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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

Dr. ORLY TAITZ, ESQ, PRO SE § Plaintiff, §
HONORABLE ROYCE LAMBERTH

§ PRESIDING

v. § **Civil Action: 10-151 RCL**

§ **FIRST AMENDED COMPLAINT**

Barack Hussein Obama, § **COMMON LAW FRAUD**

§ NOTICE OF MOTION HEARING

§ MOTION FOR TRO/INJUNCTION

§ **MOTION FOR LEAVE OF**

§ **COURT TO FILE QUO**

John Doe 1-100 § **WARRANTO**

Defendants. § **QUI**

TAM

VIOLATION OF PLAINTIFF'S RIGHTS UNDER 5 USC

552 FREEDOM OF INFORMATION ACT

VIOLATION OF PLAINTIFF'S CIVIL RIGHTS UNDER 42 USC 1983, 42 USC 1985

RICO

**VIOLATION OF COMMERCE CLAUSE AND OF PLAINTIFF'S RIGHTS TO GAINFUL EMPLOYMENT AS A DOCTOR OF DENTAL
SURGERY UPON DEFENDANT'S IMMINENT SIGNING OF THE HEALTH BILL HR 3590 and HR 3962**

FIRST AMENDED COMPLAINT

Jurisdiction

The court has jurisdiction under DC statute §§16-3501- 16-3503. Federal court is proper as diversity between the parties exist and the case revolves around the Federal Question of eligibility of the President under Quo Warranto

Parties

Plaintiff – Dr. Orly Taitz, ESQ- hereinafter "Taitz." The plaintiff is a resident of California and president of the Defend Our Freedoms foundation. She is a Doctor of Jurisprudence and a Doctor of Dental Surgery. Through her foundation she has popularized Constitution and fought violations of Constitution and civil liberties of UC citizens. As part of her work she has filed numerous legal actions, representing over 200 US citizens: State Representatives of different states, candidates on the ballot and high ranked members of US military. Her clients are seeking release of original vital records of Barack Hussein Obama, to see if he is eligible for US presidency. As of now in spite of over 100 legal actions filed all over the Nation by some 13 licensed attorneys and numerous pro se plaintiffs and in spite of 12 citizen grand jury presentments and indictments, Obama refused to provide any vital records that would be acceptable in any court of law.

Respondent/Defendant – Barack Hussein Obama, hereinafter "Obama", Acting President of the United States and Commander in Chief, who refused to present in any court of law or to the public any vital records that would show his eligibility as for US presidency based on Article 2, section 1 of the Constitution, as one born in the United States to **two citizen parents without allegiance to any other sovereignties**. From birth and until now Mr. Obama had citizenship and allegiance to three other nations: Great Britain, Kenya and Indonesia.

Standing

Taitz is an attorney and she has submitted to Attorney General Eric Holder and US Attorney for the District of Columbia Jeffrey Taylor a request to file Quo Warranto, to ascertain Obama's legitimacy for presidency. After 9 months of waiting she did not receive any response from either Attorney General or US attorney for the district of Columbia. She is seeking a ex-relator status to proceed with Quo Warranto. As Taitz tried to ascertain Obama's legitimacy as an attorney, representing her clients, she was subjected to vicious attacks coming from the

media acting as regime official propaganda, from Obama's supporters and from some judiciary, acting as tools to silence her and intimidate her into dropping her legal actions. She was subjected to numerous death threats, tampering with her car, when a fumes emissions hose was disconnected and hot combustible fumes were going back to the engine, as she was driving with her three children in the car. Several convicted criminals and document forgers were hired by someone and used in concert to submit perjured affidavits to court and to forge her signature, in an attempt to influence the judiciary and undermine her in the eyes of the community and undermine her law license. Her foundation web site was repeatedly hacked and destroyed. Her pay-pal account was tampered with. On 01.21.09. her case *Lightfoot v Bowen* was erased from the docket of the Supreme Court of the United States only two days before it was supposed to be heard in conference by all nine justices. After a year and a half of repeated complaints to law enforcement, she could not get any assistance or relief. When she brought two legal actions in the Middle District of Georgia on behalf of the members of the US military, as a form of intimidation and retaliation, she was sanctioned \$20,000. Taitz is seeking not only verification of Obama's legitimacy under Quo Warranto, but financial compensation for damages suffered as well as compensation for the severe emotional distress suffered as a result of the defendant's actions. Taitz has also submitted request for disclosure of pertinent information under the Freedom Of Information Act from Social Security Administration under 5 USC 552 (b)(6), her request was denied by Dawn S. Wiggins, FOIA officer of the SSA, Taitz is appealing this above denial.

Taitz is a Republican candidate on the ballot, running for the position of the Secretary of State of CA. Based on prior legal action, it is clear, that if elected, Taitz will demand from Obama all proper vital records to prove his legitimacy for presidency. As Taitz has filed her Declaration of Candidacy, her whole family, including her 3 children were subjected to vicious intimidation and harassment campaign.

Here come the plaintiff Dr. Orly Taitz ESQ and alleges, that District of Columbia jurisdiction allows Quo Warranto ex relator status in the name of the United States against a person who within the District of Columbia usurps, intrudes into, or unlawfully holds or exercises, a franchise conferred by the United States, civil and military". D.C. Code §§16-35-1-3503. Quo Warranto is the mechanism of redress of grievances going back to Magna Carta.

The foundation of inviolability of Constitution as supreme law was codified in Magna Carta (1215): ". .we have granted all these concessions, desirous that they should enjoy them in complete and firm endurance forever, we give and grant to them the underwritten security,. . . so that if we, or our justiciar, or our bailiffs or any one of our officers, shall in anything be at fault towards anyone, or shall have broken any one of the articles of this peace or of this security, and the offense be notified . . . laying the transgression before us, petition to have that transgression redressed without delay. . . . And we shall procure nothing from anyone, directly or indirectly, whereby any part of these concessions and liberties might be revoked or diminished; and if any such things has been procured, let it be void and null, and we shall never use it personally or by another." Magna Carta 17 John § 61 (1215) (Avalon)

The supremacy and inviolability of Constitution is shown by ongoing rulings that laws or actions are "void and null", "null and void", "void", or "null" etc. e.g., Chief Justice John Marshall affirmed this constitutional supremacy in *Marbury v. Madison*, observing:

"Certainly all those who have framed written constitutions contemplate them as forming the fundamental and paramount law of the nation, and, consequently, the theory of every such government must be, that an act of the legislature, repugnant to the constitution, is void." *Marbury v. Madison*, 5 US 137, 176 – Supreme Court 1803

However, Magna Carta codified the supremacy and inviolability of constitution over both the Executive ("We"/the King) and the Judiciary ("justiciar"/Chief Justice). Thus paraphrasing *Marbury* at 178:

"So if a [doctrine] be in opposition to the constitution; if both the [doctrine] and the constitution apply to a particular case, so that the court must either decide that case conformably to the [doctrine], disregarding the constitution; or conformably to the constitution, disregarding the [doctrine]; the court must determine which of these conflicting rules governs the case. This is of the very essence of judicial duty."

J. Marshall further emphasized the judicial oath:

"Why otherwise does it direct the judges to take an oath to support it? This oath certainly applies in an especial manner, to their conduct in their official character. How immoral to impose it on them, if they were to be used as the instruments, and the knowing instruments, for violating what they swear to support!" *Marbury v. Madison*, 5 US 137, 179 – Supreme Court 1803

The Plaintiff is seeking to uphold explicit Article II and Amendment XX qualification requirements and grant access ("standing") under Article VI supremacy and oath. Any citizen has standing to uphold the Right to redress of grievances under 1st, 9th amendment. Additionally, 16-3502,3503 does not limit ex relator status to any particular group and does not require any particular damages, however there is a heightened right to redress of grievances for an attorney who was subjected to sanctions, intimidation and harassment, while she tried to represent her clients seeking to specifically redress such grievance. There is an additional heightened standing for a Candidate on the ballot, running for the position of the Secretary of State, where a big part of her campaign is legitimacy of elections, and where she and her three children and her whole family are being threatened, harassed and intimidated with death threats, her car is being tampered with, and she is threatened with loss of her livelihood.

The plaintiffs have filed both with the Attorney General Eric Holder and the US Attorney Jeffrey A. Taylor and his successor Channing Phillips a request for Quo Warranto in March and April of 2009 respectively. Hundreds of concerned citizens have called the Department of justice demanding a response to Quo Warranto submission. No response was received for ten months. Letters, e-mails, faxes went unanswered. Employees of the justice department were slamming phones in the face of the citizens calling and urging a response, even when those calls came from high ranking officers of US military. This game of hide and seek by the Attorney General Holder and US attorneys played with the plaintiffs and their counselor is infantile at best and treasonous at worst, as National Security is on the line. Recent near tragedy of NorthWest 253, slaughter of CIA agents and tragedy at Fort Hood are only a few reminders of how dangerous it is to have a Big Question Mark with numerous stolen and fraudulent social security numbers sitting in the position of the President and Commander in Chief.

WHEREFORE, the undersigned counsel respectfully requests this Honorable Court to **grant Leave of Court to file Quo Warranto as ex-relator** in the name of the United States of America against Barack Hussein Obama, President of the United States.

Writ of Quo Warranto
QUESTIONS PRESENTED

- I. What is Respondent Obama's standard and burden of proof of his birthplace under Quo Warranto and ethical duties? – Considering Obama's first cousin Raela Odinga, Prime Minister of Kenya, sealed alleged records of Obama's birth in Mombasa; while the State of Hawaii holds Obama's "original" sealed birth records, **allows registration of births out of State, allows registration based on a statement of one relative only without any corroborating evidence and seals original birth records.**
- II. Does the State of Hawaii's withholding Respondent's Obama's original birth records by privacy laws breach the U.S. Const. by obstructing constitutional rights duties of the People to vote, and State and Federal election officers to challenge, validate & evaluate qualifications of presidential candidates based on legally acceptable and not fraudulent records and the President Elect., per U.S. Const. art. II § 1, art. VI, & amend. XX § 3?
- III. Does the restrictive qualification for President of "natural born citizen" over "citizen" include allegiance to the U.S.A. from birth without any foreign allegiance, as required of the Commander in Chief in time of war to preserve the Republic, including birth within the jurisdiction of the U.S.A. to parents who both had U.S. citizenship at that birth, and having retained that undivided loyalty?
- IV. Does birth to or adoption by a non-citizen father or mother incur foreign allegiance sufficient to negate being a "natural born citizen" and disqualify a candidate from becoming President?
- V. Having attained one's majority, do actions showing divided loyalty with continued allegiance to the foreign nationality of one's minority evidence foreign allegiance sufficient to disqualify one from being a "natural born citizen" with undivided loyalty to the U.S.A., such as campaigning for a candidate in a foreign election, or traveling on a foreign passport?
- VI. Does a presidential candidate or President Elect by default fail to qualify under U.S. Const., art. II § 2 and amend. XX, § 3, if they neglect their burden to provide State or Federal election officers *prima facie* evidence of each of their identity, age, residence, and natural born citizenship, sufficient to meet respective State or Federal statutory standards?
- VII. Do candidates for office disqualify themselves if they seek office under a birth name differing from a name given by adoption, or vice versa, when they neglect to provide election officers *prima facie* evidence of legal changes to their name, or if they neglect to legally change their name?
- VIII. Does a President elect fail to qualify through breach of ethical disclosure duties, and obstruction of election officers' constitutional duties to challenge, validate and evaluate qualifications for President, by withholding or sealing records evidencing identity, age, residency, or allegiance, or by claiming privacy and opposing in court efforts by Electors, election officers, or the People to obtain and evaluate such records?
- IX. Does misprision by Federal election officers cause a President Elect to fail to qualify, if they neglect or refuse to challenge, validate, or evaluate qualifications of Electors or a President Elect, being bound by oath to support the Constitution and laws, after citizens provided information challenging those qualifications via petitions for redress of grievance, or by law suits?
- X. To uphold its supremacy and inviolability, and to preserve the Republic, does the U.S. Constitution grant standing to Citizens to bring suit or quo warranto over negligence, obstruction, misprision, or breach of constitutional duties, and protect the People's rights?

Here come the plaintiffs/ ex-relators in the name of the United States of America praying this Honorable Court issue Quo Warranto writ against Barack Hussein Obama, President of the United States and Commander in Chief.

Ex Relators are seeking Quo Warranto under District of Columbia Codes §§16-3501-16-3503 which provides for the "Writ of Quo Warranto to be issued in the name of the United States of America against a person who within the District of Columbia usurps, intrudes into, or unlawfully holds or exercises, a franchise conferred by the United States or a public office of the United States, civil or military". The ex-relators assert that respondent Obama has indeed usurped the franchise of the President of the United States and the Commander in Chief of the United States Military forces due to his ineligibility and non-compliance with the provision of the Article 2, Section 1, Clause 5 of the Constitution of the United States that provides that the President of the United States has to be a Natural Born Citizen for the following reasons:

The legal reference and legal definitions used by the framers of the Constitution was the legal treatise "*The Law of Nations*" by Emer De Vattel as quoted and referenced in the Article 1, Section 8. *The Law of Nations* defines "...Natural Born Citizens, are those in the country, of parents who are citizens. As the society cannot exist and perpetuate itself otherwise than by the children of the citizens, those children naturally follow the conditions of their fathers, and succeed to all their rights." Book 1, Chapter 19, §212. In his book *Dreams From my Father* as well as on his web site *Fight the Smears* respondent Obama admitted to the fact that his father was never a US citizen, but rather a British citizen from a British colony of Kenya and based on British Nationality act respondent Obama was a British citizen at birth and a Kenyan citizen from age 2 on December 12, 1961 when Kenya became an independent nation. As such, for the reason of his allegiance to foreign nations from birth respondent Obama never qualified as a Natural Born citizen.

In spite of some 100 legal actions filed and 12 Citizen Grand Jury presentments and indictments Respondent Obama due to his ineligibility never consented to unseal any prima facie documents and vital records that would confirm his legitimacy for presidency.

The state of Hawaii statute 338-5 allows one to get a birth certificate based on a statement of one relative only without any corroborative evidence from any hospital. Respondent Obama refused to unseal a birthing file (labor and delivery file) evidencing his birth from the Kapiolani Hospital where he recently decided, that he was born. Similarly, respondent Obama refused to consent to unseal his original birth certificate from the Health Department in the state of Hawaii. The original birth certificate is supposed to provide the name of the hospital, name of the attending physician and signatures of individuals in attendance during birth. As such there is no verifiable and legally acceptable evidence of his birth in the state of Hawaii.

Circa 1995 Respondent Obama has made an admission in his book *Dreams from My Father* that he has a copy of the original birth certificate, when describing a certain article about his father he write "...I discovered this article, folded away among my birth certificate and old vaccination forms..." In spite of the fact that respondent Obama has a copy of his original birth certificate, he released for public consumption only a COLB, an abbreviated certification of life birth which was issued in 2007 and does not provide any verifying information, such as name of the hospital and name of the attending physician and signatures, which infers that he knows that he is not eligible and actively trying to obfuscate the records in order to usurp US presidency. An affidavit from one of the most prominent forensic document experts, Sandra Ramsey Lines, previously submitted to this court, states that authenticity of COLB and inference of the US birth cannot be ascertained based on COLB alone without examining the original birth certificate in Hawaii, that respondent Obama refuses to unseal and present in court and to the public at large.

As respondents schools records from Indonesia, previously submitted, show him the citizen of Indonesia under the name of Barry Soetoro, and there is no evidence of legal name change upon his repatriation from Indonesia, there is a high likelihood of the scenario whereby the respondent was sworn in as a president not only illegitimately due to his allegiance to three foreign nations, but also under a name that was not his legal name at the time of inauguration and swearing in as the president.

Affidavits from licensed private investigators Neil Sankey and Susan Daniels, previously submitted to this court, show that according to national databases respondent Obama has used as many as 39 different social security numbers, none of which were issued in Hawaii, which in itself is an evidence of foreign birth. Most egregious is the fact that the respondent has used for most of his life in Somerville Massachusetts, Chicago, Illinois and currently in the White House SSN XXX-XX-4425, which was issued in the state of Connecticut between 1976-1979 and assigned to an individual born in 1890, who would have been 120 years old, if he would be alive today. Respondent never resided in the state of Connecticut and he is clearly not 120 years old. There is such a high probability of criminal acts of identity theft and social security fraud committed by the respondent that the undersigned requests this Honorable court to use its inherent powers to order Sua Sponte an evidentiary hearing on this particular issue for possible criminal prosecution of identity theft and social security fraud, as the respondent has submitted himself to the jurisdiction of this Honorable court and can be brought to a separate evidentiary hearing to ascertain if fraud was perpetrated upon the court by assertion of false identity, even if the underlying case is not heard or closed for one reason or another. The undersigned requests to bar the US attorney's office from representing the respondent in such hearing based on US Code 44 Section 22 and due to obvious inherent conflict of interest.

COMMON LAW FRAUD

1. Plaintiff re-alleges everything previously plead, incorporates by reference and alleges the following:
2. Defendant knows that his social security number starts with digits 042, which is assigned to the state of CT.
3. Defendant knows that the social security number he is using was issued in the state of CT to another individual, who was born in 1890.
4. Defendant was served by the plaintiff with pleadings, where above information was provided to the defendant.
5. Defendant has a copy of his original birth certificate from HI.
6. Defendant has his school enrolment records from Occidental College, Columbia University and Harvard University.
7. Defendant knew that his vital records do not provide basis for his assertion of legitimacy for US presidency under Article 2, Section 1 of the US Constitution.
8. Defendant committed fraud and misrepresentation of material facts by placing his name on the ballot as a legitimate candidate for presidency.
9. Defendant committed fraud by taking an oath of president of the United States.
10. Plaintiff represents some 200 plaintiffs and on behalf of those plaintiffs sought release of the defendants above mentioned vital records .
11. Plaintiff was subjected to over a year of intimidation, harassment, retaliation, sanctions, ridicule, death threats due to the fact that she tried to unseal the above vital records, showing the plaintiff illegitimate for presidency and committing fraud.

12. Plaintiff has suffered severe mental anguish and distress and financial damages as a result directly attributable to the Plaintiff's conduct and actions.

Qui Tam

COMPLAINT PURSUANT TO FEDERAL FALSE CLAIMS ACT

Due to the fact that neither Attorney General Eric Holder nor US Attorney for the District of Columbia respondent to the Quo Warranto demand, plaintiff is seeking a leave of court for ex relator pursuant to the federal False Claims Act, 31 USC 3729- 3733 as well against the defendant/respondent Barack Hussein Obama as further attempts to elicit respond from the Attorney General or US attorney will be futile.

1. The relator re- alleges previously plead, incorporates by reference and pleads the following:

2. This cause of action arises under the federal False Claims Act found at 31 USC 3729 through 3733. This particular District Court for the District of Columbia affords the proper venue for this action in that the defendant has submitted within the District of Columbia his false and wrongful claim for the payment of monies by the United States Government and the Department of the Treasury located also within the District of Columbia .

3. A right of private party to proceed in Qua Tam was upheld in Vermont v. United States, 529 US 765 (2000)

4. The United States Government is the party on whose behalf the relator also brings this action, as well as on his own behalf, as required by the False Claims Act.

5. Defendant/ respondent did not fulfil the Constitutional requirement of Natural Born Citizen.

6. Defendant / respondent has received a salary as a President and Commander in chief in Violation of the False Claims act USC 3729 through 3733.

WHEREFORE, pursuant to the procedures and remedies set forth in the federal False Claims Act, relator, on his own behalf and on behalf of the Government of the United States of America demands enforcement of Qui Tam

MOTION FOR RELEASE OF INFORMATION ACT

INFORMATION UNDER 5USC 552 FREEDOM OF

PLAINTIFF re-alleges all of the above, incorporates by reference and alleges the following:

1. Plaintiff has requested information from the Social Security administration seeking explanation, why the defendant is using Social security numbers of other individuals and numbers that were never assigned and what action is Social Security administration is taking to prosecute this conduct.
2. Plaintiff received a response from a SSA FOIA officer, Dawn S. Wiggins, denying her request due to privacy.
3. Attached affidavit of investigator Sankey shows 39 different social security numbers connected to Barack Obama or Barry Obama. When one is using (x) multiple social security numbers, clearly at least (x-1) or (x) numbers are being used fraudulently, whereby there is no right to privacy or expectation of privacy in a fraudulent use of the social security numbers of others or numbers that were never assigned.
4. Plaintiff is damaged and will be more damaged in the near future, if the applications for the Social Security numbers listed in the above reports are not disclosed, and explanation is not provided by what right, by what warrant Defendant is using or have been those Social Security numbers.
5. Plaintiff is seeking a Writ of Mandamus from this Honorable Court to obtain the above information from Michael Astrue, Commissioner of the Social Security Administration.

VIOLATION OF COMMERCE CLAUSE AND OF PLAINTIFF'S RIGHTS TO GAINFUL EMPLOYMENT AS A DOCTOR OF DENTAL SURGERY UPON DEFENDANT'S IMMINENT SIGHNING OF THE HEALTH BILL

1. Plaintiff re-alleges and incorporates by reference everything alleged previously and alleges the following:
2. Plaintiff is a Doctor of Dental Surgery, licensed by the state of California.
3. Plaintiff owns and operates a dental practice at 29839 Santa Margarita PKWY, Rancho Santa Margarita CA.
4. Currently US House of Representatives is set approve via reconciliation one of two versions of the Health Bill (House Bill HR 3962 and "Senate Bill" to be reconciled in the House as HR 3590 are substantially Different). Defendant has repeatedly stated that if such bill is passed and reconciled as early as next week, he will immediately sign it into law in spite of general public outcry against such bill. This signing of the bill is imminent as Defendant, his administration and Democratic party leadership have engaged forceful arm twisting and de-facto bribery of US Senators in order to push passing of such bill, whereby Senator Mary Landrieu of Louisiana got a 100 million dollar de-facto bribe (Better known as a new "Louisiana Purchase"), senator Christopher Dodd of Connecticut got 300 million de-facto bribe and Senator Ben Nelson of Nebraska got an **infinity amount of dollars** de facto bribe to sign the Senate version of such bill.
5. Defendant has never provided any vital records to show that he is legitimate to hold position of the President and sign such bill into law.
6. Plaintiff will be directly affected by such bill, if signed into law as early as next week.
7. Health bill, as being prepared and reconciled, will create an enormous machine of governmental bureaucracy which will intrude into Plaintiff's practice, will affect her doctor-patient relations, will undermine her Hippocratic oath, will force her to ration medical care and de-facto deny medical care to elderly, whom some committees of bureaucrats will deem to be too old to receive such care, meaning too old to live.
8. Such bill will subject her to threat of multiple Medical-Dental malpractice legal actions as standard of care will clearly go down.

9. Such bill will constitute unreasonable infringement upon her gainful employment in Dental Surgery as overburdening of interstate commerce in clear violation of commerce clause.
10. Wherefore the Plaintiff seeks a writ of Mandamus, seeking release of the Defendant's vital records, such as his original birth certificate, his college and university enrollment records, social security application and passport application records to verify his legitimacy to sign Health Bill HR 3590 or HR 3962 or any other bill under the Natural Citizen requirement of the Article 2, Section 1 and seeking a declaratory relief deeming Health Bill HR 3590 and HR 3962 null and void as violating Commerce clause and not signed by a legitimate President of the United States.

Violation of Plaintiff's Civil rights under 42 USC 1983, 42 USC 1985.

Plaintiff re-alleges and incorporates by reference all of the above and alleges following

1. Plaintiff is one of two Republican candidates on the ballot in the state of CA. Democrat candidate on the ballot is an incumbent Debra Bowen.
2. Plaintiff's children were intimidated and harassed with e-mails stating that their mother will be thrown in prison and committed to mental institution. They received paintings of their mother, depicted nude, giving birth and holding a bloody placenta, titled "Birther Orly Taitz". This was clearly done to intimidate and harass not only Taitz's children but also Taitz, herself, and pressure her into dropping out of the race, as well as to cause her and her whole family severe mental anguish. Plaintiff has filed a criminal complaint with Orange County Registrar of Voters, Mr. Neal Kelley. (Exhibit –Criminal complaint, filed with the Registrar of Voters)
3. Mr. Kelley has called in response to the complaint and stated that it will be forwarded to the Secretary of State Debra Bowen, who has an investigative unit.
4. In and around the time of the incidents of harassment Plaintiff has received a copy of a campaign mailer sent by the campaign of Debra Bowen, Secretary of State, who is a top official, would be investigating the Plaintiff's complaint.
5. Bowen's mailer states "Please contribute today to help Debra stand against right-wing ideologues like Orly Taitz"... "...Her (Taitz) primary reason for running is to challenge President Obama's citizenship and invalidate the 2008 election. In Fact, Taitz has sued Debra twice to try to invalidate Obama's victory. We can't let fringe conspiracy theories use this office to get a foot in the door and undermine our democracy"... "please donate \$25 or more today so Debra can defeat Orly Taitz..." Exhibit Flier from Debra Bowen.
6. Clearly Plaintiff, Dr. Orly Taitz, cannot expect any impartiality or any assistance, when the governmental official, Secretary of State, who is supposed to investigate intimidation, harassment, hate crimes against Taitz and her children and her whole family, as related to elections, is the one who is spreading absolutely despicable defamatory, slanderous statements about Taitz, is the one who is masterminding the hysteria against Taitz, which in turn leads to hate crimes against Taitz and her family.
7. **7. Such behavior clearly shows violation of voting rights and Plaintiff's rights to be an un-intimidated candidate on the ballot. Secretary of State Bowen acted for the benefit and as a de-facto agent of the Defendant, whereby she admits in her own flier, that there is a threat of invalidation of Obama's election, if Taitz is elected. This represents a violation of Plaintiff's rights under 42 USC 1983 and 42 USC 1985.**
8. Defendant's unwillingness to unseal any and all of his vital records only fuels such attacks on Taitz and behavior of officials directed towards aiding and abetting of concealment of such records obstruction of records and violation of Taitz civil rights under the color of authority.
9. Wherefore Plaintiff seeks an adjudication in her favor and determination that her civil rights under 42 USC 1983 and 42 USC 1985 were violated and she seeks damages incurred as a result of such violation.

RICO

1. Plaintiff re-alleges and incorporates by reference all of the above and alleges the following:
2. Fraud, as described and alleged previously constitutes a predicate act under RICO
3. Violation of 42 USC 1983 and 1985 constitutes a predicate act under RICO.
4. On January 21st of 2009 my case Lightfoot v Bowen was erased from the docket of the Supreme Court. This suggests aiding and abetting in commission of fraud and a corrupt organization with a common scheme to defraud the country. As further investigation is necessary, the plaintiff cannot state prior to discovery, who was engaged in erasing of records.
5. On October 1st, 2009 Sidharth Velamoor, attorney for Perkins Coie, Obama's defense firm, where Robert Bauer, White House Chief Counsel, is a partner was hired as a clerk for Judge David O. Carter. Shortly thereafter Judge Carter has changed his opinion and decided that he no longer has jurisdiction to hear Barnett et al v Obama et al, which dealt with Obama's illegitimacy to presidency. Those actions suggest improper influence on the Federal judge in an effort to affect the outcome of the litigation, where defendant was likely to be found illegitimate to presidency. Those facts suggest violation of the civil rights of Taitz, an attorney on the case, and her clients under 42 USC 1983, which constitutes a predicate act under RICO.
6. Licensed investigators Susan Daniels and Neil Sankey have provided affidavits, showing Obama using multiple Social Security numbers, none of which were issued in Hawaii, which indicates violation of 42 USC 408 (a)(7)(b), a predicate act under RICO. (Exhibits Affidavits of Susan Daniels and Neil Sankey)
7. John Sampson, Retired Senior Deportation Officer of the United States Department of Homeland Security, Immigration and Customs Enforcement (DHS ICE), recipient of advanced training from federal Law Enforcement Center, currently a private investigator has provided an affidavit, showing that the Defendant has used a social security number, issued in the state of Connecticut, while he resided in HI. Both investigator Sampson and Sankey were subjected to retaliation and their privileges to use National databases were rescinded in retaliation, upon them providing Taitz with the information showing the defendant fraudulently using Social Security numbers of others. This is indicative of fraud, obstruction of Justice, Social Security Fraud and Identity theft- all predicate acts under RICO.

8. Plaintiff is seeking to plead RICO more fully upon conducting and completion of discovery, which is currently impeded due to plaintiff's refusal to unseal any and all information and due to the Fact that governmental officials, currently not named, are aiding and abetting in such obfuscation of records.

Wherefore:

1. Plaintiff ex-relator in the name of the United States of America is requesting this Honorable Court to issue a writ of Quo Warranto against a respondent Barack Hussein Obama and order an evidentiary hearing whether fraud upon the court was committed and whether criminal charges should be brought against the respondent for fraud, identity theft and social security fraud.
2. Pursuant to the procedures and remedies set forth in the federal False Claims Act, Plaintiff-ex relator, on his own behalf and on behalf of the Government of the United States of America demands enforcement of Qui Tam
3. Wherefore the Plaintiff seeks a writ of Mandamus, seeking release of the Defendant's vital records, such as his original birth certificate, his college and university enrollment records, social security application and passport application records to verify his legitimacy to sign Health Bill HR 3590 or HR 3962 or any other bill under the Natural Citizen requirement of the Article 2, Section 1 and seeking a declaratory relief deeming Health Bill HR 3590 and HR 3962 null and void as violating Commerce clause and not signed by a legitimate President of the United States.
4. Plaintiff seeks declaratory relief and adjudication I that common law fraud was committed by the Defendant in his declaration of Candidacy to presidency, and based on this fraud Plaintiff suffered damages. Plaintiff is seeking compensation for the damages suffered as well as severe emotional distress suffered due to the fraud committed by the Defendant.
5. Plaintiff is seeking Declaratory relief in that the Defendant has no right to privacy or expectation of privacy in his use of multiple Social Security numbers, numbers issued in other states, where he never resided, as well as numbers never assigned. Plaintiff seeks the writ of Mandamus in disclosure of the application for the social security number 042-68-4425.
6. Wherefore Plaintiff seeks an adjudication in her favor and determination that her civil rights under 42 USC 1983 and 42 USC 1985 were violated and she seeks damages incurred as a result of such violation.
7. Plaintiff is seeking damages under RICO, to be fully plead and ascertained upon completion of discovery.

/s/ DR ORLY TAITZ ESQ

By: _____
Dr. Orly Taitz, Esq. (California Bar 223433)
Attorney for the Plaintiffs

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PROOF OF SERVICE

I CERTIFY THAT TRUE AND CORRECT COPY OF THE ABOVE PLEADINGS WAS SERVED on
Channing Phillips, US Attorney for the District of Columbia
501 3 rd str. NW
Washington DC
/s/Orly Taitz

Dr. Orly Taitz Esq
29839 Santa Margarita PKWY
Rancho Santa Margarita CA 92688

1. Exhibit 1 Affidavit from Investigator John Sampson
2. Exhibit 2 Affidavit from licensed Investigator Susan Daniels
3. Exhibit 3 Affidavit from the investigator Neil Sankey
4. Exhibit 4 Campaign flier of CA SOS Debra Bowen
5. Criminal complaint filed with the office of Neal Kelley, the Registrar of Voters of Orange County



Category: Supporting Documentation

THIS NEVER HAPPENED BEFORE. THE PASSWORD DID NOT ALLOW ME TO UPLOAD PLEADINGS. THE PLEADINGS WERE SENT VIA E-MAILS TO THE CLERK AND JUDGE ROYCE LAMBERTH

Posted on | March 20, 2010 | No Comments

Attention Judge Lamberth,

cc ECF registration

cc Clerk Robert Elliott

03.19.10.

Your Honor,

ECF login that I was assigned, does not work

When I log in, it doesn't give me an opportunity to enter any pleadings. I am sending a document to you via e-mail timely, Time stamp is on the e-mail. I am unable to file it via ECF, as the ECF system is locked, it doesn't open either civil or criminal files, it only opens reports and pacer. I am sending the file as an attachment.

Please, see attached

First Amended Complaint Taitz v Obama

Opposition to Motion to dismiss Taitz v Obama

case #10-cv-151

Respectfully submitted

Dr. Orly Taitz ESQ

- Show quoted text -

On Thu, Mar 18, 2010 at 5:23 AM, <ECF_Registration@dcd.uscourts.gov> wrote:

You are now registered to file pleadings in the United States District Court for the District of Columbia's Electronic Case Filing System. To enter the "Live ECF" system, use the following login ID and password.

Your Login Name is: redacted

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Please keep track of this login and password. Should you need to have this login and password furnished again, there may be a fee involved and/or the requirement that counsel appear at the Clerk's Office with ID. And remember to keep your e-mail address up-to-date as it is the attorney's responsibility to do so.

The login name and password are case sensitive. If you wish to view case documents, use your PACER login and password.

There is an ECF tutorial on our website (www.dcd.uscourts.gov) if you have not had training on ECF. There is also a User's Manual on the website which can be viewed or downloaded.

Now that you have received your login and password, you are able to file your pleadings electronically. To do this, go to the court's website (www.dcd.uscourts.gov) and, using your ECF login and password submit your pleading. Should you encounter difficulties in the submission, you can submit your document in PDF to dcd_cmecf@dcd.uscourts.gov. For more information, please see LCvR 5.4.

Please reply to this email to acknowledge your receipt of your ECF registration login and password.

Taitz v Obama First amended complaint, Opposition to Motion to dismiss.pdf

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