

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

It is the duty of the Court system to protect the rights of all citizens, and the injustice done in this case must be corrected if citizens everywhere in similar situations are to feel protected by the system of law. It is important to maintain Civil Rights in our country, as these rights are the protection of the people. A victory in my case will make many wrongs committed by the Courts right, and will make sure that those with power are responsible to the citizens of the nation.

**OBJECTION AND DECLARATION
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OF JUDGE PRO TEM ST. GEORGE**

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 NATAN AVRAHAM
 P.O. Box 35895
 Los Angeles, CA 90035

TELEPHONE NO.: (310) 877-9115 FAX NO. (Optional):

E-MAIL ADDRESS (Optional):

ATTORNEY FOR (Name): SELF REPRESENTED

FOR COURT USE ONLY

CONFORMED COPY
 ORIGINAL FILED
 Superior Court of California
 County of Los Angeles

JAN 28 2015

Sherril R. Carter, Executive Officer/Clerk
 By M. VANDEMAN, Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 1725 MAIN STREET

MAILING ADDRESS:
 CITY AND ZIP CODE: SANTA MONICA, CA 90401

BRANCH NAME: WEST DISTRICT

PETITIONER/PLAINTIFF: MIRI AVRAHAM

RESPONDENT/DEFENDANT: NATAN RAHAMIM AVRAHAM

OTHER PARTY:

RESPONSIVE DECLARATION TO REQUEST FOR ORDER

CASE NUMBER:
 SD 027 039

HEARING DATE: 02/10/2015 TIME: 8:30am DEPARTMENT OR ROOM: F

1. CHILD CUSTODY
 - a. I consent to the order requested.
 - b. I do not consent to the order requested, but I consent to the following order:

2. CHILD VISITATION (PARENTING TIME)
 - a. I consent to the order requested.
 - b. I do not consent to the order requested, but I consent to the following order:

3. CHILD SUPPORT
 - a. I consent to the order requested.
 - b. I consent to guideline support.
 - c. I do not consent to the order requested, but I consent to the following order:
 - (1) Guideline
 - (2) Other (specify):

4. SPOUSAL OR PARTNER SUPPORT
 - a. I consent to the order requested.
 - b. I do not consent to the order requested.
 - c. I consent to the following order:

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| | |
|---|--------------|
| PETITIONER/PLAINTIFF: MIRI AVRAHAM | CASE NUMBER: |
| RESPONDENT/DEFENDANT: NATAN RAHAMIM AVRAHAM | SD 027 039 |
| OTHER PARTY: | |

5. ATTORNEY'S FEES AND COSTS
- a. I consent to the order requested.
- b. I do not consent to the order requested.
- c. I consent to the following order: PETITIONER IS RESPONSIBLE FOR MY ATTORNEY FEES AS A SANCTION UNDER FAMILY CODE SECTION 271.
6. PROPERTY RESTRAINT
- a. I consent to the order requested.
- b. I do not consent to the order requested.
- c. I consent to the following order:
7. PROPERTY CONTROL
- a. I consent to the order requested.
- b. I do not consent to the order requested.
- c. I consent to the following order:
8. OTHER RELIEF
- a. I consent to the order requested.
- b. I do not consent to the order requested.
- c. I consent to the following order: AN ORDER NOT TO SELL THE WOOSTER PROPERTY. IN THE ALTERNATIVE, AN ORDER TO ALLOW RESPONDENT TO BUY OUT PETITIONER'S INTEREST IN THE PROPERTY.
9. SUPPORTING INFORMATION
- Contained in the attached declaration. (You may use *Attached Declaration* (form MC-031) for this purpose).
SEE ATTACHED DECLARATION AND EXHIBITS

NOTE: To respond to domestic violence restraining orders requested in the *Request for Order (Domestic Violence Prevention)* (form DV-100), you must use the *Answer to Temporary Restraining Order (Domestic Violence Prevention)* (form DV-120).

I declare under penalty of perjury under the laws of the State of California that the foregoing and all attachments are true and correct.

Date: JANUARY 27, 2015

NATAN AVRAHAM
(TYPE OR PRINT NAME)

(SIGNATURE OF DECLARANT)

1
2 **REASONS TO ASSIGN CASE TO ANOTHER DEPARTMENT/JUDGE**

3 1. I have serious concerns about this court's ability to make a fair and impartial ruling in this
4 matter. I do not trust Commission St. George to make the appropriate decisions regarding my
5 case and for that reason I do not trust him. I believe Commissioner St. George ignored the law
6 and his duty to perform. I believe the Commissioner abused his power by making rulings against
7 me and entire community assets. He had no grounds to punish me but did so without reason and
8 evidence. I have been placed in a very bad situation. I have worked my entire life for my
9 children. Most children would be very happy to have a father do what did for my children. My
10 children were one of the happiest children in the world. Without reason, the Commissioner
11 destroyed everything; our community is losing money every day and my children are still
12 suffering. Further, Commission St. George allowed Petitioner's attorney, Brett Berman, to abuse
13 me and lie about the circumstances. I also believe Mr. Berman lied to his client.

14
15 2. There is no legal grounds and no basis in evidence for the court to sign and enter the
16 judgment under Code of Civil Procedure §664.4 and no legal grounds to order my attorney Cary
17 Goldstein to sign the judgment for me which does not conform to the Oral Settlement
18 Agreement. This motion is for Petitioner to cooperate regarding the house as it concerns the
19 judgment to start saving the community money and stop making me lose money and stop our
20 adult children from suffering to the divorce.

21 I filed a complaint against Commissioner St. George. I believe he is biased towards Petitioner
22 and against me. In this case, St. George's records is so lopsided as to create a reasonable doubt of
23 his impartiality. see attachment, 9

24
25 **JUSTICFORAVRAHAM.WEEBLY.COM**

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Just so it's clear I'm going to keep fighting for my rights that commissioner
Gorge to flow the law to disqualify himself

I declare under the penalty of perjury under the laws of the State of California that the foregoing
is true and correct. Executed this ___ day of January 2015 at Los Angeles, California.

NATAN AVRAHAM Respondent

**OBJECTION AND DECLARATION
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RFO Re: Order to Sell Wooster Property & Sanctions

RESPONSIVE DECLARATION OF NATAN AVRAHAM

I, NATAN AVRAHAM, declare:

1. I am the Respondent in this action and in this proceeding. I offer this declaration in lieu of personal testimony pursuant to Code of Civil Procedure §§2009 and 2015.5; California Rules of Court Rule 5.118; *Reifler v. Superior Court*, 39 Cal. App. 3d 479,484-85 (1974); *In re Marriage of Stevenot*, 154 Cal. App. 3d 1051, 1059 n.3 (1984). I have personal knowledge of the facts stated in this declaration, and if sworn as a witness, I could and would competently testify thereto. I submit this declaration in opposition to Petitioner's request for order to immediately sell the real property located at 1442 S. Wooster St., Los Angeles, CA 90035. I offered Petitioner an opportunity to resolve the entire case out of courts and explain his bad faith. (See attachment)

FACTUAL BACKGROUND

2. On August 17, 2010, and Petitioner and I entered in a settlement agreement confirmed in open court. On October 5, 2010, a Judgment of Dissolution was entered. I request that Petitioner return control of Wooster Property to me so I can repair the property and restore the income stream that this property should be providing to the community property. According to the original judgment, the Wooster Property was supposed to be the last on the list to be sold, yet the Court's allowing of Petitioner to occupy and control the property has allowed the income from the property to suffer damage to the extent that the community has lost more than \$150,000. Petitioner must work to resolve the issues with the Judgment immediately before a final sale of the Wooster Property can be determined. Petitioner and her counsel have made it clear in their declaration that they are willing to abuse their power in Court and frustrate my rights. Pursuant to the Judgment, neither party in this case can take any action that damages the credit of the other party as credit is an asset. However, the actions of Petitioner and her

1 counsel have damaged my credit to such an extent that I now believe I must seek help to analyze
2 and repair my credit.

3 FACTS REGARDING WOOSTER PROPERTY

4 3. Petitioner has refused to follow the Judgment in regards to the Wooster Property such as her
5 refusal to provide me with income reports for the Wooster Property for more than four
6 years. The damage resulting from the missed income and the actual damage to the property by
7 Petitioner means that not only must the property be saved but that the fair market value of the
8 property presented by Petitioner is inaccurate.

9 4. As a direct result of Petitioner ignoring the judgment, a huge tax problem has arisen. These
10 tax penalties will not be placed on the community but solely on Petitioner only. Both the
11 California Franchise Tax Board and Internal Revenue Service were forced to spend a tremendous
12 amount of time and resources for no reason other than that Petitioner cannot be trusted. The
13 Petitioner claims immunity from community tax liabilities as an innocent spouse even
14 though Petitioner was clearly aware of the income tax liabilities as outline in the Judgment
15 as so she must share in the tax burden. Petitioner claimed that I attempted to appeal the tax
16 case to the IRS and was rejected. This is false as the case could not even be appealed and no
17 attempt was every made by me. The legal reason the court keeps ignored the dad faith br mr berman ,

18
19 5. Although Petitioner demanded the sale of the Barrington Property and refused to pay the
20 taxes as well as allowing interest and fees to accrue on the IRS and FTB debt. During the course
21 of this extended legal battle, Petitioner accrued thousands of dollars in legal fees without the
22 ability to cover these expenses. Petitioner misled the court and refused to use the Barrington
23 escrow to pay the children's student loans and the tax fees and instead removed the money.
24 Petitioner ignored my request in 2010 prior to entry of judgment before the FTB to provide
25

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1 missing tax funds. (*Exhibit I FTB Tax Notice* incorporated herein by reference)

2 6. It is a fact that the 01/09/2014 accounting shows that Petitioner's counsel lied to the
3 court. The accounting showed that the tax authorities had not taken any money and no additional
4 \$143,000 was removed by the IRS and there was no issue of any state tax levy. Unfortunately,
5 the court ignored his request for an accounting. The court has already abused its power and
6 interfered with a veiled settlement agreement and enforced the judgment against the community
7 and me and the expense of my children. Then, the court refused to follow the judgment and
8 keeps modifying the judgment against me to enforce a settlement. It is a fact that Petitioner and
9 the children lost a lot of money because Petitioner's counsel.

10 7. Petitioner claimed in a declaration dated 10/09/2013 that she did not wish for the Wooster
11 Property to be sold earlier than 10/09/2017 especially as the property requires attention and
12 maintenance. This declaration directly contradicts Petitioner's pending RFO to immediately sell

13 the property The legal reason the government allowed also asking the people don't be a victim and protect the own
14 property.

15 FACTS REGARDING REAL ESTATE BROKER

16 8. The property broker from the Wooster Property informs Respondent that the lowered
17 income for the Wooster Property does not support the value of the property and that there are
18 problems with tenants, complaints and issues that must be resolved in order for the property to
19 maintain value. At this point, I am reluctant to seek the help of the court as every time I have
20 gone to court, I have been ignored while Petitioner has been able to create facts that have caused
21 harm to the community and an abuse of the court system. The claims about the tax liabilities and
22 escrow accounts made by Petitioner are clearly untrue and easy to verify. These claims are refute
23 by facts and indicate that the Court needs to monitor the sale or management of any properties
24 very carefully.

25 Respondent send to Mr Berman materials to review he's bad faith, and offer
to results that out of court and the benefit off the childrens. see attachment, 8

1 9. Petitioner has repeatedly blocked my access to the Wooster Property in order to avoid
2 public issues and issues with the adult children. I have been forced to sit on the sidelines as the
3 property is being abused. At first, Petitioner was attempting to prevent Wooster from being
4 sold and now she is demanding the property be sold at a huge loss. On September 24, 2014,
5 I solicited a quote from David Frank, an Associate Manager at Coldwell Bank who estimated the
6 value to be from \$1,650,000 on the low side to \$1,850,000 on the high side. According to the
7 broker's declaration attached hereto as *Exhibit A*, Petitioner was willing to sell the Wooster
8 Property for \$1,518,000. This is directly against the Petitioner's requests for both a \$1,575,000
9 asking price and for an income stream. Furthermore, Petitioner is aware that I have stated that the
10 asking price is low enough that at this price I would buy the property for our children. The
11 broker opened escrow without asking whether I wished to enter escrow at the offered price.

12 10. The Broker has misrepresented facts about the property. There have been tenant problems,
13 low income and property management problems which he refused to acknowledge. I believe the
14 broker cannot be trusted and I released him from this project and his manager agrees. Petitioner
15 has not maintained the property rent in accordance with the law. I am very concerned that further
16 Court action will prevent my purchase of the property and put further hardship on the
17 community. Indeed, I explained to the broker that I did not wish to speak to him as I felt he may
18 eventually become involved in the family law proceedings and so I feared he would not
19 understand me. The legal reason the court did not and don't follow the court of law see Attachment 9

20
21 FACTS REGARDING COMMUNITY TAX LIABILITIES

22 11. I believe the Wooster Property should not be sold at this time, and to do so would continue
23 a series of events of mismanagement of the community property in this case. Petitioner and her
24 counsel have yet to resolve the outstanding issues with the previous property sole in this case
25

1 (Barrington) including Capital Gains issues. In December 2010, Petitioner took action to sell the
2 eight unit Barrington Property for only \$700,000 all the while refusing to acknowledge this
3 amount in the escrow account. Petitioner signed and approved of every disbursement and she the
4 ability to view every transaction. However, Petitioner continues to claim that the IRS and FTB
5 have taken funds from this account while trying to gain access to those funds. Petitioner has
6 repeatedly misled the court about the tax issues going so far as to claim she was granted Innocent
7 Spouse by the IRS. I intend to file a claim against Petitioner and her counsel for perjury done.

8 12. As a result of the false testimony, the Court released the funds to Petitioner to which
9 I was entitled forcing me to take further action to fix the tax issues. Indeed, not only has
10 Petitioner worked to block my access to the money, these actions have also prevented me
11 from being able to meet credit card and other debt obligations on the community as these
12 funds were meant. For three years, the Court has been misled and Respondent denied his
13 rightful property while Petitioner claims no responsibility for the community IRS and FTB tax
14 liabilities. On 10/09/2013, the court cooperated with Mr. Berman to mislead and block. As
15 indicated in the hearing transcript from that day, Petitioner's counsel stated "... although, actually,
16 I believe there probably has been more money taken out....). (*Exhibit B 10/09/2013 hearing*
17 *transcript page 11 lines 1-3* incorporated herein by reference as though fully set forth).

19 13. Petitioner originally argued for the sale of the Barrington Property as a way to pay for the
20 tax burden on the community from 2000-2007 but this money has not been used for that purpose.
21 Furthermore, Respondent has been blocked from using these funds to meet the burden on the
22 community for all these years. I request sufficient time to protect myself and interests from
23 Petitioner as she cannot be trusted with the well being of the community and it is my belief
24 that the Wooster Property should be preserved as a source of income to offset the student
25

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1 loan liabilities and living expenses of the children in this case. Petitioner already received
2 thousands of dollars of my money for the support of the children. At this point, it is clear that I
3 and not Petitioner has the best interests of the children in mind. Petitioner has repeatedly acted in
4 a way that does not provide for the welfare of the children in this case such as by putting the
5 Shenandoah Property in danger while the children were living there and working with the
6 brokers on the properties to prevent Respondent from acquiring a loan to purchase control of the
7 properties outright. The legal reasons the perjury committed against Natan and the community need to be
8 results before,

8 14. Petitioner's actions in "maintaining" community property have not been for the benefit of
9 the children or the community, including the mismanagement of the properties and the
10 overpayment for maintenance that I could have performed at less than 25% of the costs paid.
11 Furthermore, Petitioner has not used the funds provided for the welfare of the children to care for
12 them. The Petitioner incorrectly stated that additional money was taken without authorization
13 from the community escrow account that Petitioner was granted Innocent Spouse by the IRS and
14 FTB and that I have restraining order prohibiting my access to the Barrington and Wooster
15 Properties. Petitioner keeps misleading the court about the Innocent Spouse which she did not
16 receive. I objected at the hearing regarding the Innocent Spouse statement and the entire
17 declaration. The legal reason that the court and petitioner and her consular did not follow a
18 ny point of judgement. Courts orders,

19 15. The community did not lose from the tax issues. The county claimed more than \$900,000 for
20 capital loss but the capital losses were never reported. Mr. Berman acknowledges the
21 community capital loss but he refused to cooperate by not relocating and claiming the additional
22 capital loss. The community therefore lost benefits by this negligence. Arguments continued as if
23 Petitioner and her counsel claimed to have little if any knowledge about the monies involved
24 both in these tax liabilities and sent to Israel by Petitioner. (*Exhibit H, Israeli Bank Accounts*)
25

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16. The court was dismissive of this analysis of my financial status, allowed the situation to rise where Petitioner and her lawyer were dragging out the proceedings which could cost me \$250,000. Yet further, in her January 9, 2014 declaration, Petitioner confirmed that the Barrington Property was sold to cover our tax liabilities. This sale was carried out, but the battle over the money continued long after that date. This echoes back to the September hearing in which Respondent brought up the fact that Petitioner "transferred a million dollars to Israel" leaving "the community responsible to pay all the taxes". Petitioner's counsel responded, "I have no idea what he's talking about". (*Exhibit C 09/09/2013 hearing transcript page 6 lines 7-8, 24-25* incorporated herein by reference as though fully set forth).

17. The Wooster Property was intended to be left between the parties as a safeguard against possible tax debts. The court incorrectly interpreted this to mean that the Court had jurisdiction over the property and then rolled ahead to state that in regards to taxes, "we'll deal with that when and if it comes up." (*Exhibit D 05/23/2011 hearing transcript page 10 lines 2-4* incorporated herein by reference as though fully set forth). Before the judgment was entered on 10/05/2010, the Shenandoah and Barrington Property was my separate property plus 75% of Wooster. The legal reason, my right to refuse to be abused of commissioner George.

18. The settlement in chambers in this case established the division of property as 50/50 in terms of assets and liabilities and the court reinforced this point by announcing an agreement in chambers on August 16-17, 2010 (08/17/2010 hearing transcript page 5, lines 10-27). It should also be noted that in the course of this agreement, both parties agreed to hold the other harmless in regards to tax liabilities. This is further made clear by the fact that the original settlement in this case set aside Wooster to cover any tax liabilities that may have arisen. Referring to correspondence between counsel, all parties acknowledged that the Wooster Property was

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1 intended to pay off the tax liabilities face by the parties. Furthermore, the court ordered
2 cooperation in an order on January 5, 2010 stating "both sides are ordered to cooperate with each
3 other regarding tax issues."

4 19. During the October '9, 2013 proceedings, the court acknowledged that both parties had
5 accepted that there was a tax liability at play stating he "felt obligated to disclose the funds given
6 the advice he received from an accountant. (*Exhibit E 10/09/2013 hearing transcript page 7,*
7 *lines 24-27*) As the arguments unfolded, the Petitioner further revealed to the Court that she was
8 not fully informed on the tax proposition when the court asked, "Do you know that he did not
9 receive advice from an accountant?" answering, "I'm not sure about that". (*Exhibit E*
10 *10/09/2013 hearing transcript page 7, lines 21-23*) By the end of this discussion it is clear
11 that the tax issues being presented are being shown to the Court in a confusing and misleading
12 way, and the tax issues being discussed, if pushed further, could cause me great civil or criminal
13 liability. Petitioner and her counsel ignore the courts and refused to accept the all cash offer for the
14 Shenandoah property from natan for months and keeps drak everybody to courts.

15 FACTS REGARDING PETITIONER'S PROPERTY MISMANAGEMENT

16 20. Petitioner has a history of mismanagement of community property including allowing the
17 Shenandoah Property to be threatened with foreclosure at a huge expense and danger to the
18 community. The Court delayed Respondent from purchasing Shenandoah for significant period
19 of time following incorrect ruling from the Commissioner Cowan by cooperating with Petitioner
20 to block the sale. These delay tactics and misleading statements cost Respondent a huge amount
21 of money, damaged Respondent's credit score, and risked foreclosure and loss of the property.
22 Lastly, these actions required Respondent to spend a large amount of time and resources to
23 defend the property from foreclosure. I am willing and able to buy out Petitioner's portion in
24

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1 order to take over management of the property to preserve its value for the well being of
2 the children. See attached complaint regarding Commissioner St. George's rulings.

3 21. During the three year period Petitioner mismanaged the Shenandoah Property which
4 threatened foreclosure, the court under Commissioners Cowan and St. George acknowledged
5 that Petitioner was not appropriately paying the property mortgage while Petitioner continued to
6 claim the opposite. Petitioner led the court to ignore the "800 Pound Gorilla" of capital gains
7 issues on the property and allowed the Petitioner to take actions that not only costs the Petitioner
8 money but the community as a whole. During this period, Respondent tried repeatedly to
9 prevent these actions, but even at great costs and was only just barely able to save the
10 Shenandoah property from foreclosure. Petitioner continues to ignore relevant issues by
11 demanding the sale of the property in a manner that will hurt the Respondent and the community.

12 22. The Wooster Property is a good property that has been mismanaged by Petitioner as
13 evidenced by the fact that the buyers are making all cash offers for the property. The fact
14 that the property is currently attracting all cash buyers at this bargain price means that with
15 appropriate care and renovations the value of the property will increase, allowing a better
16 broker to market and sell the property. The court allowed the modification of the judgment
17 even though the Petitioner did not pay the mortgage. I paid the mortgage thereby saving the
18 property from going into foreclosure, Petitioner further claimed that there was no evidence to
19 support payment on the property, even though this information has already been presented in
20 court. (*Exhibit E 10/09/2013 hearing transcript page 9 lines 17-22* incorporated herein by
21 reference as though fully set forth).

22
23 23. In stark contrast to Petitioner, I have taken actions that were not only meant to protect
24 property but to minimize the huge losses that could be incurred if the properties continued to be
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1 managed as is. This includes capital gains liabilities, tax liabilities, on the part of the community,
2 tax liabilities on the part of myself and tax liabilities even for the Petitioner. Already, my actions
3 have conserved \$59,700 for the Petitioner. The facts will show that the my actions actually
4 benefitted the Petitioner to the tune of \$120,000. As my former counsel indicated at the
5 06/18/2013 hearing, " the capital gains only accrued a year ago. There was no capital gains
6 consequence. He lost his \$250,000 deduction by being out of the house for more than 24
7 months. That accrued a year ago" (*Exhibit F 06/18/2013 hearing transcript page 11 lines 15-19*
8 incorporated herein by reference as though fully set forth). My efforts resulted in Petitioner
9 receiving a lot of money. This Wooster Property must be handled carefully because the value in
10 this property is meant to offset tax debts owed by the community and the same mistake the
11 resulted in the freezing of the funds in the Barrington escrow must not be repeated. Attached
12 hereto as *Exhibit G* is a letter from a Revenue Officer dated 12/05/2014 which indicates an
13 amount owed of \$~~64,558~~ for the tax periods of 12/31/2006 and 12/31/2009.

14 **FACTS REGARDING SANCTIONS**

15
16 25. Petitioner is not the only party who has incurred significant attorney fees post judgment. I estimate
17 I have spent more than \$75,000 post judgment. In addition, the court has also ordered me to contribute
18 funds towards Petitioner's legal fees as a sanction on 02/09/2011. I have lost thousands because I cannot
19 focus on work due to the numerous court appearances. I cannot afford to maintain Petitioner's legal
20 representation as well as my own. Accordingly, I respectfully ask the court to deny Petitioner's request
21 for sanctions. I should not be sanctioned simply because I expressed a difference of opinion
22 regarding the ultimate disposition of the Wooster Property.

23 I declare under the penalty of perjury under the laws of the State of California that the foregoing
24 is true and correct. Executed this ___ day of January 2015 at Los Angeles, California.

25 _____
NATAN AVRAHAM, Respondent

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MEMORANDUM OF POINTS AND AUTHORITIES

I. FAMILY CODE §271 SANCTIONS SHOULD NOT BE IMPOSED
BECAUSE RESPONDENT'S LITIGATION TACTICS DO NOT RISE TO
THE LEVEL OF SANCTIONABLE CONDUCT

An award of 271 sanctions does not require conduct that is frivolous or for purposes of delay. *In re Marriage of Freeman* 132 Cal. App. 4th 1, 6 (2005). Rather, sanctions may be awarded for "reprehensible conduct short of bad faith." *In re Marriage of Melone* 193 Cal. App. 3d 757 (1987). The type of conduct which merits Family Code §271 sanctions includes failure to disclose assets (*In re Marriage of Tharp* 188 Cal. App. 4th 1295 (2010)); filing a motion of reconsideration without new or different facts (*In re Marriage of Burgard* 72 Cal. App. 4th 74 (1999)); taking an unreasonable position in litigation (*In re Marriage of Quay* 18 Cal. App. 4th 961, 970 (1993)); and failure to sign and return proffered stipulation (*In re Marriage of Melone* 193 Cal. App. 3d 757 (1987)).

A. An Attorney Fee Award of \$5,000 Would Result in an Unreasonable Financial Burden.

Respondent should not be held liable for the attorney fees Petitioner incurred post judgment in the event the court finds Family Code §271 sanctions are appropriate. As a threshold matter, Family Code §271 does not require that the sanction imposed compensate for all fees and costs expended. *In re Marriage of Battenburg* 28 Cal. App. 4th 1338 (1994). In addition, Family Code §271 states that "in making an award pursuant to this section, the court shall take into consideration all evidence concerning the parties' income, assets, and liabilities. The court shall not impose a sanction pursuant to this section that imposes an unreasonable financial burden on the party against whom the sanction is imposed."

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1 The court should not order the Respondent to pay any portion of Petitioner's attorney fees
2 because it would constitute unreasonable financial burden. Respondent is not doing well
3 financially. Currently, Respondent's expenses which include monthly payments to the IRS for an
4 outstanding federal tax liability are about equal to his income. Furthermore, Respondent has no
5 assets. Therefore, the imposition of a \$5,000 monetary sanction against Respondent constitutes
6 an unreasonable financial burden. *In re Marriage of Petropoulos* 91 Cal. App. 4th 161, 180
7 (2001) (imposing husband's \$30,000 in attorney fees as sanction against wife did not constitute
8 unreasonable financial burden on wife where wife was awarded real properties then worth more
9 than 1,000,000, enjoyed capital gains from assets, and received income from rental properties,
10 part time work and spousal support).

11 CONCLUSION

12 WHEREFORE, the Respondent respectfully requests that the Court deny Petitioner's
13 motion for attorney fees under Family Code §271 as a sanction. Petitioner and her counsel, Brett
14 Berman, allowed by the court to provide evidence for the claim and he supports to commit
15 perjury against me and my children's future.
16

17
18 Date: January 27, 2015

19 Respectfully submitted,

20
21 _____
22 Natan Avraham

23
24 OBJECTION AND DECLARATION
25 SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

ORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

FOR COURT USE ONLY

Brett A. Berman.
LAW OFFICE OF BRETT A BERMAN APL.
301 CENTURY PARK EAST, SUITE 2240
LOS ANGELES CA. 90067

TELEPHONE NO.:

FAX NO. (Optional):

MAIL ADDRESS (Optional):

ATTORNEY FOR (Name):

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 1725 MAIN STREET

MAILING ADDRESS: 1725 MAIN STREET

CITY AND ZIP CODE: SANTA MONICA, CA 90401

BRANCH NAME: WEST DISTRICT

PETITIONER/PLAINTIFF: MIRI AVRAHAM

RESPONDENT/DEFENDANT: NATAN RAHAMIM AVRAHAM

PROOF OF SERVICE BY FIRST-CLASS MAIL---CIVIL

CASE NUMBER:

SD 027 039

(Do not use this Proof of Service to show service of a Summons and Complaint.)

I am over 18 years of age and not a party to this action. I am a resident of or employed in the county where the mailing took place.

My residence or business address is: 1778 S. Shenandoah St.
LOS ANGELES CA. 90035

On (date): 01/28/15 I mailed from (city and state): LOS ANGELES CA.
the following documents (specify):

RESPONSIVE DECLARATION TO REQUEST FOR ORDER.

The documents are listed in the Attachment to Proof of Service by First-Class Mail—Civil (Documents Served) (form POS-030(D)).

I served the documents by enclosing them in an envelope and (check one):

- a. depositing the sealed envelope with the United States Postal Service with the postage fully prepaid.
- b. placing the envelope for collection and mailing following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

The envelope was addressed and mailed as follows:

- a. Name of person served:
- b. Address of person served: 1778 S. Shenandoah St. LOS ANGELES CA. 90035

The name and address of each person to whom I mailed the documents is listed in the Attachment to Proof of Service by First-Class Mail—Civil (Persons Served) (POS-030(P)).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 01/28/15

Esther Herrera.

Esther Hc

(TYPE OR PRINT NAME OF PERSON COMPLETING THIS FORM)

(SIGNATURE OF PERSON COMPLETING THIS FORM)

OBJECTION AND DECLARATION
SUPPORTING DISPOSITION
OF JUDGE PROHEM ST. GEORGE

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

2

CONFORMED COPY
ORIGINAL FILED
Superior Court of California
County of Los Angeles

SEP 03 2015

Sherri R. Carter, Executive Officer/Clerk
By Ellen Goldstein, Deputy

1 Natan Avraham, In pro per
2 P.O. Box 35895
3 Los Angeles, CA 90035

4 SUPERIOR COURT OF THE STATE OF CALIFORNIA
5 COUNTY OF LOS ANGELES, WEST DISTRICT

6) Case No.: SD 027 039

7)
8)
9 MIRI AVRAHAM)
Petitioner,)

) RESPONDENT'S PERJURY COMPLAINT
) RE ATTORNEY BRETT BERMAN

10 vs.)

11 NATAN RAHAMIM AVRAHAM)

12)
13 Respondent.)
14)
15)

16)
17 Date:

Respectfully submitted,

18)
19)
20)
21)
22)
23)
24)
25)

Natan Avraham, In pro per
Respondent

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

1 NATAN AVRAHAM
2 1778 s Shenandoah
3 Los Angeles, CA 90035
4 (310) 488-6379

5 SUPERIOR COURT OF THE STATE OF CALIFORNIA
6 FOR THE COUNTY OF LOS ANGELES, WEST DISTRICT

ORIGINAL

7) Case No.: SD 027 039

8 MIRI AVRAHAM
9 Petitioner,

) DECLARATION OF NATAN AVRAHAM
) RE PERJURY COMPLAINT

10 vs.

11 NATAN RAHAMIM AVRAHAM

) 5:27.15

12 Respondent.

13
14 I, NATAN AVRAHAM, declare:

15
16 1. I am the Respondent in this action and in this proceeding. I offer this declaration in
17 lieu of personal testimony pursuant to Code of Civil Procedure §§2009 and 2015.5; California
18 Rules of Court Rule 5.118; *Reifler v. Superior Court*, 39 Cal. App. 3d 479,484-85 (1974); *In re*
19 *Marriage of Stevenot*, 154 Cal. App. 3d 1051, 1059 n.3 (1984). I have personal knowledge of the
20 facts stated in this declaration, and if sworn as a witness, I could and would competently testify
21 thereto. I submit this declaration to establish the perjury committed by Petitioner and her counsel
22 throughout these proceedings.

23
24 OBJECTION AND DECLARATION
25 SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

1
2 Complaint Regarding:

- 3 1) Perjury Committed
4 2) Breach of Fiduciary Duty by Petitioner
5 3) Breach of Contract by Petitioner

6 FACTS REGARDING PERJURY

7 2. Respondent asks this court to consider the numerous instances of perjury committed by
8 Petitioner and Petitioner's counsel, Brett Berman, in and out of court, during the proceedings.
9 Previously, I have complained to the LASD regarding these false statements and to claim
10 damages these statements have cause the courts.

11 3. The Court has made a request that individuals take every effort to resolve these matters
12 outside of Court. I am more than willing to do so and to resolve these acts of perjury outside of
13 Court so long as the resolution is for the betterment of the children in this case.

14 4. On September 23, 2010, Petitioner and Mr. Berman took action to structure a misleading
15 Judgment and claimed that there was an existing settlement that would allow the sale of the eight
16 unit Barrington Property (sold for the low price of 700,000) (~~Exhibit~~) against the conditions of
17 the Settlement Agreement based on misleading testimony and perjury (~~Exhibit~~) all the while
18 refusing to acknowledge this future amount in the escrow account and committing an act of
19 perjury while doing so. This is a violation of a court order-taking action against me as
20 acknowledged on the record.

21
22 5. Petitioner signed and approved every payment and she has the ability to review every
23 transaction. (~~Exhibit~~) However, Petitioner continues to claim that the Internal Revenue Service
24 and CA Franchise Tax Board have taken funds from this account while trying to gain access to
25

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

1 those funds. (See 03/20/2014 Hearing Transcript) Petitioner and her counsel have misled the
2 court on these facts and testified inaccurately even going so far as to claim that Petitioner
3 was granted Innocent Spouse by the IRS. An additional \$143,000 went to the IRS and
4 Petitioner clearly did pay the mortgage on the Shenandoah Property while misleading the court
5 and claiming at the same time that she was providing her half of the mortgage but was unable to
6 make contact with me. Both of these statements cannot be trust. Indeed, Petitioner and her
7 counsel have repeatedly misled the court by claiming the reimbursement and payments were
8 already resolved by October 9, 2013. (Exhibit)

9 6. As a result of testimony and misleading statements, the court released funds to Petitioner for
10 which I was entitled. (Exhibit) Therefore, I had to take further action to fix these issues.
11 Petitioner has worked for three years to block my access to the money in the Wilshire Escrow
12 account. These actions have prevented me from being able to meet my credit card debts and
13 other community obligations. As a result, I now have to take on high interest loans to preserve
14 the property I secured while having to fund tax defense, fees, and penalties created by the
15 community tax burden. Until now, I was the only one harmed by these tax burdens. Petitioner
16 has been receiving my rightful property while claiming no responsibility for the community
17 property to the IRS and FTB.

18
19 7. I request sufficient time to protect myself and interests from these actions all of which are
20 clearly being made without the community in mind especially in light of the fact that Petitioner
21 has been allowed to block my rights for three years based on perjury. In addition, Petitioner's
22 actions are clearly not in the best interest of the children or the community. Petitioner has been
23 guiding the court against me with false testimony and perjury repeatedly acting on the incorrect
24 basis of the Judgment and using the government against me.
25

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

1
2 FACTS REGARDING FINANCIAL BURDENS

3 8. (1) Funds Lost Due to Perjury- \$336,122.00 (10% plus penalties/fee for the entire
4 Period)

5 (2) \$79,500-Additional funds received by Petitioner from the community property sale
6 of the Barrington Property

7 9. Petitioner claimed when push forward for the sale of the Barrington Property by court order
8 that the amount of the sale would be used to meet the community tax obligation, which it was
9 not. (See Declaration) I am entitled to half of this original amount yet if Petitioner does not
10 provide these amounts, I am entitled to an equal amount from the community property and would
11 seek the appropriate sanctions by the Court for the actions of Petitioner.

12 (3) \$40,900 per the Judgment 6...6.3 Credit Card Reimbursements

13 10. Respondent is entitled to reimbursements from the community for his credit cards continual
14 delay on this has caused significant damage to my credit.

15 (4) \$28,800 per the Judgment 6.8.1 Repairs to Barrington Property

16 11. Respondent undertook extensive repairs to the Barrington Property to the benefit of the
17 community.

18 (5) \$13,000 per the Judgment 7.3

19 12. Respondent is owed reimbursement for the sale of the Nissan vehicle.

20 *Shenandoah Property*

21 (6) \$38,000

22 13. I repeatedly saved the Shenandoah Property from foreclosure and provided for the
23 mortgage. (See Bank Statements, 05/20 Hearing Transcript, Reply Declaration). Mr. Berman
24
25

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

1 Admits Petitioner did not pay the mortgage (See Statements by the Court and Petitioner's
2 Counsel) the court under Commissioners Cowan and St. George acknowledged that Petitioner
3 was not timely paying the mortgage (~~Exhibit~~) while continuing to claim the opposite.
4 (Exhibit) I am entitled to reimbursement from Petitioner.

5 (7) \$22,500 per the Judgment 6.6.5.1 Student Loans

6 14. The community funds intended to pay off these loans from the sale of Barrington Property
7 has been blocked by Petitioner for more than four years and has been removed entirely by
8 Petitioner. These expenses must still be met.

9 (8) \$14,422 (balance due by 02/18/15) per the Judgment 6.6.2

10 16. The 2005 tax obligation to the FTB has been blocked by Petitioner even though the
11 Judgment clearly outlined that the proceeds of the Barrington sale were intended to provide for
12 these expenses. These funds have been removed and must be replaced by Petitioner.

13 17. It is a fact that no one including Petitioner and her counsel can prove that Petitioner was
14 granted Innocent Spouse status by the IRS or FTB. (See 08/18/2013 Hearing Transcript) Mr.
15 Berman specifically requested, "I would ask for 90 days to come back so I could coordinate with
16 her tax counsel to get evidence together". However, Petitioner still has not produced this
17 evidence
18

19
20 (9) \$64,500 2006 Community Tax Liability (Exhibit A)

21 15. For more than four years, the penalties and fees have been leveled at me alone even as
22 Petitioner claims that these amounts have been paid. Petitioner has also falsely claimed that she
23 has been granted Innocent Spouse while I have maintained the interest and penalties on these
24 loans for three years.

25
**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

1
2 18. In addition, Petitioner can provide no evidence that Petitioner paid her share of the
3 mortgage for the Shenandoah Property to prevent disbursement of reimbursements to me. The
4 court record clearly establishes the multiples instances of perjury committed by Petitioner
5 and her attorney. I am going to fight for my civil rights.
6
7

8 I declare under the penalty of perjury under the laws of the State of California that the foregoing
9 is true and correct. Executed this ___ day of March 2015 at Los Angeles, California.
10

11 _____
12 NATAN AVRAHAM, Respondent
13
14
15
16
17
18
19
20
21
22
23

24 **OBJECTION AND DECLARATION**
25 **SUPPORTING DISQUALIFICATION**
OF JUDGE PRO TEM ST. GEORGE

REASONS TO ASSIGN CASE TO ANOTHER DEPARTMENT/JUDGE

1. I have serious concerns about this court's ability to make a fair and impartial ruling in this matter. I do not trust Commission St. George to make the appropriate decisions regarding my case and for that reason I do not trust him. I believe Commissioner St. George ignored the law and his duty to perform. I believe the Commissioner abused his power by making rulings against me and entire community assets. He had no grounds to punish me but did so without reason and evidence. I have been placed in a very bad situation. I have worked my entire life for my children. Most children would be very happy to have a father do what did for my children. My children were one of the happiest children in the world. Without reason, the Commissioner destroyed everything; our community is losing money every day and my children are still suffering. Further, Commission St. George allowed Petitioner's attorney, Brett Berman, to abuse me and lie about the circumstances. I also believe Mr. Berman lied to his client.

2. There is no legal grounds and no basis in evidence for the court to sign and enter the judgment under Code of Civil Procedure §664.4 and no legal grounds to order my attorney Cary Goldstein to sign the judgment for me which does not conform to the Oral Settlement Agreement. This motion is for Petitioner to cooperate regarding the house as it concerns the judgment to start saving the community money and stop making me lose money and stop our adult children from suffering to the divorce.

I filed a complaint against Commissioner St. George. I believe he is biased towards Petitioner and against me. In this case, St. George's records is so lopsided as to create a reasonable doubt of his impartiality. see attachment, 9

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

JUSTICFORAVRAHAM.WEEBLY.COM

Just so it's clear I'm going to keep fighting for my rights that commissioner
Gorge to flow the law to disqualify himself

I declare under the penalty of perjury under the laws of the State of California that the foregoing
is true and correct. Executed this 27 day of ^{May} ~~January~~ 2015 at Los Angeles, California.


NATAN AVRAHAM Respondent

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

KAMALA D. HARRIS
Attorney General

State of California
DEPARTMENT OF JUSTICE



PUBLIC INQUIRY UNIT
P.O. BOX 944255
SACRAMENTO, CA 94244-2550
(916) 222-3360
TOLL FREE: (800) 952-5225
TTY: CA Relay Service
(800) 733-2922

March 27, 2015

PIU: 625896

Natan Avraham
1778 S. Shenandoah
Los Angeles, CA 90035

Dear Natan Avraham:

Thank you for your correspondence to the Office of the Attorney General.

While we appreciate the time and effort it has taken to contact our office, we are unable to assist you because the Attorney General has no jurisdiction in matters already before the court or in matters where the courts have already rendered a decision. In addition, we are prohibited by law from representing private individuals or providing legal advice, legal research or legal analysis to private individuals under any circumstances.


Therefore, we suggest that you consult with a private attorney to determine any civil remedies that may be available to you. An attorney would directly represent your interests and is the one whose advice would be most helpful to you.

Your complaint about the attorney(s) involved in this case should be directed to the State Bar. The Bar has exclusive jurisdiction over complaints against attorneys. You may contact the Bar as follows:

State Bar of California
1149 South Hill Street
Los Angeles, CA 90015-2299
Telephone: (213) 765-1000 (outside of CA) or
(800) 843-9053 (toll free)
Internet: <http://www.calbar.ca.gov/>

We regret that we are unable to assist you. However, we hope the information we have provided clarifies our restrictions in regard to your request. Thank you again for writing.

Sincerely,


Kimberly Christophersen
Public Inquiry Unit

For KAMALA D. HARRIS
Attorney General

I have received this letter from the California Attorney General in response to my filed complaint, and in my understanding it outlines two ways in which it is suggested I proceed with my case. First, the letter seems to point out that I should make my complaints known to the California State Bar Association. I have done this. Second, the letter suggests that I seek a private attorney to work with me on civil remedies for what has occurred in my case. I am of the belief that this means that there are civil remedies available to me.

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

Petitioner in this case has incorrectly claimed legal exemption from taxation as not receiving income from the properties held by the community (she did not sign the returns has received community property improperly even after abusing that property and her responsibilities under the original Settlement), and has extended these courtroom proceedings longer than should have been possible

Before the judgment enters on 10/ 5/ 10 the Shenandoah and Barrington property was respondent separate properties. And 75% 1442 Wooster

Note most specifically that the settlement in chambers in this case established the division of the property as fifty/fifty in terms of assets and liabilities, and the Court reinforced this point by announcing an agreement in chambers on August 16+17, 2010 (August 17, 2010 Transcript Page 5 Lines 10-27).

It should also be noted

That, in the course of this agreement, both parties agreed to hold the other harmless in regard to tax liability. This is further made clear by the fact that the original settlement in this case set aside the Wooster property to cover for any tax liabilities that may have arisen (though, admittedly and as stated above, this Judgment had been ignored plenty of times by the Court and Petitioner's Counsel up to this point).

Referring to the correspondence between Respondent's Counselors and Mr. Berman, all parties involved acknowledge that the Wooster property was intended to pay off the tax liabilities face by the parties.

On August 17th, 2010, while in chambers, the parties also agreed that they would equally bear any pre-separation tax liability, that the pre-separation tax liability would be paid out of the proceeds from the sale of the Wooster property, and that there would be no further litigation as to who is responsible for the pre-separation tax liability. At this time Respondent agreed to split the property in questions "fifty-fifty" in order to reach an agreement. The illegal Judgment created by Petitioner's Counsel is not supported by the law, as it did not provide for the proceeds from the sale of the Wooster Property to be used for tax. The Judgment violated the orders of the tax authorities in this case, as the Judgment as structured would avoid the community tax burdens illegally and would put Petitioner and Respondent in a position to be civilly and criminally liable for disbursing the proceeds of the sale of community property without meeting the pre-existing tax burdens, making this Judgment illegal. Accepting this Judgment would mean that the Court would be required to enforce a Judgment contradictory to the Court's earlier decisions on tax issues (Respondent understands from tax counsel that using the sale of the property for non-tax reasons is directly contradictory to the requirements of the community's tax burdens). It was clear to the Court and all parties acknowledge that the Wooster property was meant to resolve the community tax issues (issues all parties acknowledged). If Petitioner's Counsel denies this fact he is clearly once again committing perjury before the Court, continuing to waste the Court's time and resources, and damaging the community. The Court has allowed Petitioner's Counsel to testify to the facts of this case and affect the Court proceedings, overriding the Respondent and leading the Court. Commissioner Cowan and Respondent's Counsel can all corroborate these facts. Either the Judgment created by Petitioner's Counsel is incorrect, or the actions of the court are incorrect in this matter. It is Respondent's position that the Judgment is in fact incorrect.

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

The only payment of \$143,768.49 occurred *before* the judgment was entered, Miri was entirely aware of this payment, and it could not have been made without her signature as it was included in the closing costs of the Barrington Property

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE



OGDEN UT 84201-0021

In reply refer to: 0484026126
Nov. 12, 2010 LTR 304C EO
551-87-5392 200712 30

00004933
BODC: SB

RAHAMIM & MIRI AVRAHM
PO BOX 35895
LOS ANGELES CA 90035-0895



11838

Taxpayer Identification Number: 551-87-5392
Tax Period(s): Dec. 31, 2007

Form: 1040

Dear Taxpayer:

Thank you for the inquiry dated Sep. 08, 2010.

We have increased your tax based on the Form 1040X, Amended Tax Return that you sent. We did not match the figures on the Form 1040X, because you did not include the under reported interest and non-employee compensation that was shown on the CP2000 Notice previously sent to you. You will receive a notice of adjustment in 4 to 6 weeks.

If you have any questions, please call a representative at 1-800-829-8310 between the hours of 7:00 AM and 8:00 PM MDT. If the number is outside your local calling area, there may be a long-distance charge to you.

If you prefer, you may write to us at the address shown at the top of the first page of this letter.

Whenever you write, please include this letter and, in the spaces below, give us your telephone number with the hours we can reach you. Also, you may want to keep a copy of this letter for your records.
Telephone Number () _____ Hours _____

We apologize for any inconvenience we may have caused you, and thank you for your cooperation.

Internal Revenue Service Letter dated November 12, 2010 regarding the 2007 Tax Return amendment received by the Internal Revenue Service September 8, 2010 (before the Judgment).

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

Mr. Berman clearly lied to the Court. I had already made it very clear at the beginning of the March 20, 2014 hearing to the Court that Miri and Mr. Berman were lying to the Court and that the Court did not care (March 20, 2014 Transcript Page 6 Lines 6-19), and even with these warnings I was completely ignored. The Transcript further does not accurately reflect my comments to the Court, omitting statements I made. At the end of the hearing I repeated that the Court's power was being abused against me, and again I was ignored (March 20, 2014 Transcript Page 26 Lines 15-21).

The most specific and obvious example is in regard to the \$143,000.00 that was withdrawn by the Internal Revenue Service. During the March 20, 2013 Court Date Mr. Berman testified

“

Mr Berman: Well, I'd answer that this way, your honor. The 143,000 that went to the I.R.S. occurred after this judgment was entered.

The Court: Is that over and above what was mentioned in 6.61, 6.62?

Mr. Berman: Yes, your honor.

The Court: All right. That helps.

“

This statement is not true, and can easily be shown to be false.

The only payment of \$143,768.49 occurred *before* the judgment was entered, Miri was entirely aware of this payment, and it could not have been made without her signature as it was included in the closing costs of the Barrington Property.

Can be easy to verify with the IRS that No additional payments were made or went to the IRS after December 9 2010 on the closing costs of the Barrington property

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

The only further amendments reported to the *IRS* after the signing of the Judgment are those that were made to the 2007 1040X, from which the community saw a huge benefit of roughly \$700,000 from the appropriate reporting of the capital loss, and took no loss. I believe that this savings is why Miri is now so willing to sell the Wooster property, as she has found out that she will save a tremendous amount in Capital Gains. I believe that there will be a savings to Miri of \$170,000.00 from these amendments. Taking all of the tax issues into account, this leaves Miri with a net benefit.

An Internal Revenue Service letter dated November 17, 2010 regarding the 2006 Tax Return amendment received by the Internal Revenue Service September 13, 2010 (before the Judgment)

An Internal Revenue Service Letter dated November 12, 2010 regarding the 2007 Tax Return amendment received by the Internal Revenue Service September 8, 2010 (before the Judgment)

Attached is a Franchise Tax Board notice from August 26, 2010 explaining that there are outstanding tax liabilities in regard to 2007.

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

On February 9, 2011, all parties in this case acknowledged that the community had an obligation to the amended taxes.

2004-2007 Tax Liabilities are no longer covered under the statute of limitation,

There is a request from the authorities to address tax issue.

On 12 .9 2010 At the time the Barrington property was sold the 2006 Internal Revenue Service obligation from the community had not yet been met,

No payments to the Internal Revenue Service occurred after the Judgment was signed.

Furthermore, on February 9, 2011 Mr. Berman himself testified that there was only \$158,000.00 left in the escrow account,

it is documented that these amounts went to Miri, to Mr. Berman, and to provide for my daughter's car.

February 9 2011 The Court acknowledged that Miri should reserve money to address the Capital Gains burden on the community.

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

Franchise Tax Board

Page 2 NPA 2007

05290418 08/26/10

RAHAMIM AVRAHM

1107590774

MIRI AVRAHM

1215155969

We issued this notice based on information provided to us by the Internal Revenue Service (IRS). Internal Revenue Code 6103(d) authorizes the IRS disclose tax return information to the Franchise Tax Board. IRS information shows that you underreported your income and/or overstated your deductions. Therefore, we adjusted your state income tax liability and any credits you claimed based on that information.

If you believe we sent this notice in error, please obtain a complete copy of the most recent IRS Report for the taxable year shown above and attach it to your protest letter. You can also send us copies of IRS Letters 555(SC), 1151(SC), 1802(SC), or CP2005.

We have allowed an additional credit for withholding as shown above.

If you agree with these adjustments, please see the Agree section in the enclosed Personal Income Tax Notice of Proposed Assessment Information (FTB 7275).

If you disagree with these adjustments, please see the Protest section in the enclosed FTB 7275. Your protest must be mailed or faxed by the protest date indicated on this notice. If you do not mail or fax your written protest by this date, the assessment will become final and we will bill you for the amount due, including penalties and interest. Filing a protest will not stop the accrual of interest. We provide current interest and penalty rates with this notice.

For additional information on your rights and responsibilities, please see the Rights As A Taxpayer and Franchise Tax Board Privacy Notice sections in the enclosed FTB 7275.

attached is a Franchise Tax Board notice from August 26, 2010 explaining that there are outstanding tax liabilities in regard to 2007.



STATE OF CALIFORNIA

FRANCHISE TAX BOARD

COLLECTION ADVISORY TEAM, MS - A240
 P. O. BOX 2952
 SACRAMENTO, CA 95812-2952

January 29, 2015

In Reply Refer to:
 624:PR:AVRAHM

RAHAMIM AVRAHM
 1778 S SHENANDOAH ST
 LOS ANGELES CA 90035-4325

Subject: ACCOUNT STATUS
FTB-ID NO. : 110-75907-74
Tax Year(s) : 2000, 2001, 2002, 2003, 2004, 2005, and 2006 Tax Years

This letter in response to your request to advise you that the Franchise Tax Board provided Miri Avraham relief of liability for the 2000, 2001, 2002, 2003, 2004, 2005, and 2006 amended married filing joint income tax returns filed by you. These above-referenced amended tax returns lacked Mrs. Avraham's signature.

Should you have any further questions regarding this matter, please contact me at the telephone number listed below.

Patricia Rojas, Specialist
 Collection Advisory Team
 (916) 845-4130

In this communication from the Tax Authorities Natan Avraham was clearly informed that Miri has been released from Tax Liability on a signature issue, not on the basis on being granted Innocent Spouse status. Petitioner was then *incorrectly exempted* from the community tax burden by the Court and received community property to which she was not actually entitled.

**OBJECTION AND DECLARATION
 SUPPORTING DISQUALIFICATION
 OF JUDGE PRO TEM ST. GEORGE**

STATE OF CALIFORNIA

FRANCHISE TAX BOARD

COLLECTION ADVISORY TEAM; MS A-340
P. O. BOX 28112
SACRAMENTO, CA 95812-2812

July 22, 2013

In Reply Refer to:
624:PR:AVRAHAM

WAYNE R. JOHNSON & ASSOCIATES PLO
WAYNE R. JOHNSON
8841 AIRPORT BLVD. SUITE 650
LOS ANGELES CA 90045

Subject: Request for Relief of Liability
FTB-ID No.: 121-51550-89
Requesting Taxpayer: Miri Avraham
Tax Years: 2000, 2001, 2002, 2003, 2004, 2005, 2006, and 2007

This letter is to advise you that the Franchise Tax Board has made a determination regarding your request on behalf of your client, Miri Avraham, that she did not sign the 2001, 2002, 2003, 2004, 2005, 2006, and 2007 amended married filing joint income tax returns filed with Rahamim Avraham. Please be advised that we have also included the 2000 tax year in our review.

Based on the information presented and the information in our files, we have determined that Miri Avraham's name will be removed from the filing of the amended married filing joint income tax returns for the 2000, 2001, 2002, 2003, 2004, 2005, and 2006 tax years.

Regarding the 2007 tax year, the Franchise Tax Board did not accept the filing of the amended married filing joint income tax return. Therefore, relief of liability based on no signature by your client is not warranted for the 2007 tax year. In fact, on August 28, 2010, a Notice of Proposed Assessment was issued assessing additional tax due for the 2007 tax year in the amount of \$1,832.00. Payment in full was received on January 13, 2009.

Should you have any further questions regarding this matter, please feel free to contact me at the telephone number listed below.

Patricia Rojas, Specialist
Collection Advisory Team
(916) 846-4130

cc: Miri Avraham

Mr. Berman was aware that Miri and her tax attorney requested a relief of liability from the Franchise Tax Board based on Miri not signing the amended tax returns. This lack of signature

Internal Revenue Service Transcripts of Accounts show a summary of all taxes and a record of all actions taken from the 2000 tax period to the 2003 tax period and show no activity. 2004.

See Attachment 1

Internal Revenue Service Transcript shows all information pertaining to the 2004, 2005, and 2007 tax years, and these records show only one payment--\$143,760.49 made on December 10, 2010. These records show that no additional assessments occurred after the Judgment in this case no additional money went to the Internal Revenue Service and no additional assessments were made on these accounts. These documents further show that there was no award of Innocent Spouse made on these accounts. **See Attachment 2**

It is important to note that the Internal Revenue Service was and is required to inform Natan of any award of Innocent Spouse and did not. The one and only payment of \$143,760.49 was made as part of the closing costs on the sale of the Barrington Property and without signature approval from Miri the escrow on the Barrington Property could never have closed and this payment could not have been made. **See Attachment 3**

The records on the 2006 Tax from the Internal Revenue Service are clear.
See Attachment 4

The only further amendments reported to the Internal Revenue Service after the signing of the Judgment are those that were made according to the 2007 1040X, from which the community saw a huge benefit of approximately \$692,474.00 due to the corrected appropriate recording of the Capital Loss on the community property. **See Attachment 5**

There is evidence of Perjury committed by Petitioner and Petitioner's Counsel Mr. Berman

All the Court Records, Transcripts, and Minute Orders show that the issue of Reimbursements was not resolved on October 9, 2013. These records also show that Miri did not pay the mortgage on the Shenandoah Property as outlined by the Judgment and that Mr. Berman misled and lied to the Court.

Note: On December 16, 2013, the Court ordered Natan's Counsel that all of Natan's requests and Motions needed to be filed as one Motion by December 27, 2013.

1

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

 Internal Revenue Service
United States Department of the Treasury
MEMPHIS, TN 37501-1498

Tracking ID: 100249883745
Date of Issue: 04-24-2015

001340.401072.455843.14468 1 AT 0.406 536
|||

RAHAMIM N & MIRI RAHMIM AVRAHM
PO BOX 35895
LOS ANGELES, CA 90035

Tax Period: December, 2000

Information about the Request We Received

In this letter, we'll report the status of the request we received.

We've enclosed the transcript or transcripts that you requested on April 24, 2015.

A transcript of account shows a summary of your tax return and subsequent actions taken. These actions could include payments, amended returns, and corrections we made to the original return due to math mistakes.

Information for current tax years is available immediately on our computer systems. Delivery time to you depends on how you submit your request and the delivery method you select to receive the information.

If you have any questions about information contained in the transcripts or other enclosed information, please call us at the IRS telephone number listed in your local directory or at 1-800-829-0922.

Sincerely Yours,

Patricia LaPosta

Patricia LaPosta, Director
Electronic Products & Svcs Support

Enclosures:
Account Transcript

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

 **Internal Revenue Service**
United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 04-24-2015
Response Date: 04-24-2015
Tracking Number: 100249883745

Account Transcript

FORM NUMBER: 1040 TAX PERIOD: Dec. 31, 2000
TAXPAYER IDENTIFICATION NUMBER: ~~XXXXXXXXXX~~
SPOUSE TAXPAYER IDENTIFICATION NUMBER: ~~XXXXXXXXXX~~
RAHAMIM N & MIRI RAHMIM AVRAHM

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: 0.00 AS OF: May 27, 2002
ACCRUED INTEREST: 0.00 AS OF: May 27, 2002
ACCRUED PENALTY: 0.00

ACCOUNT BALANCE
PLUS ACCRUALS
(this is not a
payoff amount): 0.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 05
FILING STATUS: Married Filing Joint
ADJUSTED GROSS
INCOME: 59,719.00
TAXABLE INCOME: 30,863.00
TAX PER RETURN: 4,908.00
SE TAXABLE INCOME
TAXPAYER: 14,309.00
SE TAXABLE INCOME
SPOUSE: 0.00
TOTAL SELF
EMPLOYMENT TAX: 2,189.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Oct. 18, 2001
PROCESSING DATE Nov. 19, 2001

| TRANSACTIONS | | | | |
|--------------|---|----------|------------|-------------|
| CODE | EXPLANATION OF TRANSACTION | CYCLE | DATE | AMOUNT |
| 150 | Tax return filed 89221-294-44235-1 | 20014508 | 11-19-2001 | \$5,820.00 |
| 806 | W-2 or 1099 withholding | | 04-15-2001 | -\$91.00 |
| 430 | Estimated tax payment | | 06-14-2000 | -\$6,000.00 |
| 430 | Estimated tax payment | | 09-15-2000 | -\$2,500.00 |
| 430 | Estimated tax payment | | 03-30-2001 | -\$3,200.00 |
| 460 | Extension of time to file ext. Date 08-15-2001 | | 04-15-2001 | \$0.00 |
| 670 | Payment | | 04-15-2001 | -\$5,000.00 |
| 460 | Extension of time to file ext. Date 10-15-2001 | | 04-15-2001 | \$0.00 |
| 836 | Refund you chose to apply to next | | 04-15-2001 | \$4,762.00 |

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

Tracking Number 100249883745

year's taxes

| | | | |
|-----|--|---------------------|------------|
| 846 | Refund issued | 11-19-2001 | \$6,209.00 |
| 766 | Tax relief credit | 11-26-2001 | -\$600.00 |
| 290 | Additional tax assessed 89254-999-05099-1 | 20014608 11-26-2001 | \$0.00 |
| 846 | Refund issued | 11-26-2001 | \$600.00 |

This Product Contains Sensitive Taxpayer Data

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

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**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

 **Internal Revenue Service**
United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 04-24-2015
Response Date: 04-24-2015
Tracking Number: 100249883745

Account Transcript

FORM NUMBER: 1040 TAX PERIOD: Dec. 31, 2001

TAXPAYER IDENTIFICATION NUMBER: ~~55-97-9392~~
SPOUSE TAXPAYER IDENTIFICATION NUMBER: ~~60-14-6979~~

RAHAMIM N & MIRI RAHMIM AVRAHM

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: 0.00
ACCRUED INTEREST: 0.00 AS OF: Jan. 09, 2012
ACCRUED PENALTY: 0.00 AS OF: Jan. 09, 2012

ACCOUNT BALANCE
PLUS ACCRUALS
(this is not a
payoff amount): 0.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 05
FILING STATUS: Married Filing Joint
ADJUSTED GROSS
INCOME: 73,760.00
TAXABLE INCOME: 43,082.00
TAX PER RETURN: 7,077.00
SE TAXABLE INCOME
TAXPAYER: 18,636.00
SE TAXABLE INCOME
SPOUSE: 0.00
TOTAL SELF
EMPLOYMENT TAX: 2,851.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Oct. 21, 2002
PROCESSING DATE Nov. 25, 2002

| | | TRANSACTIONS | | |
|------|---|--------------|------------|-------------|
| CODE | EXPLANATION OF TRANSACTION | CYCLE | DATE | AMOUNT |
| 150 | Tax return filed 89221-294-46324-2 | 20024608 | 11-25-2002 | \$8,112.00 |
| 806 | W-2 or 1099 withholding | | 04-15-2002 | -\$300.00 |
| 716 | Credit you chose to transfer from prior tax period | | 04-15-2001 | -\$4,762.00 |
| 430 | Estimated tax payment | | 01-17-2002 | -\$8,500.00 |
| 460 | Extension of time to file ext. Date 08-15-2002 | | 04-15-2002 | \$0.00 |
| 460 | Extension of time to file ext. Date 10-15-2002 | | 04-15-2002 | \$0.00 |
| 836 | Refund you chose to apply to next year's taxes | | 04-15-2002 | \$5,450.00 |
| 290 | Additional tax assessed | 20111308 | 04-11-2011 | \$0.00 |

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

Tracking Number 100249883745

89254-477-13252-1

290 Additional tax assessed
19254-656-05146-1

20113808 10-03-2011

\$0.00

This Product Contains Sensitive Taxpayer Data

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

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**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**



Internal Revenue Service

United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 04-24-2015
Response Date: 04-24-2015
Tracking Number: 100249883745

Account Transcript

FORM NUMBER: 1040

TAX PERIOD: Dec. 31, 2002

TAXPAYER IDENTIFICATION NUMBER: ~~551-07-0702~~
SPOUSE TAXPAYER IDENTIFICATION NUMBER: ~~600-00-6079~~

RAHAMIM N & MIRI RAHMIM AVRAHM

9

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: 0.00
ACCRUED INTEREST: 0.00 AS OF: Jan. 09, 2012
ACCRUED PENALTY: 0.00 AS OF: Jan. 09, 2012

ACCOUNT BALANCE
PLUS ACCRUALS
(this is not a
payoff amount): 0.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 05
FILING STATUS: Married Filing Joint
ADJUSTED GROSS
INCOME: 76,919.00
TAXABLE INCOME: 57,069.00
TAX PER RETURN: 10,285.00
SE TAXABLE INCOME
TAXPAYER: 24,109.00
SE TAXABLE INCOME
SPOUSE: 0.00
TOTAL SELF
EMPLOYMENT TAX: 3,689.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Oct. 16, 2003
PROCESSING DATE Dec. 15, 2003

| TRANSACTIONS | | | | |
|--------------|---|----------|------------|-------------|
| CODE | EXPLANATION OF TRANSACTION | CYCLE | DATE | AMOUNT |
| 150 | Tax return filed 89221-319-02248-3 | 20034908 | 12-15-2003 | \$11,695.00 |
| 806 | W-2 or 1099 withholding | | 04-15-2003 | -\$30.00 |
| 716 | Credit you chose to transfer from prior tax period | | 04-15-2002 | -\$5,450.00 |
| 430 | Estimated tax payment | | 01-11-2003 | -\$6,000.00 |
| 430 | Estimated tax payment | | 02-18-2003 | -\$4,000.00 |
| 460 | Extension of time to file ext. Date 08-15-2003 | | 04-15-2003 | \$0.00 |
| 460 | Extension of time to file ext. Date 10-15-2003 | | 08-15-2003 | \$0.00 |
| 836 | Refund you chose to apply to next year's taxes | | 04-15-2003 | \$3,785.00 |

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

Tracking Number: 100249883745

| | | | | |
|-----|---|----------|------------|-----------|
| 766 | Tax relief credit | | 12-22-2003 | -\$800.00 |
| 290 | Additional tax assessed 89254-999-05099-3 | 20035008 | 12-22-2003 | \$0.00 |
| 836 | Refund you chose to apply to next year's taxes | | 12-22-2003 | \$800.00 |
| 290 | Additional tax assessed 89254-477-13251-1 | 20111308 | 04-11-2011 | \$0.00 |
| 290 | Additional tax assessed 19254-656-05148-1 | 20113808 | 10-03-2011 | \$0.00 |

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**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

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**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**



Internal Revenue Service

United States Department of the Treasury
MEMPHIS, TN 37501-1498

Tracking ID: 100249883745
Date of Issue: 04-24-2015

001341.401072.455843.14468 1 AT 0.406 536



RAHAMIM N & MIRI RAHMIM AVRAHM
PO BOX 35895
LOS ANGELES, CA 90035

341

Tax Period: December, 2003

Information about the Request We Received

In this letter, we'll report the status of the request we received.

We've enclosed the transcript or transcripts that you requested on April 24, 2015.

A transcript of account shows a summary of your tax return and subsequent actions taken. These actions could include payments, amended returns, and corrections we made to the original return due to math mistakes.

Information for current tax years is available immediately on our computer systems. Delivery time to you depends on how you submit your request and the delivery method you select to receive the information.

If you have any questions about information contained in the transcripts or other enclosed information, please call us at the IRS telephone number listed in your local directory or at 1-800-829-0922.

Sincerely Yours,

Patricia LaPosta, Director
Electronic Products & Svcs Support

Enclosures:
Account Transcript

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE



Internal Revenue Service
United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 04-24-2015
Response Date: 04-24-2015
Tracking Number: 100249883745

Account Transcript

FORM NUMBER: 1040 TAX PERIOD: Dec. 31, 2003
TAXPAYER IDENTIFICATION NUMBER: ~~55-12-2002~~
SPOUSE TAXPAYER IDENTIFICATION NUMBER: ~~600-20-2009~~
RAHAMIM N & MIRI RAHMIM AVRAHM

L341

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: 0.00
ACCRUED INTEREST: 0.00 AS OF: Jan. 09, 2012
ACCRUED PENALTY: 0.00 AS OF: Jan. 09, 2012

ACCOUNT BALANCE
PLUS ACCRUALS
(this is not a
payoff amount): 0.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 05
FILING STATUS: Married Filing Joint
ADJUSTED GROSS INCOME: 84,783.00
TAXABLE INCOME: 63,083.00
TAX PER RETURN: 6,816.00
SE TAXABLE INCOME: TAXPAYER: 0.00
SE TAXABLE INCOME: SPOUSE: 0.00
TOTAL SELF EMPLOYMENT TAX: 0.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Oct. 20, 2004
PROCESSING DATE Nov. 29, 2004

| TRANSACTIONS | | | | |
|--------------|---|----------|------------|-------------|
| CODE | EXPLANATION OF TRANSACTION | CYCLE | DATE | AMOUNT |
| 150 | Tax return filed 89221-300-69125-4 | 20044608 | 11-29-2004 | \$8,178.30 |
| 430 | Estimated tax payment | | 04-10-2003 | -\$3,000.00 |
| 430 | Estimated tax payment | | 04-11-2003 | -\$4,500.00 |
| 430 | Estimated tax payment | | 09-25-2003 | -\$4,500.00 |
| 716 | Credit you chose to transfer from prior tax period | | 04-15-2003 | -\$3,785.00 |
| 716 | Credit you chose to transfer from prior tax period | | 12-22-2003 | -\$800.00 |
| 430 | Estimated tax payment | | 01-22-2004 | -\$5,000.00 |
| 460 | Extension of time to file ext. Date 08-15-2004 | | 04-15-2004 | \$0.00 |

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

Tracking Number: 100249883745

| | | | |
|-----|---|---------------------|-------------|
| 460 | Extension of time to file ext. Date 10-15-2004 | 08-15-2004 | \$0.00 |
| 836 | Refund you chose to apply to next year's taxes | 04-15-2004 | \$11,914.00 |
| 846 | Refund issued | 11-29-2004 | \$1,492.70 |
| 290 | Additional tax assessed 94254-573-05050-1 | 20112608 07-11-2011 | \$0.00 |
| 290 | Additional tax assessed 19254-656-05147-1 | 20113808 10-03-2011 | \$0.00 |

This Product Contains Sensitive Taxpayer Data

**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

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**OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE**

2

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE



Internal Revenue Service

United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 04-17-2015
 Response Date: 04-17-2015
 Tracking Number: 100248283186

Account Transcript

FORM NUMBER: 1040

TAX PERIOD: Dec. 31, 2004

TAXPAYER IDENTIFICATION NUMBER: ~~5-1-2~~
 SPOUSE TAXPAYER IDENTIFICATION NUMBER: ~~6-1-9~~

RAHAMIM N & MIRI RAHMIM AVRAHM

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: 0.00 AS OF: Jun. 25, 2012
 ACCRUED INTEREST: 0.00 AS OF: Jun. 25, 2012
 ACCRUED PENALTY: 0.00

ACCOUNT BALANCE
 PLUS ACCRUALS
 (this is not a
 payoff amount): 0.00

*** INFORMATION FROM THE RETURN OR AS ADJUSTED ***

EXEMPTIONS: 05
 FILING STATUS: Married Filing Joint
 ADJUSTED GROSS INCOME: 190,698.00
 TAXABLE INCOME: 165,498.00
 TAX PER RETURN: 14,441.00
 SE TAXABLE INCOME TAXPAYER: 71,941.00
 SE TAXABLE INCOME SPOUSE: 0.00
 TOTAL SELF EMPLOYMENT TAX: 5,850.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Oct. 16, 2005
 PROCESSING DATE: Nov. 14, 2005

| CODE | EXPLANATION OF TRANSACTION | TRANSACTIONS CYCLE | DATE | AMOUNT |
|------|---|--------------------|------------|--------------|
| 150 | Tax return filed 89221-290-29327-5 | 20054408 | 11-14-2005 | \$14,441.00 |
| 806 | W-2 or 1099 withholding | | 04-15-2005 | -\$68.00 |
| 430 | Estimated tax payment | | 04-01-2004 | -\$4,000.00 |
| 430 | Estimated tax payment | | 06-16-2004 | -\$5,500.00 |
| 430 | Estimated tax payment | | 09-16-2004 | -\$4,500.00 |
| 716 | Credit you chose to transfer from prior tax period | | 04-15-2004 | -\$11,914.00 |
| 460 | Extension of time to file ext. Date 08-15-2005 | | 04-15-2005 | \$0.00 |
| 836 | Refund you chose to apply to next year's taxes | | 04-15-2005 | \$7,541.00 |

OBJECTION AND DECLARATION
 SUPPORTING DISQUALIFICATION
 OF JUDGE PRO TEM ST. GEORGE

Tracking Number 00248283186

| | | | | |
|----------------|---|---------------------|-----------------------|------------------------|
| 846 | Refund issued | | 11-14-2005 | \$4,000.00 |
| 841 | Refund cancelled | | 11-14-2005 | -\$4,000.00 |
| 971 | Request for replacement refund | | 10-13-2006 | \$0.00 |
| 846 | Refund issued | | 11-06-2006 | \$4,000.00 |
| 290 | Additional tax assessed 89254-413-06210-9 | 20090408 | 02-09-2009 | \$0.00 |
| 290 | Additional tax assessed 89254-629-10580-0 | 20103408 | 09-06-2010 | \$0.00 |
| 290 | Additional tax assessed quick assessment 89251-242-12011-0 | 20103608 | 08-30-2010 | \$27,706.00 |
| 190 | Interest charged for late payment | 20103608 | 08-30-2010 | \$10,604.64 |
| 166 | Penalty for filing tax return after the due date | 20103608 | 09-20-2010 | \$2,424.75 |
| 196 | Interest charged for late payment | 20103608 | 09-20-2010 | \$601.10 |
| 971 | Notice issued | | 09-20-2010 | \$0.00 |
| 582 | Lien placed on assets due to balance owed | | 10-29-2010 | \$0.00 |
| 360 | Fees and other expenses for collection | | 11-22-2010 | \$36.00 |
| 971 | Issued notice of lien filing and right to Collection Due Process hear ing | | 10-28-2010 | \$0.00 |
| 971 | Tax period blocked from automated levy program | | 12-20-2010 | \$0.00 |
| 670 | Payment | | 12-10-2010 | \$43,074.06 |
| 196 | Interest charged for late payment | 20105108 | 01-03-2011 | \$368.61 |
| 826 | Credit transferred out to 1040 200612 | | 12-10-2010 | \$778.84 |
| 276 | Penalty for late payment of tax | 20105108 | 01-03-2011 | \$554.12 |
| 971 | Notice issued | | 01-03-2011 | \$0.00 |
| 583 | Lien released | | 12-31-2010 | \$0.00 |
| 290 | Additional tax assessed 89254-629-07148-1 | 20113408 | 09-05-2011 | \$0.00 |

This Product Contains Sensitive Taxpayer Data

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE

 Internal Revenue Service
United States Department of the Treasury

This Product Contains Sensitive Taxpayer Data

Request Date: 04-17-2015
Response Date: 04-17-2015
Tracking Number: 100248283186

Account Transcript

FORM NUMBER: 1040

TAX PERIOD: Dec. 31, 2005

TAXPAYER IDENTIFICATION NUMBER: ~~592-07-3392~~
SPOUSE TAXPAYER IDENTIFICATION NUMBER: ~~602-07-3392~~

RAHAMIM N & MIRI RAHMIM AVRAHM

--- ANY MINUS SIGN SHOWN BELOW SIGNIFIES A CREDIT AMOUNT ---

ACCOUNT BALANCE: 0.00 AS OF: May 04, 2015
ACCRUED INTEREST: 0.00 AS OF: May 04, 2015
ACCRUED PENALTY: 0.00

ACCOUNT BALANCE
PLUS ACCRUALS
(this is not a
payoff amount): 0.00

** INFORMATION FROM THE RETURN OR AS ADJUSTED **

EXEMPTIONS: 05
FILING STATUS: Married Filing Joint
ADJUSTED GROSS INCOME: 194,452.00
TAXABLE INCOME: 168,452.00
TAX PER RETURN: 10,815.00
SE TAXABLE INCOME TAXPAYER: 75,635.00
SE TAXABLE INCOME SPOUSE: 1,062.00
TOTAL SELF EMPLOYMENT TAX: 6,203.00

RETURN DUE DATE OR RETURN RECEIVED DATE (WHICHEVER IS LATER) Oct. 20, 2006
PROCESSING DATE Nov. 20, 2006

| TRANSACTIONS | | | | |
|--------------|---|----------|------------|-------------|
| CODE | EXPLANATION OF TRANSACTION | CYCLE | DATE | AMOUNT |
| 150 | Tax return filed 89221-300-06824-6 | 20064508 | 11-20-2006 | \$10,815.00 |
| 430 | Estimated tax payment | | 04-01-2005 | -\$4,500.00 |
| 430 | Estimated tax payment | | 06-06-2005 | -\$2,500.00 |
| 430 | Estimated tax payment | | 10-13-2005 | -\$2,500.00 |
| 716 | Credit you chose to transfer from prior tax period | | 04-15-2005 | -\$7,541.00 |
| 430 | Estimated tax payment | | 12-27-2005 | -\$5,000.00 |
| 610 | Payment with return | | 03-22-2006 | -\$2,500.00 |
| 460 | Extension of time to file ext. Date 10-15-2006 | | 04-15-2006 | \$0.00 |
| 836 | Refund you chose to apply to next | | 04-15-2006 | \$6,726.00 |

OBJECTION AND DECLARATION
SUPPORTING DISQUALIFICATION
OF JUDGE PRO TEM ST. GEORGE