

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WISCONSIN

R. DAVID WEISSKOPF, pro se)
)
 Plaintiff)
)
 VS.)
)
 YAAKOV NEEMAN, MOSHE KAHLON,)
 SIMONA SHTEINMETZ, RUTH EISENMANN,)
 EDNA BROWNSHTEIN, ORLI OSTERMANN,)
 Dr. SILVAO GUTKOVSKY,)
 P.E.F. ISRAEL ENDOWMENT FUND, INC.)
)
 Defendants)

AMMENDED COMPLAINT
JURY TRIAL
DEMANDED

3:11-CV-0665

COMES NOW, Plaintiff R. David Weisskopf, pro se, for his Complaint against the Defendants, and states as follows:

A. INTRODUCTION

This is an action filed under the Alien Tort Claims Act, 28 U.S.C. § 1350 et seq. (ATCA). Plaintiff seeks relief and damages for gross violations of human rights arising out of an institutionalized discriminatory policy of disengaging and separating fathers from their minor children. Plaintiff asserts that Defendants’ actions constitute crimes against humanity, violations of civil and human rights, torture of Plaintiff, his children and all other individuals who are similarly situated. Defendants and their agents, have acted in concert with the members of the Israeli Judiciary and employees of the Israeli Ministry of Welfare in aiding, abetting, facilitating, directing, orchestrating these practices. Defendants’ actions constitute an actionable claim under ATCA, a violation of the Law of Nations, international law, the laws of the United States of America and of individual states, including but not limited to Wisconsin, and the natural laws of man.

Defendants transfer tax-deductible donations from the United States to advocate the destruction of families, divorces, the disengagement of children from their fathers, forcing men into destitution, and even knowingly putting divorced fathers like Plaintiff into life-threatening situations. Plaintiff’s medical condition is deteriorating as a result of Defendants’ actions, omissions and reckless disregard described herein.

B. PARTIES

1. Plaintiff's service address is 2364 Jackson St. #202 at Stoughton, WI 53585. (Tel. 1-608-492-1477.) Plaintiff is the biological father of Minors; L (age 7), N (age 5), and M (age 3) with legal parental rights. Plaintiff and his children are currently being wrongfully detained in Israel.
2. Defendant, Yaakov Neeman, is employed as the Minister of Justice at 29 Salah A-Din Street, Jerusalem, ISRAEL 91010 (Tel. 011-972-2-646-6527). Neeman is the official responsible for the implementation of international treaties, including the Treaty of Friendship, Commerce and Navigation (1950), and other multilateral conventions, pursuant to which he is the chief overseer that Israel ensure fundamental human rights including no discrimination, due process, right to family life, right to access children, right to travel, right to earn a living, and the right to dignity.
3. Defendant, Moshe Kahlon, is employed as the Minister of Social Affairs & Social Welfare; 2 Kaplan St., Jerusalem, ISRAEL 91050 (Tel. 011-972-2-675-2520). He is the official in charge of social workers that are appointed in every divorce case in Israel to "investigate" fathers and determine whether, if at all, they will be allowed access to their biological children.
4. Defendant, Simona Shteinmetz, is employed as the national Director of Court Appointed Social Workers at the Ministry of Social Affairs & Social Welfare, 10 Harutzim Street, Jerusalem, ISRAEL 91012 (Tel. 011-972-2-670-8486). She is responsible for developing policies which have artificially increased the use of supervised visitations centers in "contact centers" (over 25% in Israel as opposed to 1% to 3% in the United States), as well as training social workers to appease women, and coach them to obstruct fathers' contact with their own children.
5. Defendant, Ruth Eisenmann, is employed as a social worker at Shiluv Institute for Family & Couple Therapy; 6 HaLevanon Street, Jerusalem, ISRAEL 91062. (Tel. 011-972-2-625-1390 & 011-972-54-464-6951). She is publicly and privately funded to implement discriminatory policies to dominate and humiliate fathers like Plaintiff during the divorce process. She files exaggerated and false reports to justify torture and abuse of men as in Plaintiff's specific case.
6. Defendant Orli Ostermann is employed as the manager for family services in the Jerusalem area at the Ministry of Welfare; Makor Chaim #35, Jerusalem, ISRAEL

91008. (Tel. +972-2-565-0126). Defendant Ostermann is responsible for convening and chairing committee meetings in situations where it is in the best interest of the children to award full custody to the father. Defendant Ostermann gathers 8 to 10 social workers to gang up against the father and award full custody to the mother even in situations where the children's safety and well-being are at risk in the mother's home. If the father has a proven excellent track record raising children, they bribe a psychiatrist sit in the committee meeting without the father's consent or any doctor-patient relationship whatsoever to issue a bogus psychiatric diagnosis against him as a pretext to sever all his parental rights. Defendant Ostermann's committee meetings result in perfectly fit fathers being forced into strict supervised visitation centers under lock-and-key to visit their children 1-3 hours per week. While this can drag on for years, fathers oftentimes cannot even bring family members to celebrate birthdays with their children. Most children come out of this experience psychologically and emotionally traumatized. According to Defendant Eisenmann on during a transcribed meeting with Plaintiff on 18 December 2011, Defendant Ostermann specifically participated in the conspiracy to have Defendant Dr. Gutovsky file a bogus diagnosis of "active psychosis" against Plaintiff which has ruined his life, career and traumatized his children.

7. Defendant, Dr. Silvao Gutkovsky, is self-employed as a psychiatrist at Dan #24 at Jerusalem, ISRAEL 93509. (Tel. +972-50-626-4083 & +972-2-671-6264). Dr. Gutkovsky is responsible for filing false and bogus reports against men like Plaintiff under the guidance and direction of social workers to lend credibility to their falsified claims in cases where the man would otherwise prove to be better suited parents over the woman. Social workers bribe him using public and private funds.
8. Defendant, P.E.F. Israel Endowment Fund, inc., is a not-for-profit corporation at 317 Madison Ave. Suite 607 at New York, NY 10017. (Tel. 1-212-599-1260). Defendant, PEF Israel Endowment is a not-for-profit corporation in the U.S.A. and is subject to Internal Revenue Service (IRS) regulations under sections 501(c)(3), 509(a)(1) and 170(1)(A) of the Internal Revenue Code. PEF is responsible for funding Bar Ilan University who applied a portion of those designated funds to submit a report to the Knesset Committee for Women & Children dated 8 November 2011. This report argued in defiance against recommendations from child welfare experts and in defiance against every international law and treaty, that children under the age

of 6 are always better off in the exclusive custody of their mothers and never with their fathers. They are organizing a conference on 3 January 2012 to “educate” judges, government officials and social welfare managers about the “wisdom” denying fathers their basic human rights and systematically cutting them off from their children after divorce without due process. This conference is in open defiance of expert recommendations and opinions that the best interest of children is be raised in the most natural and least restrictive environment in divorce – which includes their biological fathers. PEF is specifically responsible for funding Shiluv Institute for Family & Couple Therapy who employs Defendant Ruth Eisenmann (who came from Bar Ilan University) to dominate and destroy fathers like Plaintiff in divorce.

9. Plaintiff brings this complaint on his own behalf, as a victim of systematic persecution, torture and denial of civil rights of men in divorce proceedings, who are also subject to, abuse, harm and threats by or as a direct and proximate result of Defendants’ actions as described herein.

C. JURISDICTION AND VENUE

10. The Court has subject matter jurisdiction over this case under the Alien Tort Claims Act (ATCA) 28 U.S.C. § 1350 and pursuant to the Torture Victim Protection Act of 1991 (TVPA) 28 U.S.C. § 1350 Pub. L. 102–256, note § 2(a).
11. The court also has jurisdiction pursuant to 28 U.S.C. § 1331 encompassing actions which present a “federal question”.
12. The Court has jurisdiction over the parties pursuant to 28 U.S.C. § 1332 (diversity jurisdiction) because Plaintiffs are residents of this district, Defendants reside in the State of Israel and the impact of Defendants’ actions impact Plaintiffs in this district.
13. Defendants are subject to suit in the courts of the United States pursuant to the Foreign Sovereign Immunities Act, 28 U.S.C. §§ 1602 et seq., because their conduct falls within the exceptions to foreign sovereign immunity set forth in 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7).
14. The amount in controversy, both individually and collectively, exceeds one million U.S. Dollars.

D. FACTUAL BACKGROUND

15. Plaintiff’s claims arise in conjunction with his efforts to obtain visitation rights and custody of his minor children who have been wrongfully removed from the United States and wrongfully detained in Israel.

16. Plaintiff's minor children were taken by their mother to Israel after she declared their place of habitual residence was in the USA.
17. Once in Israel, the children's mother refused to return them to the United States.
18. Israel's entire judiciary system lacks due process for fathers in such situations. In her August 25, 2011 ruling in the Superior Court of New Jersey, the Honorable Bonnie J. Mizdol noted, "the Israeli Supreme Court rendered opinions very different than those done here in New Jersey or the United States," (Ben-Haim v. Ben Haim #FD 02-906-11). She further noted concerning the father's experience in the Israeli judicial system, "This Court finds that the entire situation was laden with duress."
19. In Israel, women are improperly favored in divorce proceedings. Women receive preferential treatment in Israel and Plaintiff is entitled to the same level of treatment.
20. Examples of preferential treatment for women in divorce proceedings include automatic interim child custody, presumptive permanent custody, and exemption from producing financial records.
21. Most egregiously, women are encouraged to allege false domestic violence complaints in support of their divorce and child custody actions. These false domestic violence actions are granted presumptive validity by the courts and men are precluded from substantively contesting the allegations because of due process violations.
22. Plaintiff is entitled to protections under the Treaty of Friendship, Commerce and Navigation and between Israel and the United States, signed in 1951 (the "Friendship Treaty").
23. Pursuant to the Friendship Treaty, Article 5, the Plaintiff is entitled to a "most favored nations treatment with respect to access to the Courts of Justice...both in pursuit and in defense of their rights", and pursuant to article VI (1) "property of nationals and companies of either party shall receive the most constant protection and security".
24. In essence, Plaintiff is entitled to treatment in Israel that is no less favorable than the sector that receives the most preferential treatment in Israel.
25. Contrary to the requirements of the Friendship Treaty, Defendants are responsible for the denial of the benefits and protections of the Treaty. As a result, Plaintiff is being treated in Israel in a manner which constitutes and is equivalent to torture and violations of his most fundamental international human rights.
26. Defendants engage in a systematic practice of torture, violations of human rights and egregious gender discrimination for the intentional purpose of separating fathers from

their biological children in formal proceedings regarding the dissolution of family relations.

27. In order to perpetrate the assault and torture of men filing for divorce, Defendants utilize a myriad of tools to suppress men and torture them, as follows:

- (a) Defendants automatically transfer children in divorce to mothers,
- (b) Defendants automatically disengage fathers from children either completely or by sending men to visitation centers where girls as young as 18 have authority over men to dominate and humiliate them in front of their children,
- (c) Defendants encourage women to file false domestic violence complaints against men and remove them from their homes,
- (d) Defendants' policies operate to validate false domestic violence complaints,
- (e) Defendants' policies operate to place greater evidentiary weight on the woman's allegations in Family Courts and criminal Courts,
- (f) Defendants automatically and without Due Process grant motions against men, oftentimes ex parte,
- (g) Defendants impose unconscionable child supports awards against men (sometimes at 80% to 250% of the men's actual salary) regardless of women's income for the improper intent of prejudicing them, making them unable to meet court imposed obligations and coercing them into giving up their parental rights,
- (h) Defendants attribute to men fictitious "imputed salaries" without testimony or evidentiary support,
- (i) Defendants deplete men's property and transfer it to their wives without testimony, evidentiary support or Due Process,
- (j) Defendants' policies operate to cause men to be arrested without due process for inability to pay child support, result in the revocation of men's passports, driver's licenses and deny men the ability to work by issuing a constant stream of executions and levies.

28. Divorced fathers in other matrimonial proceedings are automatically treated as "second class citizens". Defendants intentionally discriminate against such men who lose the protections of their human rights.

29. Indeed, the "status" of a "man in divorce proceedings" Israel is in essence institutionalized torture and denial of civil rights. The state refuses to recognize any

rights to fatherhood, family life and contact with children, and it routinely divests and destroys men's rights in this area.

30. The Defendants officially interpret the right to family life as dependent on the concept of "mother's consent", a concept which the international community and European Court of Human Rights and other international tribunals discarded long ago.
31. The "mother's consent" doctrine is facially invalid and discriminatory because its very nature is to favor one party's position over another without any objective evidentiary scrutiny, assessment of accuracy or actual of proof. It is completely subjective and without basis in fact.
32. The Defendants' policies institutionalize the practice of egregious and unconscionable discrimination and the acceptance of unequal statutory presumptions as follows:
 - (a) The Tender Years Presumption gives automatic custody of children to mothers;
 - (b) Men are oftentimes sent to social workers who act as personal criminal probation officers and cancel visitations at will.
 - (c) The rate of supervised visitations in Israel is the highest anywhere in the world (over 25%), compared with 1-3% in the U.S.
 - (d) The rate of false arrests and false convictions is also extremely high, and the false arrests are one more institutionalized tool to disengage fathers from children.
 - (e) Child support awards do not take into account the women's income when calculating amount of child support. Child support awards should be formulas based on disposable income as is the case on any other Democracy. Instead, Israeli child support awards are based on multiplying the number of children by a set base amount (about \$350 per child), and then adding additional amounts (e.g., 30%, 40% and 50% of the woman's monthly rent, medical, dental, extracurricular, babysitting, and anything else the Judge may impose at his/her discretion). As a result, most men are slapped with child support burdens that exceed their income. Therefore, the rate of non-disposable income vs. burden of child support is unconscionable and is the highest rate in the world.
33. Defendants have also imposed and enforced discriminatory domestic violence guidelines. Women enjoy immunity from prosecution for making false complaints. This practice encourages free and careless false reports, which result in automatic police orders removing husbands from their homes.
34. In Israeli Family Courts, the Court does not engage in an objective determination of justice. Instead, it systematically grants the woman's petition for interim custody

- immediately, and refers the men to social workers, who become the real Judge of the case. The social workers are trained to coach women to refuse visitations to the men.
35. Defendants are responsible for the built-in mechanisms to deter men from making applications for child support reductions or visitation expansion because those applications are routinely denied without hearing and often result in exorbitant monetary sanctions that further impoverish the men.
 36. Despite the lack due process or full and complete evidentiary hearings, judges can issue Judgments without trials, on a whim, and out of the blue.
 37. Defendants' policies also deny men due process by refusing applications to summon witnesses or financial records, denying applications to cross examine social workers' exaggerated and falsified reports, or issuing a "Judgment" at will, without trials at all. Family Court proceedings lack fair justice and equal protection.
 38. In addition, appeals from Family Court are intentionally expensive and out of reach for the average man when a \$3,000 bond is necessary to secure the appeal.
 39. The policies result in ongoing damage to the father-child relationship through the imposition of supervised visitation requirements. The per-capita rate of supervised visitation at "Contact Centers" in Israel is the highest in the world at 2,428 families in 2010, out of 9,000 divorces (including divorces-without-children). Periods of State-enforced disengagement and alienation can last 2 years, 5 years and in an extreme case, 12 years.
 40. Defendants' policies also impose a strict and unconscionable regime of supervised father-child relationships.
 41. There is no real judicial evidentiary determination of father-child contact decisions, orders or judgments. Rather, Family Court judges simply delegate the authority to determine father's levels of contact with children to state-employed social workers who serve as court aides.
 42. In making their determinations, social workers utilize a presumption that the mother is the parent best suited for custody under Capacity and Guardianship Law, Section 25. As a result, women are routinely granted primary physical custody rights on application alone. Conversely, men are sent to social workers for "investigation", character assessment and reports. This practice is discriminatory on its face.
 43. The Social workers routinely threaten the fathers, and collect rumors and false statements against them; entice women to file false domestic violence complaints to expel men from their own homes, or delay proceedings pending referrals to private

and costly “Dangerous Propensity Tests” or “Parental Fitness Tests”. These tests of the ability to “serve as a father” feed a booming industry of mental evaluators at up to \$5,000 per test.

44. Moreover, it is simply degrading and dehumanizing for a father who, devotedly raised his children during the marriage, and was certainly a fit and responsible parent be demonized upon his arrival into Israel. Those policies subject men to an unfair and discriminatory system which doubts his ability to parent.
45. As a general rule, appointed social workers routinely send the men to see their children in supervised visitations centers, and this is admitted in the press by the official in charge, Simona Shteinmetz. In these situations, fathers are treated like criminals, branded as “dangerous”, and the children only get an hour or two per week with the fathers, for several years.
46. The supervised visitation system is also designed and operated to prejudice fathers’ rights. The supervised visitations take place at social workers’ convenience, and the children only get one or two hours a week, during working hours. Thus, when the state, via its appointed social workers conditions visitations with children on supervised visitations (simply because of the mother’s refusal to consent), fathers accumulate absences from work and risk losing their jobs and livelihoods, in order to see their children.
47. While women enjoy the benefits of preferential treatment on account of gender and receive custody without a fair trial, or any trial whatsoever, men are compelled to submit to the authority of biased and unqualified social workers, who write Social Worker Reports whether she authorizes the father “grace” to see the child. Fathers normally wait for such Social Worker Reports 3 months up to 9 months and sometimes longer. After that, Courts routinely ask for several more “supplementary reports” where necessary, each taking several months to “prepare”.
48. The process used to prepare Social Worker Reports is faulty and inherently discriminatory. The social worker simply collects any piece of libel and defamation she can get from the woman, and encourages the woman to manufacture more lies. It appears that character assassination of men is the usual practice of social workers.
49. The social worker is cloaked with absolute immunity, just like a judge. In fact, once she is appointed, the social worker becomes the real judge of the case. This practice violates the guarantees under article 10 of the International Covenant on Economic, Social and Cultural Rights (ICESCR), and its equivalent in other international

Conventions, since the right to family life becomes conditioned on satisfying the whims of a hostile and biased social worker in every case and as to each child.

50. The state of Israel is signatory to international covenants such as the International Covenant on Civil and Political Rights (ICCPR), ICESCR and the Convention on the Rights of the Child (CRC). Despite those agreements, Israel's various court systems systematically refuse to interpret the "right to family life" as including the automatic right of fathers to access the children without state interference. Instead, the state and its courts require the father to demonstrate why the child's best interest warrants that there is some access to the child by the father. To that end, the Court compels fathers to submit to the authority of social workers for writing reports, and then supervising visitations, while women get automatic interim custody without a fair, evidentiary and adversarial hearing.
51. As a result of these policies, many men find themselves in supervised visitation settings having to see their children in prison-like settings one or two hours per week, simply because it is the Ministry of Welfare's unwritten policy to automatically refer men to supervised visitations whenever a woman voices disagreement with regular visitations.
52. Regarding domestic violence complaints, Defendants routinely impose convictions merely on the unsupported and unfounded allegations of the alleged victim, no evidence is required other than the rehearsed words of the woman. This is the pattern and practice in Israel even if prior to the divorce, there were never any domestic violence complaints, or complaints that the man posed a danger to the well-being of the child or woman. Despite this questionable lack of validity, domestic violence complaints result in the immediate removal of the husband from his home. He is cut off from his clothing, records, personal belongings, and his children.
53. Defendants' practices result in thousands of children being disengaged from their fathers every year, thousands of fathers being needlessly arrested, and thousands of fathers being forced to live lives of fear, taunted with endless and persistent persecution, and resulting in a suicide rate among divorced men that is 8 times higher than other men (which already outnumbers the rate among women by 3-to-1).
54. The institutionalized and statutory discrimination against fathers in Israel is a violation of international treaties, and a complaint on behalf of the fathers' rights organizations in Israel was filed and heard before the United Nations Committee on Economic, Social and Cultural Rights (UNCESCR) on November 15-16, 2011 in

Geneva. On December 4, 2011 the UNCESCR ruled that Israel is in violation of human rights treaties and is guilty of torturing fathers like Plaintiff in divorce. This ruling was published the next day in the Jerusalem Post. Additionally, the complaint to the United Nations along with exhaustive research and data about the attitude of Israeli Family Court Judges against all men are published and publicly available on the website of the Coalition for the Children and Family at www.ccfisrael.org.

E. FACTS SPECIFIC TO PLAINTIFF

55. Plaintiff is the biological father of Minors L, N, M with legal parental rights.
56. Plaintiff formerly consulted with the director of the Illinois Department of Children & Family Services (IDCFS) to reform their child welfare continuum, worked as a child welfare professional at Maryville Academy, served as an advisor to the chairman of the Knesset Social Welfare Lobby, founded a charity to advocate for Israeli orphans and at-risk kids and was licensed as a foster parent.
57. After moving to Israel, Plaintiff was subjected to discriminatory treatment solely based on his gender.
58. Plaintiff's visitation rights with his children were also limited to supervised visits without any legitimate or credible evidence that supervision was necessary.
59. Plaintiff and his children were falsely imprisoned for 1 to 3 hours per week in prison-like conditions as their only contact allowed by Defendants for over 1 year. Plaintiff and his children were under lock-and-key monitored by an armed guard wearing a "prison guard" style uniform.
60. In fact, Plaintiff was targeted and treated worse than a convicted criminal. While prisoners have a right to daily telephone contact with their children, Defendants grudgingly allowed Plaintiff 3 telephone conversations with his children in over 2 years.
61. Defendant PEF Israel Endowment funded Defendant Ruth Eisenmann who conspired with Defendant Edna Brownshtein and Defendant Orli Ostermann. They paid a bribe to Defendant, Dr. Gutkovsky, to join them in filing false and misleading reports against Plaintiff in court and other contexts including a "diagnosis" of "Active Psychosis" which proved to be bogus. Such false reports get filed under the authority and/or reckless disregard of Defendants Neeman, Kahlon, and Shteinmetz.
62. Defendants used the U.S. mail to steal Plaintiff's sealed childhood IDCFS records from the USA, including his private medical records, and attempted to suppress his

adult credentials as a child welfare professional and licensed foster parent. The Defendants knowingly and with malicious intent distorted Plaintiff's profile to perpetuate their ongoing constructive abduction and wrongful retention and wrongful imprisonment of the Minors and their ongoing physical and emotional torture; and wrongful imprisonment of the Plaintiff.

63. Defendants physically tortured Plaintiff by exploiting his medical distress which included a broken leg and cyst in his sinus which fractured the surrounding bone in his face. Defendants took steps to obstruct his ability to seek proper medical attention by confiscating all his assets, monies and medical records and preventing him from seeking medical attention in the USA. They specifically demanded that he perform physical tasks beyond his handicapped abilities in front of his children. When he failed to meet their demands, they claimed his physical limitations were manifestations of being "psychologically passive".
64. The environment in which Plaintiff endured Defendants' physical torture was independently witnessed by 3 American citizens in separate incidents who currently reside in the United States. Two currently work as registered nurses and one currently works in law enforcement.
65. At age 7, Minor L now requires psychiatric and psychological therapy resulting from emotional torture she has suffered at the hands of the Defendants. Minors N and M also display signs of emotional harm they have suffered at the hands of Defendants. Despite this, Defendants continue perpetrating constructive abduction wrongful retention and wrongful imprisonment of the Minors; and torture of Plaintiff in violation of the Hague Convention for the Civil Aspects of International Child Abduction (25 Oct 1980) and the Friendship Treaty between the USA and Israel.
66. Defendants violate Plaintiff's and the Minors' civil and human rights as a "Protected Class" religious minority in Israel, the USA, by international laws and treaties, and the natural laws of man. They conspire to forcibly convert the Minors to Orthodox Judaism and forcibly gag Plaintiff from continuing the religious practices which Plaintiff and his children have shared since birth. Though Plaintiff and the Minors are religious minorities and therefore entitled to Protected Class status both in Israel and the USA, both countries officially recognize their religion as being normative.
67. Defendants permanently destroyed Plaintiff's ability to work in child welfare or retrain in his usual career after their onslaught of torturous abuses – including marking his permanent file with an "Active Psychosis" label.

68. Defendants recklessly demonstrated contempt for the Treaty of Friendship, Commerce and Navigation and between Israel and the United States, signed in 1951. Under Article 5 of this Treaty, the Plaintiff is entitled to a “most favored nations treatment with respect to access to the Courts of Justice...both in pursuit and in defense of their rights”, and pursuant to article VI (1) “property of nationals and companies of either party shall receive the most constant protection and security”.

COUNT ONE
**AIDING AND ABETTING, INTENTIONALLY FACILITATING,
AND/OR RECKLESSLY DISREGARDING CRIMES
AGAINST HUMANITY IN VIOLATION OF INTERNATIONAL LAW**

69. Plaintiff repeats and realleges all previous allegations with the same force and effect, as if fully set forth herein.
70. The rights to non-discrimination, equal protection, due process and family life (in the sense of right to parental access to children) are universally agreed upon as the law of nations and international law.
71. For example, the rights are enshrined in ICESCR Article 10(1) – The right to family life: "The widest possible protection and assistance should be accorded to the family, which is the natural and fundamental group unit of society, particularly for its establishment and while it is responsible for the care and education of dependent children."
72. When the Defendants violate all such universal rights, combined, and at the same time, it is an act of torture and terror applied against innocent citizens.
73. Defendants intentionally, knowingly and willingly facilitated, encouraged and/or condoned, or at minimum failed to take steps to protect the Plaintiff from
- (a) The “Tender Years Presumption” which discriminates against men in favor of women and results in Separation and Alienation of fathers from children. While fathers await the social worker’s report, mothers get instant custody, and indirectly receive the power to block the fathers’ access to see their own children.
 - (b) Israeli Attorney General Guideline 2.5 which immunizes women from prosecution or liability due to false police reports of alleged violence.
 - (c) Israeli Police patrol Guidelines which mandate the issuance of orders of removal from home based on mere allegations of violence without evidence.
 - (d) Israel’s policy of disengaging children from fathers.

- (e) Israel's policies of allowing fathers access to children only in supervised visitations contact centers.
 - (f) Israel's policies of compelling fathers to prove their fitness to see children, and beg for the mercy of being granted visitations. Fathers are entitled to the same presumption as mothers that they are good and loving parent.
 - (g) Israel's policies of postponing property distribution, and awarding most, if not all of the marital property as well as the husband's private property to the women.
 - (h) Israel's policies of issuing ex parte decisions in Family Court and in post Judgment Enforcement Offices.
 - (i) Israel's Family Court policies of inflicting excessive legal fees on husbands in almost every case.
74. By reason of the wrongful conduct of the Defendants, each and every one of them, jointly and severally, as hereinabove alleged, and the consequent crimes and torts committed thereby, as hereinabove alleged, Plaintiff and others similarly situated men, suffered emotional and psychological harm due to stress and detachment from family, pecuniary and economic damages, loss of support, loss of nurture care and guidance, grief, anguish and other mental and physical injuries.
75. The actions or omissions committed by Defendants constitute crimes against humanity in violation of the law of nations.
76. Crimes against humanity are likewise defined with a specificity sufficiently comparable to international law violations that were familiar when the ATS, 28 U.S.C. § 1350, was enacted.
77. The core elements of a crime against humanity in violation of international law, as codified in the above sources and recognized in international law generally, include various forms of heinous acts against human life, physical welfare, and dignity that are undertaken as part of a widespread or systematic attack against male population in Israel.
78. Crimes against humanity are punishable whether committed in time of peace or war.
79. Aiding and abetting and/or reckless disregard of crimes against humanity are actionable claims under the law of nations and this court has jurisdiction pursuant to the ATCA and ATS.
80. The Defendants' conduct was the sole proximate cause of the severe and continuing emotional distress that has been suffered by the Plaintiff and other similarly situated individuals, who have experienced similar human rights violations, torture, mayhem,

false arrests etc. As a direct and proximate result of the intentional, reckless, outrageous and intolerable conduct of the Defendants, each and every one of them, jointly and severally, Plaintiff as well as other similarly situated men has suffered substantial damages including, but not limited to, \$800,000.

81. Plaintiff is therefore entitled to judgment in his favor against Defendants and demand damages in an amount to be determined by a jury, not less than the statutory amount of \$75,000, for damages arising out of severe emotional distress, mental anguish, intense fear and anxiety, and manifestations of physical and emotional distress, such as loss of sleep, loss of appetite, back pains, migraine headaches, heart ailments, depression loss of self esteem, nervousness and anxiety. loss of consortium, loss of solatium, and/or loss of services, plus interest, costs, and such other monetary and equitable relief as this Court deems appropriate to compensate the Plaintiff, and prevent Defendants from ever again supporting crimes against humanity in violation of the law of nations.

82. Defendants' actions towards Plaintiff and other similarly situated individuals was undertaken with the specific intent to harm and discriminate.

WHEREFORE, Plaintiff requests judgment in his favor and against Defendants in an amount in excess of \$75,000 plus interest, costs, punitive damages attorney's fees and such other relief as the Court may determine.

COUNT TWO
RECKLESS DISREGARD
FOR HUMAN AND PARENTAL RIGHTS

83. Plaintiff repeat and reallege all previous allegations with the same force and effect, as if fully set forth herein.

84. Defendants recklessly disregarded the Plaintiff's right to "most favored nations" treatment in Israeli Courts and other tribunals as no less favorable that the treatment enjoyed by women in divorce.

85. Defendants knew, or should have known, that their encouragement or disregard and/or negligence regarding the atrocities men in divorce suffer in Israel, will result in the harm, pain and suffering, as described above.

86. Defendants knew, or should have known, that they are disregarding the violation of rights of the American Plaintiff insofar as he is entitled to treatment in Israel at a “most favored nations” basis equal to the treatment women in Israel are entitled to.
87. Defendants knew, or should have known, that their disregard of the rights of Plaintiff, and others similarly situated causes an increased annual suicide rate among divorced men that is 8 times higher than other men which is a 3-to-1 ratio over women.
88. Defendants knew, or should have known, that their disregard of the rights of Plaintiff, and others similarly situated causes 4,122 children needlessly sent to Contact Centers under the almost automatic supervised visitations policies promulgated by Defendant Shteinmetz.
89. Defendants knew, or should have known, that their disregard of the rights of Plaintiff, and others similarly situated causes at least the same amount of disengagements of children from fathers every year.
90. Defendants knew, or should have known, that their disregard of the rights of Plaintiff, and others similarly situated, causes the impoverishment and false arrests of thousands of men each year.
91. Defendants knew, or should have known, that their disregard of the rights of Plaintiff, and others similarly situated causes the massive transfer of millions of dollars in properties lawfully belonging to men, which are taken without Due Process and given to women.
92. Despite this knowledge, or despite the fact that they did not take reasonable steps to know what a reasonable person should know, Defendants Neeman and Kahlon have intentionally turned a blind eye and failed to investigate or evaluate Plaintiff’s assertions of improper conduct, Plaintiff’s specific suffering and the impacts on others similarly situated.
93. Defendants have appointed various commissions to investigate the perpetration of such heinous crimes against men, including the Slonim-Nevo Commission on social workers, Shnit commission on joint parenting, and Shifman Commission on fair child supports. Defendants have taken no action on the findings of the Slonim-Nevo Commission (which finalized its report two years ago).
94. Beyond appointing the Shnit and Shifman Commissions, Defendants have let those bodies languish for more than six years (Shnit and Shifman) without taking any action within their powers. Defendants have paid only lip service to the widespread calls for

reform. This conclusively demonstrates Defendants' intent to perpetrate the systematic discrimination against men.

95. As a result, Neeman, Arbel and Kahlon were aware or should have been aware of a risk so great that it was highly probable, and thus foreseeable, that serious harm and/or death could result to Plaintiff from their acts or omissions.
96. Neeman and Kahlon recklessly disregarded this known and substantial risk thereby facilitating, assisting, aiding, abetting and incentivizing the torture and abuse that were foreseeable to Neeman and Kahlon, and which were the direct and proximate cause of the injury to Plaintiff and/or decedents.
97. As a direct and proximate cause of the acts and omissions of Defendants Neeman and Kahlon foreseeable physical and emotional injuries were inflicted upon the Plaintiffs.
98. As a result of the foregoing Plaintiff has been damaged in an amount not less than \$8,000,000.

WHEREFORE, Plaintiff requests judgment in his favor and against Defendants Neeman and Kahlon in an amount in excess of \$75,000 plus interest, costs, punitive damages, attorney's fees and such other relief as the Court may determine.

**COUNT THREE
NEGLIGENT AND/OR INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS**

99. Plaintiff repeats and realleges all previous allegations with the same force and effect, as if fully set forth herein.
100. Plaintiff brings this claim for negligent and/or intentional infliction of emotional distress against Defendants Neeman and Cachlon because Defendants Neeman and Kahlon facilitated, assisted, aided, abetted, materially supported, and incentivized acts of torture, persecution of men in divorce in Israel.
101. Defendants Neeman and Kahlon knowingly, and purposefully, directly and indirectly aided and abetted, intentionally facilitated, and/or recklessly disregarded the intentional commission of acts designed to violate the rights of men, impoverish them, arrest them, lower their self-esteem and disengage them from their children.
102. Defendants Neeman and Kahlon intended or knew or upon reasonable reflection or investigation should have known, that their conduct would lead to the death of or injury to innocent persons and resulting severe emotional distress.

103. Defendants Neeman and Kahlon intended, knew, or should have known that the commission of acts designed to violate the rights of men, impoverish them, arrest them, lower their self-esteem and disengage them from their children would create grief, devastation and emotional injuries.
104. Because Defendants' actions involved intentional interference with the parental rights of a parent designed to terminate and/or severely limit that relationship. Defendants knew or reasonably should have known that there actions were likely to inflict severe and continuing emotional distress and damage.
105. The actions of Defendants Neeman and Kahlon were unconscionable and done with an intentional, malicious, willful, and/or reckless disregard for the rights and lives of those tortured and abused, and the extended family members, especially children.
106. As a direct and proximate cause of intentional misconduct and/or reckless disregard for human life of Defendants Neeman and Kahlon. Plaintiff has suffered and will continue to suffer severe, debilitating, permanent emotional, physical and psychiatric disorders, ongoing emotional distress and anxiety, physical and mental distress, and significant mental injury and impairment causing ongoing and long-term expenses for medical treatment, services, and counseling and long-term care, particularly for all minor Plaintiffs.
107. Defendants Neeman and Kahlon, by engaging in this intentional, unlawful conduct, intentionally, grossly negligently, or negligently inflicted emotional distress upon the Plaintiffs.

WHEREFORE, Plaintiff requests judgment in his favor and against Defendants Neeman and Kahlon in an amount in excess of \$8,000,000 plus interest, costs, punitive damages, attorney's fees and such other relief as the Court may determine and an Order to prevent Defendants Neeman and Kahlon from ever again violating rights and intentionally undertakings in violation of the law of nations.

COUNT FOUR
FINANCING, AIDING AND ABETTING ACTS
OF PERSECUTION, UNIVERSALLY CONDEMNED
AS VIOLATIONS OF THE LAW OF NATIONS

108. Plaintiff repeats and realleges all previous allegations with the same force and effect, as if fully set forth herein.

109. Defendant P.E.F. Israel Endowment Fund, inc. (PEF) finances groups like Bar Ilan and Shiluv Institute for Family & Couple Therapy in Israel which gives authority to Defendant Ruth Eisenmann to support, promote, and implement aggravation of the treatment of men such as the Plaintiff. For example, Defendant PEF transferred funds to Bar-Ilan University according to their 2010 financial statement. Bar Ilan University applied a portion of those designated funds to submit a report to the Knesset Committee for Women & Children dated 8 November 2011. This report argued in defiance against recommendations from child welfare experts and in defiance against every international law and treaty, that children under the age of 6 are always better off in the exclusive custody of their mothers and never with their fathers.
110. Defendant PEF's 2010 financial report includes several women's rights organizations and several "family" organizations which advocate against men in divorce, but does not include a single father's rights advocacy nor a single organization that assists single and/or handicapped fathers in distress after their divorces.
111. Defendant PEF encourages Jewish families to emigrate to Israel only to turn against the fathers after they settle in Israel.
112. The prohibition against financing activities which are in contravention of international human rights rest on a clear and definite norm of customary international law that is universally accepted by the civilized world.
113. Consistent with its condemnation of gender-hate financing, the world community has also joined in defining who can be held liable.
114. Liability for financing torture reaches those that directly or indirectly provide or collect funds with the knowledge and purpose that the funds will be used to carry out a defined torture, regardless of whether the funds were actually used. Specifically, the United Nations Conventions reach every accomplice and every person who organizes or directs others in the torture financing effort.
115. Furthermore, legal entities may be held civilly liable for the offenses. This comports with the general international consensus embodied in the various United Nations Conventions.
116. Defendant PEF knowingly, intentionally, and purposefully, directly and indirectly, aided and abetted, intentionally facilitated, and/or recklessly disregarded crimes against humanity in violation of the law of nations.

117. Defendant PEF aided and abetted crimes against humanity by knowingly giving money to Shiluv (according to page 16 of their 2010 financial statement) who employs Defendant Eisenmann to devastate the ability of men to survive divorce in Israel.
118. Defendant PEF knowingly provided over one billion dollars to organizations including Bar Ilan and Shiluv through private and charitable contributions with the purpose of supporting, widespread intentionally discriminatory practices, gender discrimination, direct and indirect child abuse, economic discrimination, institutionalizing gender discrimination and other heinous acts against human, civil and parental rights.
119. At all times, PEF knew that the receipt, transfer, and disbursement of charitable funds were being paid to Defendant Eisenmann and others who perpetrate ferocious libelous attacks against Plaintiff and other male civilians in Israel.
120. Defendant PEF aided and abetted, intentionally facilitated and/or recklessly disregarded the planning, preparation or execution of these crimes against humanity by providing organized and systematic financial support and other practical assistance, encouragement or moral support which had a substantial effect on the perpetration of crimes against humanity, with the knowledge and purpose that such actions would enable Defendant Eisenmann and others in the commission of crimes against humanity.
121. Defendant PEF aided and abetted, intentionally facilitated, and/or recklessly disregarded a violation of customary international law, to wit, terrorist financing, by directly or indirectly knowingly providing funds to Bar Ilan and Shiluv who empowers Defendant Eisenmann to carry out offenses as defined by the Financing Convention and customary international law.
122. Defendant PEF's actions directly and materially contributed to the institutionalized discrimination which Plaintiffs and other similarly situated individuals suffered in divorce and child custody proceedings in Israel.

WHEREFORE, Plaintiff requests judgment in his favor and against Defendant, P.E.F Israel Endowment Fund, inc., in an amount in excess of \$8,000,000 plus interest, costs, punitive damages, attorney's fees and such other relief as the Court may determine and further request an Order preventing Defendant P.E.F Israel Endowment

Fund, inc. from ever again engaging in the financing of terrorism in violation of the law of nations.

WHEREFORE, Plaintiff request to be allowed to commence this action without prepayment of fees and costs, or security therefor, pursuant to 28 U.S.C. § 1915. The attached affidavit of indigency has been completed and is submitted in support of this request for leave to proceed in forma pauperis.

JURY DEMAND

Plaintiff hereby demands a trial by jury of any and all issues herein which can be tried by right of a jury.

Dated this 28th Day of December 2011.

Respectfully submitted by:



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