

HERBERT M. RITKE
RONN RITKE
13-811 Malama Street
Pahoa, HI 96778
Phone: (808) 313-2798

Re: Reply to Notice of Commercial Lien Regular System Doc A-51911051
CIV. NO. CV13 00500HGBMK

Per Se:
DEFENDANTS/COUNTERCLAIMANTS

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF HAWAII

RONN RITKE, an individual; HERBERT
M. RITKE, an individual;

Plaintiffs,

LEONARD G. HOROWITZ, an Individual as
primary representative of entire legal
proceeding with respect to case referenced
herein.

And

LEONARD G. HOROWITZ, an individual;
SHERRI KANE, an Individual.

Defendants/Counterclaimants

vs.

PAUL J. SULLA, JR.; PAUL J. SULLA, III;
HERBERT M. RITKE, an individual; RON
RITKE, an individual; JASON HESTER, an
Individual; JASON HESTOR, PHILLIP
CAREY; LINCOLN S.T. ASHIDA; COUNTY
OF HAWAII; STATE OF HAWAII

CIV. NO. CV13 00500HGBMK

**REPLY TO NOTICE OF;
COMMERCIAL LIEN REGULAR;
SYSTEM DOC A-51911051;
CORRECTION TO ANSWERS;
CERTIFICATE OF SEVICE.**

HONORABLE BARRY M. KURREN
NO TRIAL DATE

ANSWER TO: Notice of Commercial Lien on Property

I, Herbert M. Ritke and Ronn Ritke, plaintiffs in the matter referenced above summarily deny all accusations contained within the complaint.

While Lauren Lee was on the mainland, I, Herbert M. Ritke, merely relayed messages from him to others.

The following is our point by point answer to the complaint:

Pg. 2 #6: Cecil Lauren Lee was not Herbert Ritke's domestic partner, business partner, nor his fellow church member or his legal council. Herbert Ritke did not defraud or extort Horowitz.

Pg. 3 #7: Herbert Ritke did not extort Leonard Horowitz. He was just copied on a letter in which Lauren Lee claimed Herbert Ritke was his legal council – which was a lie. My dad does not know anything about the law and does not council anyone.

Pg. 3 #8: Herbert Ritke and Cecil Lauren Lee were not participating in consumer fraud or financial crimes.

Pg. 3 #9: Speculation on Leonard Horowitz's part. No extortion was committed by Herbert Ritke.

Pg. 3 #10: Lauren Lee created a church in 2004 without Ron Ritke's or Herbert Ritke's knowledge or consent. Years later he misled me into becoming an official. He said it was for a future church, not one he already created. My son, Ron Ritke, was not even living at my house (property in question) in 2004.

Pg. 3 #11: Herbert Ritke and Cecil Lauren Lee did not make any extortion demands.

Pg. 4 #12: Herbert Ritke did not try to foreclose on Horowitz nor commit multiple breaches of good faith closing agreements. He did not slander his business relationships.

Pg. 4 #13: Herbert Ritke has never owned a personal computer and never initiated a fraudulent foreclosure complaint. Nor did he forge an agreement at the closing of escrow.

Pg. 4 #14: Herbert Ritke never owned a personal computer – so this claim is libel.

Pg. 4 #15: Herbert Ritke did not forge any agreement for the closure of escrow. He did not do a defamation campaign or take any foreclosure actions. Leonard Horowitz himself chose to stop commercial operations.

Pg. 5 #17: Herbert Ritke did not conspire with Lauren Lee to defraud Horowitz or the courts. Herbert Ritke did not resurrect GOB nor transfer false debt securities into the

GOB. Herbert Ritke did not do multiple foreclosure actions nor initiate any malicious prosecutions under GOB.

Pg. 5 #18: Herbert Ritke did not defraud Horowitz nor defraud the courts in the State of Hawaii. Herbert Ritke has no interest in acquiring the mortgage or estate and did not participate in any foreclosure actions or organized crime.

Pg. 5 #19: Herbert Ritke did not assign the mortgage and promissory notes into GOB. He did not manufacture any false debt.

Pg. 5 #20: Herbert Ritke did not file any false records.

Pg. 6 #21: Herbert Ritke was not Lee's domestic partner nor his heir (this claim constitutes libel).

Pg. 6 #22: When Lee created his church, he used Herbert Ritke's address without permission. Herbert Ritke had nothing to do with falsely warranted securities or the GOB.

Pg. 6 #23: Herbert Ritke had no knowledge and gave no consent for the substitute plaintiff.

Pg. 6 #24: Herbert Ritke did not evade multiple notices from Horowitz nor threaten non-judicial foreclosure extortions.

Pg. 7 #25: Herbert Ritke did not conduct a Non-Judicial Foreclosure (NJF).

Pg. 7 #26: Herbert Ritke did not defraud the courts or the State of Hawaii nor conduct any fraudulent ejection actions.

Pg. 7 #27: Yes, we both became aware of Lee's creating a church using our address – but again, doing so without our permission or knowledge. No business or church services were ever conducted on our property and that is why we did not think the church had even been created.

Pg. 7 #28: Herbert Ritke had no knowledge and gave no permission for the alleged pattern of bad faith filings and criminal activities nor was he complicit in conspiring and/or aiding and abetting.

Pg. 7 #29: Herbert Ritke did not commit white collar crime and did not damage Horowitz or Kane for any amount. Herbert Ritke did not issue extortion demands on January 5, 2004.

Pg. 8 #30: The Ritkes did not cause any long-term emotional distress nor are we responsible for the dissolution of Horowitz's ministry or the break up of his family.

Pg. 8 #31: Herbert Ritke owes nothing to Horowitz.

Pg. 8 #32: The Ritkes did not commit fraud nor did we violate multiple laws. Accordingly, no treble damages should assessed or awarded.

Pg. 8 #33: The conditions for treble damages have not been met. The original suit is for \$6 million dollars.

Herbert Ritke 3-27-14
Herbert M. Ritke Date

Ronn Ritke 3-26-14
Ronn Ritke Date

Correction to: ANSWER TO COMPLAINT

Pg. 82 #11 Currently States: "I did make harassments against Horowitz or file any defamatory complaints with the County of Hawaii."

Pg. 82 #11 **Should** State: "I did NOT make harassments against Horowitz or file any defamatory complaints with the County of Hawaii."

Herbert Ritke 3-27-14
Herbert Ritke Date

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served upon the following parties at their respective addresses by depositing the same in the United States First Class mail, postage prepaid on March , 2014:

LEONARD G. HOROWITZ
13-3775 Paho-Kalapana Road
Pahoa, Hawaii 96778

served via certified US mail

SHERRI KANE
P.O. Box 75104
Honolulu, Hawaii 96836

PAUL J. SULLA, JR. (SBN 5258)
Attorney at Law, and as Attorney for
REVITALIZE, A GOSPEL OF BELIEVERS, Corp.
P.O. Box 5258
Hilo, HI 96720
(808) 933-3600

PHILLIP L. CAREY (SBN 4636)
Attorney at Law, and as Attorney for JASON HESTER
688 Kinoole Street, Suite 105
Hilo, HI 96720
(808) 934-9711

RONN RITKE
811 Malama Street
Pahoa, HI 96778

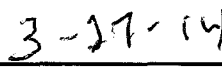
Christopher P. Schleuter attorney for Lincoln Ashida,
Office of Corporation Counsel
COUNTY OF HAWAII
333 Kilauea Avenue 2nd floor
Hilo, HI 96720

STATE OF HAWAII
Department of the Attorney General
425 Queen Street
Honolulu, HI 96813

HONORABLE JUDGE Barry M. Kurren
THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII
300 Ala Moana Blvd., #C338
Honolulu, HI 96850
(808) 541-1300


HERBERT M. RITKE


RONN RITKE


DATE: