CRIMINAL COMPLAINT

Aventura Police Department

19200 West Country Club Drive, Aventura, FL 33180

Date Submitted: ________________, 2026

COMPLAINANT	DEFENDANT(S)
Larry Margulies (formerly Lawrence Yudowitz) Current Location: Overseas (withheld) Mail: 848 N. Rainbow Blvd #4884 Las Vegas, NV 89107 Email: larry@diydetective.org Tel: +1 (305) 367-7870	Evelyn Yudowitz 19333 W. Country Club Dr., Apt. 1723 Aventura, FL 33180 (Miami-Dade County) Ken W. Shulman (Potential Co-Conspirator) One Federal Street Boston, MA 02110

ACTION REQUESTED: I request the issuance of a case number and assignment of a detective to obtain the records identified in Section 7 (Investigative Requests) and to initiate a formal investigation under Florida jurisdiction.

SECTION 1: SWORN DECLARATION

I, Larry Margulies (formerly Lawrence Yudowitz), affirm under penalty of perjury pursuant to Fla. Stat. § 92.525 that the statements in this complaint are true and correct. Unless otherwise stated, the facts describing what I personally saw, heard, received, said, or experienced are based on my personal knowledge. Statements attributed to witnesses or documents are identified as such. Statements concerning another person's intent, identity, coordination, or legal liability reflect my good-faith conclusions based on the stated facts and are submitted for independent investigation. All exhibit references correspond to documents available for inspection and attached hereto.

SECTION 2: EXECUTIVE SUMMARY

I report that Evelyn Yudowitz… coordinated a sustained campaign of threats, solicitation of violence, witness tampering, and obstruction from her Aventura residence via telephone, email, and intermediaries between 2013-2014 and 2021.

A central piece of evidence in this complaint is a November 2017 email authored by defendant and forwarded by co-defendant Ken W. Shulman, which states: "You put a price 'IN' our heads." (Ex. 9) I request that investigators determine whether this statement constitutes solicitation under Fla. Stat. § 777.04(2).

Additional Florida-verifiable acts include:

LM

- Withholding $100,000 from a joint account in later 2013-2014 to strand me overseas and obstruct my stated intention to report her conduct to the FBI (Ex. 1).
- Directing the sending of SMS threats on 5 October 2020, which were reported to the Hong Kong Police Force (Exs. 2, 3, 4).
- Directing the un-redaction of medical billing records in 2020–2021 to interfere with a Hong Kong Police Force investigation (Exs. 5, 13).
- Emailing my attorney in February 2021 with false mental-health claims (Ex. 5).

Co-defendant Ken W. Shulman, an attorney in Boston, Massachusetts, is alleged to have furthered the conspiracy by forwarding the November 2017 email. These Florida-based activities create jurisdiction under Fla. Stat. § 910.005. I have relocated abroad for safety and remain overseas as of August, 2026.

The threat to my safety is ongoing. Due to the pattern of conduct described herein, I remain in fear for my life and am currently residing overseas for safety. I have not returned to the United States due to these concerns.

I respectfully request that this matter be evaluated not solely as historical conduct, but as part of an ongoing pattern of threats and intimidation, the full scope of which may not yet be known and may involve continuing risk.

Reader Guidance and Clarification

This complaint contains a detailed factual narrative spanning multiple jurisdictions and time periods. Certain sections include both direct observations and information reported to me by others, as well as patterns that I believe may be connected based on timing, similarity of conduct, and surrounding circumstances.

To assist investigators, I request that statements based on my direct personal observation or documented evidence be distinguished from statements that reflect my understanding, interpretation, or belief. Where connections between events, individuals, or locations are described, I request that investigators independently determine whether such connections are coincidental or indicative of coordination.

This complaint is submitted in full to preserve the complete record of events and context, and I am prepared to clarify, supplement, or provide additional documentation as requested by investigators.

SECTION 3: TIMELINE OF KEY EVENTS

The following table identifies key evidentiary events, including those establishing a direct Florida nexus and those demonstrating cross-jurisdiction threats and stalking behavior.

Date	Location	Event (Key Event / Nexus)	Evidence
I identify 2010 as the	Hong Kong	Before and after the following incident, an individual described as a bald American male was present at the	Personal observation

LM

Date	Location	Event (Key Event / Nexus)	Evidence
approximate year based on the sequence of events surrounding my departure from Hong Kong, subsequent travel, and the issuance of a new U.S. passport in Boston in 2010.		location of a Seattle bottle-attack incident (which occurred after the first Hong Kong bottle attack) and engaged in subsequent threatening conduct. This same individual approached me separately on two occasions near my Hong Kong office: once before the first bottle attack and again around the time of the second bottle attack. On those occasions he approached me alone and said into his phone, “Do you want me to shoot him.” The bottle-attack incident took place at approximately 6 a.m., about one kilometer from the Mandarin Oriental Hotel, near a 24-hour resto-bar then known as “The Bridge.” The attacker was a Thai national who was later described to me as a person associated with criminal activity in that neighborhood. My head was bleeding. I ran to my office building (one block from the Mandarin Oriental and sharing premises with the OLN law firm), which was closed because of the early hour. I then walked one block to the Mandarin Oriental Hotel, where hotel security contacted the Hong Kong Police. I was transported to hospital by my hired bodyguard and received approximately 13 stitches to the head. Less than a week after the bottle attack, two men (the bald American male not among them) came to a different resto-bar adjacent to my hotel in another part of Hong Kong and verbally told me they were going to kill me.	
2010	Seattle, USA	Following a brief intervening period in mainland China during which, immediately upon entering Shenzhen by land from the Hong Kong border, I was struck by a motorcycle in what I describe as a deliberate act (the motorcyclist feigned a fall and demanded money), I arrived in Seattle. My U.S. passport application was rejected at the Jackson Federal Building. Immediately on exit from the Jackson Federal Building, a heavy whiskey-type bottle was dropped from the secure rooftop of Brooklyn Seafoods restaurant directly across the	Personal observation; post-incident corroboration obtained through hired security (restaurant contact).

LM

Date	Location	Event (Key Event / Nexus)	Evidence
		street; I took one step and the bottle missed me by a few inches. During the broader Seattle period that followed (which included travel between Seattle and Vancouver), the same bald American male from the Hong Kong bottle attack appeared in Seattle, sat with me, stalked me, and, separately, the gray-haired American male appeared in Seattle, including at a coffee shop at the Seattle Convention Centre where he asked the barista whether I was bothering her after I left. During the same broader Seattle period, one stalker stated to my face that he "kills people"; in a separate overheard conversation, another individual was asked when he was going to "do" me.	
2010	Weston, USA	Visit following Seattle incident; observed speakerphone activation during private call; father confronted me and referenced undisclosed Canadian mortgage. The Canadian mortgage referenced was the same private home mortgage I had used to capitalize the Hong Kong company (Best Score Ltd.) earlier that year, which defendant and her husband were not supposed to know about.	Personal observation (see Section 4.H)
2013-2014	Philippines / Aventura	Defendant withheld $100,000 from joint account (Ex. 1); sent $1,500 of the $2,500 the State Dept. stated was required; liaison confirmed defendant made false mental illness claims to the State Dept.; intermediaries arrived with police escort at address known only from a loan application.	Ex. 1
Dec 2014	Cebu / Aventura	Defendant sent paper check (not usual wire); break-in attempt at my residence involving fiber optic surveillance cable and bleach left at door; defendant directed me to hospital rather than police after break-in report.	Exs. 17, 18
2015	Philippines / Aventura	Threats to kill me; bribery attempts against Lesyl Medalla; assailants referenced trust account and interfered with private loan.	Exs. 16, 17, 18

LM

Date	Location	Event (Key Event / Nexus)	Evidence
Apr 2017	Boston / China	Shulman sent parcel to my China address; an American investigator visited shortly after.	Ex. 9
Nov 2017	Aventura / Boston	Email authored by defendant, forwarded by Ken Shulman, stating: "You put a price 'IN' our heads."	Ex. 9
Late August / Early September 2020	Hong Kong	Immediate post-quarantine report to HKPF regarding the 2010 death threats, bottle attack, and multi-jurisdictional stalking by the same individuals. I had avoided returning to Hong Kong for nearly a decade because of these unresolved threats.	HKPF report records (to be added as new exhibit if available)
5 October 2020	Hong Kong / Aventura	SMS threats received from +852 9342 8498 in Hong Kong; reported to HKPF; senders referenced "ELDAVIDE" and stated I was "TRAINED TO DENY"; senders denied sending messages when questioned by HKPF.	Exs. 2, 3, 4
2020–2021	Hong Kong / Aventura	Defendant directed helper to un-redact medical billing records intended for doctors whose assessment was to be provided to HKPF; defendant contacted doctors' office about costs already arranged by attorney; doctors later referenced my YouTube account.	Exs. 5, 6, 13
Feb 2021	Aventura	Defendant emailed attorney Robert Hamer with false claims about my mental health (Ex. 5); Anne argued against extra funds claiming they would be used to "hurt them" (Ex. 14).	Exs. 5, 6, 14

3A. Historical Allegations of Childhood Sexual Abuse, Abuse, Family Control, and Motive Context

When I was approximately 12 years old, my mother, Evelyn Yudowitz, inserted an anal thermometer into my rectum as punishment after I had avoided school and pretended to be ill. I state under penalty of perjury that this incident occurred. I experienced and report this conduct as childhood sexual abuse and a serious violation of my bodily autonomy. I include this childhood sexual abuse as historical context relevant to motive, coercive control, and subsequent retaliation. After I later confronted Evelyn about these childhood experiences, she denied the allegations and communicated to other family members, including my siblings and father, that I was lying. Those statements contributed to increased hostility and

LM

rejection toward me. In addition, I believe the history of childhood abuse and the family's response to my disclosures form part of the broader pattern that later motivated family members to assist Evelyn in the threats, obstruction, and alleged plot against me that are the subject of this complaint. I am not asking the Aventura Police Department to prosecute the historical Massachusetts conduct through this complaint. I reserve the right to report that offense separately to the law-enforcement agency having territorial jurisdiction. Evelyn's dual residency and her residence in Florida during the winter months do not change the territorial jurisdiction over the historical Massachusetts offense.

SECTION 4: CONDENSED STATEMENT OF FACTS

Unless otherwise noted, I allege that defendant Evelyn Yudowitz coordinated the acts described below from her Aventura residence via telephone, email, and intermediaries. The statements below are based on my personal knowledge, documentary evidence, witness information, and my stated interpretations where identified.

In 2010, I obtained a copy of a 1979 professional report strongly recommending psychotherapy and warning of severe emotional consequences if untreated (Ex. 8). Therapy was not implemented. I consulted legal counsel regarding the report's contents and potential civil implications. In subsequent communications, defendant expressed belief that I was attempting to substantiate a case against her. During the same period, defendant communicated allegations that I was mentally ill to third parties. I dispute those allegations and provide independent post-2020 evaluations reflecting no diagnosis (Ex. 7). Around the same time in 2010 that I obtained financing through private home mortgages to capitalize my Hong Kong company and discovered the 1979 report; I confronted Evelyn about the childhood sexual abuse described in Section 3A. She denied the allegations and told other family members that I was lying. The childhood sexual abuse and the family's response to my disclosure of it are relevant to motive. They help explain why family members later participated in, or assisted with, the threats, financial obstruction, and alleged efforts to prevent me from reporting Evelyn's conduct and from returning to the United States. I include these facts solely as context for motive and the escalation of the Florida-connected conduct described in this complaint. I am not asking the Aventura Police Department to charge the historical Massachusetts offense in this case.

Shortly thereafter, I experienced the death threats and bottle-attack incidents in Hong Kong and Seattle described in Section 4.G, followed by the in-person confrontation at defendant's Weston, Florida residence described in Section 4.H. *I* note the temporal proximity between the discovery of the 2010 report, the legal consultation, the expressed hostility, and the onset of threats and monitoring activity.

In 2010, I experienced a bottle-attack incident in Hong Kong. (I identify 2010 as the approximate year based on the sequence of events surrounding my departure from Hong Kong, subsequent travel, and the issuance of a new U.S. passport in Boston in 2010.) The attack occurred at approximately 6 a.m. approximately one kilometer from the Mandarin Oriental Hotel, near a 24-hour resto-bar then known as "The Bridge" (which during daytime hours operated as a sports-bar style establishment). The attacker was a Thai national whom I later understood to be a criminal working in that resto-bar neighborhood; the attacker struck my head with a bottle held in his hand on the sidewalk at an intersection while I was about to cross the street. I believe the Thai national was told to attack me because I did not know anyone except my lawyers. I ran to the center of the intersection; the attacker jumped to strike me a second time; I blocked the second strike with my arm, which was severely bruised for the remainder of the month. My head was

LM

bleeding. Because the early hour meant my office building (located one block from the Mandarin Oriental Hotel and shared with the OLN law firm) was closed, I ran first to that office, found it closed, and then walked one block to the Mandarin Oriental Hotel, where I entered the hotel security office, contacted the Hong Kong Police Force from that location, was transported to hospital, and received approximately 13 stitches to the head. Less than a week after the bottle attack, two men (the bald American male was not among them) came to a different resto-bar adjacent to my hotel in another part of Hong Kong (the name of which I do not currently recall) and verbally told me they were going to kill me. Separately during the Hong Kong period, the bald American male approached me alone near my office, stood next to me to get his attention, and stated into his phone, "Do you want me to shoot him," which I understood as a direct death threat. Following these events, I departed Hong Kong intending not to return; I did not return to Hong Kong until 30 August 2020 when COVID-19-related circumstances required my return. From Hong Kong, I first travelled into mainland China en route to the United States, entering Shenzhen by land from the Hong Kong border, where immediately upon entering Shenzhen he was struck by a motorcycle in what I describe as a deliberate act (the motorcyclist feigned a fall after striking me and demanded money from me). I then travelled to Seattle, where the second bottle-attack incident described below occurred. The bald American male and the gray-haired American male each appeared in Seattle separately during the broader Seattle period that followed (which included travel between Seattle and Vancouver); I cannot confirm that either appearance was specifically at the moment of the Seattle bottle drop. The two unidentified men who threatened to kill me in Hong Kong, just before I traveled to Seattle, are referenced in Section 4.G of this complaint as part of the ongoing threats against me.

The gray-haired male, who was present in Seattle during the bottle attack in 2010, later appeared in the Philippines in 2013-2014, where he was escorted by local police to my girlfriend's mother's residence at 26 C Imus Highway, listed as my address on the repatriation loan application. When I confronted Evelyn Yudowitz about the man's presence and the police escort, defendant and my father remarked, "That's what you get for writing the letter," further implicating defendant in the escalation of threats against me.

These facts show a connection between the bald male, the gray-haired male, and the two other men involved in separate but related threats against my life, spanning multiple locations. Evelyn Yudowitz appears to be connected to these events, either directly or indirectly.

4.A Financial Coercion and Obstruction of Repatriation (2013-2014)

I allege that in 2013-2014, defendant used financial control and communications with the U.S. State Department to interfere with my repatriation process, leaving me stranded in the Philippines and unable to return to the United States to report her conduct to the FBI. The following specific acts are alleged:

- **I informed Evelyn Yudowitz of my intention to report her conduct to the FBI** during the repatriation-loan process in 2013-2014. Despite this, defendant obstructed my ability to report by withholding funds and interfering with the State Department process, deliberately preventing my return to the U.S.
- **Defendant allegedly withheld $100,000 from a joint account** (Ex. 1), insisted on routing the repatriation through a State Department liaison near her husband's office in Arlington,

LM

Massachusetts, and sent only $1,500 of the $2,500 the State Department stated was needed to leave the Philippines.

- **I state that the liaison confirmed during a conversation that defendant and her husband had told the State Department I was mentally ill.** The liaison acknowledged this when asked. I was introduced to this State Department liaison by defendant and her husband and observed ongoing communication between them during the repatriation process.
- **Paul McSweeney's Role in Financial Surveillance (1991):** In the early 1990s, Paul McSweeney, a former Boston Police Detective and private investigator, was engaged by Evelyn Yudowitz and her husband to access my private banking records. McSweeney later admitted to me that he used his law enforcement contacts and private investigative expertise to illegally obtain these records. He subsequently reported back to Evelyn with details of my financial activities, including private mortgage information. This unauthorized access to my financial records is critical, as it links McSweeney's prior unauthorized records access to the conduct alleged against Evelyn Yudowitz herein. Given McSweeney's background as a former Boston Police Detective and private investigator with law-enforcement contacts, his role warrants investigation.
- **2013-2014, my brother Michael Yudowitz warned by phone:** "Mom and Dad told me they're sending guys to your room to set you up—I cannot stop it." Shortly thereafter, intermediaries arrived with a police escort at an address known only from the repatriation loan application. I have identified publicly available background information indicating that Michael Yudowitz may have misrepresented himself in connection with security-related roles or employment during this same general time period, including roles within private security companies. I have not independently verified this information and includes it solely as a potential investigative lead. I request that investigators determine whether Michael Yudowitz had any affiliations, training, or contacts relevant to the conduct described herein, including whether such affiliations may relate to the timing of the warning and subsequent events. (Ex. 19)
- **I personally observed Jerry** (an American male known to me in the Philippines because he consistently approached me at my residence and rented shop) display a Quezon City Drug Task Force identification card to a Philippine police desk officer in Davao City, and later witnessed a separate unidentified gray-haired American male being escorted by uniformed Philippine police officers to where I stayed with my girlfriend during the repatriation-loan period described above. I believe this unidentified gray-haired male is the same gray-haired male who had been present in Seattle during the bottle-attack incident near the Jackson Federal Building passport office in 2010. This Philippine incident occurred during the same period in which funds were being withheld and threats were escalating. I request investigation into the identity and travel history of the unidentified gray-haired male(s) referenced herein. For clarity: this gray-haired male is a different individual than the bald male described in Section 4.G.
- **During the 2013-2014 period while I was in the Philippines and attempting to return to the United States,** I engaged in a Skype chat with my brother, Michael Yudowitz. In that chat, Michael Yudowitz asked me to sign a document and write a letter requesting that Michael be made trustee over my trust account. I refused. Following that refusal, Michael Yudowitz terminated

LM

communication and blocked further contact. A copy of this Skype chat is preserved and provided as Exhibit 15. I request that investigators review this communication to determine Michael Yudowitz's knowledge of the trust, the timing of the request, and any connection to the events described herein.

My Sworn Account of 2013-2014 Repatriation Obstruction

In 2013-2014, I applied for U.S. State Department repatriation loan to exit Philippines where I faced serious threats. I state under penalty of perjury:

1. State Department Communications (Subpoena Requested)

- State Department informed me approximately $2,500 was required to exit Philippines.
- Amount needed to cover airfare, exit visa fines, and processing fees.

2. Defendant's Response

- Defendant sent $1,500 via wire transfer (insufficient amount).
- I remained stranded in Philippines as result.

3. Concealed Funds — DISCOVERED 2023

- Bank records obtained in 2023 prove $100,000 account existed in 2013-2014 (Exhibit 1). At that time, I had sought a U.S. State Department repatriation loan to return to the United States and had informed the State Department of my suspicion that defendant was withholding available funds.
- Defendant had knowledge of and/or control over this account.
- Defendant never disclosed existence of these funds.
- Had I known $100,000 was available, I could have used own funds to exit.

4. Liaison Interference

- Defendant insisted I use specific State Department liaison from Arlington, MA.
- This liaison resided near defendant's husband's office.
- State Department liaison subsequently laughed and said "Yes" when I asked if defendant (with husband) had said I was crazy.
- Pattern of false mental illness claims to State Department (2008, 2013-2014, 2020–2021).

Statute of Limitations: Fraud discovered 2023 — prosecution timely under Fla. Stat. § 775.15(10)(b). See Section 6A (Statute of Limitations — Fraud Discovery Rule).

2013-2014 Phone Conversation and Immediate Obstruction

Phone Conversation:

I state under penalty of perjury that during 2013-2014 phone conversation with defendant Evelyn Yudowitz (with Dr. Bernard Yudowitz also present), I stated I intended to use State Department repatriation loan to return to United States and report threats to FBI.

Observable Reaction:

LM

Upon mention of FBI reporting, I observed:

- Sudden, pronounced change in tone of conversation
- Abrupt silence following FBI reference
- Marked shift in mood and demeanor
- Both defendant and husband exhibited simultaneous change

Subsequent Joint Admission (2013- 2014):

2013- 2014, my brother Michael Yudowitz warned me by phone: “Mom and Dad told me they’re sending guys to your room to set you up — I cannot stop it.”

Soon after, when I called and spoke to defendant and Dr. Bernard Yudowitz simultaneously on the same phone call, they jointly admitted to sending the intermediaries, responding: “That’s what you get for writing the letter.”

This statement referenced a document attached to my repatriation loan application that disclosed a Cayman Islands wire transfer to “Distressed Assets Funds” originating from Professional Housing Ltd. (Glasgow) — a legitimate family-managed company. Defendant’s reaction (joint admission of sending threats) directly tied the threats to my financial disclosure in the State Department application.

Legal Significance:

Under criminal law principles, observable reactions and joint admissions when confronted with potential law enforcement contact constitute evidence of consciousness of guilt. Obstruction actions began immediately following this conversation.

Investigative Request: Phone records from 2013-2014 to corroborate call timing; Michael Yudowitz as potential witness regarding 2013- 2014 warning.

Attorney Confirmation of Trust Withholding

The bank account referenced in Exhibit 1 and the trust account referenced below are separate financial matters. My attorney Robert Hamer independently confirmed that the trust account in my name had been withheld by trustee defendant Evelyn Yudowitz. This is documented attorney verification — not solely my allegation that the defendant exercised financial control while concealing assets from me.

This corroborates the fiduciary breach element required for the fraud discovery rule (Fla. Stat. § 775.15(10)(b)) and supports the obstruction and witness tampering charges.

4.A.1 Motive for 2014–2021 Criminal Conduct

Background Context:

In 2014, I received correspondence from Mitchell Garabedian, Esq., a prominent Boston attorney specializing in sexual abuse cases, regarding potential legal claims related to historical abuse allegations against defendant and family members.

Exhibit 20: Letter from Mitchell Garabedian, Esq. (2014).

Significance:

LM

Defendant's 2021 email to attorney Hamer (Exhibit 5) references my "trying to substantiate a case" against her. This demonstrates defendant's knowledge that I was pursuing legal accountability for at least one of the alleged crimes.

Motive for Extreme Obstruction:

The 2014–2021 conduct alleged in this complaint (withholding funds, threats, surveillance, medical records interference) served to:

1. Prevent my return to United States to pursue legal action.
2. Prevent my consultation with attorneys regarding abuse claims.
3. Prevent me from reporting crimes to law enforcement.
4. Discredit me through false mental illness claims.

Scope of This Complaint:

The sexual abuse allegations are not the subject of this Florida criminal complaint. They are mentioned solely as context for defendant's motive in committing the Florida-jurisdiction crimes detailed herein. Any investigation of historical abuse allegations would fall under Massachusetts jurisdiction and separate legal processes.

4.B Threats, Bribery, and Break-In (2014–2015)

The following events occurred in the Philippines between December 2014 and mid-2015. I allege that defendant coordinated these acts from her Aventura residence via telephone and intermediaries. In several instances, packages or communications originating from individuals in the United States were followed by the arrival of individuals at my location who issued threats or engaged in intimidation. I request investigation into whether the delivery of those packages disclosed location information or otherwise facilitated the subsequent encounters.

- **During the late 2014 period, while I was in Cebu, Philippines and reporting active threats to my life, I placed a telephone call to my brother Martin Yudowitz.** During that call, Martin Yudowitz instructed me to ignore the death threats then being made against me and not to report or complain about them. Martin Yudowitz also referenced emails I had previously sent to family members concerning the threats, demonstrating contemporaneous awareness of those reports.
- **In 2015, while in Cebu, Lesyl Medalla informed me that she possessed information serious to my safety** which she was unwilling to communicate while inside Cebu City and asked that they leave the city before she would disclose it. Lesyl Medalla and I departed Cebu immediately in response, and upon arrival in Bohol, Lesyl Medalla wrote the handwritten statement provided as Ex. 17. Shortly after their arrival in Bohol, I sustained a foot injury that confined me for approximately six weeks and delayed further reporting to authorities; I reported the injury to a local Bohol-area Philippine police station and retains a letter from that station documenting the report (Ex. 22). I respectfully request that investigators consider these circumstances as relevant to the weight of Ex. 17 and to the explanation of the reporting gap during the relevant period.

LM

- **Mid-2015 Baguio Hospital Incident**: In mid-2015, I attended Notre-Dame de Chartres Hospital in Baguio City for a scheduled cardiac examination. I was connected to cardiac monitoring before the reported incident, and hospital personnel including the department's intern observed my heart condition as healthy before the event. I allege that during the examination, after a change in attending personnel, an individual presenting as medical staff sprayed me from behind with an unknown chemical substance. I allege that immediately afterward my heart rate increased to approximately 200 beats per minute while he remained connected to the cardiac monitor. I allege that the incident occurred in the presence of hospital personnel and that Lesyl Medalla's affidavit regarding the Baguio visit is provided as Exhibit 16.
- Following the reported Baguio incident, I later underwent cardiac evaluation in China after leaving the Philippines. The evaluation is provided as Exhibit 23 and documents subsequent cardiac findings relevant to review of the reported cardiac episode, including whether any pre-existing cardiac condition existed.
- **During the same 2014–2015 period in the Philippines, individuals who approached me referenced the Cayman Islands** and asked me whether he had been there. I had previously attached a private fax copy to my repatriation loan application involving a financial transaction to the Cayman Islands. Additionally, these individuals referenced my Hebrew name in English, which I had not disclosed outside of family context. I request that investigators determine how these individuals obtained this information, including whether any information from the repatriation loan application or family sources was accessed or disclosed.
- **In December 2014, a separate break-in attempt occurred at my residence (Ex. 17).** A few days earlier that same week, Lesyl Medalla and Ihad been forced to move to a less secure room after the loan services company was informed that I had a trust account and was mentally ill. The private loan, which I had been repaying on time for several months, was suddenly stopped immediately after a timely repayment when I expected to receive a new loan. During the break-in, a fiber optic cable was placed past the air conditioner for apparent surveillance and a five-gallon container of bleach was left at the door. Lesyl Medalla yelled "Not tonight!" toward the location where the fiber optic cable entered, because I had just messaged a local policeman to come right away. During this emergency, I called the U.S. Consulate from the family division at the police station and informed the duty officer that the baby might die without immediate assistance. I allege defendant sent a paper check rather than the usual bank wire, which delayed the receipt of funds during a period of acute need. This deviation from defendant's established pattern of sending wire transfers is documented in the financial records. Defendant allegedly directed me to go to the hospital rather than report the break-in to police, which I allege was intended to divert attention from the incident and prevent a police report.
- **In 2015, assailants allegedly threatened to shoot me, attempted to bribe Lesyl Medalla, and referenced a trust account.** Lesyl's written statement regarding coercion, bribery, and threats (Ex. 17) and the Cebu City Police Blotter (Ex. 18) document these events. Lesyl was offered "anything" in exchange for her cooperation, which she understood as a request to assist in actions that could lead to my death. The sudden cessation of loans despite a history of timely payments, combined

LM

with the discovery in 2019 that I indeed had a trust account (as previously undisclosed to him), raises serious concerns about the motives behind these actions and the possible involvement of American individuals in orchestrating the break-in and broader scheme. The trust agreement governing the Bernard S. Yudowitz Irrevocable Trust provides for distributions among the settlor's descendants, meaning that changes in beneficiary status could affect the allocation of trust assets; I therefore request that investigators review whether references to a "trust account" during the 2015 threats relate to any financial motive connected with the conduct described herein.

- **During the same 2014–2015 period while in the Philippines, specifically in or about 2015 and while I was in the Cebu region of the Philippines** (I moved frequently between Cebu, Bohol, and adjacent areas during this period), I placed a telephone call to my brother, Martin Yudowitz. During that call, Martin Yudowitz stated that defendant Evelyn Yudowitz and her husband had "ordered him to help take care of" the me. In the context of the ongoing threats and surrounding circumstances at that time, this statement was understood as a threat of harm. Similar language was used by individuals who approached Lesyl Medalla from a gray SUV and attempted to bribe her in connection with threats against me, as documented in Exhibits 16 and 17. In both instances, the phrase "take care of" was used in the context of threats, coercion, or discussion of harm to me. In Exhibit 17, Lesyl Medalla explained that speakers using the "take care of" phrase in reference to me "really wanted to do bad things to" me. I understood Martin Yudowitz's statement that defendant Evelyn Yudowitz and her husband had "ordered him to help take care of" me — in light of (i) the active death threats I was then experiencing, (ii) Martin Yudowitz's prior 2014 instruction not to report those threats, and (iii) the substantially similar verbatim language independently reported by Lesyl Medalla in Ex. 17 — as a coded reference to causing me physical harm. I respectfully request that investigators evaluate this statement in context, including its temporal proximity to the in-person threats and bribery attempts described in this section and the independently corroborating language in Ex. 17. I further note that Exhibit 8 (the 1979 professional report already in evidence) documents a pre-existing history of physical violence by Martin Yudowitz toward me in childhood. Psychotherapy for violent behavior began for Martin Yudowitz later, date unknown**.** I submit this as further context bearing on the credibility of his interpretation of the 2015 statement, without seeking criminal prosecution of the historical conduct described in Exhibit 8. Additionally, I observed that such phrasing was delivered in a manner reflecting anger, emphasis, and force consistent with the threatening context in which it was used. The recurrence of identical or substantially similar wording, used in close temporal proximity and in connection with separate individuals engaged in threatening or coercive conduct, raises a question as to whether such language reflects coordination, shared instruction, or a common source of direction rather than coincidence. Accordingly, I request that investigators evaluate whether this repeated use of identical phrasing and delivery reflects coordination, shared intent, or communication between the individuals involved and any person or persons directing the conduct described herein. During this same period, I had consulted legal counsel regarding historical conduct involving family members and potential civil claims. These circumstances may have created a motive to

LM

discredit, silence, or intimidate me. I request that investigators consider whether this context is relevant to the threats and conduct described herein.

Possible Connection to Paul McSweeney's Associates

One of the two men who allegedly came to threaten me in 2010 in Hong Kong—who later appeared outside Lesyl Medalla's mother's house in 2013-2014—bore a strong resemblance to a worker employed by Paul McSweeney in the early 1990s. This appearance, combined with the previous threat in Hong Kong, raises concerns that this individual's involvement could be linked to individuals associated with Paul McSweeney and to the conduct alleged against Evelyn Yudowitz, warranting further investigation into their connection to both the Hong Kong and Philippine incidents.

While I could not be certain it was him, the physical similarities were striking without the observed dyed black hair. Paul McSweeney was my father's best friend for many years, and my father often used Paul's services, introducing him to many clients or friends who needed help with undercover investigations. I met Paul when he would often come over to the family home, and Paul told me that he had investigated two of my associates after high school graduation. One of these associates was a confidential informant to the police, a fact that Paul McSweeney came forward and shared with me personally. This associate later admitted on record that he was indeed working as an informant, confirming Paul's information. The same individual was also spotted outside Lesyl Medalla's house while I was waiting for approval of my repatriation loan application.

Given the history of surveillance, financial intrusion, and the similarity in appearance, I believe this could be a sign of ongoing monitoring by individuals associated with Paul McSweeney, linked to Evelyn Yudowitz's broader pattern of harassment.

- **During the same 2013–2015 period while I was in the Philippines reporting active threats to his life,** I spoke by telephone with Evelyn Yudowitz and requested financial assistance for security and legal support. During that call, defendant stated that she was reviewing emails previously sent by me, which included communications describing the threats to my safety as well as prior allegations involving defendant. Despite being aware of the reported threats and having immediate access to those communications, defendant declined to provide immediate assistance and stated that she would "think about it." I include this as evidence that defendant had contemporaneous knowledge of the reported threats and of the broader context in which those threats arose.

4.C November 2017 Email: "You put a price 'IN' our heads"

- **In November 2017, defendant allegedly authored an email stating "You put a price 'IN' our heads,"** which attorney Ken W. Shulman forwarded to me. (Ex. 9)
- **Prior to this email, in April 2017, Shulman sent a parcel to my China address—known only to Shulman—after which an American investigator visited.** Shulman later asked my location, claiming ignorance. (Ex. 9)
- **The email was written after defendant read my published book describing prior threats and attempts on my life.** In that context, the statement "You put a price 'IN' our heads" warrants

LM

investigation as to whether it constitutes solicitation under Fla. Stat. § 777.04(2). The phrase appears in a communication sent shortly after defendant reviewed my published book describing prior threats and attempts on my life. The statement occurred during a period in which I had already reported threats to my safety and therefore raises concern about its meaning and intent. In light of that timing and the documented threats referenced elsewhere in this complaint, I respectfully request that investigators determine whether the statement reflects knowledge of, reaction to, or participation in conduct placing a price on my life.

Shulman's Active Participation: 2017 Parcel Delivery

Documented Conduct:

In April 2017, attorney Ken W. Shulman sent a parcel to my address in China. This address had been disclosed to Shulman by me and was not otherwise known by me to have been provided to others. Following this parcel delivery:

1. An American investigator visited me.
2. I was sprayed with chemical substances in Beijing and Jiangxi; my 2002 hazmat certification informed my identification of the substances; incidents reported to police.
3. I was assaulted at original delivery site and again after rerouting.
4. Parcel delivery address was changed mid-route (Beijing → Jiangxi). At both locations I was attacked.

Pattern of Coordination:

Shulman later asked my location while claiming ignorance of my whereabouts — a contradiction warranting investigation.

This parcel delivery, occurring approximately seven months before the November 2017 'price on head' email (Exhibit 9), raises the question of whether Shulman's involvement extended beyond passive email forwarding.

Legal Significance:

Combined with the November 2017 email (Exhibit 9), this evidence raises the possibility that Shulman's role extended beyond message-forwarding alone, including possible coordination with individuals present at delivery sites where I was subsequently assaulted.

Additional Allegation: Shulman's Possible Withholding of Evidence

(Testimonial allegation; investigation requested to clarify timeline.)

My Recollection:

I have memory of encounter with individuals who presented professional credentials (maritime/scientific background, including individual identifying as nuclear physicist from confiscated boat) at a location to which defendant had directed contact/delivery. I recall sending the boatman's name card information about this encounter to attorney Ken W. Shulman with statement to effect: "I may need this to find out who sent these people." I further recall requesting return of this information and being refused.

LM

Timeline Uncertainty — Good Faith Disclosure:

- I did not learn of Shulman's existence until Martin Yudowitz directed contact (approximately 2016–2017, Macao period).
- I fled Philippines (2014–2015) with no belongings.
- Multiple possible explanations exist for how/when this occurred.
- Email records will clarify timeline definitively.

Legal Standard:

This is presented as testimonial allegation warranting investigation, not established fact. Standard for inclusion in criminal complaint is probable cause to investigate. My sworn statement, combined with request for documentary investigation (Shulman's emails), meets this standard.

2016 Macao Incident — How I First Learned of Shulman

After fleeing Philippines, I called Martin Yudowitz from Macao seeking aid while awaiting new bank card. Martin's response:

- **"Larry, you need help!"** (stated before I spoke — indicating prior knowledge of my situation)
- Cited my specific attire, which I had not disclosed to him
- Paid only one night's hotel bill, leaving me vulnerable
- Stated: "Shulman knows where you are" and "Shulman held money" for me.

When I subsequently contacted Shulman:

- Shulman denied holding any money.
- Shulman asked: "Are you still using drugs?" (despite my confirmed sobriety — corroborated by roommates).
- This false mental illness/substance abuse implication aligned with defendant's established pattern of discrediting claims.

Legal Significance:

This incident establishes:

1. When I first learned of Shulman's existence (2016, via Martin).
2. Shulman's coordination with Martin Yudowitz.
3. Shulman's adoption of defendant's false mental illness narrative.
4. Pattern continuing the Florida-based harassment alleged herein

4.D SMS Threats and HKPF Report (2020)

Upon returning to Hong Kong on 30 August 2020 after the mandatory COVID-19 quarantine period, I immediately went to the Hong Kong Police Force to report the individuals or group that I believe were involved in the 2010 Hong Kong incidents. Despite this report, threatening SMS messages were received on 5 October 2020 from individuals who, by reference in the SMS to "ELDAVIDE" (interpreted by me as

LM

"El David"), are consistent with a connection to the individuals involved in the 2010 Hong Kong incidents and other individuals previously reported by me as involved in threats and stalking.

On 5 October 2020, I received threatening SMS messages in Hong Kong and promptly reported them to the Hong Kong Police Force. The following details are alleged:

- **On 5 October 2020, I received SMS threats in Hong Kong (Ex. 2)** from telephone number +852 9342 8498 and reported them to the Hong Kong Police Force (Ex. 4). The SMS referenced the identifier “ELDAVIDE” and stated that I was “TRAINED TO DENY.” I previously encountered an individual using the name “David” in the Philippines who stated he was a recipient of a Purple Heart medal and threatened that he would tie my feet to concrete and throw me into the ocean from a boat if I investigated his stalking activities of me. The identifiers “David,” “El David,” and “ELDAVIDE” are treated herein as possible variants of a common identity for investigative purposes.
- **When questioned by the HKPF desk officer, the senders denied sending the messages.**

4.E Un-Redaction Interference and False Mental-Illness Claims (2020–2021)

The events described in this subsection relate to defendant’s alleged interference with a medical assessment process whose results were intended for the HKPF investigation. I allege that defendant coordinated these acts from her Aventura residence.

- **Between 2020 and 2021, defendant allegedly directed a helper to un-redact medical billing records** that I had intentionally redacted before providing them to my attorney. The un-redacted information was used to mislead the doctors and discredit my account (Exs. 5, 13). During the assessment process, the doctors inquired about subpoenas of my medical records. I agreed, not realizing only the trustee had been informed at that time. This, combined with the un-redaction, raised concerns that the subpoena question could have facilitated improper interference. I believe such actions obstructed the investigation and may have allowed the suspects to manipulate the process, complicating the assessment and leading to potentially false conclusions. Defendant appeared to believe the assessment would be used to establish a case against her, further motivating the interference. Additionally, defendant falsely claimed that I had been diagnosed as mentally ill in the past, despite there being no record of such a diagnosis, further attempting to discredit my credibility. (Exs. 5, 13)
- **Defendant allegedly contacted the doctors’ office about costs already arranged by my attorney,** further indicating intent to interfere with the assessment process. The doctors later informed me that my YouTube account had “come to their attention,” suggesting that defendant or her intermediaries had drawn the doctors’ attention to content unrelated to the medical assessment. (Ex. 13)
- **In February 2021, defendant emailed attorney Robert Hamer (Ex. 5) with false claims about my mental health.** Within that same email correspondence, defendant refers to me using both the names “Lawrence” and “Larry.” The communication also references my private email requesting a medical assessment “for legal reasons” (Ex. 6). The purpose of the medical assessment was

LM

disclosed only in my private communication with the medical office. Defendant's subsequent reference to that purpose warrants investigation into how that information was obtained.

- **Via Anne, defendant allegedly argued against providing additional funds,** stating they would be used to "hurt them" (Ex. 14). I allege this was intended to prevent me from pursuing legal action by restricting my access to financial resources.
- **I deny defendant's mental-health allegations** and provide documentation of independent psychological and psychiatric evaluations conducted between 2021 and 2025, including standardized testing, reflecting no diagnosis of mental illness (Ex. 7).

4.F Pattern of False Mental-Illness Claims

I identify a recurring pattern in which defendant made false mental illness claims to third parties at critical junctures when I sought to report her conduct to authorities or secure assistance:

- **In 2008, while I was detained in China regarding a mutilated passport,** defendant made false mental-illness claims to the U.S. State Department during a period when I was facing potential criminal consequences, including possible imprisonment, despite my maintaining that I was innocent of wrongdoing.
- **In 2013-2014, during the Philippines repatriation process,** defendant and her husband told the U.S. State Department that I was mentally ill, as confirmed by the State Department liaison. This occurred after I announced my intent to return to the U.S. and report defendant's conduct to the FBI.
- **In 2020–2021, defendant directed the un-redaction of medical billing records** and contacted doctors whose assessment was intended for the HKPF investigation. The doctors subsequently referenced my YouTube account, suggesting external contact and influence regarding my mental state.
- **In February 2021, defendant emailed attorney Robert Hamer (Ex. 5)** with claims about my mental health, referencing a private communication whose purpose was disclosed only to the medical office, warranting investigation into how that information was obtained.

After receiving this allegation, I attempted to verify whether any such diagnosis existed by contacting prior medical providers and requesting available historical records. I was unable to locate any medical records confirming a diagnosis of mental illness in the United States. I further state that, throughout the relevant period and thereafter, I have not been diagnosed with any illness by medical professionals involved in my health care. I requests investigators verify the source, accuracy, and basis of the mental-health claims communicated by defendant or others. This pattern spans more than a decade and reflects a recurring sequence in which I allege that mental-health claims were raised at moments when I attempted to report defendant's conduct. Defendant's mental-health allegation is disputed and rebutted by clinician documentation available upon request (Ex. 7). I anticipate that similar claims may be directed to the Aventura Police Department in response to this complaint and requests that investigators be aware of this documented pattern. This pattern is directly contradicted by independent psychological and psychiatric evaluations conducted between 2021 and 2025, which reflect no diagnosis of mental illness (Ex. 7).

LM

4.G Prior Death Threats and Stalking Incidents (Pre-Repatriation Period, 2010–2013)

The following incidents occurred in 2010 and 2012–2013, prior to the 2014 repatriation period and the later threats and harassment described elsewhere in this complaint.

- **In 2010, I had opened a Hong Kong company office, Best Score Ltd., using funds obtained through a private mortgage loan secured on a Canadian property.** (I identify 2010 as the approximate year of the Hong Kong incidents based on the sequence of events surrounding my departure from Hong Kong, subsequent travel, and the issuance of a new U.S. passport in Boston in 2010). My office was located one block from the Mandarin Oriental Hotel in Central, Hong Kong, and shared premises with the OLN law firm. Within a few weeks of opening that office, I began observing unfamiliar individuals in the vicinity of the office whom I later recognized among the men involved in the threatening incidents described below. I later learned during the Weston, Florida visit described in Section 4.H that defendant and her husband were aware of this previously undisclosed Canadian mortgage. One of the individuals later involved in the Hong Kong bottle-attack incident was a bald American male whose speech and accent sounded consistent with a New England regional accent to me, who grew up in New England. I request investigation into how the Canadian mortgage information was obtained and whether it was used to facilitate monitoring of my activities and location.
- **In Hong Kong, I was directly threatened with death by two unidentified Caucasian men who threatened to kill me.**
- **Immediately after the incident, I telephoned defendant Evelyn Yudowitz and her husband to report that two unidentified foreign men had threatened to kill me.** During that call, I informed defendant that two unidentified men had threatened to kill me. Defendant responded with words to the effect that, "Did I tell them there was no reason to kill you," which mirrored the same words I had just used when responding to the individuals who had threatened me, by stating, "we are going to kill you," to which I replied, "There is no reason to kill me." This response was unusual given that it was defendant's immediate reply to my report of the threat. Additionally, the response was delivered in a manner reflecting urgency, emphasis, and anger consistent with the threatening context described by me In light of the temporal immediacy of the call, the similarity in phrasing, and the surrounding pattern of threats and coordinated conduct described elsewhere in this complaint, this exchange raises a question as to whether the defendants had prior knowledge of, contemporaneous awareness of, or communication with the individuals who made the threats. I request that investigators evaluate whether this response reflects coincidence, indirect knowledge, or direct or indirect communication between the defendants and the individuals involved in the Hong Kong incident.
- **Separately during the same Hong Kong period, near my Hong Kong office (one block from the Mandarin Oriental Hotel),** the bald American male approached me alone, stood next to me to get my attention, and stated into his phone, "Do you want me to shoot him," which I understood as a direct death threat. The bald American male was also present at the Hong Kong bottle-attack incident described above.

LM

- **Following these Hong Kong events, I departed Hong Kong intending not to return;** I did not return to Hong Kong until 30 August 2020 when COVID-19-related circumstances required my return. From Hong Kong, I first travelled into mainland China en route to the United States, entering Shenzhen by land from the Hong Kong border. Immediately upon entering Shenzhen, I was struck by a motorcycle in what I describe as a deliberate act; the motorcyclist feigned a fall after striking me and demanded money from me. I then travelled to Seattle, where my U.S. passport application was rejected at the Jackson Federal Building. Immediately upon exiting the Jackson Federal Building, a heavy whiskey-type bottle was dropped from the secure rooftop over the entrance of Brooklyn Seafoods restaurant, directly across the street; I took one step and the bottle missed me by a hair. The Brooklyn Seafoods rooftop required secured access, and I submit that the bottle drop was a deliberate act consistent with a continued attempt on my life. Following the incident, I hired an armed security professional/bodyguard. Through that security professional's personal contact with an individual working that day there with Brooklyn Seafoods restaurant, I obtained post-incident corroboration that the bottle-drop incident occurred as described. I provide this information as post-incident corroboration and request that investigators independently verify any available records, witnesses, or restaurant personnel connected to the incident. I later attempted to report the incident to the Seattle Police Department; however, the desk-officer advised me that it would likely be considered an accident. Due to fear and safety concerns at the time, I did not continue pursuing the report further. During the broader Seattle period that followed, which included travel between Seattle and Vancouver, the bald American male who had been present at the Hong Kong bottle attack appeared in Seattle. On a separate occasion during the same broader Seattle period, the gray-haired American male also appeared in Seattle, including at a coffee shop at the Seattle Convention Centre, where he asked the barista whether I was bothering her after I left. The bald male and the gray-haired male did not appear together. I cannot confirm that the bald male's and gray-haired male's appearances in Seattle were specifically at the moment of the Seattle bottle drop, but their appearances during the broader Seattle period are consistent with continued cross-jurisdictional pursuit by individuals connected to the Hong Kong attack.
- **I believe this individual engaged in repeated stalking behavior across jurisdictions** and requests investigation into myidentity, travel movements between Hong Kong and Seattle during the relevant periods, and any contact with defendant or her intermediaries.
- **The incidents described above occurred in multiple jurisdictions over several years and, in my view, reflect a recurring pattern of harassment and threats warranting investigation.**
- **In late August / early September 2020, immediately after completing mandatory COVID-19 quarantine,** I reported the 2010 Hong Kong incidents and the group's subsequent appearances in multiple countries to the Hong Kong Police Force. The rapid reappearance of threats via SMS on 5 October 2020, shortly after this report, is consistent with the same individuals being aware of my return to Hong Kong, and is consistent with the recurring pattern of harassment alleged herein spanning more than a decade.
- **In or about 2012 or 2013, prior to the repatriation period and prior to my meeting Lesyl Medalla,** I arrived in Manila from China for the purpose of ending a personal relationship with a

LM

prior girlfriend. Upon arrival at Manila airport, I was followed by two men to the Jade Hotel in Manila. On the night of the breakup, while I was in the Jade Hotel lobby, a young woman accompanied by her family invited me to dinner in Angeles City. I arranged secure transportation in the form of a security van to the designated meeting point. At the meeting point, two unfamiliar people — who, when contacted, were reachable at the same telephone number as the family who had issued the invitation — insisted that the group proceed under a pitch-black bridge outside town at night. The driver of the security van became visibly afraid and refused. Both the driver and I clearly heard one of those two people talk to their phone say literally that "the hit was canceled" after the driver refused to proceed. The trip was abandoned. I respectfully request that investigators identify and, if possible, interview the security-van driver and any Jade Hotel staff or records from this 2012–2013 period, and determine whether the individuals who followed me from Manila arrivals were connected to the broader pattern of cross-jurisdictional pursuit described elsewhere in this complaint.

4.H Post-Seattle Visit and Knowledge of Private Financial Information

- Following the Hong Kong and Seattle incidents, I visited defendant Evelyn Yudowitz and her husband in person.
- During that visit, I observed my mother activate her phone speaker function while he was speaking privately inside her vehicle. I later understood that my father had been listening to the conversation remotely.
- Upon returning to their residence, my father confronted me angrily regarding the contents of that private conversation.
- During that discussion, my father stated that he was aware of my private mortgage in Canada. I had not disclosed this information to him.
- When questioned as to how he obtained that information, my father stated that his attorney discovered it while reviewing tax matters involving a gift tax. I do not know whether this explanation was accurate, and notes that my mother disputed this explanation by saying aloud "You're a liar" during the conversation. My mother interjected during this explanation. The Canadian mortgage referenced in this exchange was the same private home mortgage I had used earlier to capitalize my Hong Kong company (Best Score Ltd.), as described in Section 4.G; I had not disclosed the use of those funds, or the existence of that mortgage, to defendant or her husband.
- I request investigation into how my private Canadian mortgage information was obtained, whether investigators were retained in Canada, and whether any such information sharing is connected to the broader pattern of monitoring and coordination described herein.
- I request investigation into whether any person unlawfully intercepted, monitored, or relayed the contents of my private communications in connection with these events, and whether such monitoring relates to the acquisition of the Canadian mortgage information and other cross-jurisdiction monitoring concerns described herein.

LM

- During a visit to my father's Boston office during the same general period as the Weston visit described above, Paul McSweeney showed me his elbow in the office at this urgent meeting with my father and asked me what the elbow reminded me of. I did not at the time understand the significance of the question, except that the "elbow touch" in 1990 was what began my telling of the sexual molestations by my father's father (In 1990 Paul and I had a conversation outside my counseling office when he told me he could "kill my father" that he had allowed my molestations to happen, but anyways I recalled Paul asking me to tell him what his elbow remind me of as memorable in the moment itself. Years later, in 2015 at Kukuk's Nest in Cebu, an American present at that location—who told me he had been to Thailand and who, while simultaneously on his phone, asked me "Is your [Hebrew name] name 'heart'?"—showed me his elbow asking me to look at it, and stated he had been hit by a motorbike. I submit as a stated belief that the earlier elbow gesture in Mr. McSweeney's office had the effect of conditioning me to remember the elbow as a recognition signal, and that the later Cebu reference may have been a deliberate reference back to the earlier gesture…(or possibly the motor crash accident which happened before entering Philippines that trip). The pattern is one investigators may wish to evaluate against Mr. McSweeney's documented methods This stated belief is consistent with Mr. McSweeney's documented professional background in risk-management, corporate security, and undercover investigations, in which the use of prepared cues and recognition signals is established practice. I do not assert that Mr. McSweeney was personally present in China or in Cebu, but submits that the pattern reflects coordination consistent with Mr. McSweeney's methods and his documented engagement by my parents.

SECTION 5: CHARGES

Based on the facts set forth in Section 4, I allege the following charges against the named defendants. All statute citations refer to the Florida Statutes. I request prosecutorial review of timeliness under Fla. Stat. § 775.15 for each count.

Count 1: Solicitation to Commit Murder — Fla. Stat. § 777.04(2)

Defendant: Evelyn Yudowitz

Elements: Intent to cause another to commit murder; an overt act commanding, encouraging, hiring, or requesting another to commit murder.

Supporting Facts: 2015 threats to kill me and bribery attempts against Lesyl Medalla to assist in murder. I allege

these acts were coordinated from defendant's Aventura residence (Exs. 17, 18). November 2017 email stating "You put a price 'IN' our heads" (Ex. 9), authored by defendant and forwarded by Shulman as an overt act. I request investigation as to whether this communication constitutes solicitation under this statute. The Cebu City Police Blotter (Ex. 18) and Lesyl Medalla's handwritten statement (Ex. 17) corroborate the threats and bribery attempts directed at me. My brother Martin Yudowitz stated by telephone in or about 2015, while I was in the Cebu region of the Philippines, that defendant Evelyn Yudowitz and her husband

LM

had "ordered him to help take care of" me This statement followed a separate 2014 Cebu call in which Martin Yudowitz had instructed me to ignore active death threats and refrain from reporting them. The verbatim "take care of" phrasing, and Lesyl Medalla's contemporaneous explanation that speakers using it "really wanted to do bad things to" me (Ex. 17), corroborates my understanding of Martin Yudowitz's statement as a directive originating from defendant's Aventura residence.

I request prosecutorial review of timeliness under Fla. Stat. § 775.15.

Count 2: Tampering with a Witness, Victim, or Informant — Fla. Stat. § 914.22

Defendant: Evelyn Yudowitz

Elements: Intentionally engaging in misleading conduct or intimidation with the purpose of preventing a person from reporting a crime or seeking legal recourse.

Supporting Facts: 2013-2014 fund withholding and false mental-illness claims to the State Department to prevent FBI reporting and discredit me (Ex. 1). The false mental-illness claims were confirmed by the State Department liaison, who acknowledged that defendant and her husband had told the State Department I was mentally ill. 2020–2021 un-redaction of medical billing records and interference with doctors' assessments to obstruct the HKPF investigation (Exs. 5, 6, 13). Defendant's contact with the doctors' office about costs already arranged by attorney, and the doctors' subsequent reference to my YouTube account, indicate deliberate interference with the assessment process. Pattern of false mental-illness claims in 2008, 2014, and 2020–2021, each occurring when I attempted to report defendant's conduct to authorities. Additionally, in late 2014, Martin Yudowitz telephoned (or was telephoned by) me while I was in Cebu, Philippines and instructed me to ignore the active death threats then being made against me and not to report or complain about them, while referencing my prior emails to family describing those threats. This instruction not to report is presented as additional evidence of coordinated efforts to prevent me from reporting defendant's conduct and the associated threats to authorities.

I request prosecutorial review of timeliness under Fla. Stat. § 775.15.

Count 3: Stalking — Fla. Stat. § 784.048(2)

Defendant: Evelyn Yudowitz

Elements: Willfully, maliciously, and repeatedly harassing another person, causing substantial emotional distress.

Supporting Facts: 2015 threats and bribery attempts initiating harassment pattern (Exs. 17, 18), including threats to shoot me and offers to bribe Lesyl Medalla. 5 October 2020 SMS threats from +852 9342 8498, linked by reference to "ELDAVIDE" / "El David" to the conduct alleged against defendant, with senders referencing "ELDAVIDE" and stating I was "TRAINED TO DENY," continuing the established pattern of false mental-illness claims (Exs. 2, 4). 2021 email with false claims and fund-withholding argument reinforcing repeated harassment (Exs. 5, 14). Defendant maintained communication with intermediaries to direct the harassment across multiple countries and over a period of years, causing me to relocate abroad for safety.

I request prosecutorial review of timeliness under Fla. Stat. § 775.15. LM

Count 4: Conspiracy to Commit Murder — Fla. Stat. § 777.04(3)

Defendant: Ken W. Shulman

Elements: Agreement to commit murder; an overt act in furtherance of the conspiracy.

Supporting Facts: Shulman forwarded defendant's November 2017 email stating "You put a price 'IN' our heads" (Ex. 9), an overt act furthering the conspiracy. In April 2017, Shulman sent a parcel to myChina address—known only to Shulman—after which an investigator visited; Shulman later asked my location claiming ignorance. Additional overt acts of active participation, including the 2017 parcel delivery sequence (resulting in physical assaults at delivery sites and rerouting), the 2016 Macao incident (Martin Yudowitz directing me to Shulman and confirming surveillance), and Shulman's adoption of defendant's false mental-illness narrative, are described in Section 4.C and support investigation of Shulman's role as a potential co-conspirator. Martin Yudowitz's 2015 Cebu-region statement that defendant Evelyn Yudowitz and her husband had "ordered him to help take care of" me, combined with his prior late-2014 Cebu-region instruction to ignore active death threats and not report them, and corroborated by the verbatim "take care of" language and "do bad things to him" explanation in Lesyl Medalla's handwritten statement (Ex. 17), is presented as evidence of an agreement and overt acts in furtherance of the conspiracy alleged herein. I respectfully request that investigators evaluate Martin Yudowitz's role as a potential intermediary or unindicted co-conspirator.

I request prosecutorial review of timeliness under Fla. Stat. § 775.15. I respectfully request investigation into whether the above-described conduct satisfies the statutory elements of conspiracy under Fla. Stat. § 777.04(3).

SECTION 6: JURISDICTIONAL BASIS

I allege that defendant Evelyn Yudowitz's Aventura residence at 19333 W. Country Club Dr., Apt. 1723, Aventura, FL 33180, was the location from which threats, solicitation, and obstruction were coordinated via telephone, email, and intermediaries.

Florida jurisdiction is proper under Fla. Stat. § 910.005, which provides that where any part of an offense or its effects occurs in the State of Florida, the state has jurisdiction to prosecute. The acts described herein—including the withholding of funds, coordination of threats, and email communications—originated from or were directed from defendant's Aventura address.

Co-defendant Shulman's forwarding of the November 2017 email furthered a Florida-based conspiracy, extending jurisdiction under Fla. Stat. §§ 777.04(3) and 777.011.

Specifically, the following acts are alleged to have been initiated, coordinated, or directed from defendant's Aventura address: the 2013-2014 withholding of $100,000 from a joint account and the routing of repatriation through a State Department liaison; the coordination of intermediaries who arrived at my overseas address with a police escort; the December 2014 sending of a paper check and direction to hospital rather than police; the 2015 coordination of threats and bribery attempts via telephone; the authorship of the November 2017 email; the 2020–2021 direction of a helper to un-redact medical billing records; the contact with doctors' office about costs; and the February 2021 email to attorney Robert Hamer.

LM

The cumulative effect of these Florida-based acts provides a substantial jurisdictional basis for prosecution within the City of Aventura and Miami-Dade County.

I further note that the continuing effects of the conduct described herein—including ongoing fear for personal safety, relocation abroad, and inability to safely return—constitute continuing impact within the jurisdiction and warrant present-day investigative review.

SECTION 6A: STATUTE OF LIMITATIONS — FRAUD DISCOVERY RULE

Discovery of Concealed Evidence (2023)

I discovered critical bank records in 2023 (Exhibit 1) that were inherently concealed and impossible to discover earlier. These records prove defendant withheld $100,000 in 2013-2014 while I was stranded in Philippines seeking repatriation. Prior to 2023, I had no access to these records and no knowledge the account existed.

Applicable Statute

Pursuant to Fla. Stat. § 775.15(10)(b): "A prosecution may nevertheless be commenced for any offense, a material element of which is either fraud or a breach of fiduciary obligation, within 5 years after discovery of the offense by an aggrieved party."

Application

- **Fraud as material element:** Concealment of $100,000 account constitutes fraud.
- **Breach of fiduciary obligation:** Defendant, my mother and potential administrator of family funds (see Exhibit 15 — Greenwald trust fund reference), owed fiduciary duty not to conceal assets. My attorney Robert Hamer independently confirmed the trust account was withheld by trustee defendant Evelyn Yudowitz (see Section 4.A, Attorney Confirmation of Trust Withholding).
- **Discovery date:** 2023 (when bank records obtained).
- **Filing date:** 2026 (within 5-year discovery period; expires 2028).
- **Inherent concealment:** I was overseas, had no access to U.S. banking information, and was dependent on defendant's honesty about available funds.

Additional Tolling Arguments

1. **Continuing Offense:** Defendant's obstruction and conspiracy continue through present date.
2. **Fla. Stat. § 775.15(12)(a):** Standard fraud exception provides 1 year from discovery, up to 3-year extension.
3. **Fla. Stat. § 775.15(5):** Tolling during any periods defendant was absent from Florida.

SECTION 7: INVESTIGATIVE REQUESTS

LM

I request the assigned detective pursue the following:

- **Email / Account Logs (2017):** Subpoena service-provider logs and content for accounts reflected in Exhibit 9 (both sender and Shulman forward), including IP and login metadata for approximately ±90 days around the communication.
- **Telecom CDRs (2014–2021):** Subpoena Florida carrier call-detail and text records for phone numbers associated with Evelyn Yudowitz and known intermediaries, including cell-site and subscriber data to establish Florida-based coordination. Include CDRs tied to Florida-registered accounts and billing addresses.
- **SMS Subscriber Data (2020):** Obtain subscriber-identification data for the SMS number reflected in Exhibit 2 (+852 9342 8498), through coordination with Hong Kong telecommunications providers or the HKPF.
- **Identification of "David" / "El David" / "ELDAVIDE" (Philippines and Hong Kong Threats):** Investigate the identity of the individual or individuals referenced in the 5 October 2020 SMS messages (Ex. 2) under any of the variants "David," "El David," or "ELDAVIDE." I previously encountered an individual using the name "David" in the Philippines when he consistently approached me, who stated he was a recipient of a Purple Heart medal and made direct threats against me. Investigators may be able to identify this individual by cross-referencing U.S. military Purple Heart recipient records with travel records to the Philippines and Hong Kong during the relevant period, and by querying any of the three name variants.
- **HKPF Coordination:** Request certified Hong Kong Police Force records for incidents referenced in Exhibit 4, including confirmation of report numbers, dates, and any investigative findings.
- **HKPF 2020 Post-Quarantine Report Coordination:** Request that HKPF be coordinated with to obtain certified records of my late August / early September 2020 in-person report, made immediately upon completion of mandatory COVID-19 quarantine, concerning the 2010 Hong Kong death threats, the bottle attack, the bald American male, the two men who threatened to kill me, and the subsequent appearances of individuals believed by me to be connected to those incidents in the United States and the Philippines. These pre-5-October-2020 report records are directly relevant to the question of how the senders of the 5 October 2020 SMS became aware of my return to Hong Kong especially that I went directly to quarantine.
- **Email Metadata / IP Logs (2017 and 2021):** Subpoena email service-provider metadata and IP logs associated with Exhibit 9 (November 2017 email) and Exhibit 5 (February 2021 email to attorney Robert Hamer), to confirm originating IP addresses and account access locations.
- **Medical-Billing Records (2020–2021):** Identify and subpoena the individual responsible for un-redacting medical billing documents; obtain device/IP logs or access metadata associated with the un-redaction event.
- **False-Claim Safeguard:** Upon case initiation, monitor and document any communications from Evelyn Yudowitz or her intermediaries to Aventura Police personnel for potential attempts to mislead investigators through fabricated mental-health allegations, consistent with her documented prior pattern.

LM

- **Interview Request:** Conduct an in-person interview of Evelyn Yudowitz at 19333 W. Country Club Dr., Apt. 1723, Aventura, regarding Exhibits 1, 5, 9, 14, 17, and 18.
- **Subpoena Targets:** Ken W. Shulman (email and telecom records); relevant email service providers (Exhibit 9 metadata); Florida-based banks and financial institutions (Exhibit 1 account records); medical billing service or office (un-redaction access logs).
- Identify and interview individuals present during the 2010 Weston visit described in Section 4.H to determine: (i) whether my private conversation was intentionally monitored via speakerphone or other means; and (ii) how my undisclosed Canadian mortgage information was obtained.
- Identify any United States Department of State personnel who communicated with Evelyn Yudowitz or her associates concerning my repatriation loan application, including the identity of the State Department liaison referenced in this complaint, and obtain any related communications, records, or contact logs reflecting such interactions.
- Examine whether any payments, transfers, tuition payments, gifts, deposits, remittances, or other financial support originating from Evelyn Yudowitz, Ken Shulman, or any intermediary connected to them were directed to Lesyl Medalla, her son, or any person acting on her behalf during the period relevant to the bribery and coercion described herein.
- **LinkedIn / Employment Records (Michael Yudowitz):** Identify and verify employment history, affiliations, and any security-related roles associated with Michael Yudowitz during the period 2013–2017. This may include obtaining publicly available profile data (Ex. 19), confirming employers, and, where appropriate, requesting records from identified companies regarding position, dates of employment, training, and any international travel or assignments. I request that investigators determine whether any such affiliations are temporally associated with the August 10, 2014 warning and subsequent events described in Section 4.A.
- Interview of Anne Yudowitz regarding the February 2021 statement referenced in Exhibit 14, including the factual basis (if any) for her stated belief that funds provided to me would be used to "hurt them," and any contemporaneous communications with defendant Evelyn Yudowitz concerning that statement.
- Interview of Martin Yudowitz regarding (i) his late-2014 telephone communication with Martin instructing me to ignore and not report active death threats in the Philippines; (ii) his 2015 telephone statement that defendant Evelyn Yudowitz and her husband had "ordered him to help take care of" me; and (iii) his prior 2014 joint communication with defendant referenced in §4.A ("That's what you get for writing the letter"). Subpoena of Martin Yudowitz's 2014–2016 telephone records is requested to corroborate the timing and existence of these calls.

Priority Investigative Requests

A. U.S. State Department (FOIA/Subpoena)

- Complete 2013-2014 repatriation loan file for Larry Margulies.
- All communications regarding required exit amount.

LM

- Identity and communications of Arlington, MA liaison.
- All communications from Evelyn Yudowitz regarding me.
- Records of mental illness claims (2008, 2014, 2020–2021).
- The secret State Department letter referenced by Cebu NBI leaders as held in their safe.

B. Financial Records

- Complete records for account in Exhibit 1 (2014 balance, ownership, signatory).
- Wire transfer records: $1,500 sent by defendant (2014).
- Greenwald trust fund records (Exhibit 15).
- Trust account records confirmed by attorney Robert Hamer as withheld by trustee defendant.

C. Ken W. Shulman Email Records (Priority Subpoena)

- November 2017 "price on head" email (full metadata, IP, headers).
- April 2017 parcel delivery records to China address.
- ALL emails from Larry Margulies (2014–2021).
- All communications between Shulman and Evelyn Yudowitz.
- All communications between Shulman and Martin Yudowitz (2016 Macao timeframe).
- Any emails containing business cards, photos, or threat-related evidence.

D. Telecommunications

- 2014 phone records to corroborate FBI conversation timing.
- 2014 phone records showing call where Evelyn and Martin jointly stated "That's what you get for writing the letter."
- 2020 SMS records (Hong Kong threats — Exhibit 2).
- Defendant's international call records.

E. Witness Interviews

- Michael Yudowitz regarding his August 10, 2014 warning about "sending guys to your room to set you up."
- Robert Hamer regarding trust account confirmation.

Immediate Investigative Starting Points

I respectfully identify the following as immediate investigative starting points:

- Subpoena of Exhibit 9 email metadata;
- Subscriber identification of the SMS number +852 9342 8498 (Exhibit 2);
- Interview of Lesyl Medalla regarding documented threats and bribery attempts.

LM

SECTION 8: RELIEF REQUESTED

The November 2017 email (Ex. 9) stating "You put a price 'IN' our heads" was forwarded by co-defendant Ken W. Shulman. I request investigation as to whether this communication constitutes solicitation under Fla. Stat. § 777.04(2). The language of this communication, combined with the 2015 threats to kill me, the bribery attempts against Lesyl Medalla, and the 5 October 2020 SMS threats reported to the HKPF, establishes a pattern of conduct warranting formal investigation.

Due to the nature and persistence of the alleged conduct, I have relocated abroad for safety and remains overseas as of August 2026. I respectfully request:

- Issuance of a case number and formal acknowledgment of this complaint.
- Assignment of a detective to conduct the investigation described in Section 7.
- Initiation of a formal investigation into the conduct of Evelyn Yudowitz and Ken W. Shulman under the statutes cited herein.
- Coordination with the Hong Kong Police Force to obtain certified records of my late August / early September 2020 in-person report (made immediately upon completion of mandatory COVID-19 quarantine) concerning the 2010 Hong Kong death threats, bottle attack, and the group's subsequent appearances in the United States and the Philippines, in addition to the 5 October 2020 SMS report records already referenced in Exhibit 4.
- Consideration of a restraining order under Fla. Stat. § 784.046 to protect me from further contact by defendant and her intermediaries.
- Determination whether the November 2017 communication stating "You put a price 'IN' our heads" constitutes solicitation to commit murder under Fla. Stat. § 777.04(2), including identifying any individuals solicited, financial transfers, or related communications.
- Assessment of whether the conduct described herein reflects an ongoing course of conduct, including potential continuing threats, coordination, or related activity that may fall within applicable statutes of limitation based on recent or continuing acts not yet identified. I further request that any available databases, communications, or law enforcement intelligence systems be reviewed to determine whether related activity has occurred after the dates currently known to me.
- Assessment of any ongoing threat risk, as I believe individuals involved may remain active.

SECTION 9: SIGNATURE AND NOTARIZATION

LM

Signature: Larry Margulies Larry Margulies

Date: 31 of July, 2026

NOTARY PUBLIC

State of Florida, County of Miami-Dade

On this 31st day of July 2026, before me, a Notary Public, personally appeared Larry Margulies, known to me (or satisfactorily proven), and acknowledged execution of this instrument.

Notary Signature: D Collado Notary Seal:

Commonwealth of Pennsylvania - Notary Seal
Danilza M Collado, Notary Public
Philadelphia County
My commission expires April 20, 2030
Commission Number 1468346

Notarized remotely online using communication technology via Proof.

SECTION 10: EXHIBITS

The following exhibits are true and correct copies, provided under penalty of perjury pursuant to Fla. Stat. § 92.525.

Emails and Correspondence

- **Exhibit 5:** February 2021 emails from Evelyn Yudowitz to attorney Robert Hamer.
- **Exhibit 6:** My 2020 private email to doctors requesting medical assessment for legal reasons.
- **Exhibit 9:** Defendant's November 2017 email via Shulman: "You put a price 'IN' our heads."
- **Exhibit 13:** Email from doctors regarding YouTube post.
- **Exhibit 14:** 2021 email from Attorney Robert Hamer regarding Anne's "hurt them" argument.
- **Exhibit 15:** Skype chat with Michael Yudowitz regarding request to make Michael trustee over my assets.

Police and Official Reports

- **Exhibit 4:** Hong Kong Police Force (HKPF) Report Cards for 2020 Threat Reports

  This exhibit contains two Hong Kong Police Force (HKPF) report-card stubs documenting my multiple reports of continued threats from the same group that first threatened to kill me in 2010. The reports covered by these cards include: the report made immediately after my completed mandatory COVID-19 quarantine in late August / early September 2020 (also few days before the 5 October 2020 SMS threats); and a further report made during the actual threatening-SMS incident, and then again afterwards, shown between screenshot 1 and screenshot 2, at which time the desk officer used my phone to contact the texter, who denied sending the message. Although I recall that three or four report cards may have been issued in connection with these matters, only the two stubs listed below are in my possession and are produced as this exhibit. Because the cards show only the report/case numbers and not the exact visit dates, I cannot state with certainty which card corresponds to which police visit. Sub-exhibits 4-A — HKPF report-card stub bearing one of the case/report numbers assigned to the threat matter. 4-B — HKPF report-card stub bearing the other case/report number assigned to the same matter (or an update/follow-up entry). Database note: HKPF officers advised me that any one of these report/case numbers links all related threat-report entries recorded in the Hong Kong Police Force database. Consequently, either card enables investigators to retrieve the complete sequence of linked reports (including earlier filings, later follow-ups, and any additional cards that may exist but are not in my possession).
- **Exhibit 18:** Cebu City Police Blotter report, July 21, 2015, signed by Lesyl Medalla.

LM

- **Exhibit 22:** Letter from a Bohol-area Philippine police station documenting my report of a foot injury sustained shortly after my arrival in Bohol in 2015. The injury confined me for approximately six weeks and delayed further reporting to authorities during that period (referenced in §4.B).
- Exhibit 23: China Cardiac Evaluation — Post-Baguio Chemical Spray Incident Assessment Showing Healthy Heart Function. Cardiac evaluation conducted after I left the Philippines following the reported Baguio incident, documenting subsequent cardiac findings relevant to review of the reported acute cardiac episode and related records.

Financial Documents

- **Exhibit 1:** 2023 bank records showing $100,000 withheld in 2014.

Medical and Psychiatric Reports

- **Exhibit 7:** Independent psychological and psychiatric evaluation results (Philippines 2015; Dubai 2021–2025; China 2025).
- **Exhibit 8:** 1979 professional report page strongly recommending psychotherapy (unredacted copy).

Witness Statements

- **Exhibit 16:** Lesyl Medalla's notarized affidavit regarding mid-2015 Baguio visit.
- **Exhibit 17:** Lesyl Medalla's statement implicating defendant in coercion, bribery, and threats. Supporting documentation within Exhibit 17 includes a hotel receipt corresponding to the relevant morning of the gray SUV encounter.
- **Exhibit 21:** Lesyl Medalla's handwritten letter to the Bureau of Immigration, Republic of the Philippines, dated 14 July 2015. This letter was written with Lesyl's assistance to explain why I was late in extending his visa. It was prepared during the same period of intense pressure and intimidation described in Exhibits 16, 17, and 18.

Threats and Hong Kong Records

- **Exhibit 2:** 2020 SMS from Hong Kong assailants — Evidence of direct threats and intimidation received by me.
- **Exhibit 3:** 2020 Hong Kong entry slip.
- **Exhibit 10:** Letter from Michael Zhang, April 2, 2025.
- **Exhibit 11:** Letter from Nguyen Weeks, October 17, 2022 (character witness). References defendant's husband's historical pattern of paranoid accusations followed by violence. This pattern repeated when parents accused me of financial manipulation regarding house purchase, preceding the attempts on my life detailed in complaint.

Motive and Background

LM

- **Exhibit 19:** Public LinkedIn profile associated with Michael Yudowitz reflecting security-related roles (source: LinkedIn).
- **Exhibit 20:** Letter from Mitchell Garabedian, Esq. to Larry Margulies (2014) — establishes motive for defendant's 2013-2014 obstruction conduct (see Section 4.A.1).

Historical Context Evidence

- **Exhibit 24:** Childhood Photograph and Historical Context Evidence — Childhood photograph of me from the period described in Section 3A. I state that the photograph contains physical burning damage I caused purposely during childhood as a personal reminder of the traumatic experiences I associated with that period. Included as historical context regarding my childhood experiences and the lasting impact of the events described.

LM

——————————— **END OF DOCUMENT** ———————————-