

UNITED STATES DISTRICT COURT  
for the  
Central District of California

NATAN AVRAHAM,

Plaintiff(s)

v.

COMMISSIONER MATTHEW ST. GEORGE, LOS ANGELES SUPERIOR COURT, COUNTY OF LOS ANGELES, ANGELES AND STATE OF CALIFORNIA,

Defendant(s)

Civil Action No.

CV 17 -05792 VAP(JCE)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

COMMISSIONER MATTHEW ST. GEORGE,  
LOS ANGELES SUPERIOR COURT, COUNTY OF LOS ANGELES, all located at 111  
N. HILL STREET, LOS ANGELES CA 90012, STATE OF CALIFORNIA, c/o  
CALIFORNIA ATTORNEY GENERAL, 1300 "I" STREET, SACRAMENTO, CA  
95814-2919

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

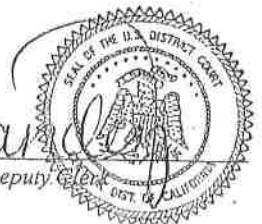
Date:

8/14/2017

CLERK OF COURT

Luz Hernandez

Signature of Clerk or Deputy Clerk



1 NATAN AVRAHAM  
2 1778 S. Shenandoah St.  
3 Los Angeles, CA 90036

3 310-877-9115

4 Plaintiff Pro Se

FILED

2017 AUG -4 AM 11:59

CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: \_\_\_\_\_

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA

12 NATAN AVRAHAM,  
13 PLAINTIFF,

16 v.

18 COMMISSIONER MATTHEW ST.  
19 GEORGE, LOS ANGELES SUPERIOR  
20 COURT, COUNTY OF LOS ANGELES,  
ANGELES AND STATE OF  
21 CALIFORNIA,

22 DEFENDANTS.

No. CV 17 -05792 VAR(JLG)

COMPLAINT FOR  
DAMAGES  
FOR DEFAMATION,  
DECLARATORY RELIEF  
AND INJUNCTION TO  
PREVENT VIOLATIONS  
OF U. S. CONSTITUTION  
AND U.S. CIVIL RIGHTS  
ACT

JURY TRIAL DEMANDED

23 Plaintiff, Natan Avraham, shows:

26 JURISDICTIONAL STATEMENT

27 1. This matter arises under the rights granted to citizens of the United States  
28 under the United States Constitution and Civil Rights Act of 1986, as amended.

COMPLAINT FOR DAMAGES, DECLARATORY RELIEF AND INJUNCTIVE RELIEF

1 Plaintiff made a claim to Commissioner Matthew St. George, the Los Angeles  
2 Superior Court, the County of Los Angeles and the State of California at various  
3 times between September 2015 and April and May of 2017. This claim was  
4 rejected by letter from D. Brett Bianco, Court Counsel of the Los Angeles  
5 Superior court on May 26, 2017. The letter contained a warning that plaintiff had  
6 only 6 months from the date of the letter to file a court action pursuant to  
7 Government Code Section Sec. 945.6. This suit is filed within 6 months of the  
8 date of notice of rejection, May 26, 2017.

9 3. All the individual parties to the complaint are residents of the County of  
10 Los Angeles, California. All the actions taken by the parties took place in Los  
11 Angeles County, California.

12 4. The defendants attempted to deprive the plaintiff of a right secured by the  
13 U.S. Constitution while acting under color of state law. His statement in open  
14 court implying the the plaintiff was a terrorist or crazy person was intended to  
15 limit the right of free expression of Plaintiff guaranteed to all citizens of the  
16 United States by the First Amendment to the U.S. Constitution and the Civil  
17 Rights Act of 1986.

18  
19 PARTIES

20 5. The plaintiff is Natan Avraham, a resident of Los Angeles County,  
21 California.

22 6. The defendants are Matthew St. George, Commissioner of the Los  
23 Angeles Superior Court, the Los Angeles Superior Court and the County of Los  
24 Angeles, a government entity authorized by the Constitution of the State of  
25 California and the State of California.

26 //  
27  
28

STATEMENT OF CLAIMS.

1  
2 7. In 2015, the plaintiff was a party in a divorce proceeding pending in the  
3 Los Angeles Superior Court, at the Santa Monica Courthouse, Case No.  
4 SD027039. Plaintiff was represented by Attorney Charles M. Green. The case  
5 was being adjudicated by Commissioner Matthew St. George. In the morning of  
6 September 3 2015, Plaintiff filed a substitution of attorney placing himself in pro  
7 per in the matter. In this capacity Plaintiff filed a Statement of Disqualification  
8 pursuant to Code of Civil Procedure Sec. 170.3( c). After it was filed Mr. Green  
9 again became his attorney of record.

10 8. The court adjourned until the afternoon. Plaintiff left the courthouse and  
11 Mr. Green appeared for plaintiff. Prior to this time Plaintiff had been pretesting  
12 the handling of his case by Commissioner St. George. When the Commissioner  
13 returned to the bench after lunch he denied to request for disqualification. Later  
14 it appeared that the Commissioner had made disparaging and defamatory  
15 statements about the Plaintiff, the full extent of which were not known to the  
16 following January of 2016 when a transcript was obtained.

17 9. About September 15, 2015 Plaintiff was startled to find a minute order  
18 which advised that the Commissioner that he was considering having a  
19 Sheriff patrol his house and if Plaintiff was seen he would be arrested. fro and  
20 requested his attorney to disqualify the commissioner. .

21 10. Prior to the hearing on September 3, 2015, Plaintiff had prepared a sign  
22 which he placed on his car when he was present at the Santa Monica Courthouse  
23 in connection with his pending court case at the Santa Monica Courthouse ase.  
24 The purpose of the sign was to suggest to Commissioner St. George that he  
25 disqualify himself from the case. The sign read, "JUSTICE FOR AVRAHAM,  
26 justiceforavraham.weebly.com." Below this heading the following words  
27 appeared, "If Commissioner MATTHEW ST. GEORGE is not going to follow  
28 the law and disqualify himself from my case, I'm going to do my best to enforce

1 the law on him."

2 9. At a hearing on September 3, 2015, Commissioner St. George made  
3 disparaging remarks about the plaintiff, in open court. His remarks were reported  
4 by a court reporter. According to the court reporter's transcript, the following  
5 statements were made. (From page 10 of the transcript for hearing on September  
6 3, 2015.)

7 10. At page 10, line 7, "AND IF HE [Plaintiff] WANTS TO SPEND HIS TIME  
8 DRIVING AROUND TOWN, HE'S FREE TO DO SO. HE CAN PUT A PLACARD UP  
9 WHEREVER HE WANTS.

10 BUT I WANT TO LET HIM KNOW THIS. I AM CONSIDERING HAVING SHERIFF  
11 PATROLS AROUND MY HOUSE BECAUSE PEOPLE LIKE HIM [Plaintiff] ARE A  
12 THREAT TO SOCIETY. WE'VE SEEN IT IN THE NEWS EVERY DAY. EVERYBODY  
13 SAYS, OH, THEY ARE JUST A LITTLE CRAZY. YEAH, AND THE NEXT THING YOU  
14 KNOW THEY GET A GUN AND SHOOT A LOT OF PEOPLE OR KILL MY FAMILY.

15 "WHAT AM I SUPPOSED TO DO? I'M DOING MY JOB. SO MR AVRAHAM  
16 SHOULD KNOW THAT I'M CONSIDERING GETTING A SHERIFF PATROL, AND SHOULD  
17 HE COME NEAR MY HOUSE -- I'M NOT TELLING YOU WHERE I LIVE. I LIVE  
18 SOMEWHERE IN LOS. ANGELES -- IF HE COMES BY MY HOUSE HE WILL BE  
19 DETAINED AND POSSIBLY ARRESTED."

20 11. Following the tirade by the Commissioner, Plaintiff's attorney, Charles M.  
21 Green, resigned as plaintiff's counsel and refused to assist Plaintiff further in the  
22 divorce. This placed Plaintiff in a very difficult position of having to act as his  
23 own attorney in subsequent proceedings.

24  
25 FIRST CLAIM AGAINST ALL DEFENDANTS  
26 FOR VIOLATION OF CIVIL RIGHTS  
27

28 12. Plaintiff incorporates all prior allegations.

1 13. On September 3, 2015, the defendants engaged in actions that were meant  
2 to chill the Plaintiff's right to Free Expression of his views under the First  
3 Amendment to the U.S. Constitution. Defendant, Commissioner Matthew St.  
4 George engaged in this behavior in a public courtroom located at the Santa  
5 Monica Courthouse. The statements of the Defendant were made in response to a  
6 sign that Plaintiff had placed on his car, with the wording set forth above.

7 14. At no time did the plaintiff threaten the Commissioner with violence or  
8 harm. The Plaintiff was simply expressing his views of what should happen in  
9 his divorce case, then pending in the Santa Monica Courthouse. At no time did  
10 Plaintiff indicate any intention of harming the Commissioner or his family.  
11 Despite the complete absence of any threat, the Commissioner indicated that he  
12 would obtain the services of the Los Angeles County Sheriff to patrol the streets  
13 of Los Angeles with a view to arresting the Plaintiff for his exercise of free  
14 speech, a right guaranteed by the First Amendment of the U.S. Constituion.

15 15. The Commissioner at the time and now (as far as Plaintiff is aware) is an  
16 employee of the Los Angeles Superior Court and Los Angeles County and was  
17 acting in his official capacity as a commissioner thereof. The Superior Court is  
18 an agency of Los Angeles County, a County operating under California state law.  
19

20 16. The threats, make in a public place to the Plaintiff and others present that  
21 day were intended to stop the Plaintiff from exercising his right to free  
22 expression of his ideas and views.

23 17. The intent of the Commissioner and his employer was to limit Plaintiffs  
24 civil rights as expressed in the First Amendment to the U.S. Constitution. Said  
25 actions are prohibited the U.S. Civil rights law, 11 U.S.C. sec.1986 et seq.

26 18. The Plaintiff seeks an injunction to prevent further attempts by the  
27 Commissioner and the Superior Court of Los Angeles County to inhibit the  
28 Plaintiff's exercise of free speech under the First Amendment to the U.S.

1 Constituion.

2 19. The Plaintiff further seeks a declaration that the Commissioner in making  
3 his remarks in court exceeded the Judicial Rules of Ethics applicable to all  
4 judges and lesser officials of the State of California. Further the declaration  
5 should contain an admission that the Commissioner had no information available  
6 to him at the time of his disparaging remarks to support the conclusion that the  
7 Plaintiff was a terrorist or crazy person.

8  
9  
10 SECOND CLAIM AGAINST ALL DEFENDANTS  
11 FOR DEFAMATION OF CHARACTER AND REPUTATION  
12 OF THE PLAINTIFF.

13 20. Plaintiff incorporates all prior allegations.

14 21. Commissioner St. George defamed the reputation of Plaintiff with his  
15 remarks made in open court on September 3, 2015, as set forth above.

16 22. These statements made directly or implied by the Commissioner's tirade in  
17 open court on September 3, 2015 were not true. Plaintiff has never been a  
18 terrorist nor crazy person.

19 23. The statement made by Commissionar were not privileged as the remarks  
20 involved a violation of the right to free expression guaranteed by the First  
21 Amendment to the U.S. Constitution.

22 24. The statements made by Coimmissioner St. George were made to the  
23 general public in an opens session of the Courthouse at Santa Monica on  
24 September 3, 2015.

25 25. The statements made to the general public on that day alleged immoral and  
26 unethical conduct by Plaintiff damaged the reputation and good name of  
27 Plaintiff.

28 26. These unfounded remarks caused great pain and suffering to the Plaintiff


1 and damaged his repuration as an honest and law abiding member of society. The  
2 defendants should pay damages in an amount to be determiend at trial for the  
3 damage that defendants caused to the reputation and good standing of the  
4 Plaintiff. Plaintiff believes that damages of \$ 10,000,000 would be appropriate  
5 plus costs and attorney fees.  
6

7 WHEREFORE, the Plaintiff asks for relief as set forth above, attorneys and costs  
8 as shall be determined.  
9

10 JURY REQUESTED

11 The plaintiff requests a jury to hear his claims as provided by law.  
12

13 July 31, 2017  
14

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16 Natan Avraham Plaintiff pro se.  
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