

To be clear, on the day in question, Natan Avraham *had already removed the sign in question from display*. At the noontime break Natan Avraham removed his vehicle from the Court premises and removed the sign in question from display. Even though the mounting bracket for the sign was firmly affixed to Mr. Avraham's vehicle Natan Avraham concealed the sign in order to conceal all legible portions. The sign was no longer displayed to passerby, and as a result was no longer a part of any peaceful protest. Natan Avraham did this because he had begun to hope that there would be a successful, just outcome to his case when the Court returned from recess. Within a half mile of travel from the Court Natan Avraham had completely concealed this sign, and not only has continued to do so to this day but never returned to the Court that day. This means that, when the Court demanded to Natan Avraham's Counsel Mr. Green that the sign be removed, the sign in question was no longer even displayed! The Court clearly was acting only on superficial authority when demanding that the sign be removed, as no other Court officials were involved in the request to conceal the already concealed sign. Even though Natan Avraham insists that this sign is clearly allowed by his Constitutional Rights to Freedom of Speech and even though the sign clearly constitutes only a peaceful protest, Natan Avraham simply concealed this sign based on the hope that it was no longer needed and that the Court would see justice served in his case.

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The purpose in displaying this sign was an attempt to halt the injustice created by Petitioner and Petitioner's Counsel Mr. Berman during the course of these proceedings and to help Natan Avraham secure his Civil and Constitutional Rights during these proceedings. For example, at the point of the original proposed sale of the Wooster Property Natan Avraham did not stand in the way of the sale of the property. According to Court Order, all that needed to occur was for Petitioner and Petitioner's Counsel Mr. Berman to arrive at the Court and sign on behalf of Natan Avraham. Petitioner and Petitioner's Counsel Mr. Berman have clearly decided that they can seek any concessions they desire from the Court, and the continued delay of the sale of the Wooster Property has allowed huge compounding of legal fees, loan interest, and other penalties against Natan Avraham and the community. It must be clearly noted that Natan Avraham has repeatedly offered to provide \$300,000.00 to the children in this case to provide for their student loan payments from his portion of the sale of the Wooster Property, so the continuing delay of this case obviously damages the community as the fees and interest associated with these loans and the other outstanding liabilities in this case continue to grow.

In the morning session Mr. Avraham's Counsel Mr. Green was supportive of rejoining the case in question (going so far as to ask to be re-appointed by Natan Avraham) and confident that he could convince Commissioner St. George. By the afternoon session,

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however, Mr. Green had been so intimidated that he was demanding release from the case. Mr. Green has been Counsel to Mr. Avraham on this case for years, and beginning proceedings with a new attorney will be a tremendous, if not impossible, volume of work for Mr. Avraham. The Court's actions have placed an almost unbearable burden on Mr. Avraham, and the requirement for a renewed retainer and the preparation of a new attorney is just another huge injury done by the Court to Mr. Avraham. Furthermore, with the obvious intention of the Court to damage and delay this case, finding a new attorney to represent Mr. Avraham will be yet more costly and difficult.

Mr. Natan Avraham believes that this over-reaction on the part of Commissioner St. George is a misleading attempt for Commissioner St. George to have himself removed from the case or have the case transferred to another justice from an administrative standpoint without the embarrassment and hassle of actual court disqualification. Mr. Avraham is truly the party that has been threatened by the actions of this case, as it has been well documented over the previous years that Mr. Avraham has suffered tremendous damage as a result of the malicious actions of Commissioner St. George. The actions of the Court have caused and continue to cause tremendous harm to both Mr. Avraham and the children involved in this case, as mentioned in the above website.



Natan Avraham must further point out that the Court has made the decision to allow Agent Alan Wachman to continue to handle the sale of the Wooster Property. Mr. Wachman has committed perjury in Court (as demonstrated by Mr. Avraham's Counsel Mr. Green on cross examination), is seeking a commission for the sale of the Wooster Property, and is seeking to sell the Wooster property for more than \$150,000.00 less than the easily obtainable price for the property. This action by the Court shows further disregard for the community and the well-being of Natan Avraham.

Real Estate Agent Alan Wachman has committed perjury. Not only have Court Orders been based on this testimony, but even after Natan Avraham has made it more than clear to the Court that these orders have been based upon misleading testimony the Court has continued to act to enforce these Orders. The Court has repeatedly acted in a similar manner against Natan Avraham and the community, and Natan Avraham feels the best avenue remaining to seek justice in this case is to make the facts of the mishandling of this case known so as to seek the assistance of the District Attorney in seeking justice. The Court Orders in question entirely lack legal basis--yet the Court continues to enforce these Orders to the damage of Natan Avraham and the community.

The Court's actions regarding the Wooster property have demonstrated even a further disregard for the Judgment and law governing this case as well as an inexplicable bias

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towards allowing Petitioner's Counsel Mr. Berman to act in whatever manner he sees fit. As an example, from August 2013 to March 2014 the Court refused to follow the letter of the Judgment governing this case in order to release to Natan Avraham \$79,000.00 held by the Petitioner in escrow. Though this money was clearly owed to Natan Avraham, the Court delayed the distribution of these funds in order to make sure that no further moneys were owed to Petitioner. The Court allowed this issue to drag both parties back to Court numerous times, and on March 20, 2014 the Court went so far as to accept perjury and misleading testimony from Petitioner's Counsel Mr. Berman that allowed the award of this money to Petitioner without any legal basis or foundation. The Court further underlined its' disregard for the law and Mr. Avraham's Civil Rights by sanctioning Natan Avraham as a result of these proceedings--even after awarding money rightfully belonging to Natan Avraham to Petitioner!

Now, on the other hand, the Court allowed Petitioner and Petitioner's Counsel to repeatedly drag all parties back to Court on the basis of allowing Petitioner the full power to sell the Wooster property. This sale has been organized without regard for the maximization of the value of the Wooster Property and in a manner that causes direct harm to both Natan Avraham and the community. The Court Order regarding this sale is based upon misleading testimony presented as illustrated by the Court Record of the Cross Examination of Alan Wachman by Natan Avraham's attorney Mr. Green on

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February 11, 2015. Natan Avraham can testify to the best of his knowledge that the testimony of Real Estate Agent Alan Wachman was misleading perjury based not only on the revelations made by Natan Avraham's Attorney Mr. Green during Alan Wachman's Cross Examination but on the fact that Natan Avraham himself was told by a representative from the Wilshire Escrow Company that Real Estate Agent Alan Wachman's testimony regarding the pressing nature of the sale of the Wooster Property was false because the buyer for the property had already walked away when Mr. Wachman was testifying that the sale must occur immediately unless the parties lose the buyer. Real Estate Agent Alan Wachman was allowed to continue to lie to the Court, however, and continued to do so on March 11, 2015. **These misleading Court Orders are based upon Perjury and must be removed from the record immediately before more harm is done to Natan Avraham, the community, and the children in this case. Nobody should profit from Perjury to the Court.**

Natan Avraham believes that the increased attention brought to this case by the sign he has posted has resulted in potential embarrassment for Commissioner St. George, and believes that the presence of Sheriff's Deputies at his most recent hearing was done to ensure peaceful protest on the part of Mr. Natan Avraham. Mr. Avraham was, of course, peaceful and law-abiding at his most recent hearing--yet Mr. Avraham believes that this increased attention further contributed to Commissioner St. George reacting in such a

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manner. Law enforcement officials contacted Mr. Natan Avraham weeks before the Court date and suggested Mr. Avraham pursue other routes of protest including a complaint to the supervision, yet Mr. Avraham informed the official that he has already attempted to pursue these methods. During further conversation Mr. Avraham volunteered to remove the sign if it presented anything illegal, yet was assured by the Sheriff that the sign was legal on display.

Natan Avraham would like to stress that he is willing to work with any and all Court and legal officials who are willing to follow the law and the Judgment governing this case. Natan Avraham simply wishes to see justice done in this case and the law appropriately observed, and has no motivation to pursue legal action against any person except to protect himself and the community in this case from abuse of the law, mishandling of the case, and misleading testimony presented to the Court.

Signed,

Natan Avraham

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Objection and Complaint regarding Minute Order of September 3, 2015

by

Respondent Natan Avraham

On September 3, 2015 the Court of Commissioner Matthew St. George issued a Minute Order further governing the divorce proceedings of Natan Avraham from his wife Miri Avraham. Natan Avraham asserts that the instructions given in this Minute Order are contradictory, unclear, and favor third parties at the expense of the community and Natan Avraham objects to the Minute Order in its' entirety. The following is Natan Avraham's response to the contents of the Minute Order on a point-by-point basis, outlining the discrepancies and inaccuracies present within. On the basis of the following evidence Natan Avraham requests that the Court Vacate or Amend this Minute Order to fairly and accurately represent the facts of this case and to protect the rights of Natan Avraham and the community.

First, in regard to the Statement of Disqualification filed by Natan Avraham regarding Commissioner Matthew St. George, the Court inappropriately struck this Statement on the basis that "The Court has no bias against the Respondent." This is simply not the case, as clearly outlined in the Statement of Disqualification. The record in this case speaks for itself on this matter, with multiple instances of the Court acting in a manner that would demand disqualification becoming obvious to anyone reading over the Court transcripts. The Court has

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repeatedly acted in a manner that demonstrates the Court's bias against Natan Avraham, and the Statement for Disqualification clearly outlines when this has occurred.

Second, the Court's reactions to the signs posted by Natan Avraham on his vehicle regarding this case are misleading, contradictory, and indicate actions by the Court meant to intimidate Natan Avraham. The Court cannot help but admit that Natan Avraham's actions are covered under Natan Avraham's Constitutional Freedom of Speech, stating "Respondent has launched a public opinion campaign against Commissioner St. George, seeking Commissioner St. George to disqualify himself. Respondent has the right of free speech." (September 3, 2015 Minute Order) However, after stating this fact, the Minute Order goes on to demonstrate the contradictory nature of the Court's actions. The Court states that "The Court is considering having a Sheriff's patrol around his home. If the respondent is seen around Commissioner St. George's home, the respondent will be detained and possibly arrested." (September 3, 2015 Minute Order) This is illogical and inappropriate on a number of fronts.

Natan Avraham has no idea where Commissioner Matthew St. George lives. Natan Avraham has no desire whatsoever to know where Commissioner Matthew St. George lives. The only actions Natan Avraham has taken outside of Natan Avraham's own home and the courtroom regarding this case is the display of Natan Avraham's protest sign on Natan Avraham's personal vehicle.

Natan Avraham is professionally employed as the owner and operator of a private plumbing business serving all of Los Angeles County, and travels daily to various work sites throughout the City of Los Angeles and the surrounding cities in Southern California. For Commissioner Matthew St. George to threaten Natan Avraham with detention and arrest simply

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for being in the vicinity of Commissioner Matthew St. George's home within an unspecified future timeframe is a massive abuse of the Court's power as this notion would allow for the detention and arrest of Natan Avraham for nothing more than travelling around Los Angeles and unknowingly coming across Commissioner Matthew St. George's home. The idea that Natan Avraham could be carrying out his plumbing business at a residence in the city and accidentally place himself in a situation to be arrested is an abuse of the Court's power, and this use of the Court's power to intimidate Natan Avraham and limit Natan Avraham's right to move freely about the city is an unconstitutional violation of Natan Avraham's Civil Rights.

Third, after making the threat of detention and arrest of Natan Avraham over the sign, protest, and complaints from Natan Avraham the Court states that "The Court will be fair and impartial." (September 3, 2015 Minute Order) Natan Avraham's complaints are directly related to the clear partiality, bias, and mismanagement of the Court, and for the Court to make this statement only one line after threatening Natan Avraham could not be a clearer sign that the Court is in fact anything but fair and impartial towards Natan Avraham.

The Court's over-reaction to this sign is further made strange by the fact that Natan Avraham has been displaying this sign since May 27, 2015. On this date, and at many dates since, the Court has made no comment regarding the sign, and only at this recent date has the Court reacted to this sign so strongly. See the attached document, Natan Avraham's first response to the Court's issue with the sign, for details about the Court's actions and opinions up to this date regarding the sign as well as the facts of Natan Avraham's peaceful, lawful protest against the Court's violation of his Civil Rights.

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y, the Court's orders regarding the Response to Respondent's Request to Vacate or Amend and Respondent's Perjury Complaints are confusing and contradictory in light of the Court's further orders regarding the sale of the Wooster Property. Regarding the Response to Respondent's Request to Vacate or Amend and Respondent's Perjury Complaints, the Court state in the Minute Order "Response to Respondent's Request to Vacate or Amend and Respondent's Perjury Complaints shall be filed and served no later than October 21, 2015." (September 3, 2015 Minute Order) This Request and Complaint and the associated Responses deal directly with the sale of the Wooster Property, and yet in the item directly above this statement in the Minute Order the Court orders that "the sale of the 1442 South Wooster Street, Los Angeles, California 90035, for \$1,575,000.00. Escrow should close no later than September 15, 2015. All liens and commissions, as set forth in the estimated closing statement, are to be paid, subject to reallocation at a future hearing. Wilshire Escrow Company is ordered to hold the net proceeds from the sale in escrow until an evidentiary hearing on November 4, 2015." (September 3, 2015 Minute Order) These Orders make no sense when taken together, as the Court has ordered the final sale of the Wooster Property before the relevant Requests and Complaints have been responded to or heard. There would be no point in having these matters addressed after the property has been sold, as the sale will have already been made legally binding and the argument will mean nothing.

Natan Avraham intends to act upon his Civil Rights to prevent the inappropriate sale of this property as the Order and rulings governing the sale of this property are based upon misleading and incorrect testimony on the part of .

Real Estate Agent in charge of this case, Alan Wachman, committed Perjury in testimony

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to the Court regarding the sale of this property but the purported Buyer for the Wooster Property has been misrepresented to the Court repeatedly in a manner that has led the Court to issue decisions and Orders that have damaged both Natan Avraham and the community in this case. See the attached document already filed in Court, Natan Avraham's Explanation Regarding the Sale of the Wooster Property, for the extensive details of these actions on the part of the Court and the damage they have caused to the property. It should be additionally noted that it is a matter of record that both Commissioner Matthew St. George and Commissioner David Cowan before him have acted in a manner that would deprive the children in this case of a stable living situation, first at the Shenandoah Property and now with the sale of the Wooster Property. Natan Avraham must pursue any legal means in order to stop the illegitimate sale of the property before these Orders take effect, including seeking the assistance of the District Attorney and/or the public is seeking justice for his case.

Natan Avraham objects to the entirety of the September 3, 2015 Minute Order on the above points and wishes to stress that the actions of the Court have caused harm to both Natan Avraham and the community in this case. The Orders and rulings of the Court have not only caused the financial and emotional harm noted by Natan Avraham at so many times during these proceedings, but the Court's actions have now reached the point where Natan Avraham's Counsel Mr. Green feels unable to continue with these proceedings. It should be noted that this is the very same Counsel that the Court requested Natan Avraham secure years ago during these proceedings, and the same Counsel that Natan Avraham has maintained at tremendous personal cost. Natan Avraham objects to the prejudicial actions of the Court, especially in the same breath as the Court states that the Court will act fairly and impartially. Commissioner Matthew

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St. George must act in accordance with the law and the Judgment governing this case and either disqualify himself from these proceedings or amend the Court's decisions and Orders to protect the rights and property of both the community and Natan Avraham in this case.

Signed,

Natan Avraham

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I declare under the penalty of perjury under the laws of the State of California that the foregoing  
is true and correct. Executed this 9 day of 15 2015 at Los Angeles,  
California. '



NATAN AVRAHAM  
Respondent

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

# SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Date 09-03-15

Honorable

Honorable MATTHEW ST. GEORGE

20 L. McCULLOUGH

Judge

E. GOLDSTEIN

Judge Pro Tem

C. ESTRADA

Deputy Sheriff

L. McLAY CSR #10765

Dept: WEF

Deputy Clerk

Court Assistant

Reporter

8:45 am

SD027039

Miri Avraham (X)

VS.

Natan Rahamim Avraham (X)

Counsel For  
Petitioner:

BRETT A. BERMAN (X)

Counsel For  
Respondent:

CHARLES M. GREEN (X)

NATURE OF PROCEEDINGS: PETITIONER'S REQUEST FOR ORDER RE:  
DISTRIBUTION OF FUNDS IN ESCROW; date filed 7-28-15

Respondent substitutes his counsel out and appears in  
propria persona.

Respondent files Respondent's Request for the Court to  
Vacate and/or Amend the March 11, 2015 and May 27, 2015  
Court Orders, Respondent's Perjury Complaint re: Attorney  
Brett Berman, Respondent's Perjury Complaint re: Broker Alan  
Wachman and Respondent's Objection to Judge Pro Tem Matthew  
St. George presiding on Ground of Disqualification, pursuant  
to Code of Civil Procedures section 170.3(c).

Matter is called for hearing.

Respondent substitutes his counsel in and does not return to  
the courtroom.

The Court strikes Respondent's Statement of  
Disqualification.

Order Striking Statement of Disqualification and Verified  
Answer is filed this date.

The Court has no bias against respondent.

Respondent has launched a public campaign against  
Commissioner St. George, seeking Commissioner St. George to  
disqualify himself. Respondent has the right of free  
speech.

Page 1 of 3

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

DEPT: WEF

MINUTES ENTERED  
09-03-15  
COUNTY CLERK

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

Date 09-03-15

Dept: WEF

Honorable

Judge E. GOLDSTEIN

Deputy Clerk

Honorable MATTHEW ST. GEORGE

Judge Pro Tem C. ESTRADA

Court Assistant

20 L. McCULLOUGH

Deputy Sheriff L. McLAY CSR #10765

Reporter

8:45 am

SD027039

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Counsel For  
Petitioner: BRETT A. BERMAN (X)

VS.

Natan Rahamim Avraham (X)

Counsel For  
Respondent: CHARLES M. GREEN (X)

The Court is considering having a Sheriff's patrol around his home. If the respondent is seen around Commissioner St. George's home, the respondent will be detained and possibly arrested.

The Court will be fair and impartial.

An evidentiary hearing is set on Petitioner's Request for Order re: Distribution of Funds in Escrow on November 4, 2015 at 1:30 p.m. in Department WE F.

The Court orders the sale of the 1442 South Wooster Street, Los Angeles, California 90035, for \$1,575,000. Escrow should close no later than September 15, 2015. All liens and commissions, as set forth in the estimated closing statement, are to be paid, subject to reallocation at a future hearing. Wilshire Escrow Company is ordered to hold the net proceeds from the sale in escrow until an evidentiary hearing on November 4, 2015.

Response to Respondent's Request to Vacate or Amend and Respondent's Perjury Complaints shall be filed and served no later than October 21, 2015.

Reply shall be filed and served no later than October 28, 2015.

Counsel are to file and exchange witness lists and exhibit lists no later than October 28, 2015 for the evidentiary hearing on November 4, 2015 which will determine allocation of the net community proceeds from the sale fo the Wooster



**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

Date 09-03-15

Dept: WEF

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Deputy Clerk

Honorable MATTHEW ST. GEORGE

Judge Pro Tem C. ESTRADA

Court Assistant

20 L. McCULLOUGH

Deputy Sheriff L. McLAY CSR #10765

Reporter

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Petitioner: BRETT A. BERMAN (X)

VS.

Natan Rahamim Avraham (X)

Counsel For  
Respondent: CHARLES M. GREEN (X)

Property, including all claims for reimbursement under the terms of the Judgment entered on October 5, 2010.

Counsel for petitioner is to prepare the Order After Hearing.

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

SEP 15 2015

Sherri R. Carter, Executive Officer/Clerk  
By A. Williams, 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 request the \_\_\_\_\_  
) court stop immediately on \_\_\_\_\_  
) sale of wooster property \_\_\_\_\_  
) \_\_\_\_\_  
) \_\_\_\_\_

10 vs.

11 NATAN RAHAMIM AVRAHAM

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13 Respondent.

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DATE 11-4-15  
Time 130 pm  
DEPT. F

17 Date:

Respectfully submitted,

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Natan Avraham, In pro per  
Respondent

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

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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 to establish the perjury committed by Petitioner and her counsel throughout these proceedings.

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VS.

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Respondent:

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St. George presiding on Ground of Disqualification, pursuant  
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Matter is called for hearing.

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The Court strikes Respondent's Statement of  
Disqualification.

Order Striking Statement of Disqualification and Verified  
Answer is filed this date.

The Court has no bias against respondent.

Respondent has launched a public campaign against  
Commissioner St. George, seeking Commissioner St. George to  
disqualify himself. Respondent has the right of free  
speech.



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C. ESTRADA

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Respondent:

CHARLES M. GREEN (X)

Property, including all claims for reimbursement under the terms of the Judgment entered on October 5, 2010.

Counsel for petitioner is to prepare the Order After Hearing.

1 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
2 is true and correct. Executed this 9 day of 14<sup>th</sup> 2015 at Los Angeles,  
3 California.'

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6 NATAN AVRAHAM  
7 Respondent

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

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

SEP 18 2015

Sherril R. Carter, Executive Officer/Clerk  
By A. Williams, Deputy

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

4 310 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
5 488-6379 COUNTY OF LOS ANGELES, WEST DISTRICT

) Case No.: SD 027 039

) RESPONDENT'S

9 MIRI AVRAHAM

Petitioner,

- Supplement for request for \_\_\_\_\_
- The court to vacant the court \_\_\_\_\_
- Orders file On 9/3/15 \_\_\_\_\_
- \_\_\_\_\_

10 vs.

11 NATAN RAHAMIM AVRAHAM

12 Respondent.

13  
14 9.18.15

17 Date:

Respectfully submitted,

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21 ~~\_\_\_\_\_~~

22 Natan Avraham, In pro per  
23 Respondent

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



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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 to establish the perjury committed by Petitioner and her counsel throughout these proceedings.

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

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

Natan Avraham  
Case # SD 027 039  
September 16, 2015

Respondent requests that the Court Vacate and/or Amend the 3/11/2015 Court Order as well as the 5/27/2015 and 9/3/2015 Court Orders, Rulings, and Hearings on these days. These Orders have the potential to cause distress and damage to Respondent and Petitioner, and were made on the basis of incorrect, misleading, and detrimental information. The Orders regarding the sale of the Wooster Property have the potential to cause damage to the Petitioner, Respondent, and the community assets and should be vacated. From an economic perspective the Court has cause to Vacate and/or Amend these Court Orders as these Orders have the potential to generate extensive additional courtroom hearings and incur the use of Court resources. These extensive repercussions are made possible by the incorrect and inappropriate nature of the Court Orders regarding the sale of the Wooster property, and could include potential third party lawsuits and continuing litigation from both parties. This series of legal consequences could be felt both in this Court and in other courtrooms as the sale of the Wooster Property as organized in these Court Orders and Rulings will result in legal action from one or both parties

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





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

RECEIVED  
LOS ANGELES SUPERIOR COURT

SEP 21 2015

Sherri R. Carter, Executive Director

By: *J.B.* Deputy

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

6 ) Case No.: SD 027 039

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9 MIRI AVRAHAM  
10 Petitioner,

11 vs.

12 NATAN RAHAMIM AVRAHAM

13 Respondent.  
14  
15

RESPONDENT'S

Supplemental Information Demonstrating  
Perjury by Petitioner's Counsel  
Brett Berman, esq. and request to  
Halt Sale of Wooster Property

9.21.15

16  
17 Date:

Respectfully submitted,

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20 ~~\_\_\_\_\_  
\_\_\_\_\_~~

21 Natan Avraham, In pro per  
22 Respondent

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

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

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

Natan Avraham  
Case # SD 027 039  
September 21, 2015

Supplemental Information Demonstrating  
Perjury by Petitioner's Counsel  
Brett Berman, esq. and request to  
Halt Sale of Wooster Property

The resolution of these points would result in the resolution of this case by signature from Natan Avraham. Natan Avraham has a good faith belief that Petitioner and Petitioner's Counsel cannot demonstrate these points through evidence and that this inability should be cause for the immediate halting of Orders regarding the sale of the Wooster Property. Documents Attached.

Signed,

Natan Avraham

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



Natan Avraham  
1778 S. Shenandoah  
Los Angeles, CA 90035

Case # SD 027 039

To Whom it May Concern;

Respondent is so clearly convinced that Petitioner cannot provide evidence of Innocent Spouse status that Respondent is willing to finalize the arguments in this case, surrender the Wooster Property, and put the remaining divorce proceedings to bed entirely if Petitioner can demonstrate with evidence:

- 1) That Petitioner was granted Innocent Spouse status
- 2) That an additional \$143,000.00 was deducted by the Internal Revenue Service

Respondent has faith that Petitioner cannot present these documents and is willing to make this offer in order to clearly demonstrate that Petitioner and Petitioner's Counsel Mr. Berman have presented misleading testimony to the Court. Specifically, this is to demonstrate that Petitioner's Counsel Mr. Berman purposefully gave false testimony to the Court on March 20, 2014.

Signed,

Natan Avraham

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

1 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
2 is true and correct. Executed this \_\_\_ day of \_\_\_\_\_ 2015 at Los Angeles,  
3 California. '

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~~\_\_\_\_\_~~  
NATAN AVRAHAM  
Respondent

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

RECEIVED  
LOS ANGELES SUPERIOR COURT

SEP 21 2015

Sherri R. Carter, Executive Officer/Clerk

By: [Signature], 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 ) RESPONDENT'S \_\_\_\_\_

9 MIRI AVRAHAM  
10 Petitioner,

11 vs.

12 NATAN RAHAMIM AVRAHAM

13 Respondent.

14 ) Information faxed to the Office of \_\_\_\_\_  
15 ) Brett Berman, esq. twice on \_\_\_\_\_  
16 ) September 17, 2015 \_\_\_\_\_

17 ) 9-21-15

18 Date:

19 Respectfully submitted,

20 [Signature]

21 Natan Avraham, In pro per  
22 Respondent

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



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

Natan Avraham  
Case # SD 027 039  
September 21, 2015

Information faxed to the Office of  
Brett Berman, esq. twice on  
September 17, 2015

Documents Attached

Signed,

Natan Avraham

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

Natan Avraham  
Case # SD 027 039  
September 16, 2015

To Whom it May Concern;

Natan Avraham gives notice that he requires seventy-two (72) hours to appropriately prepare Ex Parte orders regarding the sale of the Wooster Property. The actions of the Court and Petitioner's Counsel Mr. Berman have deprived Natan Avraham of Counsel and assistance in this case, and Natan Avraham will be forced to do a tremendous amount of work to prepare these motions.

Natan Avraham sees no emergency requiring the immediate, rushed sale of the Wooster Property and believes the request of seventy-two (72) hours to prepare the relevant orders is more than reasonable. If there are any questions, comments, or concerns regarding these Ex Parte orders Natan Avraham can be reached at 310-488-6379.

Signed,

Natan Avraham



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



# Fax Send Confirmation

Date/Time : SEP-17-2015 12:36PM THU  
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Natan Avraham  
Case # SD 027 039  
September 16, 2015

To Whom it May Concern:

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Signed,

Natan Avraham

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

1 I declare under the penalty of perjury under the laws of the State of California that the foregoing  
2 is true and correct. Executed this \_\_\_ day of \_\_\_\_\_ 2015 at Los Angeles,  
3 California. ' 9, 27, 15

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6 NATAN AVRAHAM  
7 Respondent

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OBJECTION AND DECLARATION  
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OF JUDGE PRO TEM ST. GEORGE

RECEIVED  
LOS ANGELES SUPERIOR COURT

SEP 21 2015

Sherri R. Carter, Executive Officer/Clerk

By: *[Signature]*, Deputy  
*[Signature]*

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 ) RESPONDENT'S

9 MIRI AVRAHAM  
10 Petitioner,

11 vs.

12 NATAN RAHAMIM AVRAHAM

13 Respondent.

14 Complaint Regarding Inappropriate Ex Parte Filing  
15 and Attempt to Mislead the Court  
16 by Petitioner's Counsel Mr. Berman

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25 )  
*9.21.15*

17 Date:

18 Respectfully submitted,

19 ~~*[Signature]*~~

20 Natan Avraham, In pro per  
21 Respondent

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



Natan Avraham  
Case # SD 027 039  
September 21, 2015

Complaint Regarding Inappropriate Ex Parte Filing  
and Attempt to Mislead the Court  
by Petitioner's Counsel Mr. Berman

Petitioner's Counsel Mr. Berman continues to mislead the Court and Natan Avraham and to act in a dishonest, unprofessional, and illegal manner. Last week 9.16.15 Natan Avraham spoke with the attorney's assistant to Petitioner's Counsel Mr. Berman and was informed that Petitioner's Counsel Mr. Berman wished to deal with an Ex Parte matter this Friday, September 18, 2015. Natan Avraham informed this assistant that he could not arrive at this Court date due to a pre-existing appointment, yet Petitioner's Counsel Mr. Berman brought the matter to Court in an attempt to mislead and control the Court proceedings like so many times before.

Signed,

Natan Avraham

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

Natan Avraham  
Case # SD 027 039  
September 16, 2015

Natan Avraham understands from communication with the office of Petitioner's Counsel Mr. Berman the Mr. Berman communicated with the Court Clerk on September 15, 2015 seeking a signature on the escrow agreement for the Wooster Property. Petitioner's Counsel Mr. Berman attempted to mislead the Court and work around Court Orders on September 15, 2015 by attempting to get the Court Clerk to sign off on the sale of the Wooster Property. The Wooster Property was not yet ready to be approved through the escrow process, and yet Petitioner's Counsel Mr. Berman attempted to push through the sale of the property. The Court Order governing the sale of the property dictated that escrow was supposed to close for the Wooster Property on September 15, 2015, yet Petitioner's Counsel Mr. Berman appeared before the Court without the appropriate preparations for the sale of the Wooster Property to be completed. Petitioner's Counsel Mr. Berman must not be allowed to mislead the Court. Petitioner's Counsel Mr. Berman attempted to inappropriately secure the Court Clerk's signature for the Wooster Property even before the property is ready for sale, essentially storing the Clerk's signature until the property is ready for sale against the orders of the Court that the property sale be completed by September 15, 2015.

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

as well as third parties in this case. Whether this property is sold to the current Buyer or not, the sale of the Wooster Property as currently outlined in the rulings of the Court will result in perjury cases against Real Estate Agent Alan Wachman and the other parties who have testified falsely in this case.

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



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 \_\_\_\_\_ 2015 at Los Angeles,  
California. '

9.21.15

~~\_\_\_\_\_~~  
NATAN AVRAHAM  
Respondent

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

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 RESPONDENT'S

9 Complaint Requesting Immediate Restraining  
10 of Request for Sale of Wooster Property  
11 by Petitioner and Petitioner's Counsel Mr. Berman  
12 until Resolution of Perjury Investigation

9 MIRI AVRAHAM  
10 Petitioner,

10 vs.

11 NATAN RAHAMIM AVRAHAM

12 Respondent.

13  
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15  
16 Respectfully submitted,

17 Date:

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21 \_\_\_\_\_  
22 Natan Avraham, In pro per  
23 Respondent

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



Natan Avraham  
Case # SD 027 039  
September 21, 2015

Complaint Requesting Immediate Restraining  
of Request for Sale of Wooster Property  
by Petitioner and Petitioner's Counsel Mr. Berman  
until Resolution of Perjury Investigation

Petitioner's Counsel Mr. Berman continues to act inappropriately in this case, sometimes acting as a tax attorney in order to hide the manipulation of this case over the previous years. If an appropriate tax attorney was informed of the facts of this case as shown in the Court record it would become apparent that Petitioner has not been granted innocent spouse status nor that there was an additional \$143,000.00 removed from the community property by the Internal Revenue Service and Franchise Tax Board as Petitioner's Counsel Mr. Berman continues to claim. Petitioner's Counsel Mr. Berman has also acted as a real estate attorney in the past, repeatedly encouraging the Buyer to purchase the Wooster Property even after the Court would only provide a partial title for the property. Petitioner's Counsel Mr. Berman has repeatedly ignored opportunities for the community to get out of the sale of the Wooster Property, instead creating a situation that repeatedly favored the Buyer in this case. See the attached complaint for further detail and explanation.

Signed,

Natan Avraham

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

Natan Avraham  
Case # SD 027 039  
September 16, 2015

The Court's Order have resulted from the inappropriate actions of Petitioner's Counsel Mr. Berman and have created an environment that leaves key issues of the case unresolved. For example, in the May 27th, 2015 Court Orders and Rulings the Court ordered that the Wooster Property be sold without accommodating the payment of the outstanding taxes on the property. The Court ordered that the taxes on the property would not be paid, meaning that the Buyer for the property could not be presented with a clean title at the time of sale. This decision gave the Buyer in this case the opportunity to purchase the Wooster Property without the clean title. The Court further stated that Miri Avraham was given power to sign for the sale of the property without a signature from Natan Avraham. Petitioner's Counsel Mr. Berman was ordered to go to the Buyer only without a clean title, and at this point the Buyer could take or leave the property without the clean title. This situation allowed the opportunity for the community to get out of this deal, but Petitioner's Counsel Mr. Berman applied tremendous pressure to the sale of the property and tried to secure a clean title for the Buyer at Natan Avraham's expense.

SECTION AND DECLARATION  
REPORTING DISQUALIFICATION  
OF JUDGE PRO TEM ST. GEORGE

Petitioner's Counsel Mr. Berman acted inappropriately in this case by acting as some sort of real estate attorney for the Petitioner and for Buyer in this case, made even more inappropriate by the fact that in a number of instances Petitioner's Counsel Mr. Berman took actions that put the Petitioner herself at risk of harm or legal vulnerability. Mr. Berman went to the Court and actively pursued the clean title for the Wooster Property at the time of sale, attempting to manipulate Court Orders and present false testimony that resulted in contradictory and inappropriate Court Orders being made regarding the sale of the property. Instead of going to the Buyer and informing the Buyer that the Court had not ordered a clean title for the Wooster Property but only Natan Avraham's signature, Petitioner's Counsel Mr. Berman actively tried to pursue the current sale with the current Buyer by trying to secure the clean title for the property at Natan Avraham's expense.

As a result of the actions of Petitioner's Counsel Mr. Berman and the misleading testimony of Real Estate Agent Alan Wachman, the Court Orders regarding the sale of the Wooster Property contradicted themselves on September 3, 2015. At no point before or on this date did either of the parties in this case request that the taxes on the Wooster Property be paid by the community in this case. Petitioner



Miri Avraham clearly requested from the Court that Natan Avraham be made responsible for the outstanding taxes on the property, and the Court is now saying that the taxes in question be paid at the expense of the community simply so that the current, fraudulent Buyer in this case can be awarded a clean title for the property.

This is not the first time Petitioner's Counsel Mr. Berman has acted in a manner that furthered the interests of the Buyer in this case at the expense of the community and parties in this case. On or before March 11, 2015, Petitioner's Counsel Mr. Berman and Alan Wachman presented the Court and Miri Avraham with a proposal through the escrow company for the sale of the property with a quotation of \$76,000.00 in taxes for the sale of the Wooster Property. This tax has since risen to \$276,000.00 in the closing cost statement, more than three times the amount that Miri Avraham and the Court agreed to for the sale of the Wooster Property without Natan Avraham's signature. Petitioner's Counsel Mr. Berman has attempted to continue the original Court Order for the sale of the property even with this hugely elevated figure, and in doing so has clearly shown that he is willing to do harm to the community for the good of a third party. Petitioner's Counsel Mr. Berman had an opportunity at this point as well to present the Buyer

with another opportunity to get out of this deal, yet instead pushed to create a better situation for the Buyer against the good of the community and the Orders of the Court.

The Court Orders and Rulings regarding the sale of the Wooster Property have created an environment that could result in one or both of the parties in this case or the community in this case being exposed to litigation and legal ramifications that could cause tremendous damage to any of these parties. The Orders and Rulings that currently govern the Wooster Property must be vacated and the misleading evidence used to create them must be stricken from the record, and the Court must observe the law and Judgment governing this case. The actions of Petitioner's Counsel Mr. Berman have created a situation in which the Buyer for the Wooster Property stand to benefit from perjury to the Court.

OBJECTION AND DECLARATION  
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OF JUDGE PRO TEM ST. GEORGE

1 THE PARTIES OF \$2,000 A MONTH. HE FEELS THIS IS AN  
2 IMPORTANT POINT THE COURT SHOULD WEIGH IN ANY 271 OR  
3 ATTORNEY-FEE ARGUMENTS. THE KIDS CAN STAY WITH HIM AT  
4 THE HOUSE.

5 MR. BERMAN: THEY DON'T WANT TO.

6 MS. AVRAHAM: THEY DON'T WANT TO STAY WITH HIM.

7 MR. AVRAHAM: WHY? BECAUSE I WON'T GIVE HIM DRUG

8 AND ALCOHOL? SHE BRING TEQUILA LIKE THIS FOR MY KID --

9 MR. GREEN: HE'S VERY CONCERNED --

10 THE COURT: I APPRECIATE WHAT -- MR. AVRAHAM, WHAT

11 YOU NEED TO UNDERSTAND IS -- I UNDERSTAND THIS IS VERY

12 EMOTIONAL AND IT'S VERY DIFFICULT, BUT THIS MAY NOT BE

13 THE MOST APPROPRIATE ARENA FOR THESE TYPES OF EMOTIONS

14 TO BE PLAYED OUT IN. THE COURT HAS TO DEAL WITH LEGAL

15 ARGUMENTS AND FACTUAL SITUATIONS AND --

16 MR. AVRAHAM: YOUR HONOR, THE COURT HAD TO FIND --

17 PROTECT WOMAN FROM HER ATTORNEY, YOUR HONOR, FROM HER

18 ATTORNEY, PROTECT HER FROM ATTORNEY -- A LOT OF MONEY.

19 THE LAWYER -- HAVE TO PROTECT WOMAN LIKE MY EX-WIFE FROM

20 HER OWN ATTORNEY. I'M SORRY ABOUT THIS, YOUR HONOR.

21 THE COURT: MR. AVRAHAM, IF WE END THIS MATTER

22 TODAY I DON'T THINK THERE WILL BE AN ATTORNEY AROUND TO

23 PROTECT HER FROM. IT WILL BE DONE.

24 MR. AVRAHAM: I MAKE FOR HER ALWAYS MONEY. EVEN

25 AFTER THE DIVORCE, MAKE MONEY. AND HE WANT HER TO LOSE

26 MONEY AND I MAKE MONEY FOR HER. I MAKE MORE. SHE ONLY

27 GET \$60,000 FROM ME THEN TO LOSE A \$100,000. THAT'S WHY

28 HE'S GOING FIVE, SEVEN MONTHS TO THE COURT AND HE BLAME

OBJECTION AND DECLARATION  
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ME. SHE SUFFERING. SHE'S SUFFERING BECAUSE OF HIM.

THE COURT: WELL, THE CAUTIONARY NOTE IS -- AND AGAIN, I WANT TO EXPRESS MY APPRECIATION THAT YOU HAVE COUNSEL HERE, BECAUSE THESE HEARINGS BEGAN IN FRONT ME WITHOUT COUNSEL AND IN REVIEWING PAST HEARINGS YOU WERE IN A VERY BAD POSITION. YOU WERE REQUIRED TO PAY SANCTIONS AND I'M TRYING TO HELP YOU TO DRAW A BRIGHT LINE, STOP THE LITIGATION, AS TO THOSE TWO PROPERTIES AND MOVE FORWARD.

SO IF YOU'RE WILLING TO ACCEPT THAT, WE CAN DO THAT TODAY. OTHERWISE, I'M SORRY. YOU WILL HAVE TO COME BACK AT A LATER DATE. AND, AGAIN, I CAN'T SAY THAT THINGS WILL BE ANY BETTER.

MR. GREEN: YOUR HONOR, WE WOULD -- A CONTINUANCE WOULD BE APPROPRIATE AT THIS TIME SINCE WE JUST RECEIVED HIS PAPERS AND IT'S THE COURT'S SUGGESTION A CONTINUANCE, AND IT WOULD ALLOW US FURTHER CHANCE TO MEET AND CONFER.

THE COURT: I WOULD HOPE THAT IN THE INTERIM THERE WOULD BE A SINCERE ATTEMPT TO SETTLE THE MATTER SO THAT WE DON'T TAKE AN AFTERNOON OR AN ENTIRE DAY HEARING THESE ISSUES THROUGH WHICH WILL -- AGAIN, I DON'T KNOW THAT THEY'LL END UP IN ANY BETTER PLACE. I CAN'T ADDRESS THE OTHER ISSUES WHICH I UNDERSTAND ARE VERY EMOTIONAL FOR THE RESPONDENT. AGAIN, THIS IS A COURT OF LAW. THAT'S JUST WHAT WE DO HERE.

SO LET'S PICK A FRIDAY. ARE THOSE TERRIBLE FOR YOU?

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





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 \_\_\_\_\_ 2015 at Los Angeles, California.

\_\_\_\_\_  
NATAN AVRAHAM  
Respondent

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

RECEIVED

LOS ANGELES SUPERIOR COURT

SEP 21 2015

Sherri R. Carter, Executive Clerk

By: *[Signature]*, 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

) Case No.: SD 027 039

) RESPONDENT'S

9 MIRI AVRAHAM

Petitioner,

10 vs.

11 NATAN RAHAMIM AVRAHAM

13 Respondent.

Request to Halt all Filings Regarding  
the Sale of the Wooster Property  
pending Perjury Investigation  
and in Response to any Ex Parte  
by Petitioner's Counsel Mr. Berman  
regarding Sale of Wooster Property

9. 21, 15

17 Date:

Respectfully submitted,

*[Signature]*

22 Natan Avraham, In pro per  
23 Respondent

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

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

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Natan Avraham  
Case # SD 027 039  
September 21, 2015

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and in Response to any Ex Parte  
by Petitioner's Counsel Mr. Berman  
regarding Sale of Wooster Property

Natan Avraham has the right to refuse the Court or Commissioner St. George as biased and abusive in this case, but is willing to agree with the decisions of the Court if Commissioner St. George takes immediate action to repair the damage done in this case to protect the community from perjury and inappropriate manipulation of the Court. Natan Avraham is going to hold Commissioner St. George directly responsible for the damage these Court Orders are going to cause by the sale of the Wooster property. Natan Avraham feels that if the facts of this case are made clear to the public Commissioner St. George will lose his immunity and be held responsible for the damage he has allowed by the government. Natan Avraham intends to do everything he can under the law in order to promote the investigation of his case and hold Commissioner St. George responsible for his

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actions. Natan Avraham insists that the Court not allow the sale of the Wooster Property without Natan Avraham's permission or before the investigation by the District Attorney into the perjury committed in this case. Natan Avraham insists that Commissioner St. George must disqualify himself from this case. It is clear to Natan Avraham that Commissioner St. George has acted in a prejudiced manner against Natan Avraham and that Commissioner St. George is not protected by his immunity in this case. Commissioner St. George must act immediately under the law to repair the damage done to the community and the property in this case by the actions of the Court.

The Court has already been legally provided with enough information to immediately stop the sale of the Wooster Property. The parties in this case should not be concerned with potential lawsuits from the proposed Buyer of the Wooster Property as the Court has a duty to prevent anyone from profiting from perjury before the Court. The actions of the Court have already caused damage to three properties held by the parties in this case, and if the Court is allowed to continue the abuse of Civil Rights and property will not stop. The Wooster Property is the last remaining community property in this case, and must be protected for the future of the children and the protection of the rights of Natan Avraham in this

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case. The Court must respect that individuals must not lose their property as a result of perjury to the Court. Natan Avraham cannot be asked to surrender large sums of money at the Order of the Court without Petitioner being required to take any losses. The Court can ask Petitioner if Petitioner would be willing to cover Natan Avraham's losses from Petitioner's portion of the proceeds of the sale of the Wooster Property, which Petitioner would clearly refuse. Nevertheless, Natan Avraham intends to hold Petitioner responsible for losses to the community.

If the Court is allowed to order the sale of the Wooster Property Natan Avraham must take action in order to bring the damage the Court has done to the attention of the government, the District Attorney, and the public to stop the perjury being allowed by the Court and the sale of the Wooster Property.

Petitioner has acted in a manner that has damaged the property and the community in the past by allowing the Shenandoah Property to go into foreclosure, and unfortunately the actions of the Petitioner might cause similar damage to the property and community if the Wooster Property is sold according to the Court Order. The damage done to Natan Avraham and the community by these actions is

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far worse than a lawsuit, as the destruction of Natan Avraham's credit rating and community property cannot be undone.

The Court has revealed extreme prejudice by going to lengths to extend the period of the sale of the Wooster Property and accommodate the Buyer. On the other hand, the Court has given Natan Avraham no time to protect his own property while issuing Court Order after Court Order under the direction of Petitioner and Petitioner's Counsel and to the benefit of the Buyer and Real Estate Agent Alan Wachman.

Natan Avraham refuses to support profit from Perjury to the Court and must act to protect his rights and prevent perjury from controlling the Court proceedings.

Commissioner St. George inappropriately and illegally attempted to structure the sale of the Wooster Property without the appropriate closing costs or tax considerations being arranged, and even though perjury has been committed, the taxes have still not been resolved, and the original closing costs have more than tripled. Commissioner St. George continues to press for the illegal sale of the Wooster Property under the same sale agreement.

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The Court has already been made aware of the perjury that has been committed during these proceedings, the Court certainly does not need to continue to ignore the law and allow more perjury to be committed in this case. Continuing to do so will create even more perjury that the Court will have to resolve.

Natan Avraham has repeatedly requested that the Court address the perjury committed by the Real Estate Agent Alan Wachman, filed on September 3, 2015. Natan Avraham believes that this perjury must be reported to the District Attorney in order to stop the violations of civil rights that are occurring in this Court. Natan Avraham believes that the sale of the Wooster Property must be stopped immediately in order to protect the community and parties in this case. Natan Avraham believes that Petitioner and Petitioner's Counsel must not be allowed to file for the immediate sale of the property, as the sale currently organized by the Court does not protect the rights of the community, the rights of Natan Avraham, or the Judgment governing this case. Natan Avraham believes that in order to protect the community and the individuals in this case from the damage caused by perjury the Court must halt the sale of the Wooster Property until the investigation of the perjury committed by Real Estate Agent Alan Wachman is complete.

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The Court has allowed Petitioner and Petitioner's Counsel to repeatedly damage the final remaining community property just as Petitioner and Petitioner's Counsel were allowed to do before with the other community properties in this case. The Court has supported these actions through Court Orders without any legal purpose. The evidence and record of the Court clearly shows that the Court has acted in a biased manner against Natan Avraham and the community in this case and that these actions have harmed the children in this case. It is extremely important to Natan Avraham, the community, and the children in this case that the value of the Wooster Property is appropriately maximized. Natan Avraham has been massively damaged by the actions of the Court, and has lost a tremendous amount of money attempting to protect himself and the community against the actions of Petitioner and Petitioner's Counsel in regard to the Wooster Property. Natan Avraham has made it very clear to the Court as late as September 9, 2015 that his first priority is the protection of his children and the property in this case for the future of the children. Natan Avraham continues to believe that the most important aspect of this case is the protection of the futures of the children, and will exhaust all legal avenues to protect them in this case.

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Natan Avraham must take all legal action to protect the property in this case, as the property must be used to protect the futures of the children in this case. The Court has continued to abuse its' power in a manner that violates Natan Avraham's Civil Rights and damages the property and the parties in this case, and now the Court is attempting to order the sale of the Wooster property and have the Clerk of the Court sign for the property.

Petitioner remains unconcerned with the value and destruction of the Wooster Property by Petitioner's Counsel Mr. Berman as Petitioner has the option to pursue a malpractice settlement from Petitioner's Counsel Mr. Berman after the sale of the property. Petitioner has taken similar action in the past, and the current evidence points to Petitioner seeking this form of settlement after the fact. Natan Avraham would be left only with the option to pursue Petitioner for damages in this case, a much more difficult and time-consuming process (especially considering the history of prejudice and bias from this Court) that would continue to destroy the resources of Natan Avraham and the community in this case. Furthermore, according to previously filed declarations, the Judgment, and the law governing this case, Petitioner does not have sufficient equity in the Wooster Property to provide for the credits to which Natan Avraham is entitled.

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Petitioner has the option to inform the Buyer of the Wooster Property that the Court has not appropriately arranged for the clean title of the Wooster Property as the Court has not seen to the resolution of the outstanding taxes on the property. The arrangements made between the Petitioner and the current Buyer in this case have long since expired, and only through the actions of Petitioner and Petitioner's Counsel was a situation created that brought the current Buyer and Real Estate Agent Alan Wachman back into the picture repeatedly. There is no necessity for the current Real Estate Agent Alan Wachman to remain involved in the purchase of the property, especially in light of the damage done to the value of the property by Real Estate Agent Alan Wachman's perjury to the Court. Petitioner would not have to be concerned about any future lawsuits if she is willing to act in accordance with this proposal, and if Petitioner is willing to settle out of Court. Looking at the damage the Court has done in this case so far, Natan Avraham believes that settling out of Court is an excellent option for the parties in this case.

The Court cannot continue to enforce Court Orders based upon misleading testimony and perjury that continue to violate Natan Avraham's Civil Rights and do not follow the Judgment governing this case. Natan Avraham has clearly



documented in the Court record the seven year history of abuse in this case. The record clearly shows that for seven years the Court under both Commissioner Cowan and Commissioner St. George has acted in a prejudiced manner that has abused Natan Avraham's rights. The purpose of the power and security of the Court system is to allow the Court to freely act to enforce the law and protect the rights of the people, and instead Commissioner St. George continues to abuse his power and do harm to Natan Avraham and the community in this case.

Commissioner St. George is aware that this Court has not done its' job protecting these rights, and Natan Avraham insists that the appropriate course of action would be for Commissioner St. George to dismiss himself from this case.

Natan Avraham has a good faith belief that Commissioner Cowan was removed from his position because of his actions against Natan Avraham, the community in this case, and the law. Petitioner should not fear legal action from real Estate Agent Alan Wachman or the Buyer in this case as there is already a clear case for the perjury of Alan Wachman and the Court has a duty to prevent any profit from perjury to the Court. Petitioner should verify with a real estate attorney, a criminal attorney, and the District Attorney that the aspects of this sale have been performed legally before signing any escrow that could make her potentially liable for the

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illegal nature of the sale of the Wooster Property. Regardless of the outcome of the sale of the Wooster Property, Natan Avraham intends to pursue Real Estate Agent Alan Wachman for the tremendous damage already done during the sale of the Wooster Property and, should the sale of the Wooster Property be completed, pursue the Buyer for the tremendous damage done by profit from perjury.

Signed,

Natan Avraham

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