency medical services or fire personnel were called, and the officers did not render aid. Petitioner was instructed to exit with nothing in his hands; fearing for his life, he refused, retreated to another room, experienced escalating panic, took his prescribed Xanax, and lost consciousness. When Petitioner awoke, the uniformed individuals had departed, all doors were unlocked, and the interior had been rearranged to create a clear path to Petitioner. Petitioner alleges the officers left him asleep and unattended despite his reported medical distress and despite his reporting the presence of a stalking suspect. Subsequent security camera footage captured uniformed individuals interacting with persons who appeared to be actors and an individual loading what appeared to be video equipment. Petitioner later provided BHPD with a photograph of the officer

EXHIBIT B-30

Dr. Heafey had identified; BHPD confirmed the individual was a BHPD officer, though it remains unclear whether that officer was acting in an official capacity during the January 2, 2023 interaction.

How these acts fit the broader theory of the case

Petitioner alleges Lyga's presence and the responding officers' refusal to remove an identified stalking suspect, together with the failure to provide or summon medical aid and the departure leaving the premises unsecured, were not isolated errors but part of a pattern of coordinated conduct that (a) enabled false imprisonment and harassment, (b) facilitated the removal and dispossession of Petitioner's property and business, (c) produced irregularities in evidence handling and scene control, and (d) contributed to a broader campaign to discredit and isolate Petitioner. The personal relationship between Dr. Heafey and Officer J. Lyga is alleged to have potential relevance to witness bias and investigatory integrity.

Key evidence and investigative lines

- **Security footage** from 420 N. Camden Drive showing uniformed individuals, audible pounding on the audio track, and persons loading equipment.
- **Witness statements** and contemporaneous narrative from Petitioner describing the drone, laser points, the male suspect's statements, the officers' refusal to remove the suspect, and Petitioner's reported panic attack and lack of medical response.
- **BHPD correspondence** confirming the identity of the officer photographed by Petitioner.
- **Dispatch and incident logs**, squad-car GPS records, and body-worn/in-car camera recordings for the January 2, 2023 response.
- **Chain-of-custody and evidence receipts** for any items removed or logged at the scene.
- **Communications** between Dr. Heafey and any responding officers or detectives that reference the incident or Petitioner's condition.
- **Forensic review** of the security footage metadata and any drone footage or device images.

Probable legal and professional theories to pursue (if evidence supports)

- **False imprisonment and harassment** — for failure to remove a reported stalking suspect and for conduct that effectively restrained Petitioner.
- **Official misconduct / abuse of authority** — for officers' refusal to act on a reported crime and for any collusion with non-officer actors.

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- **Failure to render aid / neglect of medical need** — for not summoning EMS or providing assistance when Petitioner reported a panic attack and lost consciousness.
- **Obstruction of justice / evidence tampering** — if scene staging, rearrangement, or improper handling of equipment or seized items is substantiated.
- **Conspiracy / aiding and abetting** — if Lyga’s actions materially assisted other actors in dispossessing Petitioner or concealing evidence.
- **Professional discipline** — referral to internal affairs and relevant oversight bodies for potential policy violations and conflicts of interest.

Immediate investigative requests and steps

1. **Preserve and produce** all BHPD and responding-agency records for the January 2, 2023 response to 420 N. Camden Drive, including incident/dispatch logs, officer names and badge numbers, squad-car GPS logs, body-worn camera and in-car video, drone reports, evidence receipts, and chain-of-custody documentation.
2. **Forensically image and preserve** the security camera footage from 420 N. Camden Drive for the relevant time period and produce raw video files with metadata and stills.
3. **Interview under oath** Officer J. Lyga and all officers present at the scene regarding the decision not to remove the reported suspect, the identity and role of any non-officer individuals present, the handling of any equipment or seized items, and the decision not to summon or render medical aid.
4. **Obtain and preserve** any communications between Dr. Heafey and Officer J. Lyga that reference the incident, the Reporting Party, or contemporaneous clinical or investigatory assessments.
5. **Assess conflicts of interest and bias** arising from the personal relationship between Dr. Heafey and Officer J. Lyga and evaluate whether that relationship affected reporting, evidence handling, or clinical documentation.
6. **Coordinate forensic review** of all video and audio evidence to determine whether the scene was staged, whether equipment was lawfully handled, whether any audio or visual material was altered, and whether the lack of medical response violated applicable policies.

Requested action

Petitioner requests that Officer J. Lyga be named as a primary suspect in the Criminal Complaint and Multi-Agency Referral, that the investigative steps above be ordered immediately, and that all responsive records and evidence be preserved and produced without delay.

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II. SERGEANT DAVID MATHIEU — Harris County Constable Precinct 4

Identifier: DavidMathieu@cd4.hctx.net; phone recorded **346-209-0656**.

Allegation and summary of conduct and evidentiary record: Assigned investigator who requested and received the full complaint and exhibits but, according to the Reporting Party, failed to open, review, or act on the materials; no follow-up or status updates were provided after receipt. This alleged inaction directly contradicts the precinct's later representation that the complaint was "reviewed in its entirety" and is cited in preservation and supervisory letters as the basis to reopen IA Complaint #**25120107**. The attached court filing documents a broader pattern of Precinct 4 conduct that the Reporting Party contends produced material omissions and procedural deficiencies affecting related civil matters. "Deputy C. Diaz, on December 15, 2024, initiated this chain of suppression by refusing to conduct a standard missing person intake."

III. DEPUTY C. DIAZ — Harris County Constable Precinct 4

Identifier: Badge/entry associated with **Case No. 20244069284** (missing person intake, 12/15/2024).

Allegation and summary of conduct and evidentiary record: Refused to take a missing person report for **Andrei George Dunca** despite documentary proof of standing and evidence of prolonged non-contact; allegedly dismissed offered documentation, relied on unverified third-party statements (identified by the Reporting Party as Victoria Alana Garcia-Winder), and omitted standard intake elements (identifiers, last-seen information, welfare-check attempts). The Reporting Party links this refusal to later procedural consequences in civil litigation, asserting the absence of a formal missing-person record was used to contest the Petitioner’s status. The attached filing states that the December 15, 2024 intake was the initiating event in a chain of suppression that impeded access to police protection and criminal remedies. “Deputy C. Diaz, on December 15, 2024, initiated this chain of suppression by refusing to conduct a standard missing person intake.”

IV. SGT. JOSEPH SIRAGUSA (#741) — San Francisco Police Department, Taraval Station

Identifier: Identified in court filings as the SFPD officer who conducted a video conference with Andrei Dunca on 9/5/2024; SFPD Case No. 240555714.

Allegation and summary of conduct and evidentiary record: Conducted a remote video interaction with Mr. Dunca on **September 5, 2024**, after which SFPD closed the missing person case with a disposition of “Unfounded.” The Reporting Party alleges the closure relied solely on that single remote interaction without in-person verification, identity authentication, or chain-of-custody documentation, and that the administrative closure was later cited by opposing parties to assert the subject was not missing. The attached record documents the video interaction as the basis for case closure and identifies the SFPD disposition relied upon by adversaries in subsequent proceedings. “On September 5, 2024, Mr. Dunca participated in a video call with an SFPD Officer (Sgt. Joseph Siragusa #741) to confirm that Mr. Dunca is not missing.”

Quoted from the movant’s court filing: “On September 5, 2024, Mr. Dunca participated in a video call with an SFPD Officer (Sgt. Joseph Siragusa #741) to confirm that Mr. Dunca is not missing.”

V. DETECTIVE GOFF — Beverly Hills Police Department

Identifier: Present with two additional officers during the Reporting Party’s arrest and present again when the Reporting Party retrieved property booked as evidence.

EXHIBIT B-34

Allegation and summary of conduct and evidentiary record: Present during arrest and custodial interactions in which the Reporting Party alleges interrogation without counsel, denial of requests to view the warrant, delayed transfer to Airport Jail, an overnight bail increase from **\$20,000 to \$100,000**, and denial of phone or attorney access. These custodial facts are asserted to support claims of kidnapping, false imprisonment, and improper external influence; exhibits attached to the court filing document the booking and later property retrieval where Detective Goff was present. The broader complaint ties these custodial allegations to the same pattern of official conduct the Reporting Party contends was used to suppress evidence and intimidate him in related civil matters.

VI. SUPPLEMENTAL PRECINCT 4 INCIDENTS (from attached filing) — Deputies Ruiz, Jones and Perry.

Identifiers and key factual findings: Deputy Ramon Ruiz (Badge 104) executed the Writ of Possession on **June 24, 2025** for 13339 Balmore Circle after a “FINAL notice” was posted on **May 22, 2025**; the execution occurred **33 days** after the posted notice, which the movant alleges rendered the 24-hour warning stale and the dispossession procedurally defective. Deputy D. Jones (Case No. 2507-00573) is identified as the responding deputy on **July 5, 2025** who handcuffed the Reporting Party, refused to permit administration of prescribed medication during an acute panic attack, and allegedly engaged in criminal intimidation while EMTs awaited transport. The attached filing documents the writ chronology and the medical record corroborating the panic attack and elevated vitals. “The execution occurred 33 days after the required 24-hour warning notice was posted.”

Quoted from the Precinct 4 response: “Upon receipt of your complaint on Deputy Ruiz, it was entered into the department Complaint Tracking System (#25120107) ... The complaint has been closed with a disposition of ‘Unfounded’.”

Key factual problems and procedural concerns

- **Failure to follow missing-person intake protocol.** The movant alleges Deputy Diaz declined to perform the standard intake despite evidence meeting the department’s missing-person criteria; that refusal created an administrative gap that the movant contends was later used to undermine missing-person inquiries in court.
- **Investigator non-response and internal review contradiction.** Sergeant Mathieu’s documented request for the full complaint followed by an apparent failure to open or act on the materials contradicts the Precinct’s later statement that the complaint was “reviewed in its entirety.” That contradiction is central to the movant’s request to reopen IA Complaint #25120107.

EXHIBIT B-35

- **Reliance on a single video conference to close a missing-person report.** The movant’s filings show SFPD relied on a video call with Sgt. Siragusa to determine the subject was not missing and to close the SFPD case. The movant argues that closing a missing-person inquiry based solely on a single video conference — without corroborating in-person checks, independent verification of identity, or documentation of chain-of-custody for the contact — is procedurally weak and vulnerable to manipulation.
-

Applicable policy and protocol (relevance and citation)

- **SFPD missing-person policy** requires proper intake, documentation, and that missing-person investigations be handled with procedures that presume risk until facts indicate otherwise. Reliance on remote verification without corroboration is inconsistent with best practices for missing-person investigations. See SFPD General Order **DGO 6.10 “Missing Persons”** for policy on intake, continuous searches, and when a person may be considered missing. [San Francisco Police Department](#)
-

Recommended evidentiary and procedural steps (what the movant is requesting / what an investigator should do)

1. **Reopen IA Complaint #25120107** and require a verified chain-of-custody showing who received, opened, and reviewed the movant’s submitted materials (Mathieu’s inbox activity and audit logs).
 2. **Produce and preserve all ESI:** BWC footage, CAD logs, dispatch audio, MDT messages, internal emails, and any records of the harassment warning delivery and who requested it. (Movant has already served formal preservation notices.)
 3. **For the SFPD video call:** obtain the original video file, session metadata, and any logs from the Taraval Station; require forensic review of the video and authentication of the participant’s identity before treating the call as dispositive.
 4. **Reassess the missing-person intake refusal** by Deputy Diaz against departmental missing-person intake standards and require a written, verified explanation for the refusal that addresses the specific documents and evidence the movant presented.
 5. **If counsel or private parties coordinated with Precinct 4 personnel,** require verified disclosures of communications between Precinct 4 and Mudd Law / AMDRE LLC and consider referral for independent external review (e.g., county inspector general or state public integrity unit).
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EXHIBIT B-36

Closing note on evidentiary weight and judicial context

The movant's filings place these events directly into the 334th District Court record and assert that the internal IA finding (closed as "**Unfounded**") is contradicted by the movant's evidence and by the documented conduct of the assigned investigator. The movant's position is that **administrative closure without transparent review of the submitted exhibits, investigator activity logs, and corroborating evidence is procedurally insufficient** and should be revisited by an independent reviewer.

REQUESTED ADMINISTRATIVE ACTIONS (as reflected in the attached filing)

Reopen IA Complaint #25120107; administratively review **Case No. 20244069284** and **SFPD Case No. 240555714**; compel preservation and production of all BWC footage, CAD logs, dispatch audio, internal communications, writ documentation, and 24-hour notice posting records; order an independent external investigation (e.g., Texas Rangers Public Integrity Unit); and set an expedited sanctions hearing under Tex. R. Civ. P. 13. The attached motion expressly seeks immediate preservation of BWC footage and internal communications to prevent spoliation and to substantiate claims of collusion, retaliation, and abuse of process. "Movant demands immediate preservation of all relevant evidence, including body-worn camera (BWC) footage and internal communications, a comprehensive independent external investigation, and the imposition of sanctions."

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ADDITIONAL SUBJECTS FOR INVESTIGATION

Individuals and entities alleged to have materially assisted, facilitated, or otherwise participated in the enterprise or in concealing its effects. These parties warrant forensic and disciplinary review.

I. MUDD LAW OFFICES

Executive summary

The reporting party alleges that **Mudd Law Offices (MLO)** and specific attorneys associated with the firm (including Joshua Pagan and Charles Mudd) participated in, facilitated, or knowingly concealed criminal conduct connected to the multijurisdictional scheme described elsewhere in this petition. The allegations assert that MLO's specialized technical expertise and litigation conduct were used to (a) obscure digital evidence of criminality, (b) prosecute litigation without verified client authority, and (c) obstruct or frustrate discovery of volatile digital and financial records. These allegations are presented for grand-jury review and criminal investigation alongside the other subjects named in this petition.

Quoted material from the reporting party's filings: "This motion is based on credible concerns regarding their potential involvement in criminal acts directed against Respondent, including but not limited to cyber intrusion, false imprisonment, defamation, and intentional infliction of emotional and economic harm." — *Amended Motion for Investigation into Joshua Pagan, Charles Mudd, Mudd Law Offices.*

Quoted material from the investigative assessment: "It is highly probable that MLO either knew or should have known that the user was a victim of a sophisticated digital crime, such as digital kidnapping." — *Investigative Assessment of Professional Liability: Mudd Law Offices.*

1. Core allegations concerning Mudd Law Offices (concise)

- **Failure to verify client authority:** Counsel filed and prosecuted litigation while refusing to produce wet-ink retainer agreements or other contemporaneous proof of client authorization, despite repeated demands and the unusual circumstances surrounding the nominal plaintiff's availability.
- **Use of specialized knowledge to obstruct fact-finding:** As a firm that advertises expertise in AI, cybersecurity, identity theft, and digital evidence, MLO allegedly used procedural and technical defenses (remote notarizations, non-native ESI production, anonymity motions) to prevent forensic review of contested digital materials.
- **Concealment or facilitation of digital impersonation:** MLO's conduct is alleged to have enabled or failed to challenge evidence that may have been produced or authenticated through compromised accounts, synthetic media, or other manipulated digital artifacts.
- **Abuse of process and malicious litigation tactics:** Counsel's filings and public statements are alleged to have amplified defamatory narratives (e.g., claims of substance-induced psychosis) without evidentiary support, causing additional emotional and economic harm to the reporting party.

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- **Possible participation in a broader criminal enterprise:** The pattern of non-production, timing of filings during reported windows of digital isolation, and the firm's technical competence create a factual basis to investigate whether counsel knowingly assisted in concealing criminal acts.
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2. Factual bases and probative indicators (what the grand jury should note)

- **Documented refusal to produce wet-ink retainers:** Repeated requests for verified retainer agreements and client verification were unanswered or refused, despite multiple attorneys and firms appearing in the case record.
 - **Temporal correlation between contested filings and reported digital isolation:** The reporting party preserved logs and notes showing loss of mobile service and account lockouts coincident with remote filings and remote notarizations submitted by counsel.
 - **Non-native ESI and authentication gaps:** Key civil filings and evidentiary exhibits were produced as static screenshots or PDFs rather than native files with metadata; remote electronic notarization certificates are present without supporting session logs.
 - **Discrepancies in client participation:** The reporting party's Power of Attorney remained unrevoked while counsel pursued contempt and eviction relief inconsistent with the nominal client's historical conduct and documented absence.
 - **Specialized firm profile:** MLO's public practice areas and CLE instruction in AI/cybersecurity create an evidentiary inference that the firm possessed the technical competence to recognize signs of account takeover, deepfakes, or other synthetic evidence.
 - **Harmful litigation narrative:** Counsel's pleadings and correspondence repeatedly advanced claims of cognitive impairment and substance misuse that the reporting party disputes and for which contemporaneous medical records (negative drug tests, clinician notes) exist.
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3. Specific alleged offenses and legal theories to be considered

- **Conspiracy to obstruct justice** — coordination to conceal or destroy evidence, or to use litigation process to impede investigation.
- **Accessory or aiding and abetting** — providing legal services or procedural cover with knowledge that those services would facilitate criminal concealment.
- **Fraud on the court / filing false instruments** — submitting filings or notarizations without proper client authority or with fabricated supporting evidence.

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- **Evidence tampering / spoliation** — failure to preserve or deliberate alteration of digital evidence, or submission of unauthenticated digital exhibits.
 - **Professional misconduct that rises to criminality** — where attorney conduct crosses from ethical breach into criminal deception, forgery, or conspiracy.
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4. Key documentary and testimonial items in the reporting party's possession (probative exhibits)

- **Amended Motion for Investigation into Joshua Pagan, Charles Mudd, Mudd Law Offices** (full text and exhibits).
 - **Investigative assessment of Mudd Law Offices' technical competence** (expert analysis summarizing the firm's advertised capabilities and the resulting elevated duty).
 - **Communications log** — texts, emails, and carrier-related notes showing service loss and account lockouts.
 - **Court filings and remote notarization certificates** — copies of contested affidavits, REN certificates, and the produced PDF/screenshot exhibits.
 - **Power of Attorney and property records** — unrevoked POA documents and title/escrow records for disputed properties.
 - **Medical and lab records** — clinician notes and negative drug test results that contradict litigation narratives.
 - **Evidence of timing and movers** — contemporaneous notes, witness statements, and photographs documenting movers present at eviction and the seizure of identity items.
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5. Witnesses and custodians identified by the reporting party

- **Reporting party (declarant):** preserved contemporaneous records and declarations.
- **Counsel of record at Mudd Law Offices:** Joshua Pagan; Charles Mudd; other listed attorneys (for testimony and production of internal files).
- **Designated local counsel and opposing counsel:** for testimony about intake, retainer processes, and communications.
- **Clerical and notary personnel or REN platform operators:** to produce session logs and authentication records for remote notarizations.
- **Carrier and platform custodians:** mobile carriers, REN providers, and platform administrators who can produce CDRs, SIM-change logs, and session tokens.

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- **Third-party witnesses:** movers, building staff, Keith Fraser, Nicholas Griffin (vandalism victim), and any employees who handled security footage or deliveries.
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6. Probative questions for grand-jury consideration (framed as factual issues)

- **Was a valid, wet-ink retainer or other contemporaneous client authorization ever executed and retained by MLO for the nominal plaintiff?**
 - **Did MLO possess, review, or receive documentation indicating account compromise, SIM swap activity, or synthetic media prior to or during the litigation?**
 - **Were remote notarization session logs, REN platform recordings, and native exhibit files requested and withheld by counsel?**
 - **Did counsel knowingly submit or rely upon unauthenticated digital evidence or representations of identity?**
 - **Is there evidence that counsel coordinated with third parties to time filings during windows when the reporting party's communications were compromised?**
 - **Do billing records, intake notes, or internal communications reflect awareness of the reporting party's claims of digital coercion and a decision to proceed regardless?**
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7. Exhibits quoted from reporting party filings (verbatim)

- “This motion is based on credible concerns regarding their potential involvement in criminal acts directed against Respondent, including but not limited to cyber intrusion, false imprisonment, defamation, and intentional infliction of emotional and economic harm.” — *Amended Motion for Investigation into Joshua Pagan, Charles Mudd, Mudd Law Offices*.
 - “It is highly probable that MLO either knew or should have known that the user was a victim of a sophisticated digital crime, such as digital kidnapping.” — *Investigative Assessment of Professional Liability: Mudd Law Offices*.
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8. Closing statement for the grand jury petition section

The reporting party presents the foregoing as a discrete, document-based set of allegations and probative indicators concerning Mudd Law Offices and specific counsel. The materials preserved by the reporting party — filings, communications, medical records, and expert assessment of MLO's technical competence — form the factual foundation for grand-jury review of whether counsel's conduct crossed the threshold from zealous advocacy into criminal facilitation,

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obstruction, or conspiracy. The reporting party requests that these allegations be added to the petition's scope for criminal grand-jury consideration and that the grand jury evaluate the documentary and testimonial evidence identified above.

II. VICTORIA ALANA GARCIA WINDER

Executive summary

Victoria Alana Garcia Winder is identified in the reporting party's record as the assistant and primary point of contact for **Andrei G. Dunca** during the period when contested filings, financial transfers, and the eviction/arrest sequence occurred. The reporting party alleges that Winder withheld critical information, refused to verify Andrei's whereabouts or authority, and controlled communications and transactional threads in ways that materially affected the reporting party's ability to verify client authorization, trace funds, and recover property. The following section consolidates all factual assertions, documentary references, and probative issues the grand jury should consider.

Quoted from the reporting party's preserved materials: "Victoria Garcia Winder, who claims to still work as his assistant, was the last person to see Andrei but refuses to cooperate and give any details to help locate Andrei."

Quoted from the reporting party's preserved materials: "Victoria made herself the only point of contact for him."

Allegations against Victoria Winder (concise)

- **Gatekeeper of communications:** Winder is alleged to have acted as the exclusive intermediary for Andrei, receiving and routing messages, and representing that she was handling his affairs while refusing to produce proof of authority or contemporaneous verification.
- **Refusal to cooperate with inquiries:** Winder allegedly declined repeated requests to confirm Andrei's location, status, or participation in litigation and declined to produce documents that would verify his consent to filings.
- **Custodial control of transactional records:** Winder is alleged to have had access to escrow/title communications, retainer or intake materials, and administrative records that are central to tracing the \$500,000 deposit, the \$385,000 loan, and other transfers.
- **Temporal correlation with contested actions:** The reporting party preserved logs showing account lockouts and service loss coincident with remote filings and notarizations; Winder's role as assistant places her in a position to receive or route communications during those windows.

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- **Potential facilitation of concealment:** By withholding records and representing Andrei as unavailable or relocated, Winder is alleged to have impeded verification of client authority and may have contributed to spoliation or concealment of evidence.
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Factual basis and documentary indicators

Last known contact and point of contact

- The reporting party's police supplements and petition repeatedly identify Winder as the last person to see Andrei and as the person who "made herself the only point of contact." These contemporaneous statements place Winder at the center of the information chain when Andrei became unreachable.

Communications and timing

- The reporting party preserved texts, emails, and call logs showing repeated attempts to reach Andrei that were routed through or answered by Winder. The preserved timeline shows **loss of mobile service and account lockouts** during windows when contested remote filings and remote notarizations were submitted; Winder's administrative role makes her a primary custodian of any incoming or outgoing communications during those windows.

Transactional custody and financial threads

- Title, escrow, and bank records referenced in the reporting party's exhibits show unresolved transfers and encumbrances (including the contested \$500,000 deposit and the \$385,000 loan). Winder is alleged to have been the assistant tasked with following up on recovery of funds yet failed to produce documentation or to effect recovery, according to the reporting party's preserved correspondence.

Representations to third parties and law enforcement

- The reporting party documents instances where Winder told third parties (including officers during wellness checks) that Andrei had moved or was otherwise unavailable. Those representations are inconsistent with unresolved property and escrow matters that required Andrei's signature, creating a factual tension the grand jury should examine.

Refusal to produce verification or retainer documentation

- Repeated requests for wet-ink retainer agreements, client verification, and contemporaneous intake records were not satisfied by counsel or by Winder. The absence of these documents is a central evidentiary gap and a primary reason the reporting party alleges fraud on the court and potential spoliation.
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Probative documentary items the reporting party identifies

- **Communications exhibits:** preserved texts and emails between the reporting party, Winder, and counsel showing routing of messages and Winder's responses.
 - **Police supplements and petition excerpts:** statements identifying Winder as last contact and point of contact.
 - **Title/escrow and bank records:** documents and transaction logs for 7711 Mulholland Drive and the \$500,000 deposit; records showing the \$385,000 loan and subsequent encumbrances.
 - **Court docket entries and counsel correspondence:** filings that reference Winder as assistant or contact and remote notarization certificates submitted during periods of reported account isolation.
 - **Witness notes:** contemporaneous notes and declarations from building staff, officers, and third parties who encountered Winder or received her representations.
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Witnesses and custodians to identify for inquiry

- **Victoria Alana Garcia Winder** — testimony and production of all communications, calendar entries, device backups, and any documents she controlled or received on behalf of Andrei.
 - **Reporting party** — preserved timeline, communications, and contemporaneous notes.
 - **Counsel and firm staff** who interacted with Winder or received communications purporting to be from Andrei.
 - **Law-enforcement officers** who recorded Winder's statements during wellness checks or other contacts.
 - **Escrow/title officers and bank custodians** who can confirm instructions, beneficiary designations, and the chain of transactional communications.
 - **Third parties** (movers, building staff, tenants) who observed Winder's actions or who were given instructions by her.
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Discrete factual questions for grand-jury consideration

- **Did Winder have contemporaneous, verifiable communications with Andrei during the periods when contested filings and remote notarizations were submitted?**

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- **Can Winder produce wet-ink retainer agreements, intake records, or other documents that verify Andrei’s authorization for the litigation and for the transfers at issue?**
 - **What documentary basis did Winder provide to law enforcement or third parties when she represented that Andrei had relocated or was unavailable?**
 - **Was Winder in possession of escrow/title or bank instructions that were not disclosed to the reporting party or investigators?**
 - **Is there evidence that Winder knowingly withheld, altered, or failed to preserve records material to the investigation of the \$500,000 deposit, the \$385,000 loan, or the eviction/arrest sequence?**
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Closing observations and evidentiary significance

Victoria Winder occupies a central, documentable nexus in the reporting party’s account: she is the proximate contact for the nominal plaintiff, the alleged custodian of transactional and communications threads, and a person whose cooperation materially affects the ability to verify client authority, trace funds, and authenticate contested filings. The reporting party’s preserved statements — including the direct assertion that Winder “was the last person to see Andrei” and that she “made herself the only point of contact” — are probative and justify focused inquiry into her records, communications, and representations. The grand jury should evaluate whether Winder’s conduct was administrative and benign, or whether it crossed the threshold into concealment, obstruction, or facilitation of criminal acts.

III. BRITTANY A. SMITH-SPRAWLING

Executive summary

Brittany A. Smith-Sprawling is identified in the reporting party’s record as a sister-in-law and a cybersecurity professional who initially corroborated the technical “playbook” used against the reporting party and later became a person of investigative interest. The reporting party alleges Brittany both described the attackers’ methods (SIM-porting, MITM routing, network filtering) and subsequently engaged in conduct that materially impeded verification, facilitated isolation, and contributed to reputational discrediting. The reporting party further reports admissions by Brittany of intrusive conduct and sexual misconduct, and states that Brittany has since become

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unreachable; her last contact was by email and the reporting party characterizes that contact as misleading and similar in effect to communications attributed to other absent associates.

“Following this, the complainant went to their sister-in-law, Brittany Smith, in San Diego before returning to Houston.”

“Brittany A. Smith-Sprawling: Rodney Samuel Sprawling’s sister-in-law and cybersecurity professional; initially corroborated the 'playbook' for the cyber-attacks before issuing a suspicious 'cease and desist' order.”

Allegations and reported conduct (concise, itemized)

- **Initial corroboration then withdrawal:** Brittany initially described and corroborated the technical attack vectors the reporting party reported (SIM-swap, routing manipulation, targeted filtering) and later issued a cease-and-desist and ceased substantive cooperation.
- **Alleged cyber-operative role:** The reporting party alleges Brittany possessed and applied the same technical “playbook” used to isolate the reporting party — **SIM porting, man-in-the-middle routing, and network filtering** — and maintained privileged channels that remained reachable while other channels were blocked.
- **Device access and unexplained damage:** Brittany accessed the reporting party’s computer to “check for viruses”; shortly after that access the reporting party reports **unexplained, irreparable damage** to the device.
- **Dual security numbers and routing anomalies:** Brittany reportedly maintained **two telephone numbers** for security/operational purposes. When the reporting party texted Brittany, she would ask **which number** was used; the reporting party observed that one of her numbers **appeared not fully under her control**, with texts and calls seemingly **rerouted elsewhere for monitoring**.
- **Proximity tactic (separate from email access):** Brittany admitted she formed a relationship with a male individual because she was “obsessed” with his girlfriend and wanted **physical proximity** to the female target.
- **Unauthorized email access (separate claim):** Separately, Brittany admitted she **accessed the female target’s email account without consent** to monitor and track that person’s communications.
- **Admissions of stalking and hacking:** Brittany admitted to stalking and hacking the accounts of individuals for whom she had romantic feelings.
- **Admission of sexual misconduct allegation:** Brittany admitted to performing sexual acts with a romantic partner while that partner was intoxicated; the partner later described the incident as rape.

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- **Public travel and professional presence:** While in contact with the reporting party, Brittany attended a **hackers' convention in Las Vegas**, indicating contemporaneous public travel and professional engagement.
 - **Mirroring disappearance pattern:** Brittany's last contact was by email; the reporting party characterizes her final communications as **false or misleading statements** that discredited the reporting party's family and justified a cutoff of communication — a pattern the reporting party notes is similar to other disappearances in the case.
 - **Current status:** Brittany is currently unreachable per the reporting party; investigators should treat her as a person of interest and preserve relevant records.
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Timeline and probative indicators (as reported)

- **Post-eviction refuge:** Reporting party arrived at Brittany's San Diego residence immediately after the Beverly Hills arrest/eviction; Brittany initially corroborated technical intrusion claims.
 - **Device access and damage:** Brittany accessed the reporting party's computer to check for viruses; the reporting party reports the device suffered unexplained, irreparable damage shortly thereafter.
 - **Convention attendance:** Brittany attended a hackers' convention in Las Vegas during the period she was in contact with the reporting party.
 - **Number-specific routing anomaly:** When the reporting party texted Brittany, she asked which number was used; the reporting party observed that messages to one number were not reliably controlled by Brittany and appeared to be **rerouted or monitored**.
 - **Last contact and disappearance pattern:** Brittany's final contact was by email; the reporting party reports that the content of that email was misleading and served to discredit the reporting party's family and justify cutting off communication.
-

Documentary and testimonial items to preserve and obtain

- **Communications exports:** Full text and metadata for texts, call logs, and email threads between the reporting party and Brittany from the Beverly Hills eviction through the San Diego stay and subsequent weeks.
- **Device forensics:** Forensic images of the reporting party's computer (pre- and post-Brittany access, if available) and any devices Brittany used to access the reporting party's systems.

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- **Carrier and routing logs:** Call Detail Records (CDRs), SMS routing logs, SIM-change histories, and forwarding/number-assignment records for the two telephone numbers Brittany used.
 - **Convention corroboration:** Registration records, travel receipts, social posts, or attendee lists confirming Brittany's attendance at the Las Vegas hackers' convention.
 - **Victim and witness statements:** A sworn statement from the romantic partner who described the sexual incident as rape; contemporaneous notes or recordings documenting Brittany's admissions about stalking, unauthorized email access, and the tactical relationship formation.
 - **Third-party corroboration:** Statements from any IT support, friends, or family who observed device damage, routing anomalies, or Brittany's behavior.
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Discrete investigative questions (for law-enforcement or grand-jury consideration)

- **Did Brittany have authorized access to the reporting party's devices, and can she produce contemporaneous records documenting the purpose and scope of that access?**
 - **Do device forensic images corroborate the reporting party's account of unexplained damage following Brittany's access?**
 - **Do carrier records and routing logs show privileged message routing through numbers associated with Brittany while other channels were blocked, and do they show rerouting or monitoring of one of her numbers?**
 - **Can convention records confirm Brittany's attendance at the Las Vegas hackers' event and the timing relative to her contacts with the reporting party?**
 - **Are there contemporaneous admissions, messages, or witness statements that corroborate Brittany's reported admissions of stalking, unauthorized email access, and the sexual incident described by the partner?**
 - **Did Brittany form a relationship with a male individual for the purpose of gaining proximity to a female target, and do communications or travel records corroborate that tactical intent?**
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Closing observation and recommended immediate actions

Brittany A. Smith-Sprawling occupies a critical nexus in the reporting party's account: she is a family contact who initially corroborated the technical attack narrative, had direct access to the

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reporting party’s devices, and — according to the reporting party — later admitted to intrusive and criminal conduct while becoming unreachable. The reporting party’s observation that **one of Brittany’s numbers appeared not fully under her control and that texts/calls were being rerouted elsewhere for monitoring** elevates the urgency of preserving **carrier routing logs, SIM-change histories, and device forensic images**. Investigators should immediately preserve all communications and device evidence identified above and schedule a recorded interview with Brittany as soon as she is located.

IV. SIMON MCPHILLIPS AKA SIMON PHILLIPS (SUSPECT – SEXUAL BATTERY/RAPE)

V. JESSICA (SUSPECT – FALSE IMPRISONMENT, FRAUD)

VI. “THE PROFESSOR” (SUSPECT – FALSE IMPRISONMENT, FRAUD)

List of suspected members and associates of alleged terrorist “rape club”/ Instagram:

Egan’s Fiancé detailed facetiming Kyle and recognizing the building and “the passed out nigga in the bed they were living out their rape fantasy on”

ADDITIONAL PARTIES TO INVESTIGATE: SUSPECTED GROUP REPORTED TO HAVE TAKEN KYLE BY INTIMIDATION FROM HIS APARTMENT AT 4650 KESTER AVE #218, 91403

----- Edwin Ortega @eddy_ortega30 Kyle Joseph Egan @dacherub, @maahez @elmalilla_ Taylor McCarthy @taylorsolar Daniel Forero @daniel_forero Johnny @johnnycashsolar Isaiah Brown @isaiahbrownmusic Paige Hill @paigehill1 Pablo Gomez @thepablogomez Donovan Andrews @donovan_andrews_ Danielle Fletcher @barbiedanz Jay Alonzo @mrjayalonzo @marcostaxout Rick Silver @ricksilver Brie Jasmin @briejasmin Sergio Santos @sergiosanxos @Abujaproperty Jeremy Gail @jeremygail Justin Konda @wakonda30 Joey Varsanik @joey_varsanik Ryan Flores @ryanflores_lasvegas Brian Qualls @hapless444 @yaya.thegeneral @simplecleantech @brixtoninmobiliaria @itzsizemore Jessica Graham @thejessgram Shane Galindo @shanegalindooo Joe Mac @jumpinjo

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WITNESSES AND CORROBORATING PARTIES

Individuals likely to provide testimony, possess corroborating evidence, or hold custody of relevant records. These parties should be interviewed and their records preserved.

- **Rhian Williamson** — During her youth, when most tight, long ago, in a galaxy far from home depot..., a victim of the same style cyber, identity theft, stalking, attack and forced isolation
- **Kory Lamar Word/Ward** — Reclassified as a witness and material corroborator. Reported as Kyle Egan's partner and a source of statements about Kyle's disappearances and safety. Preserve device logs and communications; interview under oath.
- **Nicholas Griffin** — Vandalism victim whose surveillance footage identified a tenant and linked to the 420 N Camden incidents. Preserve original footage and chain-of-custody.
- **420 N Camden building manager** — Identified the tenant and provided context about eviction status and building activity. Interview and preserve communications.
- **Keith Fraser and other tenants** — Building occupants who observed interactions, movers, or unusual activity; subpoena statements and any video.
- **Richard "Richie" Alan Vetter** – Richard "Richie" Alan Vetter reported the same type of digital intrusion, stalking, and harassment as movant. The last time movant saw Vetter he appeared nervous; Vetter had reported being stalked, was attempting to delete his social media profiles, and searched movant's temporary residence at 420 N. Camden Drive for hidden cameras. He told Sprawling he would return after his regularly scheduled work period (10 days off, 20 days on) because he had made plans to move in with Sprawling and had disclosed his romantic feelings. Vetter subsequently disappeared, and movant suspects communication interference. Shortly before his disappearance, Vetter texted, "the same people are messing with me," referring to the party now threatening extortion and alleged to be responsible for Sprawling's false imprisonment and cyber intrusion.
- **Martin Strachan** — Identified by Kory Lamar Ward as victim of the same cyber attack and harassment as the reporting party. Also identified by Kyle Egan as one his regular clients as an escort and described Strachan as someone with "common Interests".
- **Koodae Kim** — Producing Partner
- **Darin Frank** — Entertainment Lawyer of reporting party, partner at SOWD,
- **Rick Sharpe**
- **Michael Beckless**