

STATE OF WISCONSIN

IN SUPREME COURT

IN THE MATTER OF
DISCIPLINARY PROCEEDINGS
AGAINST NAOMI DAWN ISAACSON,
ATTORNEY AT LAW.

CASE CODE 30912

OFFICE OF LAWYER REGULATION,

CASE NO. 2014AP 495 -D

Complainant;

NAOMI DAWN ISAACSON,

Respondent.

COMPLAINT

NOW COMES the Wisconsin Supreme Court - Office of Lawyer Regulation (OLR), by its Retained Counsel, Wayne A. Arnold, and alleges as follows:

1. The OLR was established by the Wisconsin Supreme Court and operates pursuant to Supreme Court Rules. This complaint is filed pursuant to SCR 22.11(1).

2. Naomi Dawn Isaacson (Isaacson) is an attorney admitted to the practice of law in Minnesota on May 7, 1999 and admitted to the practice of law in Wisconsin on September 27, 2000. Her Wisconsin State Bar No. is 1036694. Isaacson's Wisconsin law

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license is currently suspended on several grounds: for non-payment of State Bar dues and failure to provide her trust account certification, suspension effective 10/31/12; for failure to comply with mandatory CLE reporting requirements, suspension effective 6/4/2013; and by the Supreme Court of Wisconsin on May 31, 2011 for her non-cooperation with an OLR investigation (*OLR v. Isaacson*, Wis. Sup. Ct. Case No. 2011XX456).

3. Isaacson's most recent address listed with the State Bar of Wisconsin is Arendal Dental Clinic, 101 5th Street East, Suite 299, P.O. Box 65528, Saint Paul, MN 55165-0528. However, Isaacson's current whereabouts are unknown to OLR. On January 3, 2012, U.S. Bankruptcy Judge Nancy Dreher [U.S. Bankruptcy Court (D. Minn)] issued a bench warrant for Isaacson's arrest and the warrant, on information and belief, remains active.

4. At times material to this matter, Isaacson was the in-house counsel for Dr. R.C. Samanta Roy Institute of Science and Technology, Inc. also known as "SIST."

5. At times material, Isaacson was the CEO of SIST, U.S. Acquisitions & Oil, Inc. ("USAO"), Midwest Oil of Wisconsin, LLC, Midwest Oil of Shawano, LLC, Midwest Oil of Minnesota, LLC, and Midwest Properties of Shawano, LLC. The latter corporation

and limited liability companies are all wholly owned subsidiaries of SIST. Isaacson's association with them dates back to 2000 when she was elected CEO of SIST. Isaacson has also described her roles as "president" of USAO and "managing member" of the aforementioned subsidiary LLCs, plus others including Midwest Amusement Park, LLC, and Midwest Oil of Anoka, LLC.

6. Isaacson has also identified herself as the president of Yehud-Monosson USA, Inc., which was incorporated, according to the New York Secretary of State, on December 1, 2010. According to court filings, Yehud-Monosson USA, Inc. is wholly owned by SIST.

7. Isaacson was the attorney-in-fact for Dr. Avraham Cohen, President and founder of Dr. R.C. Samanta Roy Institute of Science and Technology, Inc. Rama Chandra Behera, Dr. R.C. Samanta Roy and Avraham Cohen are all names that pertain to the same person, who changed his name in Wisconsin in 1990 and again in Maryland in 2007.

8. Some of the aforementioned corporations and LLCs were involved in a public amusement go-cart track business in Shawano, Wisconsin.

9. In the mid-2000s, creditors of the go-cart track business alleged default and brought claims against the various corporate entities.

10. One creditor claim was *MMG Financial Corporation v. Midwest Amusement Park, LLC, et al.*, Case No. 06 CV 929., U.S. District Court (E.D. Wis.).

11. Another creditor claim, for foreclosure, was brought in *Southwest Guaranty, Ltd., et al. v. U.S. Acquisitions & Oil, Inc., et al.*, Shawano County Circuit Court Case No. 08 CV 529.

**Regarding certain documents Isaacson
created, signed and/or filed.**

12. On March 16, 2009, USAO, and SIST, filed for Chapter 11 bankruptcy protection in the U.S. Bankruptcy Court for the District of Delaware (Case Nos. 09-10875 and 09-10876, respectively). The cases were jointly administered along with the simultaneous bankruptcy filings of five other wholly owned subsidiaries of SIST, including Midwest Oil of Minnesota, LLC, and Midwest Properties of Shawano, LLC.

13. On September 21, 2009, Isaacson testified that the sole asset of USAO was a racetrack property which was the subject of litigation with Southwest Guaranty, Ltd.

14. The jointly administered Delaware bankruptcy cases were all dismissed on September 22, 2009, when U.S. Bankruptcy Judge Kevin Gross concluded that dismissal was mandatory under 11 U.S. Code §1112(b)(1)-(4) because of continuing losses to the bankruptcy estate, the gross mismanagement of the estate by Debtors, and Debtors' failure to file tax returns. Judge Gross also stated, "Debtors have, beyond cavil, abused the bankruptcy process." SIST and USAO appealed. On May 25, 2010, the U.S. District Court (D. Del.) affirmed the bankruptcy court.

15. On May 28, 2010, creditor Southwest Guaranty, Ltd., moved to reopen Shawano County Case No. 08-CV-529 and renewed a request to appoint a receiver. On the same day, the remaining defendants SIST and USAO filed their answer and affirmative defenses. Shawano County Circuit Court Judge James Habeck ordered the case reopened and appointed creditor's attorney Steven Krueger as receiver.

16. On July 13, 2010, Midwest Properties of Shawano, LLC, again filed for Chapter 11 bankruptcy. This filing was in Wisconsin, as *Midwest Properties of Shawano, LLC, Debtor, U.S. Bankruptcy Court (E.D. Wis.) Case No. 10-31515.*

17. On July 15, 2010, Fox Communities Credit Union, a creditor in the Midwest Properties bankruptcy case, filed an "Emergency Motion to Dismiss Chapter 11 Case."

18. On July 16, 2010, Isaacson drafted and signed a sworn affidavit that was subsequently filed in the Midwest Properties bankruptcy case. Isaacson's 14-page affidavit included the following statements:

- a. The President of ... [SIST] is a man who is originally from India. Due to the racial and religious background of the President, we have suffered from unimaginable prejudice, discrimination, and business interference at the hands of Shawano City officials, particularly Shawano Mayor Lorna Marquardt.
- b. Shawano Mayor Lorna Marquardt's campaign platform was that she would drive the 'dot head back to his mud hut' referring to SIST's Indian President.
- c. [F]ollowing Marquardt's assumption of power, a number of secret meetings were held in Shawano to strategize on the demise of SIST and its Indian President. Since 2003, upon information and belief, those meetings have occurred at least on a bi-monthly basis and are attended by Lorna Marquardt, various Shawano City officials, Shawano County judges, media, and local business persons.
- d. Shawano Mayor Lorna Marquardt has solicited a number of local attorneys who will perform her wishes and mission of driving SIST out of Shawano and hurting us financially. Reportedly two of the attorneys who joined the campaign are this same attorney, David Van Lieshout and his associate, Steven Krueger ... who brought this subject motion. According to what

we have been told by many sources, these attorneys attend the secret meetings in Shawano regularly.

- e. Since the local judges are working in conspiracy with Shawano Mayor Lorna Marquardt, ... SIST has lost every case.
- f. [T]hrough their common race and religion, Shawano Mayor Lorna Marquardt has wrapped her tentacles around the judiciary system including Shawano Municipal judges, Shawano County judges, Wisconsin Appellate Court judges, the Federal District Court judge in Green Bay, Seventh Circuit Appellate Court judges, and even U.S. Bankruptcy Court Judge Kevin Gross in Delaware. We have been told that the attorney representing the City of Shawano in Delaware socialized extensively with Judge Gross and passed along Lorna Marquardt's message.
- g. We have spent millions of dollars in legal fees and have not been successful in a single case. One would expect that in the United States one could find justice, but finding justice has been like seeing the full moon in the middle of a thunderstorm.
- h. Krueger approached Shawano County Judge Habeck ex parte and without any notice to us got the judge to sign an order appointing himself as receiver of the property.
- i. One time a man who used to be on SIST's board, called Lorna Marquardt a red-headed orangutan since Lorna Marquardt has red hair and he was upset about her actions against SIST. Lorna Marquardt immediately went to Tom Grover, Shawano County judge, and got [sic] harassment and restraining order and filed a lawsuit against him and SIST for \$600,000. That lawsuit is still pending. In the media every day, President Bush, President Obama, and thousands of other politicians are criticized, ridiculed, and cartoon characters are drawn of them. Have any of them ever thought about suing? But, in

Lorna Marquardt's homemade court, any lawsuit against SIST stands.

j. We have all heard about other countries around the world where there is allegedly no justice. Yet, in all these years, SIST has never received any justice. We have requested a Senate investigation into this matter.

19. On July 16, 2010, USAO and SIST filed a "Notice of Removal" with the U.S. District Court for the Eastern District of Wisconsin captioned *Southwest Guaranty, Ltd., v. U.S. Acquisitions & Oil, Inc., and Dr. R.C. Samanta Roy Institute of Science and Technology, Inc.*, U.S. District Court (E.D. Wis.) Case No. 10 CV 596.

20. On July 26, 2010, another bankruptcy action by one of SIST's wholly owned subsidiaries was filed in Minnesota. That action was captioned: *In re Midwest Oil of Minnesota, LLC, Debtor, U.S. Bankruptcy Court (D. Minn.)* Case No. 10-35450.

21. On July 29, 2010, Southwest Guaranty, Ltd., moved for the case of *Southwest Guaranty, Ltd., v. U.S. Acquisitions & Oil, Inc., and Dr. R.C. Samanta Roy Institute of Science and Technology, Inc.*, to be remanded from the U.S. District Court (E.D. Wis.) to the Shawano County Circuit Court.

22. On August 11, 2010, counsel for SIST and USAO in the Southwest Guaranty, Ltd. case filed an "Amended Notice of

Removal" with the U.S. District Court. The amended notice referred to "the Declaration of Naomi Isaacson," in which further details and "[a]dditional facts and circumstances" were "outlined more fully."

23. On August 15, 2010, Isaacson signed a document titled: "Declaration of Naomi Isaacson In Support of Motions to Rescind and Set Aside Receivership Order, Enjoin any Further State Court Proceedings, Contempt, to Award Damages Due to Waste Committed by Receiver, to Quash Discovery, to Transfer Case to the Bankruptcy Court for the Southern District of Texas, and Response to Plaintiff's Motion for Remand." The 'Declaration' bore the case caption and was filed in *Southwest Guaranty, Ltd. v. U.S. Acquisitions & Oil, Inc., et al.*, U.S. District Court (E.D.Wis.) Case No. 10 CV 596.

24. Isaacson personally prepared this 'Declaration.'

25. Isaacson's 'Declaration' included the following:

- a. Shawano is Neo-Nazi territory where it is believed people of other races and religions have no right to life. The President of Defendant SIST is a man originally from India. Due to the racial and religious background of this Indian businessman, SIST and its personnel have suffered from unimaginable prejudice, discrimination, and business interference at the hands of Shawano City officials, particularly Shawano Mayor Lorna Marquardt. Though you may not like to hear it, the fact of the matter is that the racial discrimination and prejudice we

experience every day in Shawano, is worse than anywhere else in the world. Lorna Marquardt, the Mayor of Shawano, began her campaign against SIST and its Indian President many years ago when she took office.

- b. Given the underlying White Supremacist feelings and beliefs and Jim Crow mentality held by many persons in Shawano and surrounding areas, Lorna Marquardt has successfully ensnared and tied the media, the judiciary and law enforcement authorities together through their common race and religion and used them to pursue her obliteration aspiration. To that end, it has been reported that Lorna Marquardt formed a secretive, racist organization whose sole function is to wage psychological, physical, and financial war against SIST's Indian President, other SIST personnel, and businesses. Based upon information from many sources, following Marquardt's assumption of power, a number of secret meetings were held in Shawano to strategize on the demise of SIST and its Indian President. Since 2003, those meetings have occurred as frequently as on a bi-monthly basis and are attended by various Shawano City officials, Shawano County judges, media, and local business persons.
- c. Krueger drafted an Order appointing himself as receiver and took it to J.R. Habeck, Shawano County Judge, to sign. Even though Krueger had filed no motion, an ex parte hearing was held in the "homemade" court controlled by Lorna Marquardt.
- d. Law in Shawano is a laughing matter when it comes to Defendants.
- e. But, since when does legality matter in Shawano? ... [Attorney Krueger] has Lorna Marquardt's Gestapo to back him up, he has the local Shawano County judges, Habeck and Grover, in his back pocket ready to sign any order which furthers their mission of harming Defendants ... What can Defendants do about it? Where can they go to seek justice?

- f. [Judge] Habeck, the rubber stamp with a personal racial vendetta.
- g. [A]nytime an order is needed or desired which is detrimental to Defendants, day or night, rain or shine, coffee shop or bedroom, Habeck is ready with his rubber stamp.
- h. Despite the written [Removal] notice and their acknowledgement of receipt of the same, Habeck and Krueger proceeded with the hearing anyway. Attached is a copy of the docket which shows that they proceeded with the hearing on Defendants' motion for return of personal property despite their knowledge that the hearing was in clear violation of federal law. This incident is demonstrative of conduct of counsel Krueger and Shawano judiciary, Habeck, Grover, and Winter. Of course the 'homemade' court in Shawano, does not have to comply with federal laws. The sole purpose of Shawano courts is to propel and propagate racial hatred against Defendants and their Indian President.
- i. Plaintiff and its counsel fraudulently and deceitfully failed to disclose that it had filed for Chapter 11 bankruptcy protection in Texas on March 17, 2010. Counsel/receiver has a duty of candor to the tribunal. It was reported to Defendants that private discussions occurred between Van Lieshout, Krueger, Marquardt, and Habeck. They all decided to keep Plaintiff's bankruptcy filing a secret.
- j. Given the political circumstances of this case and the fact that Plaintiff's attorney and the judges in Shawano County are part of a conspiracy to rob and destroy any businesses connected with Defendants, Plaintiff, through its attorney, perpetuated fraud by deliberately failing to disclose its bankruptcy filing to Defendants.
- k. Since the local judges are working in conspiracy with Shawano Mayor Lorna Marquardt and are part of

her secretive, racist group, eventually, after spending money fighting the citations and appealing them, SIST has lost every case.

1. Due to the massive conspiracy led by Lorna Marquardt, SIST has never received any justice in Shawano. Through their common race and religion, Shawano Mayor Lorna Marquardt has wrapped her tentacles around the judiciary system including Shawano Municipal judges, Shawano County judges, Wisconsin Appellate Court judges, this Court's colleague, the Federal District Court judge in Green Bay, William Griesbach, and even U.S. Bankruptcy Court Judge Kevin Gross in Delaware. In all of Defendants' or related entities matters in front of Judge Griesbach, the attorney representing the opposing party has been a certain attorney who is Griesbach's former law clerk, named Wickham Schmidt. Griesbach grants this attorney whatever he asks for just like Habeck does for Krueger and Van Lieshout. This attorney has repeatedly asked for sanctions for baseless alleged "discovery violations" and Griesbach has granted him sanctions numerous times. Defendant's experience of "justice" in Shawano is comparable to the 'justice' Jews experienced under Hitler's regime. In the "homemade" court in Shawano, no legal procedures are followed and members of the judiciary and attorneys act as if there is no law.
- m. We have been told that the attorney representing the City of Shawano in Delaware socialized extensively with Judge Gross and passed along Lorna Marquardt's message. We have spent millions of dollars in legal fees and have not been successful in a single case. One would expect that in the United States one could find justice, but finding justice has been like seeing the full moon in the middle of a thunderstorm.
- n. The hate crimes being committed by Shawano Mayor Lorna Marquardt and her cronies are unfathomable. An account of all the incidents would fill many volumes. Upon information and belief, this group is

responsible for instigating and/or inciting attempted murders, bombings, death threats, property destruction, harassment, vandalism, robberies, burglaries, slander, defamation, business disparagement, business interference, and interference with lenders, vendors and suppliers. ... Lorna Marquardt and other members of her secretive racist group including reportedly local judges and counsel/receiver Krueger and his boss, Van Lieshout, are responsible for SIST's bankruptcy.

26. At all times material, Rule 11(b)(1) and (3) of the Federal Rules of Civil Procedure provided:

(b) REPRESENTATIONS TO THE COURT. By presenting to the court a pleading, written motion, or other paper - whether by signing, filing, submitting, or later advocating it - an attorney ... certifies that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances:

(1) it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; ...

(3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery ...

27. On August 16, 2010, Isaacson signed a "Declaration of Naomi Isaacson in Regards to Plaintiff's Second Motion for Default Judgment" which was filed August 17, 2010 in *MMG Financial Corporation v Midwest Amusement Park, LLC, et al.*,

U.S. District Court (E.D. Wis.) Case No. 06 CV 929. In this 'Declaration', Isaacson stated:

- a. This is an outrageous attempt to once again further prejudice the court and attempt to capitalize on the collegial relationship between this Court and Plaintiff's counsel.
- b. Once again, this behavior is evidence of Plaintiff's [counsel's] ongoing tactics to attempt to discredit Defendants and rely on his former working and collegial relationship with this Court as a tool to obtain what his client wants without any justice.
- c. Alternatively, it appears that Plaintiff's counsel is also perhaps attempting to build a case against Defendants by making repeated false accusations to enable this Court to have a supposed 'independent basis' to hide behind and rule against Defendants prematurely without appearing to be biased against Defendants. Seeing as this Court is tied up with the political events surrounding Defendants and the local community of Shawano and its mayor, it is impossible to believe with any rational basis that Judge Griesbach is completely neutral with regard to Defendants.

28. On August 17, 2010, Isaacson signed a "Declaration of Naomi Isaacson In Support of Objection to Expedited Motion for Conversion or Dismissal" which was filed in *Midwest Oil of Minnesota, LLC, Debtor*, U.S. Bankruptcy Court (D. Minn.) Case No. 10-35450. In her 'Declaration' Isaacson stated:

- a. [T]he local judges are working in conspiracy with Shawano Mayor Lorna Marquardt.
- b. Undercover, it was reported to Defendants that the attorney representing the City of Shawano, Henry

Heiman, in Delaware socialized extensively with [Delaware bankruptcy] Judge Gross and passed along Lorna Marquardt's message: 'Rule against the Indian dothead.'

- c. Due to the voluminous nature of the negative propaganda which has been saturated in the area in which this Court sits, Debtor has concerns about the Court's ability to set those matters aside and rule on the facts.
- d. According to what we have been told, through their common race and religion, Shawano Mayor Lorna Marquardt has wrapped her tentacles around the judiciary system including Shawano Municipal judges, Shawano County judges, Wisconsin Appellate Court judges, the Federal District Court judge in Green Bay, Seventh Circuit Appellate Court judges, and even U.S. Bankruptcy Court Judge Kevin Gross in Delaware. We have been told that the attorney representing the City of Shawano in Delaware socialized extensively with Judge Gross and passed along Lorna Marquardt's message. We have spent millions of dollars in legal fees and have not been successful in a single case. One would expect that in the United States one could find justice, but finding justice has been like seeing the full moon in the middle of a thunderstorm.
- e. We have all heard about other countries around the world where there is allegedly no justice. Yet, in all these years, SIST has never received any justice. ... We appeal to this Court to make a ruling based on justice and the law.
- f. The history of Debtor and its affiliates is a long saga of racial discrimination and prejudice because one of the directors happens to be originally from India. We appeal to this Court to make a ruling based on the law not based upon lies and fabrications that have been blasted by Lorna's media in furtherance of propelling and propagating racial hatred and discrimination.

- g. Sadly, in this day and age of globalism, certain individuals like the mayor of Shawano, Wisconsin, where SIST headquarters were formerly located, Lorna Marquardt, still have a White supremacy complex which prohibits her from acknowledging that peoples of other races and religions have a right to existence.
- h. As the President of SIST is of a different race and religion, Lorna Marquardt and her group have fought ferociously against SIST, its affiliates and its personnel. To that end, it has been reported that Lorna Marquardt formed a secretive, racist organization whose sole function is to wage psychological, physical, and financial war against SIST's Indian President, other SIST personnel, and businesses.
- i. Part of this attack included labeling SIST, this debtor, and its personnel as a 'CULT'. Since it would be considered barbaric in the eyes of peoples around the world to attack someone openly due to their race, they [sic] same thing is being done under the color of law by creating a false 'cult' label and using that to convey the message that this person is of a different race and religion and needs to be eliminated. Debtor and its personnel have been labeled a 'cult' ... SIST is not a religious organization and does not now, nor has it ever had any religious connection or any members. ...The 'cult' label has been affixed to convey the message to all that Debtor and its personnel are peoples and companies that need to be eliminated. Psychology shows that people accuse others of what they are guilty of. The real 'cult' is Lorna Marquardt and her secretive, racist group.
- j. Lorna Marquardt is involved in sending her cultic missionaries to other lands to destroy the family values, heritages, and cultures that have preserved peoples of other civilizations for thousands of years. While the dirty works of this religion

continue around the globe it also continues right here in the United States where a person's race, religion and affiliation determine their right to existence.

- k. Lorna Marquardt is a member of the most dangerous, dirtiest, and deadliest death cult in human history and is a descendent of Martin Luther and Hitler who started and propagated the Lutheran cult. In order to draw the attention away from their activities, members of this cult always attack everyone else as being a cult.
- l. Debtors' and affiliates' experience of 'justice' in Shawano and surrounding areas confirm what historians have found throughout the centuries. Christianity is the most dangerous death cult in human history whose sole function is to eradicate those who refuse to be converted. In fact, Lorna Marquardt sent an email to me saying be converted or face the consequences. Throughout the centuries, their loathsome religion has been used to decimate civilizations, destabilize governments, incite racial tensions, enslave peoples of other races, and strip the wealth of other lands.
- m. SIST, this debtor, its other affiliates, and its personnel have suffered from unimaginable prejudice, discrimination, and business interference at the hands of Shawano City officials, particularly Lorna (Mayor), the Christian racist. ... Lorna Marquardt, the Mayor of Shawano, began her campaign against SIST and its Indian President many years ago when she took office and formed the secretive, racist organization whose sole function is to eradicate those who refuse to be converted. Its motto is "be converted or face severe persecution which could even be lethal". Like three points of a triangle, Lorna Marquardt has successfully tied the media, the judiciary and the authorities together through their common race and religion and used them to pursue her obliteration aspiration.

- n. As discussed earlier, several members of the dirtiest, most dangerous and deadly Christian death cult have determined that since it would be considered barbaric in the eyes of peoples around the world to attack someone openly due to their race, the same thing is being done under the color of law by creating a false 'cult' label and using that label to convey the message that the target is a person of a different race and religion and needs to be eliminated.
- o. Counsel Kreuziger, the 21st century Inquisitor Torquemada [Colin D. Kreuziger, U.S. Justice Department attorney representing the bankruptcy trustee].
- p. [I]t is apparent that Counsel Kreuziger is determined to use his badge to propagate and propel racial hatred and discrimination.
- q. Counsel Kreuziger's motion is so fraught with perjurious slander and prevarications; it is astonishing that a member of the bar would file such material.
- r. [T]his Trustee [sic] is a visceral racist and feels ... that SIST, its affiliates, and personnel have no rights to existence. Therefore, since he has a badge, he can trample and tread upon Debtor's rights and slander, injure, malign, murder, and assassinate the character of Debtor, SIST, and its representatives with impunity.
- s. Literally, every single statement contained in Counsel Kreuziger's motion and supporting memorandum is untruthful, misleading and defamatory. His conduct is reprehensible. ...It is apparent that he is exercising his personal racial vendetta against Debtor in clear violation of state and federal law.
- t. Counsel Kreuziger has the audacity to tell the court otherwise either knowingly or recklessly with

complete disregard for his duty to investigate, inquire, and represent truth to this Court.

- u. This Court, not ignoramus Counsel Kreuziger, will make the determination Just because this inexperienced, condescending trial attorney feels otherwise is not a reason to dismiss or convert Debtor's case.
- v. Trustee [sic] Kreuziger's conduct indicates that he is a member of this most dangerous, dirtiest, and deadliest death cult in human history as well.

29. On August 18, 2010, U.S. Bankruptcy Judge Robert J. Kressel *In re Midwest Oil of Minnesota LLC, Debtor, U.S. Bankruptcy Court* (D. Mich.) Case No. 10-35450 held a hearing on the U.S. Trustee's motion to dismiss or convert the Chapter 11 bankruptcy of Midwest Oil of Minnesota, LLC. Judge Kressel concluded that dismissal was appropriate.

THE COURT: First, before I - - I feel I would be remiss if I didn't comment on the pleadings that you filed, Mr. Scott, [which included Isaacson document] which in my time on the bench are among the worst and most scurrilous, [sic] defamatory pleadings I have ever seen from a lawyer. It's the kind of thing I occasionally see from pro se people, but the stuff that you wrote is unprofessional in the extreme and just down right rude and inappropriate and somewhere along the line maybe you heard or thought that this was effective advocacy, but I can assure you that it is exactly the opposite.

You are not helping your clients with that kind of nonsense and trash that you have felt like you have filed in this case and I hope you refrain in the future from repeating it.

30. On August 18, 2010, the "Declaration" signed by Isaacson on August 15, 2010, was filed in a different legal proceeding, *Southwest Guaranty, Ltd. v. U.S. Acquisitions & Oil, Inc., et al.*, U.S. District Court (E.D. Wis.) Case No. 10 CV 596.

31. In response, plaintiff Southwest Guaranty, Ltd, moved the U.S. District Court for Rule 11 sanctions.

32. On October 12, 2010, in a written Order and Decision in U.S. District Court (E.D. Wis.) Case No. 10 CV 596, U.S. District Judge Rudolph Randa determined that it was inappropriate for USAO and SIST to remove the *Southwest Guaranty, Ltd.*, case to federal court. The case was remanded to the Shawano County Circuit Court. The U.S. District Court also granted Southwest Guaranty's motion for sanctions under Rule 11 because SIST's "Amended Notice of Removal" included what the Court described as "a number of inflammatory and irrelevant allegations regarding Southwest Guaranty, their counsel, and various members of the Shawano community." Judge Randa also stated, "inexplicably, the amended notice includes a number of detailed, serious, and bizarre allegations in the footnotes about certain members of the Shawano community, including

judges, city officials, and the mayor of Shawano, Lorna Marquardt."

33. Judge Randa quoted at length multiple passages from Isaacson's affidavit signed August 15, 2010, in justifying the imposition of sanctions.

34. Judge Randa's written order includes the following statements:

- a. Many of SIST's subsequent pleadings and motion papers are infected with similar allegations. SIST's allegations also implicate Southwest Guaranty and their counsel in this matter, Steven Krueger and David Van Lieshout. [Footnote omitted] This prompted Southwest Guaranty to file a motion for sanctions under Rule 11. [Footnote omitted]...
- b. For example, the amended notice alleges that "Plaintiff's counsel, Steven Krueger, and his boss, David Van Lieshout, are members of Lorna Marquardt's secretive, racist group and regularly attend the meetings orchestrated by Lorna Marquardt. Krueger and Van Lieshout have been employed as agents and emissaries of Lorna Marquardt's group to harm SIST." SIST's amended notice also accuses Southwest Guaranty and Krueger of "fraudulently and deceitfully" failing to disclose Southwest Guaranty's bankruptcy filing in Texas....
- c. [T]he Court must apply an objective standard - that is, whether a reasonable, competent attorney would believe, under the same circumstances, that the contentions were warranted. [Citations omitted.] The objectionable allegations are so fantastic and delusional that no reasonable attorney would certify that they have evidentiary support. It is "not enough that the attorneys' subjective belief and purpose are innocent; it is also necessary that such

mental state be based upon reasonable inquiry, objectively analyzed, into the basis for the facts alleged and into the law. [Citation omitted.] ...

- d. There is no basis for removal simply because the defendants are dissatisfied with the nature of proceedings in state court. Accordingly, the Court also finds that the allegations were included in the amended notice for an improper purpose. Fed. R. Civ. P. 11(b)(1) (pleading cannot be presented for an 'improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation'). [Footnote omitted.]...
- e. The objectionable allegations in the amended notice refer to and rely upon the Declaration of Naomi Isaacson, the President of U.S. Acquisitions and Oil, Inc. and the CEO of SIST. D. 17. Therefore, this is an appropriate case to impose sanctions on the attorney and the party because the defendants are also responsible for the violation [footnote omitted].

35. As a sanction for the Rule 11 violations, Judge Randa ordered the Defendants and their counsel to pay attorney fees to Southwest Guaranty. Judge Randa stated, "Hopefully, this will serve as an effective deterrent to future violations."

36. On March 23, 2011 (112 days after its incorporation), Yehud-Monosson USA, Inc., filed for Chapter 11 bankruptcy in the U.S. Bankruptcy Court for the Southern District of New York, as Case No. 11-11278. An "Adversary Complaint" subsequently filed by Yehud-Monosson USA, Inc. and Naomi Isaacson as joint plaintiffs in the New York federal bankruptcy court described

the history of Yehud-Monosson USA, Inc. It stated that Midwest Oil of Minnesota, LLC, and Midwest Oil of Anoka, LLC, were merged with Yehud-Monosson USA, Inc., on March 21, 2011. The corporation, it was asserted, was the "successor in interest to all assets, liabilities, and claims of its merged entities" including the claim of Midwest Oil of Minnesota, LLC, that was being asserted in the adversary proceedings.

37. On April 12, 2011, Isaacson drafted and signed a sworn affidavit bearing the case caption: *Yehud-Monosson USA, Inc., Debtor*, U.S. Bankruptcy Court (S.D. N.Y.) Case No. 11-11278. The affidavit, titled "Affidavit of Naomi Isaacson in Support of Objections to U.S. Trustee's Motions to Transfer Venue or in the Alternative Convert or Dismiss the Case," was filed that same day with the Court. Among other sworn allegations of fact, Attorney Isaacson stated:

- a. Lenders... know they can rob Debtor's properties and literally commit and engage in any illegal activities they so choose with impunity as all courts in Minnesota and Wisconsin will look the other direction and for one reason or another rule in their favor.
- b. This is a not a simple bankruptcy case under the law. If it was a case based upon law, the case could easily have been concluded. But, because the impetus is of a racial and religious nature, this Debtor is having a hard time finding justice. In fact, it has been impossible.

- c. This Debtor, its parent company, and affiliates should have had legal remedies for the atrocities being committed against it every day. Unfortunately, that has not been the experience. Attempts at legal recourse in Minnesota and Wisconsin have been futile.
- d. All the members of the judiciary work under the same race and religion motto, to oppress, harass, and deprive members of other races and religions of their rights and properties and sweep the atrocities of others under the rug. Truly, there is no justice in the United States. Under the façade of law, minorities are oppressed, harassed, and deprived every day. With a false smile, hiding behind the law, the judiciary accomplishes their mission to protect the atrocities being committed by members of their race and religion and to keep the minority under their feet. Did the Native Americans ever experience justice? Did the African Americans ever experience justice? While the visible chains of slavery are gone, they remain in invisible chains which are stronger and more dangerous. Due to the race of this President of this Debtor's parent company, our experience is no different. There is no justice system in Minnesota and Wisconsin and legal remedies are a farce. Racial and religious discrimination are so interwoven into the judiciary system that like the fibers of blanket, they have become inseparable.
- e. This Debtor, its parent company, and affiliates have not been successful in a single legal proceeding in Minnesota or Wisconsin despite clear, uncontroverted, decisive legal authority in our support.
- f. [T]rying a matter in Minnesota is like sending the Jews back to Germany during the Holocaust.
- g. Studies show and Debtor's predecessors, parent company and affiliates' experiences confirm that

Republican judges are dirty, evil and freely exercise their Jim Crow mentality and racial bigotry. Studies show that Democratic judges tend to be civilized and fair. Unfortunately, the judges this Debtor's predecessors and affiliates have encountered were all of the former classification. Unfortunately, Delaware justice has just been an extension of the travesties of justice of Minnesota and Wisconsin.

h. Debtor hopes for once that New York being a metropolitan area, a melting pot of all races and creeds, it will be able to have its day in court and for once be able to present its case in a neutral forum.

38. On April 13, 2011, over the Debtor's objections, the Yehud-Monosson bankruptcy was transferred from New York to Minnesota where it was captioned: *Yehud-Monosson USA, Inc., Debtor*, United States Bankruptcy Court, District of Minnesota, Case No. 11-42834.

39. On June 16, 2011, in the Yehud-Monosson bankruptcy case, U.S. Bankruptcy Judge Dennis O'Brien granted a motion by the U.S. Trustee and ordered the case to be converted to Chapter 7. The Debtor unsuccessfully appealed.

40. On October 5, 2011, the involuntary conversion was affirmed by a published decision in *Yehud-Monosson USA, Inc. v. Habbo Fokkena*, U.S. Bankruptcy Appellate Panel (8th Cir.) Case No. 11-6040. No further appeal was made.

41. On October 7, 2011, in the Minnesota Yehud-Monosson USA, Inc., bankruptcy case, Judge O'Brien entered an Order directing the Debtor to turn over the records sought by the Trustee by October 12, 2011.

42. On October 19, 2011, Naomi Isaacson signed a sworn affidavit titled "Affidavit of Naomi Isaacson in Response to Affidavit of Chapter 7 Trustee." This affidavit was filed with the Court on October 21, 2011.

43. In her "Affidavit," Isaacson stated that Chapter 7 Trustee Manty was making false, defamatory, scandalous and misleading statements to the Court, was "lying to the Court," and that Ms. Manty had given away Debtor's multimillion dollar property and settled adversary cases "worth millions of dollars ... for pennies." Isaacson made the following statements in her affidavit:

- a. From the day this Debtor filed for bankruptcy, this case has never been based upon the law. This case has been based upon bias and racial and religious discrimination. All decisions that have been made for the sole purpose of protecting the atrocities committed by other members of their common race and religion.
- b. Obviously, Nauni Manty loves power and feels free to abuse that power liberally since she belongs to a majority and the Court actors are members of her common race and religion. ... One can only conclude that since she was given a paper crown by a racially

bigoted Trustee Colin Kreuziger with the blessing of Judge O'Brien, the Jesuit, she is doing as much as she can to protect their common race and religion and rob, injure, and malign the Debtor and its sister entities.

- c. Where can the Debtor go with it when Nauni Manty, the court and the judges are all of the same race and religion working toward a common objective of harming the Debtor?
- d. It is an ignominy that there is no justice for the minority in the United States. In Debtor's experience, 'justice' is determined by one's race and religion. This case itself is a travesty of justice and a demonstration of the freedom and democracy that exists in a so-called democratic society right here in Minnesota, in bankruptcy court with its judges Robert Kressel, Dennis O'Brien, and now, Nancy Dreher. Debtor has no choice but to tell the world what is happening. Catholic Christians are the bigots of the past, present, and future where they are working undercover around the world to rule and determine the destiny of peoples of other races and religions. History proves over and over that they have exercised their power in the past to exterminate people of different races and religions. At the present, they also exercise their power to oppress the minority and to force them to be converted or face the consequences. They are cruel, they are brutal, and they are evil. Their bible is nothing but dirty toilet paper.

44. In a motion filed on November 2, 2011 the Chapter 7 Trustee moved to hold Isaacson in contempt for failing to turn over the Debtor's books, records and documents, and the address of Avraham Cohen.

45. In reply, on November 10, 2011, Isaacson swore to and signed the "Affidavit of Naomi Isaacson in Objection to Motion for Contempt." The affidavit was filed with the Court on November 11, 2011.

46. In Isaacson's November 10, 2011, "Affidavit" she:
- a. described Chapter 7 Trustee Manty as "the grand inquisitor."
 - b. described the judge who issued the order to turn over Debtor records as "Jesuit Judge Dennis O'Brien."
 - c. described Attorney Colin Kreuziger of the U.S. Trustee Office in Minneapolis as "Jesuit Trustee Colin Kreuziger."
 - d. claimed that Trustee Manty "lied to the court" and "persisted in her perjurious conduct." It stated that "Obviously, like her dirty bible, Nauni Manty is full of lies and deceit."
 - e. claimed Trustee Manty felt that "since she and the Court are of the same race and religion, the Court will join her in a crusade to oppress a minority under the color of law." And "Nauni Manty loves power and feels free to abuse that power liberally since she belongs to a majority and the Court actors are members of her common race and religion..." and "the court and the judges are all of the same race and religion working toward a common objective of harming the Debtor"
 - f. stated that Trustee Manty had "forcefully seized and took over tens of thousands of dollars from Debtor's accounts and all cash on-hand at Debtor's businesses" and that the "tens of thousands of dollars were taken by Nauni Manty ... solely to

benefit her own pocket and do as much harm as possible to Debtor

g. asserted that no "minority" could ever receive justice in the United States, particularly "in a state like Minnesota that is infested with bigoted Catholics and Lutherans whose history of murder, torture, and deceit speak louder than words as to their concept of 'justice'..."

47. On November 14, 2011 Trustee Manty renewed her motion for contempt.

48. On November 16, 2011 Isaacson signed the sworn "Affidavit of Naomi Isaacson in Response to Reply of Nauni Manty." This affidavit was filed the next day, November 17, 2011.

49. In her affidavit, Isaacson stated that Trustee Manty had fabricated stories, intentionally misled, lied and made false statements to the Court. Isaacson also stated: "This case was wrongfully converted from an 11 to a 7 on June 16, 2011. The very same day, the dirty Catholic inquisitor Nauni Manty was appointed as Chapter 7 trustee."

50. On November 17, 2011 there was to be a contempt hearing held before Judge Nancy Dreher. When it appeared the hearing had not been noticed properly, Judge Dreher adjourned the hearing to a future date and memorialized the adjournment in an Order dated November 18, 2011.

51. The Court's November 18, 2011, "Order re: Continued Hearing on Trustee's Contempt Motion" stated that "under the circumstances" it would be appropriate to continue the hearing on the trustee's motion and directed that notice of the continued hearing be given to all interested parties. In addition, Naomi Isaacson was ordered to appear in person, unless permission to appear by telephone was granted for good cause shown.

52. Isaacson drafted, verified and signed "Debtor Memorandum in Support of Motion to Vacate Order Dated November 18, 2011," which was filed with the court on November 25, 2011.

53. Although the court's order of November 18, 2011 was nothing more than adjourning the matter to a future date, Isaacson included the following statements in her Memorandum:

- a. Chapter 7 Trustee Nauni Manty had actually scheduled the hearing with Nancy Dreher, the Catholic judge, for 1:00 p.m. but sent notice to the Debtor that the hearing was set for 1:30 p.m.
- b. Debtor seriously questions Chapter 7 Trustee Nauni Manty's motive in informing Debtor of the wrong time for the hearing. Was it to make the job of the black-robed bigot that much easier? So, rather than forcing the Court to hear the case on its merits, the matter can just go by default? Debtor is suspicious of the Chapter 7 Trustee Nauni Manty's motive given her track record of lies, deceit,

treachery, and connivery, particularly, since the Chapter 7 Trustee Nauni Manty, the U.S. Trustee Colin Kreuziger, and Nancy Dreher, the Catholic judge, have been communicating with each other about this Debtor on an ex parte basis.

- c. U.S. Trustee Colin Kreuziger, Chapter 7 Trustee Nauni Manty, and Nancy Dreher, the Catholic judge, are of the same race and religion and their track record demonstrates their conspiracy and deceitful practices to hurt the Debtor. Even though all documents have been produced, Jesuitess Nauni Manty keeps repeating the same lie that records are missing.
- d. Across the country the court systems and particularly the Bankruptcy Court in Minnesota, are composed of a bunch of ignoramus, bigoted Catholic beasts that carry the sword of the church. Judge Dennis O'Brien is a Jesuit, Judge Nancy Dreher is a Catholic Knight Witch Hunter, U.S. Trustee Colin Kreuziger is a priest's boy, and the infamous Chapter 7 Trustee Nauni Manty is a Jesuitess.
- e. Debtor and its representatives have never experienced any justice at the hands of these inquisitors. Since Debtor has been vocal is [sic] exposing their dirty deeds, these dirty Catholics have conspired together to hurt Debtor.
- f. Both the Chapter 7 Trustee Nauni Manty and the U.S. Trustee Colin Kreuziger appeared at 1:00 p.m. and both the Chapter 7 Trustee Nauni Manty and the U.S. Trustee Colin Kreuziger 'pretended' to not know why Debtor's counsel was not present for the hearing. Therefore, Nancy Dreher, the Catholic judge, proceeded with the hearing in Debtor's absence and allowed the Chapter 7 Trustee Nauni Manty to argue her case as to why Debtor is in violation of the Court's Order for Turnover dated October 7, 2011.[...] When Debtor's counsel arrived for hearing at 1:20 p.m., no other parties to the case were present, and the Court's clerk informed Debtor's

counsel that the hearing had been held at 1:00 p.m. The Chapter 7 Trustee Nauni Manty and the U.S. Trustee Colin Kreuziger had already come and gone. The Court's clerk confirmed that the notice that was sent to Debtor indicated that the hearing was set for 1:30 p.m. but informed Debtor's counsel that the matter had been continued to December 6, 2011.

- g. Shockingly, on November 18, 2011, however, Nancy Dreher, the Catholic judge, issued an Order that effectively already finds that Debtor is in violation of the October 7th Turnover Order. Such Order states Chapter 7 Trustee Nauni Manty is permitted to make a record at such hearing that meets the test for a finding of contempt. The November 18th Order further states that the Debtor [sic] representative is required to be present at the hearing. Given what these dirty Catholics are capable of and particularly since there is no law to protect the minority, Debtor is concerned about what their secret plans are for the December 6, 2011 hearing. Catholic deeds throughout the history have been bloody and murderous.
- h. For Nancy Dreher, the Catholic judge, to issue such an Order when she knew that the Debtor was not present due to being intentionally misled by Chapter 7 Trustee Nauni Manty is unfathomable. One can only conclude that Nancy Dreher, the Catholic judge, is part of the conspiracy to deprive Debtor of its due process rights since she went ahead and issued an Order when she clearly knew the reason Debtor's counsel was not present at the hearing.
- i. Under normal circumstances, a Court would wait ten minutes in case some unfortunate mishap had befallen counsel to give her an opportunity to appear. What was the reason for the haste to hold this hearing? What secret discussions occurred during their secret meeting? Debtor has filed numerous pleadings which outline in detail its response to the Chapter 7's Trustee Nauni Manty's motion which clearly document that Debtor has produced all the records in its

possession. Debtor has a right to be heard on that issue. The entry of the order is illegal and in violation of Debtor's due process rights. In the interests of justice, this Order must be vacated.

j. Given the track record of injustice in this case, it seems that Debtor will never see justice until the matter is addressed in an international court in Beijing, China.

54. At a hearing on November 29, 2011, Judge Dreher described the language used in the Debtor's motion as "irresponsible, unprofessional and unbelievably and unmitigatingly outrageous".

55. At 12:46 AM (given the hour, apparently electronically) on December 6, 2011, the day the contempt hearing for Isaacson was to be held, a motion was filed to continue the hearing to allow Isaacson to obtain counsel for herself. The motion papers included a document titled "Declaration of Naomi Isaacson." In that document she stated:

The media in Minnesota and Wisconsin and even across the country, through the influence of the church and its personnel, where either the church owns the media under layers of deceit or they are major stockholders undercover, has saturated Minnesota and Wisconsin with negative propaganda against the Debtor and its personnel. Due to the saturation of intentional negative publicity against this Debtor and its personnel, which has been targeted to hurt the Debtor and its personnel financially, sociologically and psychologically and ultimately to remove them from daily functionality, I, as Debtor's principal officer, have been unsuccessful in retaining an attorney to

defend myself from the court-appointed [sic] Chapter 7 Trustee Nauni Manty's intentional and deceitful allegations against the myself and the Debtor in the pending Motion for Contempt and request for incarceration.

56. In a second "Declaration of Naomi Isaacson" filed by Isaacson with the court prior to the actual hearing on December 6, 2011, Isaacson referred to Chapter 7 Trustee Manty as the Court's "Inquisitor" and stated that Trustee Manty, "persists in boldly lying to the Court ... since she feels that the judges are of her same race and religion they will rule in her favor."

Isaacson also stated:

I want the Court to know, President Obama to know, Attorney General Eric Holder to know, United Nations to know, foreign media to know, and the world to know that Chapter 7 Trustee Nauni Manty keeps boldly lying because the judges and Court are controlled by her own race and Catholic religion. In the United States, under the Constitution, church and state are supposed to be separate. But, now like the Dark Ages, the Catholic Church obviously is in control of the Bankruptcy Court and the media.

57. On December 6, 2011, Isaacson failed to appear for the continued hearing on the Trustee's motion for contempt.

58. On December 7, 2011, Judge Dreher issued an Order to Show Cause requiring Naomi Isaacson to appear before her on January 4, 2012, and show cause why sanctions should not be imposed against her for violating Federal Rules of Bankruptcy

Procedure §9011(b) with respect to statements made in connection with Debtor's Motion to Vacate. The Order to Show Cause quoted 10 passages from "Debtor's Memorandum in Support of Motion to Vacate Order Dated November 18, 2011" that Judge Dreher described as "unsupported and outrageous allegations of bigotry, deceit, conspiracy, and scandalous statements against this court, Judge Dennis D. O'Brien, the trustee, the United States Trustee and bankruptcy courts in general." The 10 passages quoted by Judge Dreher constituted the text of paragraphs numbered 5 through 10 of the "Debtor's Memorandum" which Judge Dreher parsed into 10 statements as quoted above. The Order to Show Cause warned that sanctions might be imposed, including but not limited to \$1,000 for each unsupported statement, payable within 10 days, issuance of an injunction against future filings, and making a written public apology.

59. At all relevant times, Federal Rules of Bankruptcy Procedure §9011(b)(1) and (3) provided:

(b) Representations to the Court. By presenting to the court (whether by signing, filing, submitting, or later advocating) a petition, pleading, written motion, or other paper, an attorney or unrepresented party is certifying that to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances,

(1) it is not being presented for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation;

* * *

60. On December 8, 2011, Judge Dreher issued a "Contempt Order" in which she held Isaacson in civil contempt of court for failing to be present at the December 6, 2011, hearing, as ordered. Isaacson was given the opportunity to purge herself of the contempt by appearing at a continued hearing on January 4, 2012. Isaacson was ordered to appear at that hearing to be examined by the Trustee and to offer testimony on her own behalf concerning the acts of contempt identified in the Order. The Order also directed the U.S. Marshal or any authorized U.S. Officer to bring Ms. Isaacson before the court on January 4, 2012.

61. On December 30, 2011, Naomi Isaacson signed a 17-page document titled "Response of Debtor Representative, Naomi Isaacson, to Order to Show Cause" which was then filed with the U.S. Bankruptcy Court (D. Minn.) on the same day. Attorney Isaacson's "Response" expressly asserted that all the statements in the motion to vacate memorandum quoted by Judge Dreher were true and accurate and not made for any improper purpose.

Isaacson repeated some of the previous allegations in her "Response" by making statements such as the following:

- a. It is obvious that just because Nancy Dreher wears a black robe and carries a pen, she is using per [sic] power to suppress and squelch anything that I say which exposes their illegal conduct.
- b. Instead of admitting that she made a mistake, Nancy Dreher then issues an Order to Show Cause as to why I should not be sanctioned for exposing their illegal conduct.
- c. Since Nancy Dreher has determined that I need to show cause as to why I should not be sanctioned for stating the facts, one can only conclude that she is attempting to squelch and suppress the truth.
- d. The hearing on the motion for contempt was set for November 17, 2011 at 1:30 p.m. According to the Certificate of Service, both Debtor's attorney and Colin Kreuziger of the U.S. Trustee's Office received the same notice which indicated the hearing was set for 1:30 p.m. Obviously Nancy Dreher, Colin Kreuziger, and Nauni Manty met together to discuss how to proceed. Thus they all secretly decided they would have the hearing at 1:00 p.m. rather than 1:30 p.m. when Debtor might be present. The hearing started promptly at 1:00 p.m. and was held as expeditiously as possible before Debtor or its attorney would appear.
- e. Unless it was preplanned, how is it that Colin Kreuziger, Nauni Manty, and Dreher all appeared at 1:00 p.m., when the notice everyone received indicated the hearing was set for 1:30 p.m.?
- f. The fact that Nancy Dreher, Colin Kreuziger, and Nauni Manty all appeared at 1:00 p.m. demonstrates the conspiracy among the trio. Had there not been a conspiracy and secret discussions among them, how would they all know to appear at 1:00 p.m.?

- g. Would Nancy Dreher have proceeded with the secret hearing if this company were not associated with a businessman from India? If this were one of the hundreds of bankruptcy filings by the Catholic Church to avoid paying their victims, would Nancy Dreher have proceeded with the hearing? ...Would Nancy Dreher have ordered a priest to appear for a hearing and produce records? In fact, would Nancy Dreher have proceeded with the hearing for any company headed by a member of her White Supremacy group? The obvious answer is 'NO'. One does not have to be genius to say what it is. Whether you call it bigotry, prejudice, or intolerance, it all reeks.
- h. Shockingly, however, the following day, November 18, 2011, even though Nancy Dreher knew of the feigned 'confusion' regarding the hearing time, she issued an order by default that mandated my appearance on December 6, 2011 at 3:00 p.m. The only possible explanation is that this entire episode was preplanned. ... I want the public to take knowledge of the kind of 'justice' executed by Nancy Dreher. It is just like 'justice' during medieval times.
- i. The fact that Nancy Dreher unabashedly issues an Order even after it has been brought to her attention that the hearing was prior to the scheduled time is shocking. After that, Nancy Dreher then has the audacity to refuse to vacate her illegal order."

62. Isaacson's "Response," referred to Judge Dennis O'Brien, the first bankruptcy judge to hear the case in Minnesota, as "Jesuit O'Brien" and "Jesuit Judge O'Brien" and stated that he was "an avowed Jesuit," "the dirty Jesuit," a "dastardly Jesuit" and "a Jesuit working undercover." Isaacson stated that Judge O'Brien "conspired" with Mr. Colin Kreuziger

concerning an allegedly "falsified affidavit" so that the bankruptcy case could be involuntarily converted to a Chapter 7 bankruptcy.

63. In her "Response", Isaacson stated that "Nancy Dreher's husband is from the racial discrimination headquarters for the United States, which is a place called Shawano, Wisconsin." Isaacson's "Response" also included the following statements:

- a. [O]ut of personal malice, Nancy Dreher has issued this Order to Show Cause and warrant for my arrest.
- b. Because an Indian businessman is associated with this business, Nancy Dreher apparently feels she does not need to follow the law.
- c. In every court I have encountered, not a single judge has taken a stand against the evils being perpetrated by Lorna Marquardt. This includes Nancy Dreher. In fact, some of them like Nancy Dreher, have gone out of their way to find a way to make Debtor and its affiliates guilty. Many judges, just like Nancy Dreher, have found one excuse or another to find Debtor or its affiliates in default so they do not have to face reality.
- d. The actions of the foursome, Dennis O'Brien, Nancy Dreher, Colin Kreuziger, and Nauni Manty reek of injustice, conspiracy, bigotry and prejudice.
- e. One would expect Nancy Dreher to at least show a façade of legality. Literally, I am dumbfounded at the brashness of foursome, Nancy Dreher, Dennis O'Brien, Colin Kreuziger, and Nauni Manty, in their illegal activities in this case.

- f. Apparently since the catholics are in control of the judiciary, the court system, the media, and every arm of government, Nancy Dreher must feel she is infallible
- g. What is the purpose of ruling against the Indian businessman? The answer is bias, prejudice, and bigotry. They all belong believe in the same dirty catholic creed: we are superior; we are better; and we hold the patent to life. They all believe in the words of Lorna Marquardt, 'We are going to chase the dot-head back to his mud-hut.' Sincerely they do carry the sword of the church. That is the same mentality and sword that has been used to slaughter hundreds of millions innocent people throughout the centuries. Adherence to that catholic creed has caused the blood of the innocent to flow like a river.
- h. [A] representative of the United States Justice Department, Colin Kreuziger ... has been the most bigoted, discriminatory, bestial catholic. ... For years, his kind has used its media, to saturate Minnesota, Wisconsin, and the entire country with false, slanderous and defamatory negative propaganda against the Debtor's parent company, SIST, and its personnel to fulfill their agenda.
- i. Nauni Manty is a liar. ... Like a mindless robot, Nauni Manty keeps repeating the same prevarication that records are missing. Since the unfortunate day that Nauni Manty was appointed, she has been a Jesuitess, meaning a zealous advocate of her bigoted catholic White Supremacy beliefs.
- j. In Debtor's motion to vacate, Debtor exposed the conspiracy of the three catholics, Nancy Dreher, Nauni Manty, and Colin Kreuziger.
- k. Debtor has seen throughout this entire proceeding that Nancy Dreher, Colin Kreuziger, and Nauni Manty, all have the same bigoted catholic White Supremacy mentality.

1. It is an ignominy for Nancy Dreher to be a judge when she has such a narrow-minded world view. In fact, I am so flabbergasted at Nancy Dreher's bigotry that it sounds like she took the Jesuit oath. Part of the Jesuit Oath states: "'I do further promise and declare, that I will have no opinion or will of my own, or any mental reservation whatever, even as a corpse or cadaver, but will unhesitatingly obey each and every command that I may receive from my superiors in the Militia of the Pope... I furthermore promise and declare that I will, when opportunity presents, make and wage relentless war, secretly or openly, against all heretics, Protestants and Liberals, as I am directed to do, to extirpate and exterminate them from the face of the whole earth; and that I will spare neither age, sex or condition; and that I will hang, burn, waste, boil, flay, strangle and bury alive these infamous heretics, rip up the stomachs and the wombs of their women and crush their infants heads against the walls, in order to annihilate forever their execrable race. That when the same cannot be done openly, I will secretly use the poisoned cup, the strangulating cord, the steel of the poniard or the leaden bullet, regardless of the honor, rank, dignity, or authority of the person or persons, whatever may be their condition in life, either public or private, as I at any time may be directed so to do by any agent of the Pope or Superior of the Brotherhood of the Holy Faith, of the Society of Jesus.'" — Edwin A. Sherman, *The Engineer Corps of Hell; or Rome's Sapper's and Miners*, Private Subscription, 1883, pp. 118-124.

- m. In referring to Nancy Dreher as being a 'Catholic judge', it is not referring to being a member of the Roman Catholic Church. It is referring to a mentality and an adherence to a universal creed of White Supremacy. 'Catholic' also refers to membership in the universal Christian faith. All Christians have a creed: a belief in the father, son, and holy ghost. They believe that no one has

rights to 'heaven' except through their dirty book. They hold the patent to 'god' and can go to every nation on earth to force their vomit down everyone's throat. Nancy Dreher cleverly asserts that she is not 'Catholic' in the sense that she claims not to be a member of the Roman Catholic Church, but she cannot deny her 'catholic' mentality or catholic Christian origin which dictates a person's entire life. Only 'White Christians' have a right to life, and whether or not any minority has any rights is in the White Christians' sole discretion. Even now, even though Nancy Dreher was clearly wrong in holding a secret hearing, she still stubbornly asserts she is right. That is the catholic mentality of a Christian. Nancy Dreher certainly is not Hindu, Muslim, Jewish, or Bhuddist [sic]. Nor is she an atheist. If she were an atheist, at least one could expect to see some justice.

- n. Does Debtor not have a right to ask questions? Does Debtor not have a right to voice what it feels? What happened to freedom of speech? Apparently, that is not a right afforded to minorities. This again is another demonstration of the 'catholic' mentality of Nancy Dreher.
- o. Catholic deeds throughout history have been bloody and murderous Since Nancy Dreher has taken issue with the statement, once again it only confirms her catholic mentality.
- p. Obviously, Nancy Dreher thinks Chinese are low-grade and sub-human. Indians are subhuman. Africans are subhuman. ... Nancy Dreher's actions are reminiscent of the Dark Ages, when the priests invited rabbis to a debate. Anything the rabbis said was called blasphemy, which was punishable by death. Nancy Dreher's actions clearly demonstrate her 'catholic' mentality.

64. On January 3, 2012, Judge Dreher issued a bench warrant for Isaacson's arrest based upon Isaacson's failure to comply with the Court's December 8, 2011 Contempt Order.

65. Isaacson did not appear at the continued hearing on January 4, 2010, despite being ordered to do so. Judge Dreher found Isaacson in contempt for failing to comply with the orders to turn over documents and information and for her failures to appear on both December 6, 2011, and January 4, 2012.

66. At the January 4, 2012, hearing, Judge Dreher addressed the Order to Show Cause directed to Isaacson. Judge Dreher considered whether the statements from the "Debtor Memorandum in Support of Motion to Vacate Order Dated November 18, 2011," violated Rules 9011(b)(1) and (3). In concluding that the statements did violate the Rules, Judge Dreher stated:

All of the statements that were made were actually not just statements of thought, philosophy, or religious view. They were statements of fact, facts about this court, unsubstantiated facts about the United States courts in general, unsubstantiated facts about stated facts that this court engages in ex parte silent communication with other persons that are appearing in this court, totally unfounded and, if you will, uninvestigated. Attorneys are not allowed to do that under the rule.

67. Judge Dreher addressed the Order to Show Cause directed at Naomi Isaacson and concluded that the statements were not supported by evidence and were made for the improper purposes, as demonstrated by Isaacson's continued repetition of them, including to delay the administration of the bankruptcy estate and to threaten the court. The judge noted that Isaacson's newest statements were even worse than her older ones and that Isaacson's response to the Order to Show Cause contained even more inflammatory, untrue and unsubstantiated statements.

68. Following the January 4, 2012, hearing on the Order to Show Cause issued to Isaacson, the U.S. Bankruptcy Court issued an "Order for Sanctions" against Isaacson. Isaacson was ordered to pay a \$5,000 monetary sanction within 90 days, which the court noted represented a \$500 sanction "for each of the sanctionable statements identified in the court's order to show cause." In addition, Isaacson was expressly enjoined from any future filing in the U.S. Bankruptcy Court for the District of Minnesota of any document that referred to the religious beliefs of the court, the judge, the previous judge, the attorney for the U.S. Attorney, and the trustee, or called them disparaging names based on their religious beliefs.

69. On January 5, 2012, Judge Dreher issued a "Continuing Contempt Order" directed to Isaacson finding Isaacson, as the designated representative of the Debtor, in civil contempt for her knowing and willful failure to comply in any respect with the Order of December 8, 2011, and her failure to produce specified documents and information.

70. On January 18, 2012, a "Notice of Appeal" was filed for both Yehud-Monosson USA, Inc. and Isaacson.

71. On February 9, 2012, Judge Dreher awarded the Chapter 7 Trustee, Nauni Manty, \$10,322.99 in costs and attorney fees against Isaacson in *Yehud-Monosson USA, Inc., Debtor*, U.S. Bankruptcy Court (D. Minn.) Case No. 11-42834.

72. On February 16, 2012, the U.S. Court of Appeals for the Seventh Circuit issued a decision in *MMG Financial Corporation, Plaintiff-Appellee v. Midwest Amusement Park LLC, et al., Defendants - Appeal of Rebekah M. Nett*, U.S. Court of Appeals (7th Cir.) Case No. 11-1899. On February 16, 2012, the U.S. Court of Appeals for the Seventh Circuit issued a decision in *MMG Financial Corporation, Plaintiff-Appellee v. Midwest Amusement Park LLC, et al., Defendants - Appeal of Rebekah M. Nett*, U.S. Court of Appeals (7th Cir.) Case No. 11-1899. The ruling decided Attorney Nett's appeal of the \$5,000 sanction

imposed by the U.S. District Court for the Eastern District of Wisconsin, largely for repeating statements taken from the "Declaration" signed by Attorney Isaacson on August 15, 2010. Those included the comparison of the Defendant's experience to "the 'justice' Jews experienced under Hitler's regime." The Court of Appeals affirmed the sanction and stated in part:

The second appeal, No. 11-1899, is from an order ordering Rebekah M. Nett to pay \$5,000 as a sanction for filing papers containing insulting or scurrilous language - in particular, assertions that the basis for the adverse decisions must be racial or ethnic bias, which Nett asserted was just like Nazi persecution of the Jews. The assertion that the judicial decisions in this litigation is [sic] similar to Nazi atrocities is outrageous. The appellate brief asserts that sanctions are unwarranted because "the comments were just stating the facts" (App. Br. 16) and "counsel cannot be sanctioned for making truthful statements" (id. at 20). This is unprofessional conduct, to say the least.

73. In that sanctions were justified against Nett for repeating the Nazi persecution analogy made by Isaacson, it is equally outrageous and unprofessional for Isaacson to have made the statements for filing with the court in the first place.

COUNT ONE

74. By making unfounded, scurrilous, vilifying statements and religious slurs directed against the courts generally, and against specific judges, other counsel, appointed officers and

third parties, in a series of 12 documents she signed or created during July and August 2010, April 2011, and between October and December 2011, and which were filed in cases before various federal courts in Wisconsin, Minnesota and New York, **Isaacson** violated **SCR 20:8.2(a)**¹, **SCR 20:8.4(g)**², **SCR 40.15**³ and **SCR 20:8.4(i)**⁴, and **Minnesota Rules of Professional Conduct (MRPC) Rule 3.1**⁵, **Rule 4.4(a)**⁶, **Rule 8.2(a)**⁷, **Rule 8.4(d)**⁸ and **Rule 8.4(g)**⁹.

COUNT TWO

75. By inserting offensive language that violated the Minnesota Rules of Professional Conduct into a draft memorandum supporting a motion, and directing another counsel to file the

¹ **SCR 20:8.2(a)** provides in pertinent part: "A lawyer shall not make a statement that the lawyer knows to be false or with reckless disregard as to its truth or falsity concerning the qualifications or integrity of a judge"

² **SCR 20:8.4(g)** provides in pertinent part: "It is professional misconduct for a lawyer to ... violate the attorney's oath"

³ **SCR 40.15** provides in pertinent part: "I will maintain the respect due to courts of justice and judicial officers ..." and "I will abstain from all offensive personality."

⁴ **SCR 20:8.4(i)** provides: "It is professional misconduct for a lawyer to ... harass a person on the basis of sex, race, age, creed, religion, color, national origin, disability, sexual preference or marital status in connection with the lawyer's professional activities."

⁵ **MRPC Rule 3.1** provides in pertinent part: "A lawyer shall not bring or defend a proceeding, or assert or controvert an issue therein, unless there is a basis in law and fact for doing so that is not frivolous, which includes a good faith argument for an extension, modification, or reversal of existing law."

⁶ **MRPC Rule 4.4(a)** provides in pertinent part: "In representing a client, a lawyer shall not use means that have no substantial purpose other than to embarrass, delay, or burden a third person"

⁷ **MRPC Rule 8.2(a)** provides in pertinent part: "A lawyer shall not make a statement that the lawyer knows to be false or with reckless disregard as to its truth or falsity concerning the qualifications or integrity of a judge"

⁸ **MRPC Rule 8.4(d)** provides: "It is professional misconduct for a lawyer to ... engage in conduct that is prejudicial to the administration of justice."

⁹ **MRPC Rule 8.4(g)** provides: "It is professional misconduct for a lawyer to ... harass a person on the basis of sex, race, age, creed, religion, color, national origin, disability, sexual preference or marital status in connection with the lawyer's professional activities."

altered pleading with the U.S. Bankruptcy Court (D. Minn.) on November 25, 2011, **Isaacson violated MRPC Rule 20:8.4(a)**¹⁰.

COUNT THREE

76. By stating in three affidavits or declarations filed in the U.S. District Court and Bankruptcy Court for the Eastern District of Wisconsin and the U.S. Bankruptcy Court for the District of Minnesota, that Shawano County Circuit Judge James Habeck had appointed a receiver in an ex parte hearing, while knowingly failing to disclose that in 2006 she had signed loan papers that expressly consented to the appointment of a receiver without any notice (aside from the filing of an action seeking appointment of a receiver), **Issacson violated SCR 20:3.3(a)(1)**¹¹ and **SCR 20:8.4(c)**¹²; and **MRPC Rule 3.3(a)(1)**¹³ and **MRPC Rule 8.4(c)**¹⁴.

¹⁰ **MRPC Rule 8.4(a)** provides: "It is professional misconduct for a lawyer to violate or attempt to violate the Rules of Professional Conduct, knowingly assist or induce another to do so, or do so through the acts of another."

¹¹ **SCR 20:3.3(a)(1)** provides: "A lawyer shall not knowingly make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer."

¹² **SCR 20:8.4(c)** provides: "It is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation."

¹³ **MPRC Rule 3.3(a)(1)** provides: "A lawyer shall not knowingly make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer."

¹⁴ **MRPC Rule 8.4(c)** provides: "It is professional misconduct for a lawyer to engage in conduct involving dishonesty, fraud, deceit or misrepresentation."

Regarding OLR's Investigation

77. On November 24, 2010, OLR sent an investigative letter that informed Isaacson that, pursuant to SCR 22.03(2), she was required to provide a written response by December 17, 2010 that fully and fairly disclosed all facts and circumstances pertaining to alleged misconduct. OLR's letter informed Isaacson of her duty to cooperate with the investigation under SCRs 21.15(4), 22.001(9)(b), 22.03(2) and 22.03(6).

78. By letter dated December 12, 2010, attached to an e-mail sent on December 14, 2010, Isaacson requested a 180-day extension of time to respond. OLR did not grant an extension on questions put to Isaacson that were answerable from her own memory, and granted a 30 day extension as to other questions.

79. On December 17, 2010, Isaacson provided a partial, incomplete response to OLR's investigative inquiries.

80. On January 14, 2010, Isaacson telephoned OLR and asked for a one-week extension to respond to the remainder of OLR's letter of November 24, 2010. OLR agreed and confirmed by e-mail that Isaacson had until January 24, 2011, to respond to the balance of OLR's queries.

81. Isaacson sent a letter addressed to OLR as an attachment to an e-mail sent on January 24, 2011. Isaacson stated she felt that because of the race and religion of OLR's investigator, OLR was unable to conduct a neutral investigation. She stated she would make her response to the grievance after a new investigator was assigned. Isaacson's letter was referred to OLR's Deputy Director of formal investigations, who wrote to Isaacson on February 3, 2011 to advise her that OLR's original investigator would remain assigned to the investigation and that Isaacson's duty to cooperate remained as stated in previous correspondence to her.

82. On February 11, 2011, OLR sent Isaacson a final request for her written response to the grievance. The letter set Isaacson's deadline to respond as February 22, 2011.

83. Isaacson sent OLR an e-mail on February 22, 2011, to which she attached a letter which she described as her responses to the remainder of OLR's letter of November 24, 2010. No attachments, documentation, exhibits or other materials were included with Isaacson's letter, although internal references were made to "materials ... provided" or words to that effect.

84. With respect to OLR's request for the identification of other persons who provided her information on which

statements in her Declaration filed in federal court were based, Isaacson did not directly provide the information, instead stating, "Much of the information has been provided by hundreds of concerned citizens and customers of my various business establishments. In most cases, the information has been provided on condition of anonymity due to the severe harassment and repercussions that the informants will face should their identities be disclosed."

85. In a series of four e-mails sent to OLR on February 23 and 24, 2011, Isaacson provided online links to electronic files that she indicated contained her supporting materials. She provided a total of 53 such links in the four e-mails, not counting duplicates. These links were to www.filetolink.com, a file-sharing site on the Internet. Isaacson also provided a file named "Ponderosa.pdf."

86. The time required for OLR to access and download each of the 53 folders posted by Isaacson at <http://www.filetolink.com> was five hours and 21 minutes. The downloaded materials were so-called "zip" files, a type of compressed file, and they ranged in size from 0.423 megabytes to 805 megabytes. In total, the folders contained 5,908.423 megabytes (5.9 gigabytes) of data.

87. One of the file links Isaacson sent (<http://www.filetolink.com.1ed42880>) could not be opened at all by OLR except to determine that its alternative name was given as "Discrimination_News_Articles.rar." State of Wisconsin CCAP information technology staff advised OLR that the ".rar" file extension identified a rare and obscure data format that could not be opened with software available on the State Court system computers. CCAP staff also reported that it appeared the file was corrupted and that it therefore might be impossible to open it, even with compatible software.

88. The linked files provided by Isaacson that could be opened contained sub-files consisting of 2,947 photographs, 2 Quicktime video clips, 1 AVI video clip, and 328 document files in the Portable Document Format (PDF), containing multiple documents. This count does not include the file named "Ponderosa.pdf" attached to Isaacson's February 24, 2011.

89. The .pdf files furnished by Isaacson to OLR on February 23 and 24, 2011 contained 3,989 pages of documents.

90. Many of the electronic documents furnished by Isaacson had no readily-apparent relationship to any of the questions OLR had posed. These include, but are not limited to, photographs of a flooded basement, a cigarette butt, electrical fixtures,

street scenes and parked cars. Isaacson also provided miscellaneous court papers, such as notices of hearings, notices of depositions, notice of cancelled deposition, briefing schedules, scheduling orders, cover letters, and an affidavit of non-military service.

91. Isaacson provided no indexing or cross-references between the electronic data she sent and the specific questions asked by OLR. Isaacson did not provide OLR with a method to determine which, if any, of her electronic documents and photos she intended to relate to specific OLR questions.

92. Isaacson included no captions with the 2,962 photographs or the 3 videos. Of the 2,962 photographs, most have names which may have been automatically assigned by digital camera software such as "P1020518," "IMG_2157," "FH 000011," and "100_3217", and which convey no information about what the photo depicts. Only 72 photographs have file names that identify the photo in any way and few of these appear to relate directly to any of OLR's questions proposed to Isaacson.

93. There was redundancy amongst the electronic data files furnished by Isaacson. Of the 72 named photographs, at least 17 are duplicates of other named photographs. The unnamed

photographs also included some duplication. Two Quicktime videos were duplicates of each other.

94. The relevance of the video clips to OLR's investigative inquiries was not delineated or apparent. The duplicated Quicktime video, file name "P1010121.mov," is a one-minute-ten-second (01:10) video that begins out-of-doors with shadows of the photographer and others on snow piled in the foreground and a white WE Energies van visible in the background. The camera was then apparently tucked inside the camera operator's jacket for about three-quarters of the video. The audio is not clear but includes comments about an electric meter and a furnace. It is not apparent who is speaking or to whom. The AVI video clip (filename "MVI_2927") lasts for three seconds and appears to show a uniformed police officer standing in what might be a hotel or business lobby speaking to a woman and handing her a pink piece of paper.

95. OLR wrote again to Isaacson on March 16, 2011, stating that OLR had reviewed her letter dated February 22, 2011, and, insofar as possible, the electronic documents to which she submitted links on February 23 and 24, 2011. OLR's March 15, 2011 letter noted that Isaacson provided no indexing, cross-referencing or other method of determining what material was

related to each of the numbered questions that she had been asked in OLR's letter of November 24, 2010, and that Isaacson provided no captions for the photographs which were mostly identified by a number only. The handful of exceptions had names that were cryptic or at least not particularly informative. OLR identified for her a link she had provided, namely <http://www.filetolink.com/1ed42880>, that we were unable to open and further explained that the Court's system technical staff advised that the file extension ".rar" associated with that link was not one that could be opened with software on the State Court computer system and that, in any event, the file appeared to be corrupted so that it might be impossible to open it even with compatible software. OLR identified two specific electronic files she had supplied that OLR was unable to access: the file "feed.rss" in the folder "46f7ded0" and the file named "Picasa" in folder "631998a2." Of the programs available on the State Court computer system, only Microsoft Notepad was able to open the "picasa.ini" file. OLR supplied Isaacson with a copy of the resulting printout of that file, which did not appear to convey any useful information responsive to the investigative questions posed by OLR. OLR advised Isaacson that OLR the portion of her response OLR was able to read was generally

unresponsive to its investigative questions and was not cooperative.

96. OLR's investigator concluded the March 16, 2011, letter by stating:

If any information in the "led42880," "feed.rss" or "Picasa" files was relevant to your response to a question in my letter of November 24, 2010, you should immediately provide a paper copy, subject to the page limitations explained in that letter and identifying the specific question you are answering and to which the material relates. In the absence of such a response from you, we will continue toward filing a motion under SCR 22.03(4).

97. Isaacson responded to OLR's March 16, 2011 letter with a letter dated March 25, 2011. A copy of the letter was attached to an e-mail Isaacson sent to OLR on March 29, 2011. The text of her e-mail read, "Attached is a reply to your latest correspondence." A header on the letter stated, "Sent via electronic mail and U.S. Mail (supporting documentation by U.S. mail only)."

98. In her March 25, 2011 letter, Isaacson expressly acknowledged receipt of OLR's letter dated March 16, 2011. She also asserted, among other things, the following:

- (a) I was forced to respond in the method which I did based upon the questions that you asked. Based upon the wording of your questions, which often demanded that I answer up to a dozen questions within one question, how else can I be expected

to respond? For each question, I specifically referenced which materials supported the statement contained therein.

- (b) With respect to the documentation that I submitted electronically, all documents were submitted as PDF files and all photos were submitted as JPG files. These are standard file formats which any person with little or no education is able to open. Just because you are incompetent, are ignorant, have an arcane computer system which does not recognize these standard file types, or are intentionally not opening the files, you have taken the liberty of baselessly accusing me of being uncooperative.
- (c) One can only conclude from your conduct, that you have ulterior motives and a hidden agenda of punishing me for speaking the truth and pulling back the covers to tell about the racial and religious discrimination being perpetrated by someone of your same race and religion. Obviously, since you are in a position of power you have chosen to abuse that power to squelch the truth and stand up for your race and religion. What else someone can [sic] conclude from your irrational conduct?
- (d) On the off chance that you sincerely were unable to open the documents and are truly attempting to actually investigate this matter, enclosed herewith is a CD which contains the documents which were sent in response to your inquiry of November 24, 2010.

99. The submission that Isaacson sent via U.S. Mail arrived at OLR on April 5, 2011. The envelope was postage metered on April 2, 2011. Isaacson's submission included a signed copy of the same letter she previously e-mailed and two

CD-ROM disks. Both disks were apparently created on March 29, 2011, according to the identification data on the disks themselves. The first, hereinafter "Disk 1" had a volume serial number of 3B53-2349 and contained two directories both created on March 29, 2011, at 7:22 PM, one named "Discrimination News Articles" and the other named "Pictures." The second disk, hereinafter "Disk 2," had a volume serial number of 4356-F85A and contained three directories all created 3/29/11 at 10:30 PM and named "Litigation to Send," "Pictures," and "Video."

100. OLR was able to print a list of the names of the directories, subdirectories and files on the two disks. The list of names is 66 pages long, single spaced.

101. The Disk 2 files in the "Litigation to Send" directory appear to duplicate the 328 files, totaling 3,982 pages, previously submitted by Isaacson under the same heading. The Disk 2 "Video" directory contains one file, which is a duplicate of the AVI movie file previously supplied by Isaacson, consisting of a three-second video clip, file name "MVI_2927." The two "Pictures" directories on Disk 1 and Disk 2 together contain 2,700 files with the ".jpg" file extension usually used for photographs, plus two files with the ".mov" file extension used for Quicktime movies (which files are duplicates of each

other), plus two files, "feed.rss" and "picasa.ini," that OLR was unable to properly open. Isaacson's Disk 1 and Disk 2 therefore appeared to contain 247 fewer photo files than her previous submissions.

102. Contrary to OLR's direction, Isaacson resubmitted the electronic files "feed.rss" and "picasa.ini" that OLR was unable to open, rather than submitting any relevant information from these files in paper form.

103. The Disk 1 directory "Discrimination News Articles" and the files contained therein, were newly submitted materials. However, Isaacson failed to include any references to specific documents therein that she believes provide evidence of the factual assertions in her Declaration. The "Discrimination News Articles" directory contains a total of 383 files, together totaling over 1 gigabyte of data, which are subdivided into subdirectories numbered 1975 through 1980, 1982 through 1985, 1995 through 1996 and 2000 through 2010. In addition, there are six files in the main "Discrimination News Articles" directory that have similar numerical names, specifically: 1986.pdf, 1987.pdf, 1988.pdf, 1990.pdf, 1998.pdf and 1999.pdf.

104. The first subdirectory, "1975," consisted of 104 pages of .pdf images of newspaper clippings from 1975 and 1976,

including some blank pages. The clippings related to a variety of matters, none of which pertained to OLR's investigation, namely:

- a) A series of clippings of both articles and letters to the editor from newspapers including the *St. Paul Dispatch*, *Free Press* (of Mankato, Minnesota), *Green Bay Press-Gazette*, *Minneapolis Tribune*, *Minneapolis Star*, *St. Paul Pioneer Press*, and *Rochester Post-Bulletin*, concerning the 1975 suspension and firing of a high school English teacher named Kalmar Gronvall by the school board in Mankato, Minnesota.
- b) A March 1976 advertisement from the *Rochester Post-Bulletin* (of Rochester, Minnesota) announcing that Rama Behera would be proclaiming the word of the Lord at the Mayo Civic Auditorium.
- c) An April 1976 article about a Mankato, Minnesota, high school student who joined, then subsequently left, the Brother Rama Behera sect.
- d) A series of clippings concerning the 1976 slaying of Waseca County, Minnesota, Sheriff Donald Eustice.
- e) A 1976 article from *The Redwood Gazette* (a shopping center publication from Redwood, Minnesota) headlined "Cults Bird Island Pastor's fighting them."
- f) A 1976 article about three *Rochester Post-Bulletin* staffers winning news writing awards.
- g) A 1976 *Minneapolis Tribune* article headlined "Most think new cults are passing fad."
- h) A 1976 *Rochester Post-Bulletin* article headlined "Offbeat religious cults considered fad by most."

- i) Two 1976 letters to the editor of *The Redwood Gazette* responding to the article concerning the Bird Island pastor fighting cults.
- j) A reprint of one of the letters to the editor in the Bird Island Union.
- k) A 1976 article in *The Redwood Gazette* about a teacher in Redwood Falls concerned about his job because he is a follower of Brother Rama Behera.
- l) A 1976 letter to the editor of *The Redwood Gazette* from a former member of the Brother Rama Behera group.
- m) A 1976 letter to the editor of *The Redwood Gazette* from a self-identified member of the Brother Rama Behera fellowship.
- n) A 1976 letter to the editor of *The Redwood Gazette* seeking a public debate over what is or is not a cult, as well as who is lying, harassing, slandering or is a "born again" Christian.
- o) An apparent letter to the editor of *The Redwood Gazette* (Winter 1976-77), headlined "Energy Crisis is 'God's Wrath.'" "
- p) An apparent letter to the editor of the *Free Press* (date unknown), headlined "America Repent."

105. On April 21, 2011 OLR filed a Motion for Order to Show Cause with the Supreme Court of Wisconsin, asking that the Court order Isaacson to show cause why her license to practice law should not be temporarily suspended for her failure to cooperate with OLR's investigation. On April 27, 2011, the Court ordered Isaacson to show cause (OTSC) within 20 days why her license to

practice law should not be temporarily suspended for failure to cooperate with OLR's investigation.

106. On May 17, 2011, Isaacson filed a Response to the OTSC. In it, she claimed that the thousands of photographs and documents she had submitted were in response to a single OLR question. Isaacson's response essentially asserted it was up to OLR to sift through her submissions to unearth evidence supporting her allegations of conspiracy and criminal or tortious acts.

107. On May 31, 2011, the Court temporarily suspended Isaacson's license to practice law in Wisconsin, based on its determination that Isaacson had failed to cooperate with OLR in its investigation. *OLR v. Isaacson*, Sup. Ct. Case No. 2011XX456-D.

COUNT FOUR

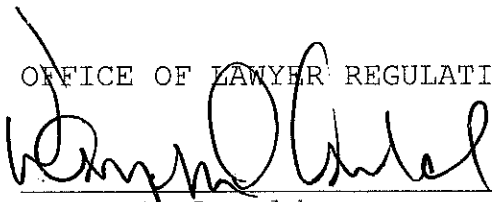
108. By failing to timely respond to OLR's initial investigative inquiry, by belatedly providing a reply that did not fully and fairly respond to OLR's questions and failed to include supporting evidence as requested, and by subsequently submitting approximately 3,000 photos and 4,000 pages of newspaper clippings and miscellaneous documents having no discernible substantial relevance to OLR's inquiries, **Isaacson**

violated SCR 22.03(2)¹⁵ and SCR 22.03(6)¹⁶, which are enforced via SCR 20:8.4(h)¹⁷.

WHEREFORE, the Office of Lawyer Regulation asks that Attorney Naomi Dawn Isaacson be found in violation of the Supreme Court Rules as alleged herein, that the Court revoke Attorney Isaacson's Wisconsin law license, and order such other and further relief as may be just and equitable, including an award of costs.

Dated this 2 day of March, 2014.

OFFICE OF LAWYER REGULATION



Wayne A. Arnold
Retained Counsel
State Bar No. 1015804

ADDRESS:
816 Colan Blvd.
Rice Lake, WI 54868
(715) 790-7499
rlcityatty@gmail.com

¹⁵ SCR 22.03(2) provides: "The respondent shall fully and fairly disclose all facts and circumstances pertaining to the alleged misconduct within 20 days after being served by ordinary mail a request for a written response" and that "the director ... may compel the respondent to answer questions, furnish documents, and present any information deemed relevant to the investigation."

¹⁶ SCR 22.03(6) provides: "In the course of the investigation, the respondent's wilful failure to provide relevant information, to answer questions fully, or to furnish documents and the respondent's misrepresentation in a disclosure are misconduct, regardless of the merits of the matters asserted in the grievance."

¹⁷ SCR 20:8.4(h) provides: "It is professional misconduct for a lawyer to fail to cooperate in the investigation of a grievance filed with the office of lawyer regulation as required by SCR 22.03(2), [or] SCR 22.03(6)."