

phrase, referenced in the "Declaration Under Penalty of Perjury of Jeffrey Alan Goldberg, In Support of OBF Respondents' Response to Motion for Rule to Show Cause," (Declaration of Mr. Goldberg) refers: "Shoghi Effendi appointed his successor 'in his own lifetime'"

Response: Admit, except that the succession referred to was one of religious authority but not a legal succession in that no property rights or obligations pass merely by the appointment of a Guardian's successor. The Guardian's authority is set forth in the Will and Testament of `Abdu'l-Bahá.

83. Admit that Jeffrey Goldberg resided in Barrington, Illinois when he discovered the OBF on the Internet.

Response: Admit.

84. Admit that members of the OBF solicited Jeffrey Goldberg to join the OBF while Jeffrey Goldberg resided in Barrington, Illinois.

Response: Deny. Goldberg initiated all contact and requested membership.

85. Admit that members of the OBF encouraged Jeffrey Goldberg to recruit other members of his community in Barrington, Illinois.

Response: Deny. The OBF does not seek recruits. Instead, the OBF offers its teachings to anyone who inquires and answers questions that may be posed by them.

86. Admit that Jeffrey Goldberg declared himself a member of the OBF while residing in Barrington, Illinois.

Response: Admit.

87. Admit that Jeffrey Goldberg recruited others in his community regarding the OBF.

Response: Deny.

88. Admit that Jeffrey Goldberg recruited Janice Franco of Barrington, Illinois to join the OBF.

Response: Deny. Ms. Franco initiated all contact and insisted that Goldberg tell her why he withdrew from the NSA's organization.

89. Admit that Janice Franco subsequently joined the OBF.

Response: Admit that she joined the OBF shortly after Jeffrey Goldberg, but deny that it was subsequent to being "recruited."

90. Admit that Janice Franco's residence was in Barrington, Illinois when she joined the OBF.

Response: Admit

91. Admit that Janice Franco currently resides in Barrington, Illinois.

Response: Admit.

92. Admit that OBF's Baha'i Declaration was sent via electronic mail to Jeffrey Goldberg.

Response: Admit.

93. Admit that Jeffrey Goldberg signed the Baha'i Declaration in Barrington, Illinois.

Response: Admit.

94. Admit that Janice Franco resides at 29959 N. IL Route 59 Apt 59, Barrington, IL 60010.

Response: Deny.

95. Admit that a Mother Baha'i Council was incorporated in Quincy, Illinois.

Response: Deny.

96. Admit that Joel B. Marangella has ultimate authority over the Web site at [www.rt66.com/~obfusa/council.htm](http://www.rt66.com/~obfusa/council.htm).

Response: Admit that, as third Guardian, Marangella has the right of ultimate review and approval of the PNBC's actions and decisions, although the PNBC has authority over the site. It is denied that Marangella exercised that authority over the Web site.

97. Admit that Joel B Marangella has ultimate authority over the Web site at [www.truebahai.com](http://www.truebahai.com).

Response: Deny.

98. Admit that Joel B. Marangella has ultimate authority over the Web site at [www.bahai-guardian.com](http://www.bahai-guardian.com).

Response: Admit.

99. Admit that Joel B. Marangella instructed his followers to teach the faith on the Internet.

Response: Admit.

100. Admit that Brent Reed was at one time a member of the OBF.

Response: Objection as irrelevant. However, it is admitted.

101. Admit that Jeffrey Goldberg interacted with Franklin Schlatter on the Internet prior to executing the Baha'i Declaration.

Response: Admit.

102. Admit that Jeffrey Goldberg interacted with Joel B. Marangella on the Internet prior to executing the Baha'i Declaration.

Response: Deny.

103. Admit that Jeffrey Goldberg interacted with Marilyn Meyer on the Internet prior to executing the Baha'i Declaration.

Response: Deny.

104. Admit that Jeffrey Goldberg interacted with James Meyer on the Internet prior to executing the Baha'i Declaration.

Response: Deny.

105. Admit that Joel B. Marangella was involved in the affairs of the Remy Corporation.

Response: Admit, but only acting on behalf of Charles Mason Remy.

106. Admit that Joel B. Marangella has authority over the PNBC.

Response: Admit that he has the right of ultimate review and approval over the PNBC's actions and decisions. Authority in the PNBC rests with its Directors.

107. Admit that Joel B. Marangella had authority over the Remy Corporation.

Response: Deny.

108. Admit that Joel B. Marangella acted in active concert and participation with the Remy Corporation.

Response: Admit, but only acting on behalf of Charles Mason Remey and at his direction.

109. Admit that Joel B. Marangella acted in active concert and participation with certain members of the Remey Corporation.

Response: Admit, but only acting on behalf of Charles Mason Remey and at his direction.

110. Admit that Joel B. Marangella acted in active concert and participation with Franklin Schlatter prior to the formation of the Remey Corporation.

Response: Deny.

111. Admit that Joel B. Marangella acted in active concert and participation with Marilyn Meyer prior to the formation of the Remey Corporation

Response: Deny.

112. Admit that Joel B. Marangella acted in active concert and participation with James Meyer prior to the formation of the Remey Corporation.

Response: Deny.

113. Admit that Joel B. Marangella communicated with Franklin Schlatter prior to the formation of the Remey Corporation.

Response: Admit.

114. Admit that the Remey Corporation was vested with administrative authority by the Second International Baha'i Council.

Response: Deny.

115. Admit that the Remey Corporation was vested with administrative authority by the Guardian.

Response: Deny. Administrative authority of the National Spiritual Assemblies is derived spiritually from the Will and Testament of `Abdu'l-Bahá. and legally from the corporate charter and bylaws.

116. Admit that Marangella and the Remey Corporation coordinated the affairs of the Faith.

Response: Deny. Marangella conducted affairs on behalf of Mason Remey and the Remey Corporation had its jurisdiction over the United States affairs of the Faith

under Mason Remey. They did not coordinate.

117. Admit that Charles Mason Remey consulted with Joel B. Marangella concerning the litigation captioned *The National Spiritual Assembly of the Baha'is of the United States of America Under the Hereditary Guardianship, Inc. v. National Spiritual Assembly of the Baha'is of the United States of America*, Civil Action No. 64 C 1878 ("Civil Action").

Response: Admit, but only to the extent that he received a letter from Mason Remey stating that the Remey NSA still wanted to continue the litigation against the NSA despite his instructions to terminate it.

118. Admit that Joel B. Marangella communicated with Donald Frey.

Response: Deny.

119. Admit that Joel B. Marangella communicated with the Secretary of the Remey Corporation during the 1960's.

Response: Admit

120. Admit that Joel B. Marangella has corresponded with members of the PNBC concerning the content of the website at the following domain: [www.rt66.com/~obfusa/council.htm](http://www.rt66.com/~obfusa/council.htm).

Response: Admit

121. Admit that Franklin Schlatter is not prohibited from acting on behalf of the PNBC.

Response: Deny, unless the PNBC specifically authorizes Schlatter to act on its behalf with respect to a specific matter.

122. Admit that the Remey Corporation was located in or around Roswell, New Mexico.

Response: Deny.

123. Admit that the Mother Baha'i Council was located in or around Roswell, New Mexico.

Response: Admit.

124. Admit that the PNBC is located in or around Roswell, New Mexico.

Response: Deny, except that the Mother Baha'i Council and the PNBC are the

same entity. Once its name changed to the PNBC, however, it was no longer located in Roswell, although some of its directors reside there.

125. Admit that PNBC conducts meetings in or around Roswell, New Mexico.

Response: Admit that sometimes the PNBC meets in Roswell. It also meets in Albuquerque, Vaughn, and other places, and it often meets via telephone conference call.

126 Admit that Joel B. Marangella has corresponded with members of the PNBC concerning the content of the web site at the www.truebahai.com domain name.

Response: Deny, except that it is admitted that Jeffrey Goldberg corresponded with Marangella regarding a portion of the web site prior to the time that Goldberg was a member of the PNBC.

127. Admit that the OBF has a Guardian at the head of its administrative order.

Response: Admit.

128. Admit that the OBF's Guardian is assisted by Hands of the Cause of God.

Response: Admit.

129. Admit that the OBF's administrative structure includes National Councils that are subordinate to the Guardian.

Response: Admit, as the Guardian is defined within the corporate charter and bylaws of the National Councils.

130 Admit that the OBF's administrative structure includes Local Councils that are subordinate to the National Councils and to the OBF's Guardian.

Response: Admit.

131. Admit that the OBF currently has no International House of Justice.

Response: Admit, but the OBF does have a Third International Bahá'í Council, an embryonic form of the Universal House of Justice.

132. Admit that the OBF has recruited members that reside or did reside in Illinois.

Response: Deny. The OBF does not and never has recruited members.

133. Admit that the OBF's web sites are accessed by Internet users in Illinois.

Response: Admit. The web sites are accessed by users from all over the world.

134. Admit that one of the OBF's goals is to convince those enrolled with the NSA that OBF is the true Baha'i faith.

Response: Admit.

135. Admit that "Orthodox" is a temporary appellation of the OBF.

Response: Admit, but it is temporary in the sense that the OBF believes it will no longer be necessary after all of the misled believers in the Bahá'í world eventually recognize the OBF as the one true Faith. Until then, the OBF uses the word to distinguish itself from other denominations.

136. Admit that Joel B. Marangella has ultimate authority over the affairs of the PNBC.

Response: Admit. The directors of the PNBC have authority but Marangella has the right of ultimate review and approval of its actions and decisions.

Respectfully submitted,



Jeffrey A Goldberg  
Goldberg Law Firm  
Attorney for Respondents Joel B. Marangella,  
Franklin D. Schlatter, and the Provisional National  
Bahá'í Council of the United States  
PO Box 254  
Albuquerque, NM 87103-0254  
Tel: 505-321-2932  
Fax: 866-373-4890

Marshall N. Dickler  
James Slowikowski  
Local Counsel for Respondents Joel B. Marangella, Franklin D. Schlatter, and  
the Provisional National Bahá'í Council of the United States  
Dickler, Kahn, Slowikowski & Zavell, Ltd.  
85 West Algonquin Road, Suite 420  
Arlington Heights, IL 60005  
Tel: 847-593-5595  
Fax: 847-593-5632

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 30, 2007, true and correct copies of the foregoing RESPONDENT PROVISIONAL NATIONAL BAHÁ'Í COUNCIL'S RESPONSE TO NSA'S REQUEST FOR ADMISSIONS, were served on:

Christopher M. Dolan  
Jeffrey A. Handelman  
Philip A. Jones  
Brinks, Hofer, Gilson & Lione  
Attorneys for National Spiritual Assembly of the Bahá'ís of the United States  
455 North Cityfront Plaza Drive  
Suite 3600  
Chicago, IL 60611  
Tel: 312-321-4200  
Fax: 312-321-4299  
Email: cdolan@brinkshofer.com  
(Service via Electronic Mail)

Marshall N. Dickler  
James A. Slowikowski  
Dickler, Kahn, Slowikowski & Zavel, Ltd.  
Local Counsel for Respondents Joel B. Marangella, Franklin Schlatter, and the  
Provisional National Bahá'í Council of the United States  
85 West Algonquin Road, Suite 420  
Arlington Heights, IL 60005  
Tel: 847-593-5595  
Fax: 847-593-5632  
Email: jim@dicklerlaw.com  
(Service via Electronic Mail)

Bradley S. Rothen  
Neil A. Benchell  
Breighanne A. Eggert  
KATTEN MUCHIN ROSENMAN, LLP  
Attorneys for Baha'i Publishers Under the Provisions of the Covenant and The Second  
International Baha'i Council  
525 W. Monroe Street  
Chicago, IL 60661  
Tel: (312) 902-5200  
Fax (312) 902-1061  
(Service Via Electronic Mail)



Jeffrey A Goldberg  
Goldberg Law Firm  
Attorney for Respondents Joel B.  
Marangella, Franklin D. Schlatter, and the  
Provisional National Bahá'í Council of the  
United States  
PO Box 254  
Albuquerque, NM 87103-0254  
Tel: 505-321-2932  
Fax: 866-373-4890  
Email: mail@jeffrey-goldberg.com

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THE NATIONAL SPIRITUAL ASSEMBLY )  
OF THE BAHÁ'ÍS OF THE UNITED STATES )  
OF AMERICA UNDER THE HEREDITARY )  
GUARDIANSHIP, INC. )

Counter-Defendant, )

Civil Action No. 64 C 1878

v. )

The Honorable Amy J. St Eve

THE NATIONAL SPIRITUAL ASSEMBLY )  
OF THE BAHÁ'ÍS OF THE UNITED STATES )  
OF AMERICA, INC. )

Counterclaimant. )

RESPONDENT FRANKLIN SCHLATTER'S  
RESPONSE TO  
NSA'S REQUEST FOR ADMISSIONS

Respondent Franklin Schlatter, by and through his attorneys, hereby responds to the Request for Admissions served upon him by the NSA on February 16, 2007.

RESPONSE TO DEFINITIONS

Respondent here re-asserts and adopts, as if fully set forth herein, its response and objection to the definitions as set forth in his response to the NSA's Request for Production of Documents.

RESPONSE TO REQUESTS FOR ADMISSION

1. Admit that Franklin Schlatter was a founding member of the Remey Corporation.

Response: Admit.

2. Admit that the Secretary position in the Remey Corporation was an executive leadership position.

Response: Admit, except that the functions of the Secretary were limited by the corporate governing documents to calling meetings (at the direction of the Chairman,

Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

3. Admit that Franklin Schlatter was an officer of the Remy Corporation.

Response: Admit.

4. Admit that the Remy Corporation was the governing body for the followers of Charles Mason Remy as the Second Guardian in the United States.

Response: Admit, except that the Respondent denies the implication that those who recognized Remy as the second Guardian were his "followers," because the Guardian is not the founder of a religion but rather is the spiritual head of the Faith and authorized interpreter of the Holy Text. The believers under the Remy Corporation were at all times followers of Baha'u'llah.

5. Admit that the Remy Corporation was ultimately controlled by the Guardian.

Response: The Respondent admits that Charles Mason Remy had ultimate control over the Remy Corporation. The Respondent denies that "the Guardian" necessarily has such control.

6. Admit that the Second International Bahá'í Council had authority over the affairs of the Remy Corporation.

Response: Deny.

7. Admit that the membership of the PNBC includes former members of the Remy Corporation.

Response: Admit.

8. Admit that the membership of the PNBC includes family members of former members of the Remy Corporation.

Response: Admit.

9. Admit that the Secretary position of the National Bureau was an executive leadership position.

Response: Admit, except that the functions of the Secretary were limited by the corporate governing documents to calling meetings (at the direction of the Chairman, Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

10. Admit that the National Bureau was a predecessor organization to both the

Mother Baha'i Council and the Provisional National Baha'i Council.

Response: Admit, except that the National Bureau, unlike Mother Baha'i Councils and National Baha'i Councils, exercised no jurisdictional authority over any Orthodox Baha'i body or individual believers.

11. Admit that the Mother Baha'i Council was a predecessor organization to the Provisional National Baha'i Council.

Response: Deny. They are one and the same entity.

12. Admit that meetings of the Remy Corporation were held at Franklin Schlatter's residence.

Response: Deny.

13. Admit that meetings on behalf of the OBF were held at Franklin Schlatter's residence.

Response: Admit with respect to some, but not all meetings.

14. Admit that the Secretary position of the Mother Baha'i Council was an executive leadership position.

Response: Admit, except that the functions of the Secretary are limited by the corporate governing documents to calling meetings (at the direction of the Chairman, Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

15. Admit that the Secretary position of the Provisional National Baha'i Council is an executive leadership position.

Response: Admit, except that the functions of the Secretary are limited by the corporate governing documents to calling meetings (at the direction of the Chairman, Vice-Chairman, or any three Assembly members), keeping the minutes and official records of the Corporation.

16. Admit that Franklin Schlatter was appointed "Hand of the Cause of God" by Joel B. Marangella.

Response: Admit.

17. Admit that the "Hand of the Cause of God" assists the Guardian.

Response: Admit.

18. Admit that Franklin Schlatter as "Hand of the Cause of God" acts on behalf of Joel B. Marangella.

Response: Admit, except only to the extent that Marangella specifically directs Schlatter to act on his behalf.

19. Admit that as "Hand of the Cause of God," Franklin Schlatter derives his authority from Joel B. Marangella.

Response: Deny. The authority of a Hand of the Cause of God is derived from the Will and Testament of `Abdu'l-Bahá.

20. Admit that as "Hand of the Cause of God," Franklin Schlatter is the agent of Joel B. Marangella.

Response: Deny, except to the extent that Marangella might appoint him as agent for specific tasks from time to time. However, under the Will and Testament of Abdu'l-Baha, agency is not one of the duties or spiritual responsibilities of a Hand.

21. Admit that as "Hand of the Cause of God," Franklin Schlatter has authority over the PNBC.

Response: Deny.

22. Admit that as "Hand of the Cause of God," Franklin Schlatter has conducted affairs of the PNBC on behalf of Joel B. Marangella.

Response: Deny.

23. Admit that as "Hand of the Cause of God," Franklin Schlatter has entered into contractual obligations on behalf of Joel B. Marangella.

Response: Deny.

24. Admit that after September 9, 2001, Franklin Schlatter has conducted business on behalf of Joel B. Marangella.

Response: Deny. Neither the OBF, Franklin Schlatter, nor Joel B. Marangella conducts business.

25. Admit that Franklin Schlatter is currently "Hand of the Cause of God".

Response: Admit.

26. Admit that Franklin Schlatter's role as Secretary of the Remy Corporation was

substantially identical to his role as Secretary for the Mother Baha'i Council.

Response: Deny.

27. Admit that Franklin Schlatter's role as Secretary of the Remy Corporation was substantially identical to his role as Secretary for the PNBC.

Response: Deny.

28. Admit that Joel B. Marangella's instruction to the Roswell Local Council to become the Mother Baha'i Council, was communicated to Franklin Schlatter by Joel B. Marangella.

Response: Admit. Schlatter was Secretary of the National Bureau and a member of the Local Council.

29. Admit that Franklin Schlatter was among those responsible for the formation of the Mother Baha'i Council.

Response: Admit

30. Admit that Franklin Schlatter incorporated the Mother Baha'i Council.

Response: Deny, except admit that he was one of the incorporators.

31. Admit that Franklin Schlatter was an officer of the Mother Baha'i Council.

Response: Admit

32. Admit that Franklin Schlatter was Secretary of the Mother Baha'i Council.

Response: Admit

33. Admit that Franklin Schlatter incorporated the PNBC.

Response: Admit that he was one of the incorporators.

34. Admit that Franklin Schlatter is an agent of the PNBC.

Response: Deny

35. Admit that Franklin Schlatter has entered into contractual obligations on the behalf of the PNBC.

Response: Admit, although those obligations were limited to such things as making meeting and room arrangements for teaching conferences.

36. Admit that Franklin Schlatter acts on behalf of the PNBC.

Response: Admit, as to when he was a member of the PNBC.

37. Admit that Franklin Schlatter is in active concert or participation with the PNBC.

Response: Admit, as to when he was a director and officer of the PNBC.

38. Admit that Franklin Schlatter has conducted business on behalf of the PNBC.

Response: Deny. Neither the PNBC nor Franklin Schlatter conducts business.

39. Admit that Franklin Schlatter currently serves on the "Review Committee" of the PNBC.

Response: Deny.

40. Admit that Franklin Schlatter, at one time, served on the "Review Committee" of the PNBC.

Response: Deny

41. Admit that Franklin Schlatter is the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

42. Admit that Franklin Schlatter was the Webmaster for the Web site at domain name [www.rt66.com/~obfusa/](http://www.rt66.com/~obfusa/)

Response: Deny

43. Admit that after September 9, 2001, Franklin Schlatter has recruited new members on behalf of the OBF.

Response: Deny. The OBF does not recruit members, but simply offers information to anyone who inquires.

44. Admit that, after September 9, 2001, Franklin Schlatter has contributed to the advertisement of the OBF.

Response: Admit

45. Admit that Franklin Schlatter currently resides at the address: 3111 Futura Avenue, Roswell, New Mexico 88201.

Response: Admit

46. Admit that Charles Mason Remy is the "successor" to which the following phrase, referenced in the "Declaration Under Penalty of Perjury of Jeffrey Alan Goldberg, In Support of OBF Respondents' Response to Motion for Rule to Show Cause," (Declaration of Mr. Goldberg) refers: "Shoghi Effendi appointed his successor 'in his own lifetime'"

Response: Admit, except that the succession referred to was one of religious authority but not a legal succession in that no property or other legal rights or obligations pass merely by the appointment of a Guardian's successor. The Guardian's authority is set forth in the Will and Testament of `Abdu'l-Bahá.

47. Admit that Jeffrey Goldberg interacted with Franklin Schlatter on the Internet prior to executing the Baha'i Declaration.

Response: Admit.

48. Admit that Franklin Schlatter coordinated "First National Convention of the Baha'is Under the Hereditary Guardianship" that was held in Quincy, Illinois ("First Convention").

Response: Deny.

49. Admit that Franklin Schlatter is not prohibited from acting on behalf of the PNBC.

Response: Deny, unless the PNBC specifically authorizes Schlatter to act on its behalf with respect to a specific matter.

50. Admit that the Remy Corporation was located in or around Roswell, New Mexico.

Response: Deny.

51. Admit that the Mother Baha'i Council was located in or around Roswell, New Mexico.

Response: Admit. The Mother Baha'i Council was the Roswell Local Council.

52. Admit that the PNBC is located in or around Roswell, New Mexico.

Response: Deny, except that the Mother Baha'i Council and the PNBC are the same entity. Once its name changed to the PNBC, however, it was no longer located in

Roswell, although some of its directors reside there.

53. Admit that PNBC conducts meetings in or around Roswell, New Mexico.

Response: Admit that sometimes the PNBC meets in Roswell.

54. Admit that the OBF's Guardian is assisted by Hands of the Cause of God.

Response: Admit.

55. Admit that Joel B. Marangella instructed the Roswell Local Council to become the Mother Baha'i Council.

Response: Admit.

Respectfully submitted,



Jeffrey A Goldberg  
Goldberg Law Firm  
Attorney for Respondents Joel B. Marangella,  
Franklin D. Schlatter, and the Provisional National  
Bahá'í Council of the United States  
PO Box 254  
Albuquerque, NM 87103-0254  
Tel: 505-321-2932  
Fax: 866-373-4890

Marshall N. Dickler  
James Slowikowski  
Local Counsel for Respondents Joel B. Marangella, Franklin D. Schlatter, and  
the Provisional National Bahá'í Council of the United States  
Dickler, Kahn, Slowikowski & Zavell, Ltd.  
85 West Algonquin Road, Suite 420  
Arlington Heights, IL 60005  
Tel: 847-593-5595  
Fax: 847-593-5632

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 30, 2007, true and correct copies of the foregoing RESPONDENT FRANKLIN SCHLATTER'S RESPONSE TO NSA'S REQUEST FOR ADMISSIONS, were served on:

Christopher M. Dolan  
Jeffrey A. Handelman  
Philip A. Jones  
Brinks, Hofer, Gilson & Lione  
Attorneys for National Spiritual Assembly of the Bahá'ís of the United States  
455 North Cityfront Plaza Drive  
Suite 3600  
Chicago, IL 60611  
Tel: 312-321-4200  
Fax: 312-321-4299  
Email: cdolan@brinkshofer.com  
(Service via Electronic Mail)

Marshall N. Dickler  
James A. Slowikowski  
Dickler, Kahn, Slowikowski & Zavel, Ltd.  
Local Counsel for Respondents Joel B. Marangella, Franklin Schlatter, and the  
Provisional National Bahá'í Council of the United States  
85 West Algonquin Road, Suite 420  
Arlington Heights, IL 60005  
Tel: 847-593-5595  
Fax: 847-593-5632  
Email: jim@dicklerlaw.com  
(Service via Electronic Mail)

Bradley S. Rothen  
Neil A. Benchell  
Breighanne A. Eggert  
KATTEN MUCHIN ROSENMAN, LLP  
Attorneys for Baha'i Publishers Under the Provisions of the Covenant and The Second  
International Baha'i Council  
525 W. Monroe Street  
Chicago, IL 60661  
Tel: (312) 902-5200  
Fax (312) 902-1061  
(Service Via Electronic Mail)



Jeffrey A Goldberg  
Goldberg Law Firm  
Attorney for Respondents Joel B.  
Marangella, Franklin D. Schlatter, and the  
Provisional National Bahá'í Council of the  
United States  
PO Box 254  
Albuquerque, NM 87103-0254  
Tel: 505-321-2932  
Fax: 866-373-4890  
Email: [mail@jeffrey-goldberg.com](mailto:mail@jeffrey-goldberg.com)

# EXHIBIT 7

File Number 5802-332-9 : 94934310



DEPT-01 RECORDING 433.00  
117777 IRRAN 0042 11/02/94 13421400  
44974 DLJ \* -94-934310  
COOK COUNTY RECORDER

94024310

**Whereas**, ARTICLES OF INCORPORATION OF NATIONAL SPIRITUAL ASSEMBLY OF THE BAHAI'S OF THE UNITED STATES INCORPORATED UNDER THE LAWS OF THE STATE OF ILLINOIS HAVE BEEN FILED IN THE OFFICE OF THE SECRETARY OF STATE AS PROVIDED BY THE GENERAL NOT FOR PROFIT CORPORATION ACT OF ILLINOIS, IN FORCE JANUARY 1, A.D. 1987.

*Now Therefore, I, George H. Ryan, Secretary of State of the State of Illinois, by virtue of the powers vested in me by law, do hereby issue this certificate and attach hereto a copy of the Application of the aforesaid corporation.*

**In Testimony Whereof**, I have set my hand and cause to be affixed the Great Seal of the State of Illinois, at the City of Springfield, this 14TH day of OCTOBER A.D. 19 94 and of the Independence of the United States the two hundred and 19TH



*George H. Ryan*  
SECRETARY OF STATE  
BHR

CEX 2

NSA 000005

NFP-102.10  
(Revised 5/84)

ARTICLES OF INCORPORATION-

(Do Not Write in This Space)

SUBMIT IN DUPLICATE

Payment must be made by Certified Check, Cashier's Check, Illinois Attorney's Check, Illinois C.P.A.'s Check or Money Order, payable to "Secretary of State."  
DO NOT SEND CASH!

Date 10-14-94 Filing Fee \$50  
Approved [Signature]

TO: GEORGE H. RYAN, Secretary of State

Pursuant to the provisions of "The General Not For Profit Corporation Act of 1986", the undersigned incorporator(s) hereby adopt the following Articles of Incorporation.

Article 1. The name of the corporation is: National Spiritual Assembly of the Baha'is of the United States

Article 2. The name and address of the initial registered agent and registered office are:

Registered Agent: Geoffrey N. Wilson  
First Name Middle Name Last Name  
Registered Office: 1233 Central Street  
Number Street Ill. 60204  
City Zip Code County  
Evanston

Article 3. The first Board of Directors shall be ning in number, their names and addresses being as follows: (Not less than three)

Director's Names Number Street City State  
See attachment.

Article 4. The purposes for which the corporation is organized are:

See attachment.

Is this corporation a Condominium Association as established under the Condominium Property Act?  
 Yes  No (Check one)

Is this corporation a Cooperative Housing Corporation as defined in Section 216 of the Internal Revenue Code of 1954?  
 Yes  No (Check one)

Is this a Homeowner's Association which administers a common-interest community as defined in Subsection (c) of Section 9.112 of the Code of Civil Procedure?  
 Yes  No

Article 5. Other provisions (please use separate page):

See attachment.

NAMES & ADDRESSES OF INCORPORATORS

The undersigned incorporator(s) hereby declare(s), under penalties of perjury, that the statements made in the foregoing Articles of Incorporation are true.  
Dated October 9, 1994

POST OFFICE ADDRESS

1. See attachment.  
Signature \_\_\_\_\_ Street \_\_\_\_\_ City/Town \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_
2. Name (please print) \_\_\_\_\_ City/Town \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Signature \_\_\_\_\_
3. Name (please print) \_\_\_\_\_ City/Town \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Signature \_\_\_\_\_
4. Name (please print) \_\_\_\_\_ City/Town \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Signature \_\_\_\_\_
5. Name (please print) \_\_\_\_\_ City/Town \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Signature \_\_\_\_\_

(Signatures must be ink on original document. Carbon copy, error or rubber stamp signatures may only be used on the blue copy.)  
NOTE: If a corporation acts as incorporator, the name of the corporation and the state of incorporation shall be shown and the execution shall be by its President or Vice-President and verified by him, and attested by its Secretary or an Assistant Secretary.

The registered agent cannot be the corporation itself.

The registered agent may be an individual, resident in this State, or a domestic or foreign corporation, authorized to act as a registered agent.

The registered office may be, but need not be, the same as its principal office.

A corporation which is to function as a club, as defined in Section 1-3.24 of the "Liquor Control Act" of 1934, must insert in its purpose clause a statement that it will comply with the State and local laws and ordinances relating to alcoholic liquors.

FOR INSERTS - USE WHITE PAPER - SIZE 8 1/2 x 11

National Spiritual Assembly of the  
Bahá'ís of the United States

under the  
GENERAL NOT FOR PROFIT  
CORPORATION ACT

of

ARTICLES OF INCORPORATION  
FORM NFP-102.10

FILE NO. \_\_\_\_\_

**FILED**  
OCT 14 1994  
GEORGE H. RYAN  
SECRETARY OF STATE

SECRETARY OF STATE  
DEPARTMENT OF BUSINESS SERVICES  
CORPORATION DIVISION  
SPRINGFIELD, ILLINOIS 62756  
TELEPHONE (217) 782-9522  
782-9523  
(These Articles Must Be Executed and Filed in Duplicate)  
Filing Fee \$55

C-1518

NSA 000006

9 4 9 7 3 1 0

ATTACHMENT TO  
ARTICLES OF INCORPORATION  
OF THE  
NATIONAL SPIRITUAL ASSEMBLY  
OF THE BAHÁ'Í OF THE UNITED STATES

Article 3.

Directors/Trustees' Names	Number	City	State
Juana C. Conrad	121 Linden Avenue	Wilmette	IL 60091
William E. Davis	414 Bay Road	Menlo Park	CA 94025
Alberna Deas	P.O. Box 1677	Orangeburg	SC 29116
	1631 Carolina Avenue		
Robert C. Henderson	536 Sheridan Road	Wilmette	IL 60091
Firuz Kazemzadeh	143 Hoyt Street #4L	Stamford	CT 06905
Patricia Loeke	P.O. Box 44	Mobridge	SD 57601
Jack McCants	P.O. Box 3251	Greenwood	SC 29648
	104 Greenbriar Road		
Dorothy W. Nelson	725 Arden Road	Pasadena	CA 91106
James F. Nelson	725 Arden Road	Pasadena	CA 91106

Article 4. The purposes for which the corporation is organized are:

FIRST: Said corporation is organized exclusively for religious and charitable purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(3) of the Internal Revenue Code of 1986 (the "Code") or the corresponding provision of any future United States Internal Revenue Law.

SECOND: No part of the net earnings of the corporation shall inure to the benefit of, or be distributable to its members, directors, officers or other private persons, except that the corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article First hereof. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements), any political campaign on behalf of any candidate for public office. Notwithstanding any other provision of these articles, the corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from Federal income tax under section 501(c)(3) of the Code (or the corresponding provision of any future United States Internal Revenue Law) or (b) by a corporation, contributions to which are deductible under section 170(c)(2) of the Code (or the corresponding provision of any future United States Internal Revenue Law).

9 4 9 7 3 1 0

THIRD: Upon the dissolution of the corporation, the Trustees shall, after paying or making provision for the payment of all of the liabilities of the corporation, dispose of all of the assets of the corporation exclusively for the purposes of the corporation to such organization or organizations organized and operated exclusively for charitable and religious purposes as shall at the time qualify as an exempt organization or organizations under section 501(c)(3) of the Code (or the corresponding provision of any future United States Internal Revenue Law), as the Board of Trustees shall determine.

Article 5. Other provisions:

FIRST: The corporation is the successor organization to the Declaration of Trust dated April 4, 1977, under which the Trustees of the National Spiritual Assembly of the Bahá'ís of the United States acted as the administrative body of the Bahá'í religious community in the United States of America. In creating this corporation, the incorporators, who are all the Trustees under said Declaration of Trust, intend to transfer all powers, rights, responsibilities, privileges, obligations, assets and liabilities, including but not limited to, the right to receive gifts and bequests of all kinds from all sources, to this corporation and to carry out the sacred duties they accepted as trustees under said Declaration of Trust as the directors of this corporation.

SECOND: In recognition of the sacred duties performed by the Trustees under said Declaration of Trust, which will now be carried out by the Trustees as directors of this corporation, the directors of this corporation shall be known as "Trustees".

9 4 9 7 3 1 0

30031807.1

NSA 000007

ATTACHMENT TO  
ARTICLES OF INCORPORATION  
OF THE  
NATIONAL SPIRITUAL ASSEMBLY  
OF THE BAHÁ'Í'S OF THE UNITED STATES

NAMES AND ADDRESSES OF INCORPORATORS

SIGNATURES AND NAMES  
OF INCORPORATORS

POST OFFICE ADDRESS

1. Madame C. Conrad  
Signature  
Madame C. Conrad  
Name (please print)  
121 Linden Avenue  
Street  
Wilmington, Illinois 60091  
City/Town State Zip
2. William E. Davis  
Signature  
William E. Davis  
Name (please print)  
414 Bay Road  
Street  
Menlo Park, California 94025  
City/Town State Zip
3. Alberta Deas  
Signature  
Alberta Deas  
Name (please print)  
P.O. Box 1677  
1631 Carolina Avenue  
Street  
Orangesburg, South Carolina 29116  
City/Town State Zip
4. Robert C. Henderson  
Signature  
Robert C. Henderson  
Name (please print)  
516 Sheridan Road  
Street  
Wilmington, Illinois 60091  
City/Town State Zip

NAMES AND ADDRESSES OF INCORPORATORS (CONTINUED)

5. F. Kazimzadeh  
Signature  
F. Kazimzadeh  
Name (please print)  
141 Hoyt Street #41  
Street  
Stamford, Connecticut 06905  
City/Town State Zip
6. Patricia Locke  
Signature  
Patricia Locke  
Name (please print)  
P.O. Box 44  
Street  
Mohrville, South Dakota 57601  
City/Town State Zip
7. Jack E. McCants  
Signature  
Jack McCants  
Name (please print)  
P.O. Box 3251, 104 Greenbriar Road  
Street  
Greenwood, South Carolina 29648  
City/Town State Zip
8. Dorothy W. Nelson  
Signature  
Dorothy W. Nelson  
Name (please print)  
723 Arden Road  
Street  
Pasadena, California 91106  
City/Town State Zip
9. James F. Nelson  
Signature  
James F. Nelson  
Name (please print)  
723 Arden Road  
Street  
Pasadena, California 91106  
City/Town State Zip

3002649 1

9422 1310

NSA 000008

# EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THE NATIONAL SPIRITUAL ASSEMBLY )  
OF THE BAHA'IS OF THE UNITED STATES )  
OF AMERICA UNDER THE HEREDITARY )  
GUARDIANSHIP, INC., )

Counter-Defendant, )

v. )

NATIONAL SPIRITUAL ASSEMBLY )  
OF THE BAHA'IS OF THE UNITED STATES )  
OF AMERICA, INC., )

Counterclaimant. )

Civil Action No. 64 C 1878

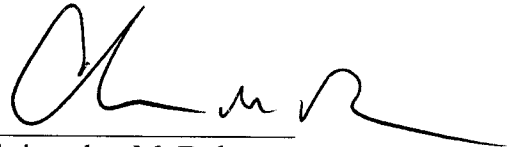
The Honorable Amy J. St. Eve

AFFIDAVIT

Christopher M. Dolan hereby testifies as follows:

On March 19, 2007, I served *NSA's Motion to Extend Notice Period and Notice of Motion; NSA's Motion For Rule To Show Cause Why The Remeyites Should Not Be Held In Contempt and Notice of Motion; Memorandum In Support Of The NSA's Motion For Rule To Show Cause Why The Remeyites Should Not Be Held In Contempt and Exhibits A through X* thereto upon Ms. Marilyn Meyer, registered agent for Provisional National Baha'i Council at 6 Meyers Road, Espanola, New Mexico via in-hand delivery.

Executed this 12<sup>th</sup> day of June, 2007 in Chicago, IL.



By: Christopher M. Dolan