

Commonwealth of Puerto Rico
Court of First Instance
Carolina Superior Courtroom

<p>One World Corporation 300 E. Lombard St. Suite 840 Baltimore, MD 21202 Plaintiff</p> <p>v.</p> <p>International Holdings, LTD Suite 104 97-B Granby St. PO Box 1639 Kingstown, St. Vincent & The Grenadines</p> <p>Alberto Medina Lopez PO Box 6596 Woodbridge, VA 22195 Defendants</p>	<p>Civil Num: CA2020CV01800</p> <p>RE:</p> <p>Civil Action</p> <p><i>Liquidation of Community</i></p>
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ANSWER TO COMPLAINT IN FORMA PAUPERIS
& PETITION TO DISMISS BY EMBLEZLEMENT, UNFAIR ENRICHMENT & FRAUD

1 Defendant **Alberto Medina Lopez**, appearing by himself as a natural person,
2 prose, (hereafter “AML”); and, the artificial juridical person, the offshore corporate
3 entity **International Holdings, LTD** (correctly known, identified and registered since
4 the year 2005 as **International Investments (Holdings) LTD**) (hereafter “IIHLTD”),
5 appearing prose, represented by the aforesaid “AML” as its absolute owner and sole-
6 universal shareholder, hereby answer the Complaint of Plaintiff **One World**
7 **Corporation** (hereafter “OWC”), and assert their Affirmative Defenses as follows:
8 1. Denied in part; admitted in part, as follows:

9 **A** - Currently, based on the legal grounds and evidence well explained
10 below, AML as an individual, and IIHLTD as an artificial person, are the full
11 and absolute owners in common, sharing each one **fifty percent (50%)**
12 **undivided ownership**, of the parcel of land described as follows in Spanish:
13 “RUSTICA: Estancia denominada “Juan Perez”, sita en el Barrio de
14 Montenegro de la jurisdicción de Loíza, compuesta de 850 cuerdas de terreno.
15 Colindante al Norte, con el mar; por el Sur, con la Hacienda de Don Teodoro
16 Chevremont; por el Este, con terrenos de la Hacienda Pública; y por el Oeste,
17 con la Hacienda denominada Piñones.” *Recorded in the Karibe System, property*
18 *number 57 of Loíza, inscription 14th, as last (hereafter “P57”).*

1 **B** – AML and IIHLTD **fully deny** that OWC, including all his past
2 antecessors in interest, recorded in the title chain, fully controlled by the
3 promoters of this frivolous civil action, Mr. Anthony Edwin Hurley and Mrs.
4 Mary Elizabeth Hicklin, had or has a legal title and valid undivided full
5 ownership in common (pro-indiviso) in the above described land **P57**. Same
6 lack of ownership applies too to all Hurley and Hicklin’s silent (past, present
7 and future) associates, heirs, partners, creditors & assignees (known and
8 unknown), including **Mr. Eugene M. Allamby** (*U.S. Naval Intelligence Office*
9 *officer*), **Mr. Robert Thomas Taylor** (*Washington D.C. retired police officer,*
10 *Maryland Driver License Number T-460-745-792-881 / DOB 11-17-48*), and,
11 **Mr. Michael Gene Daniel** (*U.S. Department of Defense retired officer,*
12 *Maryland Driver License Number D-540-603-275-447 / DOB 06-15-54*).

13 **See EXHIBIT 1 – Plaintiff Identifications (1 Page), at**

14 <https://protonicsmail.com/owc-litigation.html>

15 **C** - The main legal grounds of said assertion are the undisputable
16 FACTS that OWC, including all his previous common persons and entities in
17 interest, mentioned in the Puerto Rico’s Registry of Property title chain, like
18 **Diversified Investments (Holdings), LTD (DIHLTD)**, and the controlling
19 shareholders Mr. Anthony Edwin Hurley and Mrs. Mary Elizabeth Hicklin (as
20 promoters of this civil action), **as identified below**, NEVER and EVER
21 delivered to AML and IIHLTD the agreed liquid monetization of **Four**
22 **Hundred Fifty Million U.S. dollars** (\$450,000,000) AS FULL PAYMENT; via
23 loaning, servicing, selling and/or developing said immovable asset P57, **during**
24 **a long illegal retention period of 18 years, counting from the year 2002 to**
25 **present; and, moreover**, NEVER and EVER paid to AML and IIHLTD the
26 fifty percent (50%) minimum shared benefit of said capitalization agreement
27 with a valuation of **Two Hundred Twenty Five Million U.S. dollars**
28 (\$225,000,000); **neither**, the repeated small sum of **Two Hundred Ninety Five**
29 **Thousand U.S. dollars** (\$295,000) mentioned in all the recorded title chain
30 deeds (*private conveyance to Hurley & Hicklin, from July 28, 2004; #6 of*
31 *protocolization, to Hurley & Hicklin, of August 16, 2005, before the Notary*
32 *Public Jorge R. Diaz Aquino; #6, to DIHLTD, of October 14, 2005, before the*

*Notary Public Annette Rivero Marin; and, #3, to OWC, of July 10, 2007, before the Public Notary Edgardo Oyola Torres, as last inscription); neither, an agreed minimum support living expenses of **One Hundred Thousand U.S. dollars** per month (\$100,000/month) until the completion of said multimillion capitalization.*

Anthony Edwin Hurley
1401 Sheford Rd Baltimore MD 21239
SSN 214-48-7682
Tels 301-785-4661 / (301) 785-2438
Maryland Driver's License
Class C #H-640-067-188-780
Birth Date 10/10/1951
Sex M HT: 5-11 WT: 190 / Rest B Type R
Email: 1worldcorporation@gmail.com

Mary Elizabeth Hicklin
1401 Sheford Rd Baltimore MD 21239
SSN 213-60-6669
Tel 301-785-5768 Fax (410) 296-4052
Maryland Driver's License
Class C #H-245-587-210-430 / Birth Date: 06/08/1954
Email: 1worldcorporation@gmail.com

D - By the act of asking to this Honorable Court the subdivision and liquidation of said immovable asset P57 community, OWC and his shareholders Mr. Anthony Edwin Hurley, Mrs. Mary Elizabeth Hicklin and associates, pretend to take for FREE (unpaid) **Two Hundred Twenty Five Million U.S. dollars** (\$225,000,000) in assets valuation, stealing the land patrimony belonging entirely to AML and IIHLTD jointly; ALL, by virtue of the Hurley and Hicklin's illegal actions and criminal-indictable executed acts of CONTRACT BREACHING, EMBEZZLEMENT, UNFAIR ENRICHMENT, ASSETS KIDNAPPING, TRANSFERENCES IN FRAUD OF CREDITORS, CONCEALING, RACKETEERING, CONSPIRACY, COERCION, PUNITIVE & TORT DAMAGES and FALSE PRETENSES. **The alleged community between OWC and AML & IIHLTD does not exist. Therefore, it CANNOT be liquidated.**

E - During the past 15 years OWC, including all his aforementioned previous common persons and entities in interest, have been concealing, conspiring, destroying and manipulating all P57's corporate and banking records, books, ledgers and accounting; keeping AML and IIHLM ignorant, **in a perpetual poverty condition limbo**, with the hardship of continuing

1 controlling illegally said piece of land P57. That illegal control has impeded to
2 AML and IIHLTD to get the capacity to raise capital with the land for 18 years,
3 suffering the direct consequence of not having the financial resources to litigate
4 in the courts to stop said criminal venues during very long period of time, **at the**
5 **extreme to appear in this civil action as indigents, IN FORMA PAUPERIS.**

6 **F** - The business relationship between AML, Hurley and Hicklin started
7 on December 8th of 2002, when the last ones published an ad in the *Washington*
8 *Post* newspaper (Section P & Q3) asking for half million U.S. dollar as working
9 capital for their 2nd music enterprise (Megaproductions, Inc., DBA
10 Megaconcerts), suggesting to AML the using of said property P57 to raise
11 capital via loans, development, collateral using and other venues.

12 **See EXHIBIT 2 – P57 Monetization History (231 Pages), at**

13 <https://protonicsmail.com/owc-litigation.html>

14 **G** - Between the dates of December of 2002 to July 2004 (17 months)
15 Hurley and Hicklin worked with AML to appraised and clarified P57 boundaries
16 before Puerto Rico's Courts, participating mainly as helpers, links and brokers,
17 with the expectation to be compensated in the future after bringing a buyer or
18 lender. Outcome, **that they NEVER DELIVERED until present time,**
19 embezzling AML and IIHLTD for 18 years, keeping illegally P57's fifty percent
20 undivided interest, via their fraudulent corporate NON-AUTHORIZED multi
21 conveyances, making hard to AML and IIHLTD the recovery of their legitimate
22 full ownership.

23 **H** - After July 2004 Hurley and Hicklin convinced AML to execute on
24 their favor a deeded transfer of P57's fifty percent undivided interest
25 WITHOUT MONEY (\$0) in exchange to raise the aforesaid liquid monetization
26 of **Four Hundred Fifty Million U.S. dollars** (\$450,000,000), to be shared in
27 equal parts in the future via loaning, servicing, selling and/or developing;
28 capitalization that they never delivered to AML. **Said transfer was part of a**
29 **well-crafted fraudulent plan to TRICK and EMBEZZLE at perpetuity**
30 **AML.** As a second embezzling act, after the execution of that first step, Hurley
31 and Hicklin transferred their shared personal P57 interest to DIHLTD on
32 October 2005. Then, to OWC on July 2007. Creating a FALSE, NULL and

1 VOID protecting titling shield structure in Registry of Property by virtue of
2 committing FRAUD, with the premeditated and well calculated future plan of
3 asking a liquidation and subdivision TAKING FOR FREE **Two Hundred**
4 **Twenty Five Million U.S. dollars** (\$225,000,000) in assets valuation, stealing
5 the land patrimony belonging entirely to AML and IIHLTD jointly.

6 See **EXHIBIT 3 – IRS Whistleblowing Case (59 Pages)**, at
7 <https://protonicsmail.com/owc-litigation.html>

8 I - Pursuant all signed contracting, all parties agreed never compensate
9 SERVICES. Instead, only compensate a liquid capitalization of **Four Hundred**
10 **Fifty Million U.S. dollars** (\$450,000,000) via loaning, servicing, selling and/or
11 developing said immovable asset P57.

12 J - During a long period of 18 years OWC, Hurley, Hicklin and
13 associates have refused to return to AML said illegally retained P57's 50%
14 undivided ownership interest, rejecting all reasonably good faith solutions.

15 K - If the aforesaid illegal behavior is not enough, on the year 2006
16 OWC per conduct of Hurley and Hicklin asked to private investors to buy OWC
17 non-voting shares for approximately **Four Hundred Thousand U.S. dollars**
18 **(\$400,000)** to pay the marketing costs to sell the P57 in an international public
19 auction sale with the company [JPKing Auctioneers](https://protonicsmail.com/owc-litigation.html), concealing all bank
20 accounts, books and accountancy from AML and IIHLTD, stealing the funds for
21 their personal use and other non-related ventures, executing a clear FRAUD.
22 Until present, the whereabouts of that funding is unknown. The auction never
23 was executed. It was a mechanism to steal the funds.

24 See **EXHIBIT 4 – Public Auction Sale Plan (24 Pages)**, at
25 <https://protonicsmail.com/owc-litigation.html>

26 So the things, on the year 2007 said **fraudsters** OWC, Hurley, Hicklin
27 and associates hired a local surveyor, Mr. Ismael Carrasquillo, creating an illegal
28 subdivision plat plan in the P57 land, **never approved by the Planning Board**
29 **of Puerto Rico** committing a real estate felony, in violation of [4 LPRA 2091 \(5\)](#)
30 and [31 LPRA 3453 \(6\)](#) as amended. In the same year they used said illegal
31 document to update the previous 2003 MAI clean appraisal, **showing to the**
32 **markets a NON-EXISTENT subdivision.** This felony was recorded illegally in

1 the Registry of Property by virtue of the deed #3, in favor of OWC, on July 10,
2 2007, before the Public Notary Edgardo Oyola Torres, as last inscription,
3 **stating FALSELY that AML agreed to subdivide the East side of P57. AML**
4 **NEVER-EVER authorized that act.** OWC inscribed a NULL and VOID Ab
5 Initio 413 acres subdivision agreement WITHOUT the consent of AML and
6 IIHLTD.

7 **See EXHIBIT 5 – Fraudulent Appraisal (166 Pages), at**

8 <https://protonicsmail.com/owc-litigation.html>

9 **L -** So the things, on the year 2009 the criminal enterprise continued. **All**
10 **concealed from AML and IIHLTD.** This time, OWC, per conduct of his
11 shareholders Hurley, Hicklin and associates, started offering in United States
12 unregistered securities, using as collateral the AML and IIHLTD land ownership
13 to finance a 3,800 acres development in Dominican Republic known as [Los](#)
14 [Corbanitos](#) (concealed to AML and IIHLTD too), in violation of the U.S.
15 Federal and State Laws of Washington DC, Maryland and Arizona. The
16 outcome of said dark operation was getting a **Cease and Desist Order** from
17 Washington D.C. Securities Commissioner, after an under-covered work. Since
18 said year this high-profile fraud scheme has been included in the educational
19 platform of the **American Bar Association** as a learning tool for all attorneys in
20 America.

21 **See EXHIBIT 6 – Securities Fraud (143 Pages), at**

22 <https://protonicsmail.com/owc-litigation.html>

23 **M –** As victims, not having other civil financially reachable remedies,
24 AML and IIHLTD **have been asking the criminal prosecution of Hurley,**
25 **Hicklin and associates** before the U.S. Department of Justice, the Federal
26 Bureau of Investigation, the Internal Revenue Service (whistleblowing \$225+
27 million U.S. dollar per year tax evasion, reported in 1099 MISC), Maryland's
28 State Comptroller and the Maryland Attorney General.

29 **See EXHIBIT 7 – Fed. & State Prosecutions (6 Pages), at**

30 <https://protonicsmail.com/owc-litigation.html>

1 N – Pursuant all the applicable rule of Law, this Honorable Court CANNOT
2 authorize this fraudulent OWC P57 community liquidation and subdivision.

3 2. Denied in part; admitted in part, as follows:

4
5 Pursuant all the legal grounds and facts explained in the answer number
6 **ONE**, AML as an individual, and IIHLTD as an artificial person, are the full and
7 absolute owners in common, sharing each one **fifty percent (50%) undivided**
8 **ownership**, of P57; and, AML and IIHLTD **fully deny** that OWC, including all
9 his past antecessors in interest, recorded in the title chain, fully controlled by the
10 criminal promoters of this civil action, Mr. Anthony Edwin Hurley and Mrs.
11 Mary Elizabeth Hicklin, had or has a legal title and valid undivided full
12 ownership in common (pro-indiviso) in the above described land P57.

13 3. Denied totally, as follows:

14 **OWC is not, and, cannot be called or identified as a co-owner of P57.**

15 Therefore, discussing about a positive or negative agreement, or parties, is a
16 non-sense, or a disparate that defies all rationales.

17 4. Admitted.

18 5. Denied in part; admitted in part, as follows:

19 According to the Article 334 of the Puerto Rico [Civil Code](#) (31 LPRA
20 1279) no co-owner can be obliged to endure a co-ownership. **Said statute IS**
21 **NOT applicable to OWC because he has lack of ownership in P57.**
22 **Therefore, no rights in the immovable.** As creditors of the OWC's usurped
23 F57 interest, AML and IIHLTD, pursuant to the Article 337 of the aforesaid
24 [Civil Code](#) (31 LPRA 1282), **has the full right to ask the dismissal of the**
25 **present frivolous civil action by the grounds of FRAUD.**

26 **§ 1282. Concurrence or objection of creditors or assignees**

27 The creditors or assignees of the part-owners may concur in the division
28 of the thing held in common **and object to any division which may be made**
29 **without their concurrence.** But they cannot object to a division already made
30 **except in cases of fraud**, or when made notwithstanding a formal opposition
31 interposed to prevent it, without prejudice, however, to the rights of the creditor
32 or assignee to maintain its validity.

33 6. Admitted in part, denied in part, as follows:

34 P57 can be subdivided by the owners only, **not by OWC that has lack**
35 **of ownership.** OWC never paid or inherited it for having it.

36 7. Admitted.

1 The OWC illegal control has impeded to AML and IIHLTD to get the capacity
2 to raise capital with the land P57 for 18 years, suffering the direct consequence
3 of not having the financial resources to update the IIHLTD resident agent
4 presence and corporate status at Saint Vincent and The Grenadines.

5 WHEREFORE, all Defendants pleads to the Honorable Court the
6 acceptance of all the grounds and evidence, proceeding with the immediate
7 dismissal of the present frivolous civil action IN FORMA PAUPERIS, free of
8 Court filings fees, ordering to the Plaintiff officials, Mr. Anthony Edwin Hurley
9 and Mrs. Mary Elizabeth Hicklin, the immediate delivery in favor of AML of all
10 OWC usurped shareholdings, domiciled at Delaware State, PLUS **Seven**
11 **Hundred Fifty Million U.S. dollars** (\$750,000,000) in TRIPLE liquid and due
12 civil personal FRAUD damages.

13 Remotely, at Woodbridge, Virginia State; this November 13th, 2020
14

15 **International Investments (Holdings) LTD,**
16 p/c of sole shareholder, principal and owner



17 **Alberto Medina Lopez**

18 *PO Box 6596*

19 *Woodbridge, VA 22195*

20 *Tel. 571-230-9465*

21 *Email: alberto_medina@yahoo.com*

22 Defendants

**ASKING TO APPEAR IN FORMA PAUPERIS FREE OF FILING FEES
DUE TO SUFFERED DAMAGES BY THE PLAINTIFF & COVID-19 UNEMPLOYMENT**

NOTIFICATION CERTIFICATION

Today, November 13th, 2020, Defendants certified have notified Plaintiff's Attorney:

Lcda. Rosanna Rivera Sanchez PO Box 14584 San Juan, Puerto Rico 00919

Tel (787) 231-5894 Email: rrivera@bbh-law.com

Via U.S. Mail / Email / Web <https://protonicsmail.com/owc-litigation.html>