

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA AT ALLENTOWN

YAAKOV BEN ISSASCHAR,	)	
	)	
Plaintiff,	)	<b>VERIFIED COMPLAINT</b>
v.	)	
	)	
ELI AMERICAN FRIENDS OF THE ISRAEL	)	<b>RACKETEERING, CONSPIRACY</b>
ASSOCIATION FOR CHILD PROTECTION, INC.)	)	<b>TO ENGAGE IN A PATTERN OF</b>
HANITA ZIMRIN, DANI MALE-RON,	)	<b>RACKETEERING ACTIVITY,</b>
YORAM SHAKED, TOVA SIVAN, and	)	<b>AND RELATED CLAIMS;</b>
NATHAN NACHMANI,	)	
Defendants.	)	
	)	

Plaintiff hereby complains of the Defendants, alleges and sets forth as follows:

**INTRODUCTION**

1. This is a civil action for RICO remedies authorized by the federal statutes at 18 U.S.C. 1961 *et seq.*; for declaratory and injunctive relief; for actual, consequential and exemplary damages; and for all other relief which this honorable Court deems just and proper under all circumstances which have occasioned this Initial COMPLAINT. See 18 U.S.C. §§ 1964(a) and (c) (“Civil RICO”).

2. The primary cause of this action is a widespread criminal *enterprise* engaged in a *pattern of racketeering activity* across State lines, and across international lines and a conspiracy to engage in *racketeering activity* involving numerous RICO predicate acts during the past ten (10) calendar years.

3. The predicate acts alleged here cluster around activities in soliciting funds and donations under false pretense in the United States to finance morally shocking, repugnant and horrendous activities of imprisonment of children against their parents’ will, alienation of children from parent, subjecting children to regime of terror and Dickensian discipline in facilities operated by “ELF”, administering drugs to children, physically restraining children and disciplining them,

exploiting the poverty of the children's parents to supply jobs to the staff of ELI in Israel, See 18 U.S.C. §§ 2319, 2320, 1512, 1513, 2315, 1503, 1510, 1511 and 1581-1588 respectively.

4. Other RICO predicate acts, although appearing to be isolated events, were actually part of the overall conspiracy and pattern of racketeering activity alleged herein, e.g. mail fraud and bank fraud. See 18 U.S.C. §§ 1341 and 1344, respectively.

5. The primary objective of the racketeering enterprise has been to inflict severe and sustained economic hardship upon Plaintiff, his daughter and other parents similarly situated whose children may were kidnapped from them by ELI personnel through the assistance of co-defendants, and with the intent of impairing, obstructing, preventing and discouraging Plaintiff from writing, publishing, investigating and conducting judicial activism as a qualified reporter and public activist.

### **JURISDICTION**

6. This honorable Court has original jurisdiction pursuant to the civil RICO remedies at 18 U.S.C. 1964, and the holdings of the U.S. Supreme Court in Tafflin v. Levitt, 493 U.S. 455 (1990), and the U.S. Court of Appeals for the Ninth Circuit in Lou v. Belzberg, 834 F.2d 730, hn. 4 (9<sup>th</sup> Cir. 1987).

7. The main Defendant "Eli" is incorporated in Pennsylvania, and the fundraising that propels the industry of snatching children in Israel from loving parents into prisons for children is centrally orchestrated from Pennsylvania.

### **PARTIES**

8. Plaintiff, born 1968, age 44 is a resident of Israel, whose child whose elder daughter was declared by ELI as "at risk child", because she did not want to live with her mother and wanted to live with Plaintiff. The daughter was "kidnapped" with the help of social workers and Judges and locked up in a facility operated by ELI. Plaintiff has devoted his life to fight corrupt entities that for personal gains inflict terror and torture upon children. Plaintiff, as a whistleblower, has exposed the nefarious activities of Defendants in print, media and in the Parliament, and ever since

Defendants seek revenge by way of filing bogus police complaints, or seeking to separate him from his other children.

9. Plaintiff's address is 97 Hagolan Street, Tel Aviv.

10. Defendant Eli-American Friends of The Israel Associate for Child Protection Inc. ("Eli-USA") is a corporation registered in the State of Pennsylvania with an address at 1009 Delene Rd, Rydal, Pennsylvania 19046-3313, and EIN-Tax ID 522171745. This Defendant fundraises in the United States to finance a child prison in Israel and kidnapping of innocent children from parents into outplacement facilities.

11. Hanita Zimrin is a resident of Israel who is on the Board of ELI-USA and was the chief promulgator of the conspiracies to target children for lock-up and/or treatment at Eli-Israel facilities. Zimrin's address is 14 Ibn Gvirol Street, Tel Aviv.

12. Dani Male-Ron is a resident of Israel who is on the Board of ELI-USA and was the chief promulgator of the conspiracies to target children for lock-up and/or treatment at Eli-Israel facilities. Male-Ron's address is 14 Ibn Gvirol Street, Tel Aviv

13. Yoram Shaked is a resident of Israel who performs judicial activities at the Tel Aviv Family Court, and is a sponsor of Eli-USA and Eli-Israel. Shaked's address is 38 Ben Gurion Street, Ramat Gan. Shaked is currently retaliating against Plaintiff via Plaintiff's younger child from another woman, who vowed to murder the Plaintiff.

14. Tova Sivan is a resident of Israel, who is the supervisor of Defendant Shaked and has been supplying "work" for ELI and similar entities by appointment of friends and relatives outside the Judiciary who support and promote Eli and similar entities. Sivan is associated with an underground network of lawyers and social workers, who give each other jobs at the expense the public and litigants and dividing the profits. This includes jobs to charities such as ELI, jobs to receivers of property who takeover the men's properties and sell them for a large service fee, which

is then transferred to a friend of Sivan, and pay her back her share. She has sadistically destroyed the lives of thousands of men and children.

15. Sivan's address is 29 Zayin Be Heshvan, Ramat Hasharon.

16. Nathan Nachmani is a resident of Israel, who performs judicial activities at the Tel Aviv Family Court, and is a sponsor of Eli-USA and Eli-Israel. Nachmani's address is 38 ben Gurion Street, Ramat Gan.

#### BACKGROUND

17. ELI in Israel is a corporation, which purportedly provides services to children at risk, including operation of a so called "safe house" where children are removed from parental care are placed, as well as a network of therapists and public campaigns. All its services are billed to the Israeli ministry of welfare at 5 times the actual cost.

18. Out of pure greed, and in total disregard of international human rights, ELI has established a network of fundraisers in the United States intended to fraudulently collect money from American donors under false pretenses.

19. Defendant American Friends of ELI is incorporated in Pennsylvania and is the center of the bogus fundraising. The chief principal of Eli-USA, Michael Hersch does not have a fundraiser license in Pennsylvania.

20. Defendant Hanita Zimrin, created ELI in 1979, and today her activities were taken over by Defendant Dani Male Ron, yet she has not relinquished control. Both Zimrin and Male-Ron are, upon information and belief, on the Board of ELI-USA and they actively operate ELI-USA and derive personal benefits from it.

21. Since all of ELI-Israel activities are covered by the Israeli Welfare authorities, the monies collected in the USA go to Zimrin and Male-Ron's salaries and bonuses, and to pay corrupt

judges in Israel who support them, and refer to them business, such as Defendants Shaked and Sivan.

22. While in the United States, "children at risk" are usually children of parents with severe neglect problems (alcoholism, violence or incapacity of the parents), in Israel ELI has stretched the definition to include children living in poverty, and children of divorce in case a child insists on custody with a father. ELI and the co-Defendants believe that no father is fit to be a parent in a divorce situation. Nachmani, Shaked and Sivan have said they prefer to see the fathers dead or commit suicide than giving custody to a father, any father.

23. ELI in the United States create the false impression that there are many at risk children in Israel whose future development depends on the donation. However, in Israel, ELI uses the United States money to launch public campaigns that poor children belong in facilities away from their parents, solely to create more business and bill the Israeli Ministry of Welfare.

24. As a result, instead of assisting the parents by handouts and keeping the children in parental care, those parents are haunted, chased, ridiculed and impoverished by legal proceedings designed to take away the children and place them in ELI's facilities.

25. ELI's facility, which is touted in the United States as safe houses for children are actually full-fledged prisons where the children are disciplined, physically restrained, administered drugs, and forbidden to be in contact with the parents.

26. This massive campaign to "catch" poor children and transfer them to outplacement facilities (first temporary, and then permanent), is cruel, inhuman, degrading to the parents and children and is conduct that is in gross violation of human rights.

27. In order to catch more children and falsely brand them as "at risk" children, Defendants have determined that in situations of divorce, when the woman is unfit, cannot or does not want to raise the children, then fathers would be excluded from receiving custody and the children will be declared "at risk".

28. In other words, Defendants promote the idea that all fathers in divorce are unfit parents, and therefore either the children are placed with the mothers or placed in the custody of ELI.

29. Such cruel and inhuman treatment of men is especially advocated by Defendants Shaked and Sivan, who have declared a war on fatherhood in Israel, and expressed many times that so long as they are alive, they will destroy physically, mentally and financially any man who seeks custody of his children.

30. In or about 2005, a custody dispute erupted between Plaintiff and the mother of their daughter, Eti Ben Issaschar, born 1994. The mother relinquished custody, because the daughter was adamant to live with the Plaintiff.

31. Instead of the child being placed with the father, the Plaintiff, Defendants ELI, Zimrin and Male-Ron started a campaign to tarnish and destroy the Plaintiff and the child by working with social workers to declare the child "at risk" and incarcerate her.

32. Indeed, using false and bogus declarations of "at risk" Defendants obtained an order placing Eti Ben Issaschar in an emergency shelter operated by ELI in Tel Aviv.

33. Eti Ben Issaschar was locked up for 8 months with no access to the Plaintiff, in conditions that are physically and mentally torturous.

34. Defendant Zimrin filed numerous police complaints against the Plaintiff in order to coerce him to give up the battle to bring his daughter home.

35. In addition, Zimrin and Male Ron arranged for a petition to declare Plaintiff mentally unfit, and lock him up in a psychiatric facility for mental observation.

36. The Plaintiffs dispatched a police squad in the middle of the night to pick up Eti Ben Isaschar from the Plaintiffs' home and transfer her to Eli's care.

37. In the end, Eti suffered 8 months incarcerated at ELI facility, refused to release herself to her mother's custody and was returned to the Plaintiff's custody.

38. Since then Plaintiff started a charity designed to release children who are needlessly placed in such entities posing to “save children”, and he has received thousands of complaints.

39. In retaliation all Defendants harass and pester the Plaintiff by filing constant police complaints against him allegedly on charges of “insulting an officer”.

40. To perpetuate the activities of ELI, defendant Zimrin, Male-Ron, Shaked, Sivan and Nachmani have supplied Eli-USA with assistance to be able to appeal to American donors under false pretenses, in return for kickbacks from the funds collected.

**COUNT ONE:**

Acquisition and Maintenance of an Interest in and Control of  
an Enterprise Engaged in a Pattern of Racketeering Activity:  
18 U.S.C. §§ 1961(5), 1962(b)

41. Plaintiff now re-alleges each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

42. At various times and places partially enumerated in Plaintiff’s documentary material, all Defendants did acquire and/or maintain, directly or indirectly, an interest in or control of a RICO enterprise of individuals who were associated in fact and who did engage in, and whose activities did affect, interstate and foreign commerce, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(b).

43. During the ten (10) calendar years preceding today all Defendants did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. 1962(b) (Prohibited activities).

44. The Defendants created a network of website to collect funds. The web sites repeat the following text, all of them containing complete and utter falsehoods:

Standing the test of time, ELI has helped tens of thousands of children who were victims of abuse to heal. ELI’s team of 90 clinicians works tirelessly to ensure that whenever and wherever in Israel a new case of abuse is discovered, ELI responds. Last year ELI offered therapy to nearly 4,000 children and their families. Together,



ELI's team of social workers and psychologists delivered nearly 1,000 hours of therapy per week. ELI's toll free hotline fielded calls from nearly 7,000 children, and concerned friends and family members. More than 90,000 of Israel's school children participated in one or more of ELI's Outreach and Abuse Prevention programs, and thousands more teachers, parents, principals and school counselors. After 30 years on the front line in the battle against child abuse in Israel, **ELI was granted the authority by Israel's National Ministry of Social Welfare to handle every case of sexual abuse in Central Israel, an area comprised of over 1,000,000 people !**

ELI demonstrates awareness and commitment by translating its services with cultural sensitivity so we can help all of Israel's children, from native Israelis to immigrants from The Former Soviet Union, Ethiopia and the Far East, from Ultra Orthodox children to those that live on Kibbutzim, regardless of their religion, ethnicity, or social strata. ELI's aim is to broaden awareness among all Israeli's as to what constitutes abuse, and how it can be stopped. And ELI can only do this with you help. Please make a tax deductible contribution to American Friends of ELI today.

45. On or about June 12, 2012, Defendants created the web site: [www.eli-usa.org](http://www.eli-usa.org). The website is registered to Emmanuel Werthenschlag, 300 E85th Street, Apt 501, New York, NY 10028

46. The web site calls for people to send money to Michael Hersch at American Friends of ELI 1009 Delene Road Rydal PA - 19046.

47. A search of Pennsylvania's DOS Charities Online Database revealed that Hersch does not maintain a license pursuant to The Solicitation of Funds for Charitable Purposes Act, 10 P. S. § 162.1 et seq., which requires fundraising counsels to register with the Bureau of Charitable Organizations prior to providing services related to solicitations in Pennsylvania.

48. Defendants also created a sub-page under [www.just-tzedakah.org](http://www.just-tzedakah.org), a corporation in Maryland, Tzedaka, Inc., PO Box 34841, Bethesda MD, 20827. The fundraisers listed there are Jeffrey Hamberger, Ira Kaminow, Daniel Rothner, Alan Weitzner, Kalman Yelowitz. They admit to deducting a 3.5% service fee from donors.

49. Some of the donors to ELI are: Amcha for Tzedakah, Auerbach Family Foundation, Azrael Food Dynasty, Inc., June Baumgardner, Gelbart Foundation, Gerry & Burt Belzer Fund,



Jack Chester Foundation, Congregation B'nai Brith, Durham-Chapel Hill Jewish Federation, Fox Family Foundation, William Greenfield & Joan Rockower, Greenfield Foundation, Phoebe & Herman Kappel Foundation, Esther Sherman Mc Donald Fund, Harvey M. & Lyn P. Meyerhoff Fund, Irvin Saltzman Family Foundation, Jewish Federation of Somerset, Hunterdon & Warren Counties, Ben N.Teitel Charitable Trust, Temple Shir Ami Religious School, NancyWagman Foundation, Jewish Federation of Greater Washington, The Harry & Jeanette Weinberg Foundation, M.B & Edna Zale Foundation, Anne & Lionel Bercovitch, David Cohen/Janine Marlowe Scott Davis Albert Dreyfuss, Murray Foss, Jenifer Friedman, Bruce Goldberger, Del Rene Goldsmith, Alice & Jacob Klein, Kenneth & Maralyn LakinPaul & Kathleen Rosenberg, Stephanie Seltzer, Arthur & Barbara Sheer, Ilse Stamm, Arnold Stanley, Roselyne Swig.

50. On or about October 19-21 Zimrin toured the United States and appeared at dinners and brunches at the home of Kent Newton and Bill Slatoin in California under auspices of Bnai Brith and the Jewish Community Foundation of the West, where she made the same appeals to Americans to donate money to her organization so that she can allegedly improve the lives of thousands of children.

51. Around the same time Zimrin appeared in New York at "A Networking Event Made in Heaven" in an event sponsored by Jennifer and Alan Zweibel.

52. Defendants intentionally deceived the above listed donors into giving her money so that she and co-defendants can increase their salaries, distribute it in clandestine channels, and torment and molest more and more children under the false guise that the children are victims of "neglect and abuse" that never happened.

53. According to Defendant ELI's own reports, \$800,000 a year was donated from the United States. This amounts to \$8,000,000 in 10 years.

54. Upon information and belief.. This money was spent in israel to kidnap children from parents, to incarcerate children in facilities and to launch a war against the whistleblowers and activists who started protests against this organization.

55. In order to disguise the nefarious Defendants disseminate the following false and misleading information to the public in the United States:

- a. The web site which Michael Hersch prepared for Defendants presents to the public claims that the money donated in the US goes to a "safe House" for children. This is utterly false. ELI charges the Israeli Government the full cost of operating the safe house, and in fact inflates the bill five times. Whereas it costs ELI 3,000 NIS, \$750 per month to accommodate a child, it charges the Government 17,000 NIS per child per month (\$4,250). Clearly the safe house not only funds itself in Israel, it yields a 500% profit. The American donors are clearly misled.
- b. Defendants do not tell Americans that the safe house accommodates only 15 children, and no more. It gives the false impression that it is a huge operation, by making vague assertions such as "Eli caters to an area where 1,000,000 people reside". Still Eli's house is only allowed to accommodate 15 people.
- c. The pictures which Defendants show to American donors are false and misleading. In the web site there is a picture of a bright white neat building with flowers. In reality, that is not the safe house. The safe house is a dilapidated, horrendous conditions, infested with rodents, bunk beds, and prison type security. The web site says that the children get contact with parents three times a week. In fact, it is a secluded closely guarded children prison, with no parent access. Even members of Knesset were denied access.
- d. Hersch and the Defendants herein publish pictures of children with full face to gain sympathy. It is illegal in Israel to take outplaced children's photos.

- e. Hersch and the Defendants herein touts a picture of a bus as a “mobile clinic”. In fact, no such bus exists and it is a dangerous activity to randomly interview children without the parents’ agreement, with the sole purpose of removing them, from parental care to the safe house or additional coercive treatment.

56. ELI, Zimrin and Male Ron also operate a therapy clinic for sexually molested children. They use the money collected in the United States to encourage women in divorce to fabricate false charges of sexual molestation by the father of the children to yield two goals: Defendants are enriched and supplied with jobs, while the women in divorce are able to get automatic custody, and take over all of the husbands’ money.

57. The problem with that is that ELI, Zimrin and Male Ron are instilling in young children false memories of false sexual episodes which will torment these children forever.

58. The co-Defendants, and especially Tova Sivan give ELI and its cohorts full support by failing to investigate, supervise or cross examine, and encouraging women to fabricate sexual molestation charges.

59. In addition to the acts of fraud deceit, unlicensed solicitations and which Defendants perpetrated against the unsuspecting American public, Defendants committed predicate acts against the Plaintiff and his daughter:

- a. Defendants fabricated documents to falsely brand Plaintiff’s daughter as at risk child.
- b. Defendants used the police to forcefully enter Plaintiff’s home and remove the child to a temporary “safe house (which by law cannot exceed 3 years), where the child was abused for 8 months, while ELI was charging the Israeli ministry of Welfare 5 times their cost, and appealing to Americans to finance these kinds of activities.
- c. Defendants made at least 4 false police complaints against the Plaintiff in order to silence him and deter him from exposing the corruption and from assisting other parents, whose only “crime” is being poor.

- d. Defendants falsified documents to arrange for the psychiatric lock up of Plaintiff.
- e. Defendants extorted a young child emotionally that if she wants to be released from their prison (the so called "safe house"), she can agree to live with her mentally unstable mother.
- f. Defendants have do these kinds of acts at least 100 times a year, and in addition, they coerce young children to undergo unnecessary therapy for sexual molestation that never happened at the rate of 2,000-4,000 cases a year.

60. Defendants conspired to file false complaints to arrange false detentions of the Plaintiff on numerous occasions.

61. The persecution of Defendants of the Plaintiff led to another conspiracy to silence the Plaintiff by way of launching civil libel case against him in September 10, 2008.

62. On numerous occasions in 2012-2013, because plaintiff became a whistleblower and a civil rights activist against corruption in the Judiciary, when another child, Ruby Ben Issaschar, was born to Plaintiff from another woman, and the matter came before Shaked, under supervision of the corrupt Tova Sivan, Shaked started tormenting Plaintiff and denying him the right to fatherhood.

63. Plaintiff further alleges that all Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective racketeering activities, also in violation of the RICO law at 18 U.S.C. 1962(b) supra.

64. Pursuant to the original Statutes at Large, the RICO laws itemized above are to be liberally construed by this honorable Court. Said construction rule was never codified in Title 18 of the United States Code, however. See 84 Stat. 947, Sec. 904, Oct. 15, 1970.

**COUNT TWO:**  
Conduct and Participation in a RICO *Enterprise*

through a Pattern of Racketeering Activity:  
18 U.S.C. §§ 1961(5), 1962(c)

65. Plaintiff now re-alleges each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein. Substance prevails over form.

66. At various times and places partially enumerated in Plaintiff's documentary material, all Defendants did associate with a RICO enterprise of individuals who were associated in fact and who engaged in, and whose activities did affect, interstate and foreign commerce.

67. Likewise, all Defendants did conduct and/or participate, either directly or indirectly, in the conduct of the affairs of said RICO enterprise through a pattern of racketeering activity, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(c).

68. During the past ten (10) calendar years, all Defendants did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. 1962(c) (Prohibited activities).

69. Plaintiff further alleges that all Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective racketeering activities, also in violation of the RICO law at 18 U.S.C. 1962(c) supra.

70. The RICO enterprise complained of begins in the United States by way of false or unlicensed fundraising, the fruits of which then sent to Israel to start campaigns that inflate the severity of the problem, so as to put pressure on the ministry of Welfare to give ELI monopoly in certain territory so that when the public calls the hotline to complain of any minor behavioral problem with a child, ELI then is recommended to Sivan, Shaked and Nachmani, who rubber stamp Welfare documents. Then police is used to kidnap the children, without due process, and place them in prisons for what is supposed to be three years but can last much longer. The money

from the US is then spent for salaries, trips overseas and payments to confidants who work closely with Sivan, Shaked and Nachmani.

**COUNT THREE:**  
Conspiracy to Engage in a  
Pattern of Racketeering Activity:  
18 U.S.C. §§ 1961(5), 1962(d)

71. Plaintiff now re-alleges each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein. Substance prevails over form.

72. At various times and places partially enumerated in Plaintiff's documentary material, all Defendants did conspire to acquire and maintain an interest in a RICO enterprise engaged in a pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(b) and (d).

73. At various times and places partially enumerated in Plaintiff's documentary material, all Defendants did also conspire to conduct and participate in said RICO enterprise through a pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(c) and (d).

74. See also 18 U.S.C. §§ 1961(4), (5) and (9).

75. During the ten (10) calendar years preceding March 1, 2003 A.D., all Defendants did cooperate jointly and severally in the commission of two (2) or more of the predicate acts that are itemized at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. 1962(d).

76. Plaintiff further alleges that all Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective racketeering activities, also in violation of 18 U.S.C. 1962(d) (Prohibited activities supra).

77. Pursuant to 84 Stat. 947, Sec. 904, Oct. 15, 1970, the RICO laws itemized above are to be liberally construed by this honorable Court.

**RELIEF REQUESTED**

78. *Wherefore*, pursuant to the statutes at 18 U.S.C. 1964(a) and (c), Plaintiff requests judgment against all named Defendants as follows: (1) Declaration that ELI-USA and ELI Israel are together a RIVO organization. (2) Declaration that Defendants Shaked, Sivan and Nachmani are aiders and abettors of a RICO organization. (3) Accounting of all ill gotten monies in the past 10 years and its disgorgement to the donors. (4) Compensation from ELI, Zimrin and Male-Ron, jointly and severally to each child was subjected to the torture by Eli in the past 10 years in the amount of at least \$50,000 each, for a total of \$10,000,000. (5) Compensation from co-Defendants Shaked, Sivan and Nachmani in the amount of \$50,000 per each child that they have delivered to the hands of ELI, either for sheltering or therapy. (6) Punitive damages from all Defendants in the amount of \$1,000,000 to set up a victim rehabilitation fund, and (7) An injunction enjoining the fundraising of ELI in the United States.

**JURY DEMAND**

Plaintiff hereby demands trial by jury on all issues triable to a jury lawfully convened.

Dated: April 20, 2013.

Signed: /s/  
Yaakov Ben Issaschar  
Plaintiff Pro Se  
97 Hagolan Street, Tel Aviv  
Yeladeinuorg@gmail.com