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I. Introduction and Summary

Bernie Goldsmith, (“Petitioner”), Petitioner’s elderly mother (with whom he lives), Janet Goldsmith, and Petitioner’s sister, Allison Goldsmith, all residents of California, all living in the City of Davis, in the County of Yolo, have been the targets of a torrential barrage of hateful, threatening, bizarre, and incessant communications from Lucas Q Connor, (“Respondent”), a resident of Massachusetts, over a period of four years. These communications consist of over 1400 pages of email sent to the above by Respondent, as well as social media posts.¹ Now, Petitioner comes before this court

¹ The large volume of correspondence from Respondent is excerpted in this motion only as a representative selection made from these emails. They can be viewed in full by the court and Respondent at <https://tinyurl.com/lcqemails>, in a

for relief with an order restraining certain unlawful and intentionally harmful acts and communications Respondent has directed towards the people listed above and toward certain audiences online via their social media posts.

Both Petitioner and Petitioner's mother have made it clear to Respondent early on in this campaign that they find Respondent's communications to be criminal harassment, that further communications are unwanted, and that they should stop. They did not stop. Instead, they continued, and were followed by extortive demands for money, customized jewelry, personal items of Petitioner as trophies, and other fanciful demands, e.g., that Petitioner buy a full-page ad in a nationally distributed newspaper to apologize to Respondent for what amounts to a shifting and illusory list of grievances against Respondent and the public at large for which Petitioner is purportedly responsible.

Respondent's constant emails contain incredibly disturbing and vile accusations towards Petitioner, e.g., practicing pedophilia, accusations which are made maliciously by Respondent and with full knowledge of their falsity and impossibility. Respondent constantly and publicly accuses Petitioner of open, flagrant, and active pedophilia through social media posts and through email messages directed at Petitioner, Petitioner's elderly mother, Petitioner's sister, the City of Davis Police and the Chief of Police of that city, Petitioner's sister via her email address at the California Department of Justice, Petitioner's sister's employer, California Attorney General Robert Bonta, Petitioner's congressional representative John Garamendi, the office of California Governor Gavin Newsom, and anyone else Respondent can, through often delusional processes of reasoning, connect to Petitioner or his family, no matter how tenuously.

Respondent also spends a considerable amount of time, every day, making social media posts directed at anyone who interacts with Petitioner's social media account,

PDF printout numbering 145x pages, uploaded by Petitioner.

@FalconryFinance on the platform X, through their current primary account @HouseofLeavesMD. Respondent makes every attempt to inform the audience of @FalconryFinance that his account is run by the Petitioner by his full legal name, Bernard Robert Goldsmith, and that Petitioner is also guilty of active and enthusiastic pedophilia, that Petitioner is the treasonous clandestine agent of various foreign state actors or malevolent groups of hackers, that Petitioner has organized lynch mobs of tens of thousands of brainwashed cult members, and that Petitioner is actively and daily directing them to find and murder Respondent and to commit other acts of terrorism or mass infanticide.

These threats and disturbing accusations have caused intolerable emotional distress and disturbance to Petitioner, triggering multiple nervous breakdowns over these years. Respondent has incessantly stalked Petitioner, sending constant emails and making continuous social media posts so that Petitioner would know of this stalking through the publication of personal information, both real and delusionally imagined by Respondent, so that these targets would be even more distressed.

The tenor of these activities changed in May, 2026, when Respondent successfully convinced a “conspiracy” focused Youtuber, “flesh simulator,” legal name Thomas Gauntt, resident of Maryland, to publicize Respondent’s numerous claims against Petitioner on his YouTube channel, which has over 500,000 subscribers and a national audience. In these videos, Mr. Gauntt rehabilitates the accusations made by Respondent, identifies Petitioner by name, multiple times, for the purpose of causing his network of fans to harass Petitioner, and repeats the specific claims made by Respondent, that Petitioner is an active pedophile who grooms children online for sexual purposes, that Petitioner has organized a vast underground compound and network of tunnels and is luring children there to rape them, that Petitioner is disbarred, and further makes statements intended to rehabilitate Respondent’s

credibility generally and the veracity of their many bizarre and impossible claims against Petitioner.

Since this time Petitioner has been subjected to harassment and escalating threats of violence from Respondent, Respondent's co-conspirator Thomas Gauntt, and the fan network that Mr. Gauntt influences, a group he calls his "Simulators," a sobriquet based on Gauntt's online YouTuber identity as the "flesh simulator." Gauntt repeats Respondent's accusations against Petitioner despite knowing that they are false and that he is defaming Petitioner and that this will cause Petitioner great harm. Gauntt intends, by making and directing these threats, to actually harm Petitioner and bring harm about through means of his extensive fan network. Now, it is only a matter of time before the lies these people broadcast and use to excite and incite their audiences will result in a terrible and violent outcome for Petitioner and his family. This matter, unacceptable for a long time already, has now reached an intolerable crescendo where the authorities *must* intervene.

Petitioner asserts that California and the County of Yolo are the constitutionally appropriate venue for this action because of the extensive avilment Respondent has made of the executive police authority of this state, because their behavior is clearly and intentionally tortious and directed at residents of this state, and that the harmful effects of their conduct are foreseeably felt in this jurisdiction, for reasons not limited to numerous police and FBI visits to Petitioner's home address due to false reports of Respondent. For all of these reasons, Respondent has personally availed themselves of this forum state and can reasonably expect to be haled into court here, where their actions were directed and the effects and harms were intended to land.

Petitioner requests an order barring Respondent from going anywhere near Petitioner. Petitioner requests an order forbidding Respondent from contacting Petitioner, Petitioner's family, or associates of Petitioner on the basis of that

association. Petitioner requests an order barring Respondent from making posts on social media about or directed to Petitioner or Petitioner's family in any way, directly or indirectly, through their legal names or through their online account names or commercial aliases. Petitioner requests an order barring Respondent from making further false reports to law enforcement authorities, local, state, or federal, about Petitioner. Petitioner requests that this matter be forwarded to the Yolo County District Attorney for prosecution for stalking, criminal harassment, false reports to authorities, and extortion.

II. Respondent has been harassing Petitioner, Petitioner's family members, and anyone discernably associated with Petitioner, no matter how tenuously.

"Harassment" means unlawful violence, a credible threat of violence, or a knowing and willing course of conduct directed at a specific person that seriously alarms, annoys, or harasses the person, and that serves no legitimate purpose. CCP §527.6(b)(3)

"When you fall into a machine there, [Petitioner], I'm going to scoop what's left of you out of the gears chunky style and feed it to your last dog." Post made by Respondent Lucas Conner on June 5, 2026, via X.com on their @HouseofLeavesMD account. See Attachment A, page 3.

Thomas Gauntt, a third-party affiliated with Respondent, threatening to weld Petitioner into a steel barrel and then leave it in the sun, presumably so that Petitioner will die slowly and painfully from the resulting prolonged and tortuous exposure:

"You're a psychotic piece of shit pedophile subhuman." Thomas Gauntt to Petitioner, via his @fleshsimulator account on X.com, May 26, 2026. See Attachment A, page 4.

“I would weld Bernie into a 55 gallon drum and leave it in the sun if I were allowed to.” *Thomas Gauntt, from his X.com account @fleshsimulator, posted 23 May, 2026. See Attachment A, page 5.*

“I am going to set a yearly reminder to check if you’ve finally gotten a girlfriend. And if you do, I’m going to stalk her, and post her address and name and picture and threaten to rape her and threaten her family and tell her it’s YOUR FAULT this is happening.” *Thomas Gauntt, via his @fleshsimulator account, targeting @FalconryFinance and others, who Gauntt maintains is responsible for coordinating an online “doxxing” of his then-girlfriend. See Attachment A, page 6.*

The nature of the accusations published by Respondent on social media and via email, the volume and frequency of these accusations, and their continued transmission to a growing audience of unrelated parties, in fact, “anyone and everyone with ears,” has created a level of actual emotional harm and distress in Petitioner that qualifies these actions as restrainable harassment under CCP §527.6(b)(3).

To constitute restrainable harassment, the course of conduct must be that which would cause a reasonable person to suffer substantial emotional distress and must actually cause the petitioner substantial emotional distress. CCP §527.6(b)(3). Here, Respondent “has made disturbing accusations against Petitioner on social media,” which, “together with derogatory and threatening messages from respondent’s viewers, would cause a reasonable person to suffer emotional distress.” *E.G. v M.L.*, *supra*, 105 CA 5th at 704-705.

Since 2022, Respondent, Lucas Connor, has written over 1400 pages of email correspondence to Petitioner, Petitioner’s mother, and later, Petitioner’s sister, after discovering that she works at the California Department of Justice as a prosecutor. These emails baselessly accuse Petitioner of vile crimes, numerous abominable and illegal acts of sexual perversion on innumerable underaged children, including those of his immediate family members.

In an email to Petitioner's sister, Allison Goldsmith, at her California Department of Justice email address, Petitioner, and Petitioner's mother, dated March 31, 2025, subject: "Religion," Respondent writes of Petitioner:

"Are any of you religious at all? Like do any of you have a level of sincere belief in a higher power, or feel invested in any value systems? I'm asking because Bernie is out here trying to molest little fucking kids. He's targeting the stupidest zoomers he can find in order to molest their crib-bound offspring and kindergarteners. So why does he still have access to his phone? Why isn't he in treatment or anything?" *See Attachment B page 1.*

Respondent frequently sends vile emails to Petitioner and Petitioner's mother, in an attempt to drive a wedge between them, accusing Petitioner of despicable acts against children calculated to cause distress to both of them.

In an email dated April 8, 2025, sent to Petitioner's sister at her California Department of Justice email address, and to Petitioner and Petitioner's mother, subject: "Again, Child Porn and Bernard," Respondent writes:

"You NEED TO DO SOMETHING to prevent him from engaging with people like that, with real kids, or with adult women. Because the problem is, if an adult woman says yes to him, he talks about wanting to have kids and hoping to be a parent at some point. That would be a human rights violation because he is seeking to molest and (as he has suggested himself) kill children, just any child, as a category of people. When he says he "wants a family" he is materially seeking access to a future victim." *See Attachment B, page 2.*

In another email dated March 14, 2025 titled "The Children he DMs" addressed to Petitioner and Petitioner's mother, Respondent wrote:

"One of the racist white children that he's been exchanging sexual messages with just talked back to me. I don't need to talk to racist zoomers. I'm not trying to molest developmentally disabled children, so me and them never ever ever have ANY reason to interact. I am only hearing them speak because your son wants to fuck toddlers with FAS."

“If a girl like that, an underage racist moron, were somebody that I wanted to fuck, I would end my life. If I were attracted to that, and if that attraction made me interact with that person, I don’t know what I would think I had left. He needs to be honest with his doctors about his pedophilia, because he’s also picking up fucking little Hitler Youth alcohol-damage cases. ... He VOLUNTEERED to to interact with a little Nazi two brain cell fucking underage girl just because he wanted to try and manipulate nudes out of her.”

“This is a perfect example of something that would not ever happen in your life if you were not a pedophile. Non-pedophiles never have a reason to speak to this person. She is shit that got onto your shoe by means of you being a fucking active pedophile. You need a treatment program just to keep fucking racist little girls from stinking up the area around you.”

“And we can prove in court that he was pretending to like me 100% of the time because he became involved with a child. He doesn’t like grown people and never has. It was ALL a ruse to fuck little kids. Look at this shit. Look at this. *See Attachment B, pages 3-4.*

[Respondent then attached a picture of 26 year old Sasha, *see Attachment C*]

“That one image alone, even if she had never spoken a word or photographed herself again, would be enough to prove beyond any shadow of a doubt that his intentions towards me were nothing but premeditated violence from day one because he does not like adults.” *See Attachment B, page 3.*

In an email addressed to Petitioner and Petitioner’s mother, Janet Goldsmith, dated March 26, 2024, subject: “Time Sensitive”, Respondent Lucas Connor wrote:

“He’s trying to goad me into doing something drastic. That’s not a fortunate position for you [Janet Goldsmith] or him [Petitioner] to be in – he’s banking on the idea that I would drive there with a gun or something instead of calling the DEA or similar. I have been remiss. I’m very sorry that I let it slide when he was clearly engaging in self-destructive drug abuse at that dealer’s [Allison Crandall’s] apartment and then later the antibiotics and so on.” *See Attachment B, page 5.*

III. Petitioner and Petitioner's mother have made it very clear that this contact is unwanted, and constitutes harassment.

The primary targets of Respondent's efforts, Petitioner Bernie Goldsmith and Petitioner's mother, Janet Goldsmith, have repeatedly made it clear to Respondent that these continued communications constitute unwanted and illegal harassment, and that no further communication from Respondent should take place for this reason.

"I hate you. Leave me alone. I do not want your help. You are a horror to me. There is no circumstance, ever, where I would ever, ever want you near me. You're just a terrible, wretched person. Leave me alone. You are not well. No matter what the facts are in your head, I am entitled to be safe and feel safe. I hate you. You are a curse." *email from Petitioner Bernie Goldsmith to Lucas Connor, dated May 24, 2023. See Attachment B, page 6.*

"Your communications to me constitute criminal harassment and I demand that they stop. I am opening a criminal complaint against you. Do not contact me again, for any reason." *another email from Petitioner Bernie Goldsmith to Respondent Lucas Connor, dated April 10, 2024. See Attachment B, page 43.*

Petitioner's mother also wrote to Respondent Lucas Connor, with little effect at diminishing the barrage of their hateful and despicable emails. In an email dated April 1, 2024, responding to all in the chain of that correspondence, which at that time was Petitioner, Petitioner's mother, Lucas Connor, and Davis Police Chief Darren Pytel, Petitioner's mother wrote:

"Lucas Connor,

I do not know you. I have never met you. I have never had any communication with you, or relations or transactions with you.

Yet you have emailed me repeatedly—so many times that I am compelled to write this email.

I do not know anything about your relationship with my son, Bernie, Goldsmith, or anything about the dispute you apparently have with him.

Your persistent emails are an attempt to interfere with my relationship with my son, and/or induce, intimidate, or threaten me to become involved in that dispute.

Your uninvited and unwanted emails amount to harassment and I insist that you end all attempts to communicate with me and cease and desist from all attempts, direct or indirect, to control my interactions with my son. Having thus warned and notified you, I will consider any further attempt by you to communicate with me as criminal harassment and will take appropriate action in response.

Janet Goldsmith” *See Attachment B, page 8.*

Respondent, in their further and ongoing emails and social media posts, repeatedly accuses Petitioner of conspiring to commit mass coordinated acts of violence upon Respondent including hate crimes and attempted lynchings. As with the numerous claims of sexual perversion against children, Respondent has never provided substantial evidence of the veracity of any of these claims in their many emails and posts on the subject.

In an email from Respondent Lucas Connor to Petitioner’s sister, Allison Goldsmith, at her Department of Justice email account, Petitioner, and Petitioner’s mother,

“It would take so much less than the bare minimum of human decency for NONE OF THIS TO HAVE EVER HAPPENED or to FIX IT AT ANY TIME. I am fucking astonished that there are people like you.”

“I’m reporting it as a terror threat since I live in a large building and we have a mail room, so the physical threat they’re making is mainly against 1000 people who aren’t me. So maybe the cyber crime division will be able to follow up on it. It’s either a radicalized white supremacist youth or it’s Bernard himself thinking terror threats against 1000 people is a joke.”

“We know that’s true, right? He used to say the mayor falsely accused him of something. And when he would talk about it, his tone was usually, “I admire the mayor for falsely accusing me because that’s a funny joke. If he ever

apologized, I would think he was wrong to do so and ask him to take it back and fucking lie about me again. Hahaha!"

"Yeah, he says, "I only wish that in addition to that, Mayor Frerichs had told 50 fucking other random ass stupid lies and tried to get a giant mob to kill me. I wish they were posting my address two goddamn years later over a stupid lie."

"OH! The fusion center [FBI Fusion Center in Sacramento] doesn't know about all that yet. Tell your little nazi butt boy thanks for reminding me." *See Attachment B, page 10.*

In an email the next day titled "Bernard and Religion," Respondent wrote to Allison Goldsmith at her California Department of Justice email address, Petitioner, and Petitioner's mother an email with the following alarming and morbid imagery:

"... That dead body whose death twitches and liquid excretions was resulting in my address getting posted hasn't a) said shit since I emailed you lot about it, nor has it b) deleted anything else since then. That suggests it's probably Bernard himself who posted my address three times today, and he was only pretending to use a corpse that he found and fermented as a handpuppet."

"I sent the screenshots where the person was leaking the fluids that used to comport their life processes all over their keyboard to that fusion center [the FBI Fusion Center in Sacramento] with a note that it's probably (but not for sure) just Bernard pretending to be a third party."

"Dragging this out is so fucking crazy. I can't imagine wanting to see where else this could go, not for a fucking second. Your son is trying to have people murdered, it doesn't make any fucking sense to say "this is so riveting, I'm too busy chowing down on popcorn to stand up" *See Attachment B, page 11.*

This line of messages later evolves into an April 22, 2025 email with an ominous subject line, "Rotting Nazi Dead Thing, and an equally ominous warning, sent to Petitioner's sister at her California Department of Justice email account, Petitioner, and Petitioner's mother:

“The rotting dead nazi that Bernard stuck his hand up the asshole of and is moving the mouth of is posting my address again. That thing he’s using is posting my address again. Every second that you do not fix him is bringing us closer to a situation where your idiot special boy is put away for real fucking murder.” *See Attachment B, page 12.*

And then again, later that same day, same recipients, with the subject line: “Nazi Maggot Pieces”:

“The meat moved again. Why are none of you moving? Why? Why? Why? Why? What is forcing you to be still through every single one of these fucking incidents? Why are you letting him dig and dig and dig and dig and dig until we’re all suffocating on dirt and none of us can get any oxygen and we’re all deep deep underground because he wouldn’t fucking stop digging forever and ever and none of you stopped him? They aren’t stopping. I think it’s Bernie and I’m calling the police. Fuck you all.” *See Attachment B, page 13.*

After calling the Davis Police and making another false report with them about imagined conduct of Petitioner, Respondent then emailed again:

“The Davis Police said they love it when you send people to fucking murder me and they’ll never stop you from killing anybody. So I guess WIN FOR YOU” *Id.*

Despite frequent and emphatic claims by Respondent about evidentiary support of their claims, not a single one of their emails or social media posts provide any substantive evidence of the truth of any of Respondent’s accusations of pedophilia. Nevertheless, Respondent has persisted for many years repeating variations of these accusations with dead certainty to Petitioner, Petitioner’s family, various local, state, and federal law enforcement agencies, and to dozens of targeted individuals who had any kind of contact or association with Petitioner, no matter how brief, tenuous, or *imagined*.

“The guy [Petitioner] you’re responding to is a pedophile. People aren’t joking about that. It’s at issue in federal court. He’s only attracted to little,

little kids. Like if you wanted to honeypot him, you would have to pretend to be brain damaged and think you're onwy thwee." *Lucas Connor, 11 May 2026, in a typical post made to users on X.com who respond to Petitioner's posts about any and every subject. See Attachment A, page 7.*

"He's [Petitioner] is really talking about this rural compound with a vast network of tunnels for his cult that involves 15 year olds and child porn producers, indicating an intent to kill as many people as possible, and people are really just yapping about this [missing] dog to him... "Real excited for that land you just bought, Ed Gein! Love the clown suit! Hope you find that kid that ran off!" " *Lucas Connor referring to Petitioner via their account @HouseofLeavesMD on X.com on May 24, 2026.*" See Attachment A, page 8.

"The falcon guy [Petitioner] is ... a massive pedophile, which he's so disgusting about that basically everybody on the planet has seen proof by now, especially after the past month. It's not a joke." *Lucas Connor, 31 May 2026, from his @HouseofLeavesMD account on X. See Attachment A, page 9.*

These allegations have no merit, and are clearly made falsely to defame and cause psychological pain to Petitioner, isolate him from his family, mar his professional career, and to provoke and put him in fear of retaliatory violence against him. These actions undertaken towards Petitioner and associates "serve no legitimate purpose" and have actually caused Petitioner to suffer substantial emotional distress.

Respondent has been repeating these accusations and claims via hundreds of social media "sockpuppet" accounts that they maintain solely for the purpose of harassing Petitioner and evading blocks by Petitioner and bans by the platforms on which these claims and threats are made, and to give the appearance of a widespread opinion that Petitioner is an active, proud, "outspoken" Pedophile.

"Have you been in a coma for three years? He's super open about being a pedophile. He's legitimately proud of it. @FalconryFinance [Petitioner], is that true or false, for your lawsuit? Would you say it's false that you've bragged about being a straight up fucking pedophile?" *25 May, 2026, from Lucas Connor's X account, @HouseofLeavesMD, See Attachment A, page 10.*

During this harassment campaign, Respondent offered to sell Petitioner hundreds of these sockpuppet accounts he had made for harassment purposes for \$1 a piece. In an email dated November 1, 2023, written by Lucas Connor, addressed to Bernie Goldsmith, Respondent wrote:

“You know that I’m obligated to obtain a correction ... You know that you’re lying, and not only would a correction be easy ... So here’s an offer. For peace. You issue the corrections. ... And then, with peace established, as a gesture of goodwill, I offer the alts [sockpuppet accounts] to you for sale at a rate of \$1 each.” *See Attachment B, page 14.*

Respondent aggressively and systematically contacts most if not all of Petitioner’s social media followers who interact with Petitioner, making vile and confusing accusations against Petitioner, for the purpose of surrounding Petitioner in a public atmosphere of threat and doubt concerning his professional life and personal activities. Respondent has successfully frightened dozens of people away from associating at all with Petitioner through these methods.

Respondent has specifically targeted any woman that replies to Petitioner or is associated with Petitioner in any way, whether that association is an actual one or merely a delusion.

One such woman targeted by Respondent is an attorney in Washington D.C. posting under the anonymous twitter handle @Rule12b6. Through internet sleuthing, Respondent researched this woman’s social media accounts and discovered her legal name, Allie Diercks. Respondent then used this information to provide a false complaint to the District of Columbia bar association against Mrs. Diercks, based on her association with Petitioner, who Respondent, in that complaint, identified as a “cult leader” who is receiving legal advice from Diercks in connection with “forming a church” to “commit tax fraud.” These completely baseless allegations made to the

District of Columbia bar association required a formal response from Diercks, and were subsequently dismissed. *See Attachment D.*

Another woman targeted by Respondent is a 28 year old woman living on the East coast, real name unknown, who, in addition to her various Twitter and discord accounts goes by the name “Sasha.” Once identified as a potential romantic interest by Respondent, Sasha was bombarded with harassment from Respondent, who developed extensive delusions about Sasha’s involvement in producing and distributing child pornography for Petitioner and others. This harassment included reposting the same rather anodyne “selfie” of Sasha, declaring that picture to be an example of this child pornography. Respondent sent this picture to hundreds of people online through social media along with this accusation, for the purpose of frightening any other woman who might associate with Petitioner. *See Attachment C.*

In one series of emails, one among many, Respondent writes to Petitioner, Petitioner’s mother, and Petitioner’s sister about “Sasha,” dated Mar 28, 2025, subject: “Re: About Bernie”

“Bernie keeps interacting with minors and the child impersonator [Sasha], so to me, it looks like there's been no conversation with him about why child porn is wrong or acknowledgement he needs actual treatment in order to be safe around children.”

“There are two incidents that happened on the phone toward the end. So I can't show you these things in court and that's why they're not part of the case. But you need to know about them to understand that I'm not exaggerating or jumping to conclusions out of resentment or whatever.”

“One is, he straight up told me he had considered sending me some loli content, but reconsidered. He said there was some porn that he liked from 25 years ago and that he enjoyed it in that context, but realized it might be inappropriate to share. I was like "Yeah, that would be inappropriate to share, thank you for not doing that" and we moved on, because sometimes

people have private shit to work through and he put it to me like an isolated thing from when he was a hospitalized teenager.”

“The other incident, WAY toward the end, in the beginning of 2023, made me very uncomfortable. We were doing stuff on the phone, and he got into a fantasy where I was dressed like Short Round or something in a mall food court. He kept calling me his "little buddy". At that point I was mostly focused on him getting his surgeries and surviving the recovery, but it was disturbing and I was thinking of leaving after he recovered at that point.”

“That's background relevant to why I have reacted to his engagement with the child porn people the way that I have. There's no excuse for what he's doing.” *See Attachment B, page 44.*

All of the claims made in the above email are false and knowingly and maliciously made to cause severe emotional harm against Petitioner and Petitioner's mother, and, in fact, have caused severe emotional harm.

Another woman, 27 year old Allison Crandall, was targeted by Respondent after they learned that Petitioner was temporarily staying at her apartment in San Francisco to receive medical treatment for an infected leg implant. Respondent, somehow, discovered the hidden account through which Petitioner and Allison planned this arrangement, and then contacted Allison herself via DM and then personal cellphone under the pretended guise that Respondent was Petitioner's personal assistant and psychiatric nurse. Motivated by intense jealousy, Respondent made false claims about Petitioner to Ms. Crandall for the purpose of defaming him and causing him to lose this housing arrangement, which he did.

For years afterwards, Respondent has been obsessed with Ms. Crandall, dedicating Chapter 7 of a book Respondent claims to have written about Petitioner and publishing it online. The fanciful and scandalous chapter claims that Ms. Crandall is alternately a stripper, a cocaine dealer, and, later, further delusional claims that Ms. Crandall is a possible asset of Russian intelligence or the Russian Mob, purposed to

recruiting Petitioner into the treasonous clandestine service of a hostile foreign power. To this day, Respondent continues to publish wild, breathless, and baseless claims about the activities of this woman.

On May 21, 2025, Lucas Connor wrote to Petitioner and Petitioner's sister, at her California Department of Justice work email address an email with the title, "Allison Crandall"

"Bernie, do you remember when Allison "Enza" Crandall said that she used to date an enemy of yours?"

"Do you remember her second username she came back with? The first was "Enzathereal", the second was "ACXEnza"."

"Do you know anybody at Astral Codex Ten? If you know of, for example, Russian Mob people doing ops like hiring motherfuckers to post foreign disinformation, you should communicate that to the authorities immediately. Anything you know about her connection to that group, or hell, anything else that would bring that whole situation to justice needs to be brought out of your mouth fast." *See Attachment B, page 45.*

The recipients, Petitioner and Petitioner's immediate family, are baffled by the content of this letter and has no contacts with the "Russian Mob" and has never heard of anything called "Astral Codex Ten". Nevertheless, for Respondent, these investigations have been extremely fruitful, resulting in the publication of numerous bizarre followup emails to Petitioner, Petitioner's sister, and Petitioner's mother. In an email entitled, "Bernie and Autism", sent by Lucas Connor on March 30, 2025, the Respondent claims to have reported the results of his investigations to the FBI Fusion Center in Sacramento:

"I'm in contact with the fusion center about Bernard's situation. If he is or has been employed, for example, by the Russian mafia, as some of the evidence indicates, it will be discovered. If he is employed by domestic law enforcement and using his position to attack young girls and (of all

unimaginable things!!) defame me, it will be discovered. If he is a crazy person and you're just keeping his symptoms secret from everybody that information could protect or reroute, it will be discovered.” *See Attachment B, page 46.*

In an email dated March 7, 2025, Respondent wrote to Petitioner and Petitioner’s mother, subject: “Leg – what his doctors don’t know” Respondent wrote,

“[Bernie] isn’t quitting the antibiotics because a stripper gave them to him. I told him to stop because his leg isn’t infected. He saw that as me being “jealous” of this amazing stripper that he thought he was going to marry, so he kept taking them to “show me” that he was going to be more “loyal” to her no matter what. He doesn’t think his leg is infected, he knows antibiotics don’t work that way. He ONLY takes them to “feel closer” to the stripper.” *See Attachment B, page 15.*

In an email dated March 10th, 2025, Respondent wrote to Petitioner and Petitioner’s mother,

“This is going to be an exhibit, so here, have this. This is the adult woman he slept with in SF. As you can see, my first concern was his access to medical care and I was more than professional. He didn’t express attraction to ACTUAL TODDLERS until about two or three weeks later.” *See Attachment B, page 16.*

Respondent creates fantastical, delusional scenarios in their mind about some of these women, and then acts upon those delusions, harassing random people and finding out information about them and their families. In an email dated April 15, 2025, subject line “News: Illana Touzin,” Respondent describes one such encounter, deciding, after investigating, to report this woman to the FBI Fusion Center in Sacramento for unspecified criminal activities:

“Bernard has had a real stalker for about four years. This is a lady who showed up out of the blue to consistently yell at him and say insanely personal things to him, but they both say they don’t know each other.”

“This is a woman named Illana Touzin, aged about 63, living in Geneva Switzerland. After I broke up with Bernie, she also turned her attention to me. She likes to pretend she’s being stalked too: she’ll say something to me and then pretend to be scared when I reply. She says “Leave me alone!” as if she believed that were a funny thing to pretend to want, like as if her life is a fucking joke to her and should be to everyone she interacts with.”

“The update is, I did leave her alone. But today she returned. She called me “an erotomaniac”, suggesting that Bernie hadn’t in fact pretended to be involved with me. Obviously that’s an act of senseless violence, to say something like that, so I began research to begin a defamation suit against her as well. She’s said this type of shit in front of really serious people I actually flirt with, so it’s identical with shooting at me and it will be answered for. It’s very similar to what Bernard has taken upon himself to do for no fucking reason at all.”

“The update for you is, I found out she has a second daughter. So the person who has been insulting Bernard strenuously, relentlessly, for four fucking years, is this woman’s mom: the chief of staff to the CEO of politico and a former counterterrorism professional.”

“I’m going to let the fusion center [FBI Fusion Center in Sacramento] know about those people to. You never know what’s going to clarify this situation for everybody and resolve it. We’re getting everything out in the open and finding out what is happening, how much is legal, and how much we can prevent from ever happening again to anybody.” *See Attachment B, page 17.*

Petitioner can confirm that two FBI agents from the FBI Fusion Center in Sacramento visited Petitioner at his mother’s address to ask questions about Petitioner’s activities pursuant to reports made by Respondent.

Most recently, Petitioner had a pre-matrimonial and intimate relationship with a woman, his fiancée, who wishes to remain unidentified. After learning of Petitioner’s problem with stalking and threats, specifically towards any woman perceptibly associated with him, this woman withdrew from the relationship and is refusing to re-engage with Petitioner until this matter is taken care of and further harassing activity

is restrained by the courts. This caused Petitioner a great deal of mental anguish. Respondent can be seen gloating about this via their account on X.com.

“His fiancée from a few weeks ago is either fake or freshly murdered under the Nebraska corn. He deleted posts about just leaving her there and hoping she mails his stuff to him.” *Lucas Connor, June 19th, 2026, responding via their @HouseofLeavesMD account to Thomas Gauntt who posted a screenshot of “Bernie Goldsmith.” See Attachment A, page 11.*

Respondent has also been posting about Petitioner’s ex-wife, who is a healthcare access agent working in the State of California:

“Hey Bernie, how’s your wife? Oh wait, you fucked with her so bad she joined a monastery.” *Post made by Respondent Lucas Connor on 24 May, 2026, from his X account @HouseofLeavesMD. See Attachment A, page 12.*

These individuals are used as examples; this list is most certainly not exhaustive of Respondent’s dozens if not hundreds of online investigations undertaken to identify and then harass females who interact with Petitioner. Judging from the around-the-clock posts and emails made by Respondent, there are dozens of women that are currently under Respondent’s constant surveillance, both of Petitioner’s social media activity and the social media activity of anyone who responds to or re-tweets posts made by Petitioner.

IV. Respondent’s conduct has successfully provoked dozens of threats of violence against Petitioner by unrelated third parties.

Respondent has successfully convinced a YouTube “conspiracy theorist” personality with over 500k subscribers, Thomas Gauntt, aka “flesh simulator,” to make multiple videos about Petitioner, videos which repeat these accusations and which explicitly bolster and recuperate Respondent’s credibility concerning these

accusations. These videos display tens of thousands if not hundreds of thousands of views in their visible metrics, and have directly provoked the organized followers of this YouTuber to seek out Petitioner and threaten him with direct bodily harm and criminal acts of violence, specifically because Petitioner was named in these videos and by these individuals as a frequent and active Pedophile.

In Gaunt's video, posted on his @fleshsimulator YouTube account and publicized to his 500k audience, entitled, *"How To Clear Your Name (or, How To Stop Worrying And Melt Your Gangstalkers)"*, as of June 29, 2026, still available at https://youtu.be/o3A-rbrCK_Y, most recently posted on June 11, 2026,² Gauntt begins by naming and associating the purported real legal name of several individuals he has identified as participating in a network of pedophiles, child groomers, and child abusers:

"This is a reupload of a video I originally uploaded to this channel on June 9th. This video was mass reported and taken down by the same people this video discusses, namely: [Gauntt names three other individuals in the video, names withheld.], UAE Falcon Finance, AKA, Bernard Robert Goldsmith, as well as [two other individuals, names withheld]." YouTube video at 0:10 seconds.

"If this video gets taken down too, I will keep re-uploading it. And when my channel is finally taken down, I am going to make this ... into the biggest PR distaster you have ever fucking seen. ... why? **Because this deals with a network of child abusers and groomers and pedophiles**, for which this platform is currently running cover. It needs to be brought to light, it is going to be brought to light, I am going to do this regardless of the platform's wishes, so help me god." Youtube Video at 0:35 seconds.

"UAE Falcon Finance, AKA Bernard Robert Goldsmith, AKA Martin Random, AKA Communist Waluigi, lost most of his fanbase after another person, [Respondent], who he has doxxed, discredited, defamed, and gaslit in the exact same manner he did to me has reached out and explained about his

2 Mr. Gauntt has posted several versions of this video to evade efforts by the YouTube platform to remove it for revealing personal, private information about identifiable individuals and incitement of violence. Since these takedowns, Mr. Gauntt has uploaded a new video with an introduction explaining his efforts to evade this content ban.

past.” *Gauntt describing Respondent’s allegations towards Petitioner, Refer to YouTube video at 39:07.*

“It has since been widely revealed that [Bernard Goldsmith] is a disbarred lawyer involved in the distribution of child sexual abuse material in exchange for webhosting. ... He [Bernie Goldsmith] was then immediately caught grooming a 15 year old who he instructed to recruit others into a cell, and who was very excited to come live with him in his weird, asbestos filled rape compound in Nebraska.” *Refer to YouTube video at 39:20.*

“We’re going to tab over to Bernie again, Bernard Goldsmith, UAE Falcon Finance. He has been ... responsible for a great great deal of the escalation. He has evidently backstabbed me as thoroughly as he possibly could. All for no clear reason. I think he was jealous he didn’t get to be fourth mic on my podcast. Whatever.” *Refer to YouTube video at 34:42 until 35:30*

“Around this time I make contact with a former partner of UAE Falcon Finance, [Respondent], who reveals that he employed the exact same strategy of betrayal, doxxing, defamation and gaslighting in an attempt to discredit [Respondent] in an attempt to prevent anyone from believing them after they came forward with an number of disturbing allegations about his conduct. My experience with this has in my eyes validated [Respondent’s] claims completely, as he did the exact god damn same thing to me. And the only reason it didn’t work in my case is I had 70,000 people ready to back me up when I called bullshit on him. Follow [Respondent] on twitter at @HouseofLeavesMD if you’re curious to learn more of the sordid details.” *Id.*

“If anyone deserves to have their credibility restored and refreshed in light of what has been kind of raked up from the deep, it’s [Respondent].” *Refer to Youtube video at 34:42 to 35:30*

Petitioner asserts that he is not involved in a network of pedophilic gangstalkers, that Petitioner is not responsible for these most recent troubles in Mr. Gauntt’s fraught personal life, and that the rest of these claims made by Gauntt about Petitioner are false.

Since the date of its posting, approximately two weeks ago, this, only the most recent version of this video, has garnered 183k views according to online metrics. The

response by Mr. Gauntt's audience, the "Simulators," was instantaneous, overwhelming, violent, and repeated the despicable allegations of Mr. Gauntt and Respondent.

"You're a literal pedophile, outright, clear as day." Post made by "Simulator" RapedHowlingBermanSimulator to Petitioner, from his x account 26, May 2026. See Attachment A, page 13.

"Literally fuck bernie in the mouth, moronic vile pedophile freak. Glad you're [Lucas Connor, Respondent] finally getting the vindication you deserve after being fucked over by him." @DocCosmic98 on X.com, follower of Thomas Gauntt, aka @fleshsimulator. See Attachment A, page 14.

"Thank you!" Respondent Lucas Connor's reply to @DocCosmic98's threat against Petitioner, reply made June 10, 2026. Id.

Here is Thomas Gauntt himself, repeating the notorious accusations made by Respondent, and then threatening to weld Petitioner into a steel barrel and then leave it in the sun, presumably so that Petitioner will die slowly and painfully from the resulting prolonged and tortuous exposure.

"You're a psychotic piece of shit pedophile subhuman." Thomas Gauntt to Petitioner, via his @fleshsimulator account on X.com, May 26, 2026. See Attachment A, page 4.

"I would weld Bernie into a 55 gallon drum and leave it in the sun if I were allowed to." Thomas Gauntt, from his X.com account @fleshsimulator, posted 23 May, 2026. See Attachment A, page 5.

Here are posts made by Thomas Gauntt and Respondent clearly working together to harass Petitioner by organizing an email "hotline" for others to report on the conduct of Petitioner or to make unverifiable claims about him, all to create a plausible but unfalsifiable source of anonymous accusations to later level against him publicly through their social media and YouTube platforms.

[@fleshsimulator’s post asking his audience to report] “being doxxed and harassed followed by a repeated pattern of defamation intended to erode credibility of the victim and paint them as unstable, combined with relentless gaslighting from him and his group of followers. Rather than publicize these statements myself, I would request that anyone with this experience reach out to @HouseOfLeavesMD if you are willing to speak on the record about the matter. (HAARP [Lucas Connor] you may wish to make a public email address where people can reach you if your Dms are still locked.)” *See Attachment A, page 16, 17.*

Lucas Connor made the email address, scryharder@proton.me, and then Thomas Gauntt proceeded to advertise it to his followers. *Id.*

It is clear from these events that the nature of the harassment by Respondent has changed to become more dangerous, more explicitly violent, and more likely to result in violence towards Petitioner, specifically from the individuals Respondent has been transmitting these falsehoods to. *After years of repeating these accusations online, Respondent has, through Gauntt, finally discovered a mechanism to provoke third-party threats of violence against Petitioner without personally or explicitly making those threats himself.*

For example, here is Respondent thanking one of Gauntt’s followers for threatening to rape Petitioner in the mouth. Here is another “simulator” threatening to blow away Petitioner’s brains with a firearm. (“Simulators” is what social media followers willing to be directed by Gauntt, the “flesh simulator,” call themselves, and what Gauntt himself calls them when directing them to act.

“Literally fuck bernie in the mouth, moronic vile pedophile freak. Glad you’re [Lucas Connor, Respondent] finally getting the vindication you deserve after being fucked over by him.” @DocCosmic98 on X.com, *follower of Thomas Gauntt, aka @fleshsimulator. See Attachment A, page 14.*

“Thank you!” Respondent Lucas Connor’s reply to @DocCosmic98’s threat against Petitioner, reply made June 10, 2026. *Id.*

Here is Respondent publicly identifying the moment-to-moment location of Petitioner to these individuals via posts on X.com, as Petitioner crosses the country, promising to sue his estate after he is “shot outside of SLC.” In a post made on 26 May, 2026, from his X account @HouseofLeavesMD, upon learning that petitioner was traveling through Salt Lake City.

“Bernie, if you get shot outside SLC tomorrow, I’m suing your estate/mom. You should have gone back for that dog.” *See Attachment A, page 17.*

Respondent makes posts in response to individuals who threaten Petitioner, encouraging their actions. Respondent is thereby knowingly provoking and encouraging unlawful violent threats against Petitioner by third-parties. These actions by Respondent show that these threats are in accordance with the desired consequences of Respondent’s willful and illegal conduct of defaming Petitioner.

V. Respondent successfully extorted public statements from Petitioner made on his social media account in exchange for stopping this harassment.

Respondent shows a clear awareness that their pattern of conduct constitutes harassment and has attempted again and again to leverage the extreme emotional discomfort directly caused by this harassment to extort money, personal possessions, and certain actions by Petitioner, in exchange for promises to cease and leave Petitioner alone.

In these series of emails, Respondent offers to cease their contact with Petitioner and stop making public accusations in exchange for a “correction” and “apology” authored by Respondent, “to be pinned for two weeks on all of [Petitioner’s] social media accounts,” for all to see. Petitioner was compelled through Respondent’s extortive demands to post this four point “correction” and “apology,” hoping that the

harassment would cease. It did, for a time, until Respondent decided to re-engage in their harassment of Petitioner for reasons known only to them.

One such attempt by Respondent is to demand that Petitioner take out an advertisement apologizing to Respondent in a nationally circulated newspaper “as an absolute minimum.”

In a March 26, 2025 series of emails by Respondent lamenting that Petitioner has deleted his social media account, addressed to Petitioner, Petitioner’s sister at her California Department of Justice work email address, and Petitioner’s elderly mother, subject line “Re: Deleted Account”:

“Bernard has deleted his twitter account. I understand that may be healthy and won't ask him to bring it back. I already have all our texts so from that perspective it's no big deal.”

“From the perspective of distributing the necessary correction and apology it is a problem. So as an alternative, it would be acceptable if he buys a full page ad in a nationally distributed newspaper.”

“The audience we're talking about is around 40-50,000 people.”

“No - that's not quite accurate because it was only 40-50,000 people following him. So it's way more than that, a national newspaper is probably the minimum.”

“Scratch all that. That wouldn't work because it's all a *different audience*. He needs to correct the individual people who he lied to. So contacting them one on one, including in the discord, would be progress toward that. I would need recordings of the conversations as proof that they had happened” See *Attachment B, page 47*.

Respondent shows a clear awareness that their pattern of conduct constitutes vexatious harassment and attempts again and again to leverage the extreme emotional discomfort caused by repeated contacts with Petitioner and his family and associates

to extort money, specific customized jewelry, cosmetic items, and, as a personal trophy, books from Petitioner's personal library.

"... \$5000 isn't a lot for this [leaving Petitioner alone]. You've cost me a lot of time and stress. You have to pay something. It has to cost you. ... But provisionally, what I'd be happy with is a couple of your psychology books, that blue Tiffany ring in a size 7, and about \$250 of the good Sephora. I mean the seaweed Bumble & Bumble shampoo and conditioner, the Youth To The People body wash and face wash, the serum with the plankton OR the one with the cactus. ... Get yourself something too. ... Do silver and a nice big smooth sky blue topaz. ... And I want the travel size Voce Viva from Valentino along with their new lipstick in shade 123. I did the virtual try-on, it's identical to my normal lip color and costs \$50." *See Attachment B, page 18-19.*

In an email dated May 9, 2026, Respondent attempts to extort money from Petitioner, writing an email to Petitioner with the subject like, "\$3000".

"Give me \$3000. paypal.me/perfectlylegal. I will count it toward what you eventually owe. My uncle died and his friend died. They live in different cities. I will have to fly to Alaska and either rent a car or get a flight. You may not know this, but there are only two cities in Alaska and they're almost 400 miles apart. I will also need a hotel." *See Attachment B, page 20.*

There is no legitimate reason for Respondent to expect money from Petitioner, except in the context of extortion. Respondent is demanding money in exchange for ceasing or pausing their constant barrage of illegal harassment and interferences with Petitioner's private life.

In another email, dated May 25, 2026, Respondent attempts to extort more money from Petitioner, and, through this email, makes Petitioner aware that not only is Respondent aware of Petitioner's personal loss of a dachshund dog, but to make light of a joke shared between Respondent and Thomas Gauntt about Petitioner's dog being cooked and eaten by ethnic minorities.

“Give me \$3000 to fly to Anchorage. That’s \$1500 for helping the UC Davis police locate your dog and \$1500 for seasonings.” *See Attachment B, page 21.*

This email includes an image Respondent made showing a picture of Petitioner’s missing dachshund, taken from Petitioner’s widely circulated missing dog flyers. In that image, Petitioner’s missing puppydog is being pepper sprayed by Officer Pike, referencing an incident during locally well-known protests in 2011 on the UC Davis campus that Respondent knows Petitioner attended and helped organize.

In an email dated May 26, 2026, Respondent writes to Petitioner, subject line “Money money money”:

“Give me \$3000 or \$5000 so I can get a cab 100 miles to the airport, get the best hotel in Anchorage, and get room service for a week.” *See Attachment B, page 22.*

This email also includes the same image of Petitioner’s dog being pepper sprayed by Officer Pike. `

In an email dated May 9, 2026, entitled “Money Talks,” Lucas Connor demands \$5,000 from Petitioner:

“I sell you screenplay rights to that crypto story. It's called Money Talks. \$5000. If I get covid I'll need doordash for like three weeks.” *See Attachment B, page 23.*

In an email dated March 14, 2025, subject line “Re: His Idiot Leg,” Respondent once again emails Petitioner and Petitioner’s mother and demands money in exchange for a stop to their constant harassment of Petitioner and his family and associates. He makes another offer to leave them in peace for \$1119, along with \$50,000, payable to Respondent’s father.

“If you want me out of your hair: ... pay my university (\$1119), send my dad \$50k, give me copies of Bernard’s interviews, a public correction, and a public apology. The apology and correction can be the same statement. ... you

can see that being willing to take this 50k is a gift to you. If I have to deal with this fucking nonsense for any more of my life I will seek double that ...”
See Attachment B, page 24.

On April 25, 2024, Petitioner asked Respondent for the form of the apology or corrective performance demanded of him, and Respondent replied with the following points, to be posted and pinned on Petitioner’s social media accounts:

- “1. I didn’t cause you a problem in SF.
2. I didn’t rob your mother – she can explain that to you if you have questions.
3. I didn’t call police on you at any time before October of last year
4. I didn’t call your hospital – you cover this in your 5th podcast.” *See Attachment B, page 26.*

In compliance with Respondent’s extortive demand, Petitioner posted those points, verbatim, and pinned them on his social media accounts, and Respondent complied by ceasing their harassment for a short period of time. But Respondent was not satisfied with this performance, and shortly thereafter continued their pattern of harassment. Respondent later demanded more and different performances of “correction” of Petitioner.

In an email dated July 14, 2024, titled “Re: CT Scan,” Respondent Lucas Connor wrote to Petitioner and Petitioner’s mother:

“If I don’t get the real apology, a genuine one in your own words and in public, before I get back at 8am your time, I’m going to contact Bobby, your former landlord, and the Davis Enterprise, the three of which I’ve held off on. And that apology includes:

-No more war disinformation. It doesn’t matter who’s paying you, continuing will cost you more money than that. There’s plenty that’s true to criticize, if you have to lie it means you don’t have a real problem to state with what’s happening, so stopping will be easy.”

- Deleting the thread about me, never making future compositions of that type about me, and correcting your followers about believing you any time they bring me up.”

“That’s a real ceasefire offer, since we’re even in terms of previous ones. And if it’s broken I have contingencies, this one is for real.” *See Attachment B, page 28.*

Petitioner did not comply with what he correctly saw to be yet another extortion attempt by Respondent, so Respondent later made good on his threats to contact Bobby. In an email to Bobby Arlen, who is a former roommate and business associate of Petitioner, dated Friday, June 5, 2026, Respondent writes to him describing a Jonestown style slaughter purportedly planned by Petitioner at a compound in Nebraska which does not exist. Respondent writes,

“Hello, I hope I have the right email to reach Bobby Arlen. I'm wondering if he knows anybody from WWOOF that worked with Bernie Goldsmith. Bernie claims to be setting up a cult compound in Nebraska, and his statements over time indicate that he intends for like a True Detective/Jonestown kind of situation. He says he's recruiting from WWOOF people who used to work with him in Davis so that they won't get spooked and leave quickly. He's hiding the location of the alleged compound. In a couple of months, I'll have a bureaucratic way to intervene or at least put a lien on it. What I'm wondering is if A) Somebody can confirm that he's not just writing this all from his house, and if not, B) If somebody who he knows from WWOOF or has seen him recruiting can get some information. Thank you! Sorry to bother you with this, but it's kind of serious and time sensitive.” *See Attachment B, page 29.*

VI. Respondent has purposely availed himself of this forum state, and satisfies the due process requirements of substantial justice and fair play in multiple ways.

Under the effects test annunciated by the United States Supreme Court in *Calder v. Jones*, 465 US (1984), when an out of state defendant commits an intentional tort outside the forum state that is specifically targeted to cause severe harm to a resident

within that forum state, the forum state may constitutionally exercise specific personal jurisdiction over the defendant because the conduct was expressly aimed at the forum state and the brunt of the harm was felt there. *Calder v. Jones*, 465 U.S. 783 (1984).

This test requires three elements: 1. Intentional Action: The out-of-state actor performed a deliberate act. 2. Express Aiming: The act was uniquely and deliberately targeted at the forum state. 3. Forseeable Harm: The defendant knew that the brunt of the injury would be suffered by the plaintiff in the foreign state.

Respondent's actions demonstrate a clear purposeful availment of this jurisdiction. Aside from the obvious and intentionally tortious conduct of repeating false and despicable accusations of pedophilia to Petitioner's family, elected officials, county staff, and other authorities, Respondent's constant engagement with executive law enforcement bodies resulted in multiple highly unpleasant contacts with different law enforcement agencies across California.

Pairs of Police officers have shown up at Petitioner's house that Petitioner shares with his mother many times as a result of disturbing, alarming, but false reports by Respondent, and Respondent has successfully provoked welfare checks for Petitioner's supposedly suicidal conduct at his place of work in Crescent City, California, causing great professional embarrassment. Respondent has repeatedly contacted the executive police functionaries of California in multitudinous ways both known and unknown to Petitioner, including the constant harassment of Petitioner's own sister at her own workplace at the California Department of Justice.

Respondent learned, sometime around March 15, 2025, that Petitioner's sister, Allison Goldsmith, is a prosecuting attorney employed by the California Department of Justice. Since then, he has included Petitioner's sister in a series of vile and

inflammatory emails that describe nonexistent crimes Petitioner has committed or is planning to commit against children.

On March 15, 2025, Respondent emailed Petitioner, Petitioner's mother, and Petitioner's sister, Allison Goldsmith, at her California Department of Justice email address, subject line, "Victims," the following baseless and disgusting accusations:

"He [Petitioner] needs to be removed from the internet so that these dumb little girls aren't being fooled by somebody into providing their younger siblings for abuse. If he's not working for law enforcement, you have a big problem because there's proof of everything I'm saying and he made a whole discord server for it. If he is working for law enforcement in any capacity, he needs to be removed from that. He's been doing things like trying to trick people into having kids with him so that he has access to molestation targets. I almost fell for it before he started being open about his attraction to small children. After the child impersonator [Sasha] dumped him, he picked up a neo-nazi who had a nine year old daughter. He is absolutely seeking out underage victims and ultra-young newly adult women that he thinks he can fool into giving him access to toddlers." *See Attachment B, page 30.*

Petitioner asserts that all of these accusations are false, maliciously made, and are clearly the products of a diseased, delusional mind.

Respondent also acquired the delusion that Petitioner is being paid by unknown agents on "an internet forum" to physically attack doctors. On March 16, Respondent wrote a letter to Allison Goldsmith, at her California Department of Justice email account, along with Petitioner and Petitioner's mother, trying to interest Allison in pursuing Bernie's prosecution for various crimes.

"Here's something that's more important to the State Of California than to my case. In 2021 or 2022, Bernie wrote a letter to his doctor. It was a doctor Lin or Lim. He was threatening the doctor to try and get extra vaccines. He showed it to me. But he also said something like: Some guys on a forum paid me \$350 to escalate with this doctor. The way this phone works, it stores older text messages in the cloud and I can't get them without a court order for the company. But I'm going to seek that and it will be evidence in the case

later. In the meantime, Bernie can show you, and then you can follow up with the state and DOJ to find out what [internet] forum is paying people to commit self-destructive acts.” *See Attachment B, page 31.*

Petitioner is not a member of any kind of internet forum that pays him to molest or threaten doctors.

After learning that, over a decade ago, Petitioner worked as a Special Deputy County Counsel for the County of Yolo, handling the estates of decedents on behalf of the Yolo County Public Guardian, Respondent continued their pattern of harassment and false reports to authorities by sending emails to the then Chief of Police of Davis, California, Petitioner’s hometown, where Respondent repeatedly and baselessly accuse Petitioner of robbing the estates of the homeless, in an email Darren Pytel, Petitioner, and Petitioner’s mother, dated August 15, 2024, subject “Re: Bernard’s Former Employment,” Respondent wrote:

“Is it true that Bernie used to work for the county handling the estates of indigent people? He has shown such a visceral hatred and aggression toward the poor *on the basis of their poverty* that it would be worth looking over the records of his time there to account for any thefts that might have taken place. He spends all day laughing that he can't be sued because he only attacks people who are in extreme poverty. This is how he gets through the day, by amusing himself by causing material harm to poor people that they would need money to correct in civil court. If that's so amusing to him, there's a very strong chance that he was using his office to rob homeless dead people.” *See Attachment B, page 50.*

Respondent also reported that Respondent privately accused the Chief of Police of personally “smoking meth with [his] cousin,” along with the typical accusations that Petitioner is building an online cult. Respondent goes on to demand the prosecution of Petitioner’s mother on charges of criminal negligence for not controlling the actions of Petitioner:

“He lied about you too. He told everybody that he saw you smoking meth with your cousin. And there's no "no reasonable person would believe what he says" because he has built up a cult and explicitly described his process for selecting the most gullible morons he can find.”

“If you have knowledge of a medical condition that would lead to his behavior, this needs to be followed up on as criminal negligence charges against his mother. If you do not, you still personally have grounds to sue him. Somebody needs to in order for there to be justice for serious crimes he's committed that unfortunately would cost me \$1000 to handle while I'm terminally ill and on social security. He laughs to his people about how painfully this illness is going to kill me, before I'm 40, and he gets away with it because justice would cost \$1000 that I do not have access to.” *See Attachment B, page 50.*

Respondent then goes on to report the address of Petitioner's rented commercial space in Del Norte County, claiming,

“He is living there illegally, in a commercial space, pretending that he needs to save money and never taking a shower. I haven't been able to get a hold of the landlord there, but maybe you can,” listing the address of Petitioner's rental property there.” *Id.*

Respondent, in an email to Petitioner and Petitioner's mother, dated March 13, 2025, and entitled, “DOJ,” claims to have reported Petitioner to the United States Department of Justice as a communist. The basis of this report is Petitioner using his account on X.com to retweet an account named “Red Help ATX.” This is the first hint of what will be a continuing delusion by Respondent that Petitioner is clandestinely employed by various law enforcement agencies, or is a treasonous agent for a foreign power, specifically Russia. He expresses a commonly stated goal of somehow using this information to earn money through means of a lawsuit against Petitioner or against different agencies of the federal government.

“You keep posting that “Red Help ATX” cop lady. Given your constant promotion of “Communism” alongside statements indicating that you

understand “communism” to be illegal, given your work history, I’m going to put in a complaint to the DOJ. Obviously earlier would have been better, but if you work for anybody and this is part of a job I am going to seek seven figures.” *See Attachment B, page 32.*

Later, in that same email chain, Respondent confirms that they have reported Petitioner to the DEA for operating “fish pharmacies.”

“I did contact the DEA about your fish pharmacies, I did that last night.” *Id.*

On an email dated February 24, 2025 made by Respondent to Petitioner, Petitioner’s mother, Janet Goldsmith, and Davis Police Chief Darren Pytel, Respondent wrote a false report that Petitioner had harmed or killed his own mother, requesting a welfare check.

“Mr. Pytel, can you call them and make sure Janet is still alive? I’m concerned at the lack of response here ... if she’s healthy enough to check her email, it seems odd that she wouldn’t want to resolve this verbally. ... Everybody knows lying is wrong and everybody knows it’s worse to have your text messages entered into evidence on Pacer so if they’re both still alive and well, the decisions they’re making are pretty confusing. ... Mr. Pytel, we need confirmation that Janet is still alive and healthy enough to check her email. I’m going to call your department in a couple hours if I don’t hear back.” *See Attachment B, page 33.*

In an email dated March 1, 2025, entitled “Destruction of Evidence,” written to Petitioner and Petitioner’s mother, Janet Goldsmith, Lucas Connor asserts that they “ ... called the police both locally and in Crescent City, so there are witnesses,” to the fact that they believe Petitioner “deleted all of his tweets between September 15th, 2024, and October 21st, 2024.” To Petitioner’s knowledge, this was due to a bug at the time in the search feature of the X.com website, and not any kind of criminal activity on Petitioner’s part.

In another false report to Davis Chief of Police Dennis Pytel, Petitioner, and Petitioner's mother, Janet Goldsmith, Respondent attempts to open an investigation into Petitioner's conduct, and writes,

" ... Tens of thousands of people believe he's getting blood in the mail from me, the pope, from you, from all these random fucking people, so much blood that he could drown in it ... It's blood libel with intent to kill. ... Darren, don't worry, it's a little box of commercially packaged handwarmers. They both believe it's blood so they'll bring that by for you tomorrow to hold on to. ..." *See Attachment B, page 35.*

In another email, dated March 30, 2025, Respondent again wrote to Petitioner about blood and whether a package mailed to Petitioner by Respondent might contain human blood. Respondent writes to Petitioner, Petitioner's sister at her Department of Justice email account, and Petitioner's mother the following email that had the effect of frightening Petitioner and making Petitioner fear for his life and safety:

"How are you people sending him blood in the mail while talking to him face to face? Do they wave and say, "Hey, your blood is in the mail! Don't want you to think I forgot!"

"Because when you don't mail him blood, he acts like you're fucking stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and stabbing him and ."

"And just to be clear, I never offered to send him blood. I never took payment from him in exchange for a promise to send him blood. I never brought up the idea of blood or mailing anything from out of a human body, do you get the idea?"

"He took it upon himself to expect a shipment of blood from me as a baseline of behavior to avoid mob violence. Like pogrom style "Murder this guy and here's a map" style defamation, was his response to not getting a box of blood in the mail from me. He didn't get any blood in the mail and because of

that he flipped fucking shit and tried to have me killed (Ongoing).” See *Attachment B, page 36*.

Respondent sent another email to Petitioner, Petitioner’s sister at her California Department of Justice email address, and Petitioner’s mother, dated April 22, 2025, subject: “One of the people that Bernard owns is speaking again”:

“Hey one of the people that Bernard converted into his legal property by lying to them and telling them to act upon that is speaking to me again. Every moment that an end isn’t put to this is like fucking stabbing me and stabbing me and stabbing me. It’s like fucking stabbing me and stabbing me and stabbing me. It’s like fucking stabbing me and stabbing me and stabbing me.” See *Attachment B, page 37*.

After stating that he has blocked Respondent’s email address, Respondent obtained a new address from which to mail Petitioner and his family, and wrote to Petitioner’s sister at her California Department of Justice email address, along with Petitioner and Petitioner’s mother at their email addresses, **to report that Petitioner has been regularly threatening violence against the synagogue where his family attends**. In a January 13, 2026 email to the abovementioned individuals, Lucas Connor, Respondent wrote from their knowledge.arcana@gmail.com email address:

“I trust that every single person who still engages in a friendly way with your posts is without a soul or conscience and they’ll still cheer no matter how violent you are without provocation. In the meantime consequences will follow your behavior because you’ve acted like a demon and you failed to target a minor this time. ...”

“ ... By the way, you all heard about the synagogue that was attacked in Mississippi yesterday, right? You must be aware that Bernie has been making threats against the temple you guys attend, right? He’s been making videos threatening people every fucking day, but along with broadly inciting antisemitism and telling people that you’re all a legitimate target, he personally made threats against your temple on video repeatedly. It’s because of me that the police know about it. Nobody else is trying to stop the constant terror threats and incitement from him against the Jewish

community, your temple specifically, his medical team, you personally, any of it. I am the only person standing up for anybody here and I have no resources to do it with. I am working to save your lives as well as my own and there's apparently nothing he could do to make you intervene in the slightest. If he showed up physically and blew the place up while everybody was there, after seeing your behavior for the past three years, it seems unlikely that you would even sneeze, let alone rebuke him."

"... You could have stopped it yesterday and you let it escalate an additional time. The next best time to stop it is today. If you don't stop it today, he will escalate again. You need to make it stop before he continues to escalate, because if you don't make it stop it will be stopped by other means, and the more it escalates before it is able to stop, the worse that's going to be for everybody. We're working with the Davis police right now. That "we" means you, me, and him, because nobody wants this to keep happening!" See *Attachment B, page 38*.

Respondent reported to the Davis Police Department that Petitioner, in his past role decades ago as a lawyer for the County of Yolo, used his position to embezzle funds from the estates of clients of the Yolo County Public Guardian Cass Sylvia. Respondent also reported Petitioner's mother to the Davis Police Department for "criminal negligence," for failing to raise Petitioner correctly.

As shown above and in the attachments to this Petition, Respondent has made numerous, nearly countless false claims to the Davis Police Department about Petitioner, including claims that Petitioner was illegally inhabiting his business address in Crescent City, with the stated intent through these accusations, by their own admission, of having Petitioner evicted from that address. As described earlier in this document, Respondent threatened to, but was ultimately unable to, contact Petitioner's commercial landlord with the purpose of reporting his activities and having him evicted from his offices in Crescent City.

By their own estimations (and by Petitioner's observations this estimation is correct), Respondent has made "thousands" of reports to California State Attorney General Rob Bonta, repeating the libelous and damaging accusations that Petitioner is a mass child rapist, that Petitioner is in charge of a "Jim Jones" style cult, that Petitioner is in control of an underground compound and massive complexes of tunnels in which he hides children he intends to rape.

"... the DOJ California already knows because I bug the [California] AG about it every single day. Bernie's sister is an assistant AG, she's a state prosecutor."

"Not that I didn't report it a million other times and spam Rob Bonta [Attorney General of California] with the fucking clock from groundhog day 50,000 times, they know! We need journalists to find out what's happening. His sister is a state prosecutor, too." *Post made 31 May, 2026, by Locas Connor, from their account @HouseofLeavesMD. See Attachment A, page 19.*

Respondent brags to Petitioner that they have looked up, contacted, and reported Petitioner's alleged activities of mass child rape and murder to Petitioner's federal representative, the Office of John Garamendi. Respondent, even today, at the writing of this portion of this request, has sent multiple messages via social media to the Offices of California Governor Gavin Newsom, making identical complaints about Petitioner.

Respondent has also personally availed themselves of the forum state of California because of their incessant emails to Petitioner's sister, urging them to act, to take advantage of their workplace influence to bring about prosecutions of Petitioner, contacting Petitioner's sister's employer, California Attorney General Rob Bonta repeatedly with these fantastical warnings and reports. Respondent even attempts to persuade Petitioner's sister to change California's statewide policies because of Petitioner's service as a clandestine agent to domestic law enforcement, foreign national adversaries such as Russia, and other nebulous agencies such as secret internet anti-doctor forum cash-for-harass groups.

In an email dated April 18, 2025, Respondent wrote to Petitioner's sister at her Secretary of State email address, Petitioner, and Petitioner's mother, with the following accusations and speculations:

"He's posting again. He seems to have changed his mind since yesterday and he's determined to continue with whatever terrorism incitement he's trying to do, whether it's entrapment against the vulnerable people he collected or he's genuinely a terrorist."

"We're going to know soon if that's entrapment or not because everything about him has been with the fusion center for a few weeks. I'm in contact with them. So that means that incident with the gift cards, the incident with the Russian stripper, and all 90 hidden channels that the public discord API shows in his server are all in the hands of the place where agencies share data. It shouldn't take more than three months or so for them to either move or not move in a way that demonstrates what's happening."

"In the meantime, now that you know that type of entrapment does take place, whether he's been victimized by being assigned to it or not, we can begin advising the state of California against it and work from there. Allison, it might be better if you broach this first in the workplace, it's so egregious that even a quiet word from a professional might shut the practice down forever." *See Attachment B, page 51.*

Here, with their account @HouseofLeavesMD, Respondent is contacting the office of California Governor Gavin Newsom and California Attorney General Robert Bonta, explicitly mentioning her reason for contacting Mr. Bonta being Petitioner's sister's employment in that office, and speculating that Petitioner may be clandestinely working for unnamed law enforcement agencies.

[To @GavinNewsom] "You know what I can't afford? Three years of dealing with your law enforcement problems while my relatives die one after another. That would be in reference to the serial criminal Bernard Goldsmith, brother of [California] Assistant AG Allison Goldsmith. CC: Robert Bonta, who as far as I know is her direct supervisor @AGRobBonta. I mean this guy. ... @FalconryFinance." *See Attachment A, page 20.*

Here, Respondent's primary actions were on social media platforms that reach every state. However, Respondent also sent over 1400 pages of email messages targeted directly to Petitioner, Petitioner's mother, and Petitioner's sister, who is a prosecutor at the California Department of Justice, with the aim of causing distress and harm to multiple individuals within California. The nature of the claims made by Respondent and Respondent's other statements about their motivations for these actions demonstrate to a very high degree of certainty that the elements of the Calder test are satisfied. It is clear that Respondent could easily foresee their being haled into court in this jurisdiction to answer for their actions as a result of their own intentional actions directed at victims in the forum state which were purposed towards causing harmful effects within the forum state.

VII. Conclusion

Petitioner requests an order barring Respondent from going anywhere near Petitioner. Petitioner requests an order forbidding Respondent from contacting Petitioner, Petitioner's family, or associates of Petitioner on the basis of that association. Petitioner requests an order barring Respondent from making posts on social media about or directed to Petitioner or Petitioner's family in any way, directly or indirectly, through their legal names or through their online account names or commercial aliases. Petitioner requests an order barring Respondent from making further false reports to law enforcement authorities, local, state, or federal, about Petitioner. Petitioner requests that this matter be forwarded to the Yolo County District Attorney for prosecution for stalking, criminal harassment, false reports to authorities, and extortion.

VIII. Affidavit of Petitioner

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Signed: _____ BERNARD ROBERT GOLDSMITH

Date: _____

Executed at: _____ (Davis, CA)