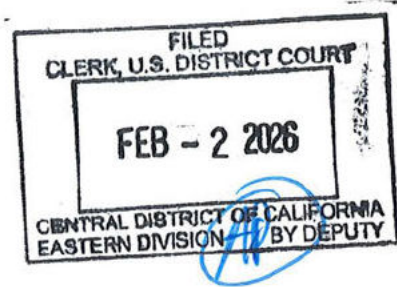


January 20, 2026

The Honorable Sunshine S. Sykes
District Judge

George E. Brown Jr. Federal Building and U.S. Courthouse
Riverside Courtroom 2, 2nd Floor
3470 Twelfth St.
Riverside, CA 92501-3801



Re: Plaintiff Marin Barbu, Case No. 5:52-cv-02429-SSS-MAA,
Plaintiff Mihai-Constantin Petcu, Case No. 5:25-cv-02429-SSS-RAO,
Plaintiff Constantin-Alin Nitu, Case No. 5:25-cv-02559-DSF (SPx),
Plaintiff Alexandru-Cristian Busca, Case No. 5:25-cv-03052 JAK (RAOx),
Plaintiff Bogdan Ionescu, Case No. 5:25-cv-03093-SVW-JC,
Plaintiff Aurelian Busca, Case No. 5:25-cv-03048-MWC (DTBx),
Plaintiff George-Adrian Vasile, Case No. 5:25-cv-002561,
Plaintiff Razvan-Gheorghe Nitu, Case No. 5:25-cv-02560-MEMF (SPx),
Plaintiff Florin Cristian Caragea, Case No. 5:25-cv-03076-AB (DTBx),
Plaintiff Cristian Aeroaiel, Case No. 5:25-cv-02461-KK (DTBx), and
Plaintiff Marian Dragne, Case No. 5:25-cv-3074-CAS-DTB

Dear Honorable Sykes,

This letter is written by myself, Paul Havsgaard, the accused in these cases. I am responding to the CIVIL STANDING ORDER which I received from you. I am not an attorney, nor can I afford to hire an attorney. This is my personal response.

I have been overwhelmed since I first started receiving these documents a few years ago regarding the street kids that I was able to help, now some years ago. When I first went to Romania, my heart was broken by all the young kids living outside on the streets and in the sewers while it was very cold with snow on the ground. Many of them had no shoes or cold weather apparel.

I have dealt with a lot of anger since receiving Attorney Ann Olivarius' and Attorney Jan Cervenka's claims. I spent nearly 12 years, along with thousands of dollars of my own finances, to help these kids. There are many wonderful kids that indeed needed to be helped and sincerely wanted to be helped. The former street kids behind all of these lawsuits are only one part of the kids we were able to help and it is all about money for them. It has always been all about money to them, when I was still there and now. They even asked me when they found out we were selling our house in America, how much they were going to get individually from the sale!

I am angry because the lawsuit states these accusations as if they are facts. They are not. Everything I am accused of in these lawsuits are blatant, ugly lies manufactured for one purpose, to achieve a payout.

If things were as bad as these accusations claim, each child could have left whenever they wanted to. In fact, the children were allowed to go and come as they pleased.

I went to Romania because I cared about the street kids. I saw them living on the streets, in wind and snow of January weather, doing whatever they could (begging and stealing) to get food, stay warm and survive. Most of their families didn't know where they were and didn't care. Most of the general population of Romania didn't care and I was even asked more than once why I helped them and was told they were worthless and there was no help for them. Even more than one police officer and a college dean told me that!

When I saw these kids, I knew I had to do something to help. When I got back to California, I shared with people in my church about the terrible situations and circumstances I had seen. Two months later I returned to Romania to see what could be done to help them. At that time I also began the necessary steps to form a foundation in Bucharest in order to be able to help any of them I could.

As we were forming the Romanian Foundation, one of the government workers told me: "You know these kids will lie to you, steal from you, cuss you and much more. Are you willing to deal with all that?" I told her I was, I just wanted to help them to be able to have normal lives and to be able to grow up with a future and a hope.

In all of Ms. Olivarius' and Ms. Cervenka's efforts to round up information to discredit me and to bring false accusations against me, they say nothing of all that we accomplished in the lives of the children. We put them through school, after first helping to build that school because street kids were not allowed in Romanian schools because they did not have proper documentation that was required to attend them. We provided food, shelter, clothes, even Christmas and Birthday presents and much more. They were treated well by all the staff and myself. When staff did not treat them well, they were fired.

In Ms. Olivarius' communications with former street kids, she intentionally made fraudulent statements in order to gain a greater number of plaintiffs and thereby increase her own potential financial gain. The plaintiffs' testimony will be forever tainted by this intentional deceit. In a letter (Exhibit A) dated 11/10/2022, she told a potential witness in the third paragraph, "Paul admitted to church staff that he was and remains desperately ill and cannot control himself". It also says that I was receiving counseling from the church for this behavior. None of this is true just as the accusations are absolutely not true. In fact, I have repeatedly denied all of these horrific accusations and attested to my innocence. These false statements are against Rule 4.1: Truthfulness in Statements to Others, according to the ABA.

There are so many lies in Ms. Olivarius' communications to the former street kids. Toward the end of the 2nd paragraph, Ms. Olivarius wrote, "The church had been on notice of 'Paul's appetites' and of the abuse but decided to do nothing." The church was never put on notice because nothing had ever happened. Ms. Olivarius had no way to gain this type of inside information from the church to prove such terrible claims because it never happened. She had no "insider" resources to something that never happened. She completely fabricated the statements but shared it as true fact to a potential witness in order to recruit him to her case.

At the end of the third paragraph, Ms. Olivarius says that my new wife "brought him more young boys to 'care for'". This is another completely false statement implicating criminal behavior. There is no evidence or proof of any pedophile behavior by myself or my wife. Law enforcement has never been called nor filed charges against myself or my wife. There is a complete absence of criminal findings. Ms. Olivarius has no proof to support these completely disgusting and cruel allegations. She is (again) creating false evidence and tampering with witnesses. My grandchildren and any other children who have visited our home, can attest to the fact that I've never harmed them. All of these evil thoughts and accusations come straight from the mind of the attorneys bringing these lawsuits.

At the end of the third paragraph, Ms. Olivarius calls my shape grotesque and my new wife heavy. The descriptions of our weight are not necessary for the case(s) and only seeks to prejudice the witnesses against me. This is against Rule 8.4, Misconduct through discrimination and harassment.

Ms. Olivarius used the promise of financial gain to coax witnesses to testify against me in paragraphs five and six. Please note, she never asks these former street kids to be honest or to tell the truth about what happened during their time at the orphanages. Rather, she tells them what she wants them to say.

The entire correspondence shows the lengths that Ms. Olivarius will reach, in order to deceive witnesses and malign my character so terribly that she can achieve financial gain through this litigation. The accusations against me in her communications are ludicrous. Most of these former street kids would not have come up with these accusations on their own and especially would not have, were it not for the promise of financial gain.

I'd like to bring to your attention that Ms. Olivarius has a prior history of dishonesty. She was previously found guilty of making materially false statements with nine specifications of the single charge by Appellate Division of NY, entered on April 5, 2012, (please see *Matter of Olivarius*, Exhibit B). Please also note that D.C. Bar subsequently suspended her on May 15, 2014 (*In regard to Olivarius* due to the NY suspension, Exhibit C).

This lawsuit has cost me everything. I was teaching a Bible study for senior citizens but had to step down when I told them about these lawsuits. These lawsuits have ruined any hope of being able to minister because no church wants to risk a potential lawsuit as well. My wife and I live paycheck to paycheck on Social Security and my veterans benefits. I worked as a pastor for 27 years prior to becoming a missionary in Romania and there was never, ever, a complaint about me. This lawsuit is about money, it's all about money.

I don't know what will become of this lawsuit. Prayerfully I will be proven innocent. But if not, and my accusers gain wealth, when the money is gone and our bodies decay, there is a judgment coming. We will all stand before God and see Him with our own eyes. But as for me, I know that my Redeemer lives and He will prove me to be innocent on that day.

Respectfully,



Paul Havsgaard

