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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

<p>YEHONATAN KAPACH,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">against</p> <p>INTEL CORPORATION, DIKLA KLEIN YONA, YEHORAM SHAKED, ESTHER HAUT, DAPHNA BARAK EREZ, ANAT BARON, YAEL VILNER, EDNA ARBEL, DAVID MINTZ and GEORGE KARA.</p> <p style="text-align: center;">Defendants,</p>	<p>CASE NUMBER:</p> <p style="text-align: center;">COMPLAINT</p>
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9 Plaintiff, pro se, for his complaint, alleges and sets forth as follows:

10 1. This is a complaint by an employee of Defendant Intel Corporation ("Intel") and several
11 public officials in the State of Israel, who have reduced the Plaintiff into a slave, extracting labor
12 from him for a period of 4 months without compensation.

13
14 2. Plaintiff's entire salary was transferred by Defendant Intel to the State of Israel by an order
15 of Defendant Dikla Klein Yona to satisfy a phantom debt for fictitious and stale child support that
16 was wholly paid years ago, leaving with no money Plaintiff and his new wife and two new children
17 as well as the daughter from the first marriage who moved to his custody in January 2013.

18
19 3. The enslavement of Plaintiff became possible against a background of a
20 poisonous radical feminist ideology that prevails in the State of Israel, and is promoted and
21 enforced by the co-Defendants named in the caption, who are judges in Israel that make it
22 impossible for a man to even win a family case in that country, and it has led to countless events of
23 suicide (about 320 per years), impoverishment, denial of basic human rights, denial of due process
24 and fair trial, and in this case rendering men into slaves by robbing them of their ability to survive,
25 and/or a minimum modicum of living.

26
27 4. This branch of radical feminism has no counterparts in any other country in the
28 world. The co-defendants who behave and practice traits similar to a Satanic cult, preach men
29 hating, denigrating men to a form of a sub-human creature, an animal whose life can be spared,

1 who has no emotions, and his only purpose in life is to manufacture money for women. They
2 strongly believe in the illusion that all Jewish men are the most violent men in the world, and that
3 the men of Israel belongs to a secret patriarchy that mandates it members to use and abuse women
4 for sexual pleasures, and to stop women from promoting their independence and careers.

5
6 5. In light of this cult ideology, the co-defendants falsely interpret laws, invent and fabricate
7 facts that never happened, write nasty and humiliating orders and judgments against men that have
8 no resemble to reality or truth, and they all in tandem committed to their only purpose in life which
9 is to steal and rob money from the hands of Jewish men and transferring the money to the hands of
10 Jewish women, purportedly to compensate for the "crimes of the patriarchy".

11
12 6. The causes of action in this case are based on the Torture Victim Protection Act of 1991
13 (TVPA"), the Alien Tort Statute, 28 U.S.C. § 1350), ("ATS"), the International Convention to
14 Suppress the Slave Trade and Slavery of 1926 (the " Slavery Convention" signed by the US in
15 1956, the Supplementary Convention on the Abolition of Slavery of 1956, the ILO Co 29 Forced
16 Labor Convention, 1930 and ILO C105 Abolition of Forced Labor Convention, 1957.

17 18 **PARTIES**

19 7. Plaintiff is 51 years old, and he is a citizen and resident of the State of Israel. He recently
20 managed to lift a no exit order imposed on his for the past 20 years by paying off (the ransom) an
21 entirely fictitious and bogus child support "debt" dating back to 2013 and came to live with his sister
22 in Los Angeles.

23
24 8. Plaintiff is a father of 3 children, two from a second relationship and one from a previous
25 marriage, who is child for whom the child support was sought. That child actually lived in his
26 custody since January 1, 2013.

27
28 9. Plaintiff is also a human rights activist. When Plaintiff realizes that the Israeli courts are no
29 courts of justice and instead are a circus where men are thrown into a gladiators' arena, with no
30 chance of coming out to be eaten alive by the radical feminist, Plaintiff joined with others and
31 formed Fathers for Justice, a non-profit registered in Israel and recognized by the UN as a civil
32 society. Because of his status as an "activist" for men's rights, Plaintiff is blacklisted and
33 persecuted by the Judiciary of Israel.

1 10. Plaintiff worked for Defendant Intel for a period of 3 years.

2
3 11. Defendant Intel Corporation American multinational corporation and technology
4 company headquartered in Santa Clara, California, with offices in Los Angeles as well. It is the
5 world's largest and highest valued semiconductor chip manufacturer based on revenue, and is the
6 inventor of the x86 series of microprocessors, the processors found in most personal computers
7 (PCs). Intel ranked No. 46 in the 2018 Fortune 500 list of the largest United States corporations by
8 total revenue. Upon information and belief, Intel is incorporated in Delaware.

9
10 12. Defendant Dikla Klein Yona is a citizen and resident of the State of Israel. She works as a
11 magistrate handling collections of child support by women from men at the Israel Enforcement and
12 Collections Authority in the city of Tel Aviv. All of her "clients" are women, because in the State
13 of Israel women are exempt from paying child support, and their incomes are exempt from
14 contributing to the child's maintenance. Despite all human rights conventions which Israel signed,
15 there is no equality between men and women since only the man is responsible to pay regardless of
16 his income, and regardless of whether he has an income or ability to work at all.

17
18 13. Defendant Dikla Klein Yona is the person who refused to give Plaintiff a chance to have
19 his day in court and prove that the child support "debt" is fictitious. She ordered that Plaintiff's full
20 and entire salary be garnished until a bogus debt in the amount of \$ 34,000 (124,000 NIS) is
21 extracted, that all his credit cards be suspended and unusable, that all his bank accounts be lined
22 and the funds therein transferred to the former wife, that a no exit order shall continue, that all his
23 pension and retirement funds be liquidated, and that within a certain amount of months of non-
24 payment, Plaintiff shall be arrested and incarcerated (usually for 21 days every 3 months).

25
26 14. Defendant Yehoram Shaked is a citizen and resident of the State of Israel. He is a
27 controversial family court judge in the City of Tel Aviv. He was the subject of quite a few
28 investigatory news exposés involving corruption. He refused to hear Plaintiff's appeal and
29 dismissed it.

30
31 15. Defendants Esther Hayut, Daphna Barak Erez, Anat Baron, Yael Vilner, Edna Arbel,
32 David Mintz and George Kara are citizens and resident of the State of Israel.

1 16. Defendants Esther Hayut, Daphna Barak Erez, Anat Baron, Yael Vilner, Edna Arbel,
2 David Mintz and George Kara have an address at Bet Mishpat Elyon, 1 Kiryat Hamemshala,
3 Jerusalem, Israel.

4
5 17. Defendants Esther Hayut, Daphna Barak Erez, Anat Baron, Yael Vilner, David Mintz and
6 George Kara are Israel Supreme Court judges, and Edna Arbel is a former Supreme Court
7 judge. They belong to a cult of radical feminists who promote hatred and contempt towards men,
8 female supremacy and the enslavement of men to serve the needs and whims of women. These
9 defendants systematically deny each and every application, motion or complaint by a man seeking
10 fair justice, fair justice or even to be treated equally without discrimination and they direct all other
11 judges and others in judicial or administrative capacity to copy them. They systematically deny
12 Due Process and human rights of men (both domestic and international), and they issue decisions
13 always prefer the women's position or version no matter what.

14
15 18. Defendants Esther Hayut, Daphna Barak Erez, Anat Baron, Yael Vilner, Edna Arbel,
16 David Mintz and George Kara integrate the Nazi-style influenced theories of Andrea
17 Dworkin, Catharine MacKinnon, Valerie Solanas, and Alice Walker as if their writings are the
18 Constitution of Israel.

19
20 19. Defendants Esther Hayut, Daphna Barak Erez, Anat Baron, Yael Vilner, Edna Arbel,
21 David Mintz and George Kara systematically disregard and ignore human rights of men and their
22 children's rights by international law by knowingly and repeatedly allowing the other Israeli co-
23 defendants to rob men of their assets, properties, salaries, persons and so on, and transfer the wealth
24 to the hands of women.

25
26 **JURISDICTION**

27 20. This Court has subject matter jurisdiction over this action under Torture Victim Protection
28 Act of 1991, also ATS - The Alien Tort Statute (28 U.S.C. § 1350; ATS), also called the Alien Tort
29 Claims Act, the U.S. Foreign Corrupt Practices Act (FCPA), Sections 13(b)(2)(A) and 13(b)(2)(B)
30 of the Securities Act (15 U.S.C. § 77q(a)), the Slavery Convention and the Convention against
31 Forced Labor.

32
33 **VENUE**

1 21. Venue is proper in the Central District of California. Venue is proper in this Court
2 pursuant to 28 USC § 1391 and 18 USC § 2334. A substantial part of the activities and decision
3 making underlying the slavery originated in this District from Intel's office at 26630 Agoura Road,
4 Calabassas 91302. Defendant Intel is located in this District, and moreover products produced in
5 the location where Plaintiff worked are sold widely in this District in violation of California
6 Consumer Protection Laws, Cal. Civil Code §1950, et seq, the Consumer Legal Remedies ACT
7 (CLRA), CA Business and Professions Code §17200 et seq, and the Unfair Competition Law
8 (UCL).

9
10 **FACTS**

11
12 22. As stated, Plaintiff is a citizen and resident of the State of Israel, currently living in Los
13 Angeles after he managed to leave Israel following a period of 20 years of no exit order being
14 forbidden from leaving the country.

15
16 23. Plaintiff is now 51 years old (born July 14, 1969). He was married and had a daughter but
17 in May 2002 his former wife opened a child support case in the Family Court in the city of Tel
18 Aviv in Israel against him. Shortly after that in December 24, 2002 he divorced that wife.

19
20 24. Plaintiff paid all child support timely as ordered in the amount of 1,180 NIS
21 (approximately \$320 USD). Despite paying timely and regularly the former wife opened a child
22 support collection case at the Israeli Enforcement and Collection Authority, Child Support Unit in
23 November 2004.

24
25 25. The former wife maliciously and falsely launched her child support collection in the
26 amount of 1,800 NIS (approximately \$500) instead of 1,080 NIS. She had let this case accumulate
27 debts and interest despite being paid fully on time, and without the knowledge of Plaintiff.

28
29 26. In order around January 1, 2013, when the daughter was 14 years old, the former wife
30 decided to abandon her and travel overseas. As a result, the daughter was placed in the custody of
31 Plaintiff, and the mother was automatically exempt from paying child support, despite her
32 becoming non-custodian, simply because she is a woman.

1 27. Needless to say that in the rad-fem State of Israel, the former wife who became non-
2 custodian was exempt from paying child support to the Plaintiff, solely because she is a woman and
3 as such enjoys the privileges of a preferred citizen of the State, and the State's express public
4 policies of discriminating against men in every way possible.

5
6 28. When the daughter reached the age of 21, in or around September 2018, Plaintiff filed an
7 application with the Israeli Debt Collection to discharge the false debt accrued based on the initial
8 false manipulation of the numbers and figures by the former wife. That application reached the
9 desk of the Collection Magistrate Defendant Dikla Klein Yona.

10
11 29. The former wife conceded that she falsely inflated the opening sum of her collection case
12 and accumulated 73,100 NIS (\$19,750) in child support that was never owed. She conceded that
13 she was paid child support, and that she did receive it regularly until she gave up the child, however
14 the recalculation of the false charges did not eliminate the usurious interest rates that Israel applies
15 to its male population when collecting child support, as well as the Cost of Living escalations, and
16 as a result a sum of approximately 124,000 NIS (approximately \$34,000) was not discharged.

17
18 30. Plaintiff made several petitions to Defendant Klein Yona protesting this false debts with
19 proof that he paid all changes directly to the former wife and there are no open debts, however
20 Defendant Klein Yona refused to accept the proof, the receipts and an accountant certifications, and
21 also refused to schedule a hearing.

22
23 31. In October 2-3, 2019 Plaintiff was invited by the UN Committee on Social, Economic and
24 cultural rights to participate in hearings to assess Israel's compliance with the UN human rights
25 convention.

26
27 32. Plaintiff made a special application to lift the no exit order so that he can give testimony
28 in the UN in Geneva. The Collection Magistrate allowed Plaintiff to travel provided he files bonds
29 and assurances. Plaintiff filed the bonds it in a city not covered by the jurisdiction of Dikla Klein
30 Yona.

31
32 33. When Defendant Klein Yona learned that Plaintiff is about to travel to the UN, in
33 retaliation on September 25, 2019, Defendant Klein Yona issued an final judgment dismissing all
34 his open claims against the false calculations and false interest charges, and resumed all
35 enforcement proceedings against the Plaintiff, and she has ordered the Enforcement and Collection

1 Authority to impose on Plaintiff every possible limitation on his life, liberty and properties
2 including no exit order, liens on all his bank accounts and credit cards, and a 100% garnishment on
3 his salary. Defendant Dikla Klein Yona also ordered *ex parte* and sua sponte the forfeiture of the
4 cash bond deposited to secure the travel to the UN, valued at a few thousand dollars.

5
6 34. That means that every penny he earns in wages must be transferred by the employer to the
7 Enforcement and Collection Authority as of October 3, 2019.

8
9 35. On or about October 28, 2019 Plaintiff filed an appeal on the decision of Defendant Klein
10 Yona, and that appeal was handled by Judge Yehoram Shaked of the family Court in Tel Aviv.

11
12 36. Defendant Shaked issued an order on November 7, 2019 demanding that Plaintiff pay into
13 the Court a bond in the sum of 5,000 NIS (\$1,350), despite the fact that all of Plaintiffs accounts
14 were placed under liens, his credit cards suspended and his employer was ordered to transfer
15 Plaintiff's salary in its entirety to the Enforcement and Collection Authority.

16
17 37. Plaintiff was left without one penny to live on, despite the fact that he now has a new
18 common-law wife with whom he made 2 children and had a new wife to feed and support them, as
19 well as the daughter for whom the old child support debt was supposed to be "collected".

20
21 38. On or about November 13, 2019 Plaintiff filed an application to exempt him from paying
22 a bond, because he had no sources of money to pay it, and/or. At minimum to release for him a
23 minimum sum for basic subsistence. In response Defendant Shaked denied the application and
24 even sanctioned Plaintiff in the sum of 1,500 NIS for having "troubled" the Judge with such
25 application, and another sum of 1,500 NIS for using "inappropriate" language.

26
27 39. Eventually, on January 8, 2020 Defendant Shaked dismissed the appeal on the decision of
28 Defendant Klein Yona for non-payment of the bond.

29
30 40. As soon as Plaintiff returned from Geneva and found out about all the collection
31 restrictions imposed upon him, he contacted Mr. Mark Bitton, his direct manager and other
32 officials and principals at his employer Defendant Intel, and implored them to refuse to transfer his
33 entire salary to the Enforcement and Collection Authority, because that would mean that he works
34 "for free" as a slave, and that if he is not allowed a minimum amount for basic subsistence, then he
35 becomes a victim of coerced labor.

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41. In or around October 2019 the officials at Defendant Intel told him that they would examine the legal situation and consult with Intel's headquarters in the United States and promised him assistance to the full extent possible.

42. On December 2, 2019 Plaintiff had a meeting with Defendant Intel's Human Resources officer and warned her that if Intel would not file a protest with the Enforcement and Collections Authority, they it will be deemed violating the Conventions against slavery and forced labor.

43. A few weeks later Plaintiff had another meeting with another Intel representative Mr. Matan Kurner, and Plaintiff repeated the same warning. At that time Mr. Kurner told Plaintiff that Intel USA directed them to obey the wage garnishment order and forward all the salary in its entirety to the State of Israel.

44. Given this news, in order not to work for nothing, Plaintiff asked to be released on vacation without pay until the end of the legal proceedings, but Mr. Kurner said it is not possible.

45. While Plaintiff was waiting for a word from Intel headquarters, Intel took Plaintiff's salary in its entirety and sent it to the Enforcement and Collections Authority for the months of September through December 2019, allegedly in compliance with a wage garnishment order.

46. By doing so, Intel rendered Plaintiff into a slave, a person who works full time and receives no remuneration in return for a period of 4 months. Defendant left Plaintiff and his new family with nothing to eat.

47. It should be noted that Intel could have protected Plaintiff by making its own application to the Enforcement and Collections Authority and stating that they refuse to turn its own loyal employee into a slave.

48. Finally, when Plaintiff learned that he will never get any justice from the Israeli Courts and in particular from Judge Shaked, and that even if he appeals, he will again be required to file a bond, which he doesn't have, and that his family is suffering on the verge of starvation, Plaintiff's parents took a loan and paid off the debt at the Enforcement and Collections Authority.

49. After that, Plaintiff purchased a ticket and came to stay with his sister in Los Angeles.

GENERAL BACKGROUND

1
2 50. In the past 20 years, the State of Israel has been overtaken by a fanatical cult of radical
3 feminists. Defendant Edna Arbel before she joined the Supreme Court in 2004 was Chief State
4 Prosecutor. She drafted guidelines which exempt women from prosecution for filing false
5 complaints. Instructions were given to the police that in any case of altercation between a man and
6 a woman, the man must be arrested, and removed from his home for a minimum of 15 days.
7

8 51. When Defendant Arbel joined the Supreme Court, she has infected the entire court with
9 her hate mongering rhetoric, that women are victims of the patriarchy, that women never lie and
10 that women are fragile and sensitive creatures that can never lay hands on a man. She spiced her
11 rhetoric with citations from McKinnon and other members of the rad-fem gang.
12

13 52. Needless to say, that Defendant Arbel herself filed a false claim against her son in law
14 Eyal Baumgart (himself a judge) who was divorcing her daughter claiming that he is a pedophile
15 fondling his own children sexually.
16

17 53. Defendant Arbel later retired in 2014 and immediately she was appointed in a secret
18 procedure, as head of a secret "Committee of Two", a screening committee that filters out all
19 candidate for the Judiciary. She was given immense powers to promote only radical feminists to
20 positions of judgeship, and any other person whose sample writings do not contain explicit hate
21 words towards men was thrown out.
22

23 54. Meanwhile another radical feminist Daphna Barak Erez who was Dean of the Law School
24 in Tel Aviv was promoting this ideology by writing articles and books, all contaminated with
25 preaching of female supremacy. Based on these writings she recommended for a position as a
26 Supreme Court Judge in 2012, and indeed she became very influential judge.
27

28 55. Slowly but surely the State of Israel became one big concentration camp for men. The
29 child support laws were interpreted as if men are the only parent responsible for child support, and
30 women are exempt from contributing one penny.
31

32 56. Child support rates in Israel became the highest in the world, 2 or three times higher than
33 US and Australia, and much more than that compared with Continental Europe. The usurious child
34 support "awards" in Israel became an instrument to take money from men and transfer it to

1 women. For example, after Israel who is at the top list of OECD countries surveyed stands
2 Switzerland. There the rates are slightly lower than Israel, but a Swiss employee makes about 4
3 times more in salary than an average Israeli man.

4
5 57. The laws of custody were already in favor of women. Article 25 of the Capacity and
6 Guardianship Law states that women get automatic custody (the Tender years presumption). This
7 was also interpreted to give women veto powers on the amount of child access they wish to grant
8 their former husbands.

9
10 58. In many occasions, Daphna Barak Erez and Defendant Yael Vilner said that this complies
11 with international law, and with women's claims for "equality between the sexes", however absurd
12 this claim is.

13
14 59. In the area of divorce law, the rad fems began enforcing strictly the Ketuba. That is a
15 religious deed given by the bridegroom to the bride at the time of marriage and it contains a
16 symbolic figure, which the husband promises to pay the woman if he no longer desires to accept the
17 sexual favors of the wife. Although this is purely a symbolic instrument of marriage, and if taken
18 literally is reduces a woman into an objectified servant of the husband, whose sexual services are
19 sold for the duration of the marriage, Defendants Arbel, Barak Erez, Baron and Vilner had no
20 problem holding that the Ketuba can be used as a civil contract, just because it can yield women
21 tens of thousands of dollars and even hundreds of thousands of dollars.

22
23 60. In the area of domestic violence, these defendants, as members of the cult, have
24 eliminated all rules of evidence in criminal cases so it can be as easy to convict a husband for
25 violence, spousal rape or sexually indecent conduct with children, as easy as making an
26 omelet. They have encouraged every woman who wishes to divorce to start her journey at the
27 police and concoct every imaginable false claim they can think of.

28
29 61. As a result, hundreds of men in divorce or divorce proceedings commit suicide, tens of
30 thousands of men find their salaries being garnished to satisfy child support awards that can even
31 exceed the alary, many of them lose their jobs and find themselves embroiled in horrendous
32 violence and rape, they gave to spends thousands of dollars on lawyers, on examinations to prove
33 parental fitness, and on court fees and appeals bond.

1 68. As a proximate result of defendant Intel's act or omissions Plaintiff suffered the damages
2 described including severe humiliation, mental anguish, and emotional and physical distress, and
3 has been injured in mind and body.

4
5 69. The emotional distress suffered by Plaintiff was serious or severe.

6
7 70. Plaintiff is therefore entitled to recover from the Defendant Intel the sum of \$2 Million
8 dollars.

9
10 **SECOND CAUSE OF ACTION**

11 71. Plaintiffs repeat and reallege all facts and circumstances described above as if fully set
12 forth as truth herein.

13
14 72. Just like the Plaintiff, there are many Israeli men who are in divorce or divorce
15 proceedings who are in similar situation, and their salaries are being "eaten" by Intel who transfers
16 them to the hands of the Enforcement and Collections Authority of Israel, either in full (thus
17 leaving the employee nothing to live on, or no choice but to quit his job), or these transfers are
18 products of discriminatory awards of child support that are undue, and would not have been
19 awarded if there was equality between men and women.

20
21 73. Defendant Intel is in a position of power towards the State of Israel, as the State is
22 courting Intel to invest and provide jobs. Each year, the State of Israel gives Intel about 1 Billion
23 NIS (about 270 Million USD) in cash just to keep Intel factories open in Israel. In fact, on
24 December 4, 2019 Israel's parliament confirmed an addition incentive grant to Intel in the amount
25 of 4 Billion NIS (about \$1.080 Billion dollars).

26
27 74. Thus, it is within Intel's powers and abilities to protest and refuse to transform its male
28 employees into employees of slavery and servitude. Especially since Intel had a lot of leverage in
29 these negotiations concerning the grant. Intel could have negotiated an exclusion of its male
30 employees from the application of the discriminatory, arbitrary, and atrocious child support regime
31 in Israel that reduced men to a sub human creature.

32
33 75. Each year Intel issues an "Anti-Slavery and Human Trafficking Statement" (the Anti-
34 Slavery Statement", which is made in order to comply with California Transparency in Supply

1 Chains Act of 2010 (SB 657) and the United Kingdom Modern Slavery Act of 2015 which require
2 businesses to provide disclosures concerning their efforts, if any, to address the issues of slavery
3 and human trafficking in their supply chains.
4

5 76. According to Defendant Intel's 2018 Anti Slavery Statement: "similarly, the revised
6 Federal Acquisition Regulation (FAR) 52.222-50 ("Combating Trafficking in Persons") and new
7 FAR provision 52.222-56 ("Certification Regarding Trafficking in Persons Compliance Plan") are
8 aimed at removing slavery and human trafficking from the U.S. Federal Government contracting
9 supply chain.
10

11 77. According to Defendant Intel's 2018 Anti Slavery Statement: "This Slavery and Human
12 Trafficking Statement responds to the California and U.K. Acts, and reflects Intel's efforts to
13 combat the conduct prohibited by the FAR's anti-slavery and anti-trafficking provisions. The
14 statement aims to provide consumers detailed information to make better, more informed choices
15 about the products and services they buy and companies they support. Our statement covers Intel
16 Corporation and its subsidiaries, including but not limited to, Intel Corporation (UK) Ltd. For
17 additional information about Intel and its operations, refer to the 2018 Annual Report on form 10-
18 K".
19

20 78. Moreover, according to Defendant Intel's 2018 Anti Slavery Statement: "Intel is
21 committed to maintaining and improving systems and processes to avoid complicity in human
22 rights violations related to our operations and supply chain. Intel recognizes that slavery and human
23 trafficking can occur in many forms, such as forced labor, child labor, domestic and indentured
24 servitude, sex trafficking, and workplace abuse. Throughout this statement we use the terms
25 "slavery and human trafficking" to encompass all forms of coerced labor. At Intel, we take steps to
26 minimize the risk of slavery and human trafficking in our operations and supply chain. Our
27 commitment and integrated approach to human rights includes provisions on avoiding risks such as
28 slavery and human trafficking in these documents: (a) Intel Global Human Rights Principles, (b)
29 Intel Code of Conduct, (c) Responsible Business Alliance (RBA) Code of Conduct, (d) Trafficking
30 in Persons Federal Government Purchasing Policy , (e) UN Global Compact".
31

32 79. When Plaintiff was recruited he was presented with a similar statement (applicable to that
33 year) and was required to sign it. Little did Plaintiff know that he himself will become a slavery
34 victim himself by Intel.

1 80. In California, in response to consumer demands, the California Legislature passed
2 the California Transparency in Supply Chains Act of 2010 (the “Act”), Cal. Civ. Code
3 §1714.43. The Act addresses the market for goods and products “tainted” by slavery and
4 human trafficking—crimes that are outlawed by state, federal, and international law. *Id.* In
5 enacting the California Transparency Act, the Legislative Counsel’s Digest stated that
6 “consumers are inadvertently promoting and sanctioning these crimes through the purchase
7 of goods and products that have been tainted in the supply chain.” *See* Legis. Counsel’s Dig.,
8 Sen. Bill 556, ch. 556, §2(h), (2010 Reg. Sess.).

9
10 81. The Legislature in CA further stated that: “[a]bsent publicly available disclosures,
11 consumers are at a disadvantage in being able to distinguish companies on the merits of their
12 efforts to supply products free from the taint of slavery and trafficking. Consumers are at a
13 disadvantage in being able to force the eradication of slavery and trafficking by way of their
14 purchasing decisions. *Id.* at § 2(i).

15
16 82. The Act recognizes that consumers are deeply concerned about the way in which
17 their products are made and would alter their purchasing practices if they knew their products
18 were tainted by slavery and human trafficking.

19
20 83. The Act, therefore, requires businesses with an annual gross of over \$100 million to
21 “disclose their efforts to eradicate slavery and human trafficking from their direct supply
22 chains.” *See* Cal. Civ. Code §1714.43(a)(1). This imposes an affirmative duty on Defendant
23 Intel to eradicate slavery and work in debt bondage.

24
25 84. The California Transparency in Supply Chain Act (“the Act”), Cal. Civ. Code §
26 1714.43, was signed into law in October 2010. The Act addresses the market for goods and
27 products “tainted” by slavery and human trafficking—crimes that are outlawed by state,
28 federal, and international law. *Id.* This statute recognizes that consumers should not be forced
29 to promote slavery and human trafficking through their purchasing practices. Therefore,
30 businesses such as Costco are required to “disclose their efforts to eradicate slavery and
31 human trafficking from their direct supply chains.” *Id.* at § 1714.43(a)(1).

32 85. Such disclosure should include a statement that addresses the extent that the
33 company: (1) engages in verification of product supply chains to evaluate human trafficking

1 and slavery, (2) conducts audits of suppliers to evaluate supplier compliance with company
2 standards for trafficking and slavery in supply chains, (3) requires direct suppliers to certify
3 that materials incorporated into the product comply with the laws regarding slavery and
4 human trafficking in the country or countries in which they are doing business, (4)
5 maintained internal accountability standards, and (5) provides company employees and
6 management, who have direct responsibility for supply chain management, training on
7 human trafficking and slavery. Cal. Civ. Code § 1714.43, *et seq.*

8
9 86. California has also enacted several statutes that directly address human trafficking
10 abuses such as The California Trafficking Victims Protection Act, The Human Trafficking
11 Collaboration and Training Act, the Access to Benefits for Human Trafficking and Other
12 Serious Crime Victims Act as well as various Senate and Assembly Bills that amend current
13 California 41 statutes.

14
15 87. The US Federal government also responded to modern forms of slavery. In
16 response to the growing concern about slave labor within the supply chains, the United States
17 enacted the Tariff Act Section 307 of the Tariff Act of 1930, 19 U.S.C. §1307, prohibits
18 importing goods made with forced or indentured labor.

19 88. In 2000, to expand on sanctions against traffickers and to protect trafficking victims,
20 the U.S. enacted the Victims of Trafficking and Violent Protection Act of 2000. According to
21 the TVPA of 2000: "Congress finds that [a]s the 21st century begins, the degrading
22 institution of slavery continues throughout the world. Trafficking in persons is a modern form
23 of slavery, and it is the largest manifestation of slavery today. *See* 22 U.S.C. § 7101(b)(1).

24
25 89. After analyzing slavery and human trafficking in the supply chain, the TVPA of
26 2000 stated that "[t]rafficking in persons substantially affects interstate and foreign
27 commerce. Trafficking for such purposes as involuntary servitude, peonage, and other forms
28 of forced labor has an impact on the nationwide employment network and labor market." *Id.*
29 at § 7101 (b)(12). This Act, among other provisions, strengthened sanctions against
30 traffickers, established an Office and Interagency Task Force to Monitor and Combat
31 Trafficking and provided assistance to victims of trafficking by allowing them to seek "T-
32 Visas" to obtain temporary residency in the United States.

1 90. In 2003, the U.S. enacted the Trafficking Victims Protection Reauthorization Act of
2 2003 (“TVPRA of 2003”). The TVPRA of 2003 amended the TVPA of 2000 and, among
3 other things, enhanced the prevention of trafficking in persons, added additional provisions to
4 protect families of trafficked victims, added human trafficking to crimes that can be charged
5 under the RICO statutes, and established a civil right of action for trafficking victims. The
6 United States continues to address the evolving issues of human trafficking, the TVPA of
7 2000 by further amended in 2005, 2008, and 2013.

8
9 91. In 2005, the U.S. enacted the Trafficking Victims Protection Reauthorization Act of
10 2005 (“TVPRA of 2005”). The TVPRA of 2005 further amended the TVPA of 2000 and
11 enhanced the protections for trafficked victims and includes measures to ensure that the U.S.
12 Government personnel and contractors are held accountable for their involvement with acts
13 of trafficking in persons.

14
15 92. Following this amendment, the U.S. Department of Defense incorporated anti-
16 trafficking and protection measures for vulnerable populations. Additionally, a \$5 million
17 pilot program was established to create residential treatment facilities in foreign countries for
18 victims of trafficking.

19
20 93. In 2008, the U.S. enacted the William Wilberforce Trafficking Victims Protection
21 Reauthorization Act of 2008 (“TVPRA of 2008”). The TVPRA of 2008 was enacted to
22 “authorize appropriations for fiscal years 2008 through 2011 for the Trafficking Victims
23 Protection Act of 2000, to enhance measures to combat trafficking in persons, and for other
24 purposes.” The TVPRA of 2008 amended the TVPA of 2000 to include new prevention
25 strategies to combat international trafficking in persons, to ensure the availability of possible
26 witnesses and informants, enhance the sanctions against traffickers, and more.

27
28 94. In 2013 the Trafficking Victims Protection Reauthorization Act of 2013 (“TVPRA
29 of 2013”) was passed to, among other improvements, strengthen efforts to “ensure that
30 United States citizens do not use any item, product, or material produced or extracted with
31 use of labor from victims of severe forms of trafficking.”

1 95. As evidenced throughout these federal statutes, the United States is deeply
2 concerned with national and international human rights abuses and seeks to eradicate these
3 abuses by enacting programs, criminal sanctions, and protections for victims of trafficking. In
4 doing so, the U.S. also sought to prevent consumers from unconsciously sanctioning these
5 human rights violations through their unwitting purchases of tainted supply lines for
6 consumer goods.

7
8 96. Defendant Intel states publicly that it does not tolerate human trafficking and slavery
9 in its supply chain yet it continues to sell merchandise such as computer chips developed or
10 manufactures in Israel by men who are subject to child support slavery to consumers in CA
11 and elsewhere in the US and the world.

12
13 97. In light of the foregoing, it is clear that Defendant Intel's Participation in the slavery
14 of its Israeli male employees is critical to the tainted products reaching California Consumers.
15 Intel sells its chips to U.S. customers everywhere where computers and laptops are sold. U.S.
16 consumers who buy Intel chips are buying the product that was created through the use of
17 forced labor, chattel labor, and/or slave labor. As stated, due to its power it can and it could
18 have dictated to the State of Israel terms and conditions that would protect the employees in
19 its chain of supply and production from the horrendous maltreatment of the family courts,
20 supreme court and the Enforcement and Executions Authority.

21
22 98. Defendant Intel knew, or should have known, that it was relying upon forced labor to
23 produce their products. Despite Intel's knowledge of the widespread use of forced labor
24 rampant in Israel and the specific policies prohibiting forced labor, Intel continues to obey the
25 draconian orders of the family courts, Supreme Court and Enforcement and Collections
26 Authority.

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100. Defendant's Intel is misleading the public in California and elsewhere by falsely representing that its products are free from slavery when indeed the products are manufactured by employees who are either robbed of their salaries or are forced to quit so as not to continue their servitude.

101. Such acts of the Defendant Intel as described above, constitute unlawful business practices within the meaning of California Business and Professions Code § 17200. Defendant Intel's business acts and practices, as alleged herein, also constituted and constitute a continuous and continuing course of conduct of unfair competition by means of unfair, unlawful and/or fraudulent business acts or practices within the meaning of § 17200.

102. Defendant Intel' practices are unlawful in that their conduct in collaborating with the co-defendants regime of child support extortions and full wage garnishments actively contributes to the use of slave labor in violation of bans on such human trafficking enacted by the U.S., California and by international conventions, including but not limited to the Tariff Act of 1930. The Anti-Trafficking in Persons Act, the UN Declaration of Human Rights, and California Penal Code § 236, § 237, *etseq.*

103. In addition, Defendant Intel's conduct in representing that it enforces policies against the use of slave labor in the computer chips it sells is a violation of Civil Code Section 1714.43. Intel's practices are also unlawful under California Business and Professions Code Section 17500, *et seq.* and Civil Code Section 1750, *et seq.*

104. Defendant Intel's practices are fraudulent in that Defendant Intel affirmatively represents that it enforces standards to prohibit the use of slave labor, when in fact it clearly did not.

105. Defendant Intel's participation in a supply chain tainted with slave labor is immoral, unethical, oppressive, unscrupulous and injurious to consumers.

106. Defendant Intel's business acts and practices, as alleged herein, have caused harm to Plaintiff and other men in his situation who worked or continue to work at Intel.

1 107. As a result of the above violations of Business and Professions Code Section
2 17200, Plaintiff is entitled to an order enjoining such conduct by Defendants, such orders and
3 judgments that may be necessary, including the appointment of a receiver, to restore to any
4 person in interest any money paid as a result of the acts of Defendants.
5

6 108. Defendant Intel also violated the Misleading and Deceptive Advertising
7 California Business and Professions Code Section 17500, *et seq.* California Business and
8 Professions Code Section 17500 provides that it is unlawful for a corporation “to induce the
9 public to enter into any obligation relating thereto, to make or disseminate or cause to be
10 made or disseminated ... from this state before the public in any state, in any newspaper or
11 other publication, or any advertising device, or by public outcry or proclamation, or in any
12 other manner or means whatever, including over the Internet, any statement ... which is
13 untrue or misleading, and which is known, or which by the exercise of reasonable care should
14 be known, to be untrue or misleading ...”
15

16 109. Defendant’s representations, including statements made in Defendant’s
17 television, radio, and print advertising, websites, brochures, and all other written and oral
18 materials disseminated by Defendant contained statements that were false, misleading, or that
19 omitted material information that Defendant were under a duty to disclose and which were
20 known or should have been known to Defendant to be false, misleading or deceptive.
21

22 110. The misleading advertising described herein presents a continuing threat to
23 Plaintiff and members of the public in that Defendant persist and continue to engage in these
24 practices, and will not cease doing so unless and until forced to do so by this Court.
25

26 111. Defendant Intel also violated the Consumer Legal Remedies Act, Civil Code
27 Section 1750, *et seq.* The above acts of Defendant Intel, in selling computer chips that are
28 the product of slave labor, were and are unfair methods of competition and unfair or
29 deceptive acts and practices in violation of the Consumer Legal Remedies Act, Civil Code
30 Section 1750, *et seq.* (“CLRA”). CLRA section 1770(a)(5) prohibits “representing that
31 goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or
32 quantities which they do not have or that a person has a sponsorship, approval, status,
33 affiliation, or connection which he or she does not have.”
34

1 112. Defendant Intel violated this provision by making the misrepresentations
2 describe above, including but not limited to, in connection with its Code of Conduct and in
3 selling misleading and inadequately labeled prawns that fail to notify the consumer of
4 unlawful labor abuses in the supply chain. Defendant continues to violate this provision in
5 connection with sales of prawns to Class members.
6

7 113. CLRA section 1770(a)(7) prohibits “representing that goods or services are of
8 a particular standard, quality, or grade, or that goods are of a particular style or model, if they
9 are of another.” Defendant violated this provision by making the misrepresentations describe
10 above, including but not limited to, in connection with its Code of Conduct and in selling
11 misleading and inadequately labeled prawns that fail to notify the consumer of unlawful labor
12 abuses in the supply chain. Defendant continues to violate this provision in connection with
13 sales of computer chips designed or manufactured in Israel to California consumers.
14

15 114. CLRA section 1770(a)(9) prohibits “advertising goods or services with intent
16 not to sell them as advertised.” Defendant violated this provision by making the
17 misrepresentations describe above, including but not limited to, in connection with its Code
18 of Conduct and in selling misleading and inadequately labeled prawns that fail to notify the
19 consumer of unlawful labor abuses in the supply chain. Defendant continues to violate this
20 provision in connection with sales of computer chips designed or manufactured in Israel to
21 California consumers.
22

23 115. CLRA section 1770(a)(16) prohibits “representing that the subject of a
24 transaction has been supplied in accordance with a previous representation when it has not.”
25

26 116. The violations of the CLRA have caused pecuniary loss to Plaintiff and the
27 California public.
28

29 117. As a result of the above violations of Business and Professions Code Section
30 17500, and all other authorities above, Plaintiff is entitled to an order of this Court enjoining
31 such future conduct on the part of Defendant. Thus, Plaintiff seeks to enjoin Defendant’s
32 illegal practices tied to the supply chain for Intel computer chips, including: (a) an
33 injunction against the further sale of computer chips designed or manufactured in Israel; (b)
34 an injunction prohibiting Intel from selling misleading, or inadequately labelled computer

1 chips that fail to notify the consumer of the conditions described herein; and (c) an injunction
2 prohibiting Intel from continued buying, distributing, and selling products that they know,
3 should know, or suspect to be tainted by slave labor or human slavery.
4

5 118. Plaintiff is entitled to an award of reasonable attorneys' fees under California
6 Code of Civil Procedure Section 1021.5 for the benefit conferred upon the general public of
7 the State of California by any injunctive or other relief entered herein.
8
9

10 **THIRD CASE OF ACTION**

11 119. Plaintiffs repeat and reallege all facts and circumstances described above as
12 if fully set forth as truth herein.
13

14 120. As stated above, all the other co-defendants except Intel (the "Israeli
15 Defendants") perform various types of judicial capacity in Israel, but they also belong to the
16 dangerous and Satanic cult of acute misandric Radical Feminism, and hence they are sued
17 here also as members of the cult. By so affiliating themselves with the cult, and carrying its
18 mission via their rulings and precedents, the Israeli Defendants committed crimes against
19 humanity that result on 320 deaths annually, about 10,000 impoverished men each year (with
20 at least 20% becoming homeless), and 20,00-25,000 men denied their rights to raise their
21 children.
22

23 121. The Israeli Defendants replace notions of *Jus Cogens* and fundamental
24 international human rights law with preaching of male hate in its most severe form. Their
25 hate of males can easily be compared with the way German judges adjudged the Jews in Nazi
26 Germany with similar propaganda and rhetoric.
27

28 122. In fact, they have turned the State of Israel into one big *Konzentrationslager*
29 by issuing no exit orders left and right just upon the asking so by a woman. Plaintiff himself
30 was under a no exit order for a period of 20 years, even after he became custodian of his
31 daughter.
32

1 123. In addition to having no shame to write and adjudge that women are always
2 superior to men with their parenting skills and are always the best custodian for the children
3 and in addition to making it so easy for a woman to concoct the most ridiculous charges of
4 violence and pedophilia against men, with no repercussions for the false claims whatsoever,
5 these co-Defendants members of the cult have excelled at issuing the most unconscionable
6 and manifest violations of international human rights and the rights to dignity, equality and
7 due process in their decisions concerning child support. In fact, the Israeli Defendants have
8 turned an entire population of men in Israel (particularly the Jewish ones) into child support
9 slaves.

10
11 124. In order to understand the level of hate mongering, one needs to only take a
12 look at the campaign addressed to women launched by the Enforcement and Collection
13 Authority (the employer of Defendant Dikla Klein Yona), on June 2014, which was aired in
14 television, posters in every government agency, advertisements in newspapers, and almost
15 each and every communications outlet.

16
17 125. In this campaign the women are dressed in military commando outfits as if
18 they are at war with men, and the slogan is "Come to us, Let us fight for you to get you the
19 child support you deserve".

20
21 126. See the official poster and flier:
22



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127. See also the video clip that aired on tv as uploaded by the employer of Dikla Klein Yona to Youtube at: <https://youtu.be/aSEYrroz-x8/>



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128. This is a visual admission that the Israeli Defendants declared a war on the Jewish men of Israel. However explicit admissions in writing and in English can be found in

1 the Israeli periodic reports to the UN Committees on Civil and Political Rights and the UN
2 Committee on Economic Social and Cultural Rights. Already in 2011 the latter Committee
3 admonished Israel for not complying with international laws and standards by giving
4 automatic custody to women, exempting women from child support and imposing an
5 enormous burden on the men, and not taking measures to prevent more than 200 cases of
6 suicide by men in divorce or divorce proceedings.

7
8 129. The rules of this war (*Jus ad Bellum*), succinctly are: only the man pays child
9 support. A woman never has to pay child support because she belongs to the superior sex, no
10 matter how rich or wealthy she is. A man has to pay full child support even if he is the
11 custodian of the children and the woman travels the world to pursue sexcapades. A man also
12 has to pay the one third of the woman's rent and rent maintenance wherever she chooses as
13 "child support". A man is also expected to pay "caretaking fee" when the woman needs a
14 babysitter.

15
16 130. Only the man pays for the transportation costs of visitations and gas. The
17 child support never stops, even if the man is sick, crippled, army veteran in PTSD, in
18 bankruptcy, in jail, in hospital, in mental facility, suffering from terminal cancer, about to die
19 or incapacitated, the child support never stops. The woman can also sue the parents of the
20 man if he is unable to pay her in full or in part.

21
22 131. More rules of the war are: the child support is not dependent on the man's
23 income, and the income has nothing to do with child support. In fact, there is no problem to
24 impose child support exceeding the income, even twice or three times the income. The child
25 support begins at a fixed sum of 1,400 NIS per child (not including school tuitions including
26 private schools and kindergarten, and 50% of extraordinary expenses such as medical and
27 dental not covered by insurance, etc.) All the add-ups amount to about 2,200-2,500 NIS
28 (\$600-\$675 per-child. Unlike other countries where the amount escalates moderately with
29 additional children, the fee is fixed and is multiplied per child.

30 132. This is in a country with 50% of the population earns minimum wage which is
31 5,500 NIS (about \$1,500), and you cannot rent a studio for less than 2,500 NIS (\$675), and
32 the minimum incidentals (city tax, building common fees, electricity, water and gas) are at
33 least another 1,000 NIS (\$270).

34

1 133. Assume that a man earns 5,500 NIS (\$1,500) and he has 3 children, he will
2 have to pay at least 7,500 NIS (\$2,020) in child support. Where will that person live and how
3 will he be able to afford the \$520 shortfall? Some judges in Israel had no shame telling the
4 men in the courtroom to "go ahead sell a kidney".
5

6 134. The situation at the Execution and Collections Authority can only be described
7 as an inferno. A woman is allowed to open a collection case even if she is owed \$0. She can
8 issue a no exit order immediately, thus using the body of a man as collateral for "future child
9 support". Also, immediately usurious rates of interest start accumulating on a compounded
10 basis together with cost of living adjustment so that the child support base always go up faster
11 than anyone can imagine. Not soon thereafter all pension funds are liquidated, all bank
12 accounts are seized, credit cards forbidden, driving license not renewed, and then come the
13 mandatory 21 days in jail, whenever the wife wants to abuse her former husband a little bit
14 more.
15

16 135. The Israeli Defendants are responsible for all this torture, and therefore are
17 accountable under the Alien Tort Claims Act.
18

19 136. The Israeli Defendants have no immunity from trial under FSIA. The
20 exception to foreign sovereign immunity at issue in this case is the state-sponsored terrorism
21 exception, codified at 28 U.S.C. § 1605(a)(7), enacted as part of the comprehensive
22 Antiterrorism and Effective Death Penalty Act ("AEDPA"), Pub. L. No. 104-132, § 221(a),
23 110 Stat. 1214 (Apr. 24, 1996).
24

25 137. This statute provides that foreign sovereigns are not immune when money
26 damages are sought against a foreign state for personal injury or death that was caused by an
27 act of torture, extrajudicial killing, aircraft sabotage, hostage taking, or the provision of
28 material support or resources ... for such an act if such act or provision of material resources
29 is engaged in by an official, employee, or agent of such foreign state while acting within the
30 scope of his or
31 her office, employment, or agency. See, 28 U.S.C. § 1605(a)(7).
32

