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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Dr. ORLY TAITZ, ESQ, PRO SE Plaintiff, LAMBERTH	§ §HONORABLE ROYCE
	§ PRESIDING
v.	§ **Civil Action: 10-151 RCL**
Barack Hussein Obama,	§
	§ 60 B MOTION § FOR RECONSIDERATION
Defendant.	§

60 B Motion for reconsideration is warranted and granted when new evidence is presented, when there are new legal precedents or findings, when there was a mistake of law or fact in prior order , or when it is warranted in the interest of Justice.

Rule 60. Relief from Judgment or Order

(b) Grounds for Relief from a Final Judgment, Order, or Proceeding.

On motion and just terms, the court may relieve a party or its legal representative from a final judgment, order, or proceeding for the following reasons:

(1) mistake, inadvertence, surprise, or excusable neglect;

(2) newly discovered evidence that, with reasonable diligence, could not have been discovered in time to move for a new trial under Rule 59(b);

(3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party;

(4) the judgment is void;

(5) the judgment has been satisfied, released, or discharged; it is based on an earlier judgment that has been reversed or vacated; or applying it prospectively is no longer equitable; or

(6) any other reason that justifies relief.

(c) Timing and Effect of the Motion.

(1) Timing.

A motion under Rule 60(b) must be made within a reasonable time — and for reasons (1), (2), and (3) no more than a year after the entry of the judgment or order or the date of the proceeding.

Error of Fact and Law in regards to Quo Warranto cause of action Rule 60 B (1) and Rule 60B (6)

In it's prior order issued on 06.18.2010 this court made an error of fact. On page 3 of the order, denying Taitz request to add 2008 Presidential Candidate Ambassador Keyes and Vice Presidential candidate Gail Lightfoot, this court has made an error of law and fact in it's statement "...amendment of the complaint to add these two plaintiffs would be futile because they lack standing to pursue a Quo Warranto action against a public official"." ...a Quo Warranto action against a public official may be brought by the Attorney General or the US Attorney."

Taitz respectfully would like to point out that there is an exclusion to such rule. When an Attorney General or U.S. Attorney refuses to initiate such action, an interested person has a right to seek a leave of court to proceed as an ex-relator in Quo Warranto. Newman v. United States ex rel. Frizzell, 238 U.S. 537 (1915). Ambassador Keyes is indeed a classic, "interested person" as he ran for President in 2008 as a candidate from the American Independent Party. Additionally Ambassador Keyes ran against Obama in 2006 in the General election for the U.S. senate. At the time, Ambassador Keyes was a Republican candidate and the first runner up in the Senatorial election in IL. If

indeed the evidence brought forward by Taitz is correct, Obama will be found liable in both Quo Warranto and in fraud and elections fraud causes of action to Ambassador Keyes. Newly discovered transcripts from the Spring session of the Assembly of Kenya, specifically a speech by Minister of Lands James Orengo, stating that Obama was born in Kenya, suggest that Obama obtained his Certification of Live Birth by fraud, therefore he never obtained valid, legal US citizenship, therefore Ambassador Keyes has standing to proceed and high likelihood to succeed in both actions for Quo Warranto and Fraud in regards to both the 2008 Presidential election and 2006 Senatorial election. Gail Lightfoot was a Vice Presidential candidate on the ballot in CA for a write- in Candidate Congressman Ron Paul. Derivatively, as a vice presidential candidate, she would qualify as an "interested person". Judge David O. Carter in the Central District of Ca in Barnett et al v Obama et al 09-cv-82 DOC has already established Keyes and Lightfoot standing to proceed in Quo Warranto, but Judge Carter stated that he cannot maintain the action in CA, as it would be "robbing the District of Columbia of its's jurisdiction." Due to the above mistake of law and fact, Taitz moves your Honor to grant her Motion for Reconsideration.

Mistake of fact regarding FOIA request rule 60 B(1) Justification for Reconsideration

In Your 06.18.2010 order denying Taitz request to proceed under FOIA request, your Honor cited as a basis for denial a 5U.S.C. §552(b)(6) exemption to such requests stating that "personnel and medical files and similar files the disclosure of which would constitute a clearly unwarranted invasion of personal privacy". Taitz respectfully would like to point out that the ruling was an error of fact, Your Honor misunderstood the request. According to the affidavits presented to court by Taitz, specifically an affidavit from a recently retired Senior Deportation Officer from the Department of the Homeland Security, John Sampson and, licensed Private

Investigator, certified by the Department of the Homeland Security Susan Daniels, Social Security number 042-68-4425 was issued in the state of CT between 1976-1979 to another individual, born in 1890. If Obama was to be born in 1890, he would be 120 years old today. While Taitz appreciates Obama's daily exercise and basketball rounds with his aids, none of these activities could keep a 120 year old individual looking like 50. Obama's official records, such as they appear, show him to be born in 1961, not 1890. Between 1976 and 1979 Obama resided in HI and would have received a Social Security number from HI, not Ct. All of the above shows that Obama used and is still using today a stolen Social Security number, issued to another individual in CT. **Obama has no standing** to object to FOIA request to unseal the Social Security application for that number. One does not have an expectation of personal privacy in someone else's stolen records. Moreover, an individual, who actually received the aforementioned Social Security number never objected to such release, he is most probably deceased and his death was either never reported to the Social Security administration or was deleted by someone from the database of the Social Security administration. That is how Obama was able to use his number. Not only Taitz's claim for fraud, but also concern for National Security as a whole, require this error of fact to be corrected and Taitz's Motion for Reconsideration to be granted.

A. New Facts, new Evidence $20, 000 damages suffered by Taitz due to fraud committed by Obama, give her standing to proceed with discovery on the merits

In the 06.18.10 order this court stated that Taitz has no standing to raise generalized grievances.

Per Lujan v. Defenders of Wildlife 504 U.S. 555, 573-74 (1992) to establish standing the plaintiffs must satisfy 3 prong test:

1. plaintiffs must have suffered an injury in fact, economic or otherwise; 2. there must be a causal connection between plaintiffs injuries and the challenged action; 3. a favorable decision in the case must be likely to redress plaintiffs injuries.

So far, over a 100 legal actions have been filed around this nation in federal and state courts by numerous attorneys and pro se litigants. None of these cases were heard on the merits, as judges were stating that the damages the plaintiffs were claiming are too generalizes and not particularized., that if indeed Mr. Obama committed fraud in his sworn Certification of a candidate on the ballot, when he ran for US presidency, than it was fraud committed on the whole country and no one plaintiff could not show a particularized injury, different from injury of all the other American citizens. Therefore the plaintiffs were told that they did not have standing to proceed on the merits of the cases.

Taitz respectfully points out that this court made an error of fact and law in regards to the letter from the Department of Justice that Taitz submitted into evidence.

According to Black Law Dictionary evidence is something... that tends to prove or disprove the existence of the alleged fact.

Alleged fact in this case is **STANDING**. The defendant claims that Taitz does not have standing to proceed in her causes of action for Common Law fraud and Elections fraud because she did not sustain a particularized injury and does not have standing. **Taitz is bringing evidence of injury to prove standing.**

Taitz is statng that she has perfect standing, since

a. the defendant committed fraud in order to get into the White House

b. he intended to defraud the whole nation, including Federal judges

c. Judge Clay D. Land in GA was one of the targets of such fraud, he believed Obama to be legitimate for the position of the US presidency and therefore he believed that the fact that Taitz represented active duty officers of the US military, challenging such legitimacy was frivolous and sanctioned Taitz $20,000 for allegedly bringing a frivolous law suit. Never in her life was Taitz sanctioned: never before and never after. This sua sponte Rule 11 sanction was not for anything wrong done by Taitz. She didn't cheat, she didn't steal, she didn't abandon her client, she never did anything immoral or unethical, that would justify any sanction. The **only wrong here was fraud committed by Obama, which caused Judge Land to believe that Taitz's action of doubting Obama was frivolous. This was not an unrelated matter. This was not an unrelated case.** Since Judge Land refused to grant a hearing or discovery or recuse himself, the only way for Taitz to prove that indeed fraud was committed by Obama, was to bring a proper legal action for fraud, in the proper jurisdiction, in Washington DC, as she did in this case, and in the course of discovery show that indeed fraud was committed, that her damages were related to that fraud by Obama and that a favorable decision by this court will redress her grievance, whereby Obama will be ordered to pay damages suffered by Taitz, as a direct and foreseeable result of his actions, of fraud committed by him. When one intends to occupy your house by fraud, it is foreseeable that an attorney will represent the victims to regain their house and fight this fraud. When one got into the White House and the position of the Commander-in-chief by fraud, it is foreseeable, that someone would represent members of the US military in exposing this fraud and **retaking the people's house, the White House**. Taitz satisfied all three prongs of the standing test per Lujan v Defenders of Wildlife.

On November fifth, 2010 for the first time in US history the United Nations Commission on Human Rights will be reviewing Human Rights violations in the

United States of America. One of the most serious concerns, presented to the commission, is lack of meaningful access to courts, as routinely cases are not heard on the merits and most cases, dealing with the violations of the Civil rights of the U.S. citizens are thrown out of courts, particularly Federal Courts, as judges are refusing to grant citizens standing. Additionally, an area of concern for the UN Commission for Human Rights, is the pattern of intimidation, retaliation and harassment of attorneys during Obama administration. Taitz submits, that the fact that she cannot get a hearing on the merits and that sua sponte sanctions against her were imposed without granting her any hearing, represents such violation of her Human Rights, and only hearing on the merits, to show that Obama indeed committed fraud and Taitz's actions were not frivolous, is the only way to redress such violation of her Human rights.

On August 9, 2010 An Abstract of Judgment (Exhibit 1)was issued and a demand from the US Justice Department under the rule of Obama appointee Eric Holder, for Taitz to pay $20,000 or a lien will be placed on her properties including her house, where she is residing with her husband and three children. This lien comes from a decision by a Federal Judge Clay D. Land, who decided that the fact that Taitz represented active members of US military questioning Obama's natural born status is frivolous. So, Land issued $20,000 in sanctions against Taitz, stating that those sanctions are for this frivolous action. On 08.19.10. Taitz paid this $20,000 under protest, in order not to uproot her family and not to cause additional emotional distress to her children. (exhibit 2.) As of 08.19.10. Taitz has standing to proceed against Obama in a legal action for fraud to collect $20,000 that were taken from her as a result of fraud committed by Obama, as well as interest, punitive damages and compensation for severe emotional distress inflicted upon her by Obama, who committed fraud and cover up for a year and a

half. If previously judges stated that there is no particularized injury, today not one single judge can state that there is no particularized injury. Out of 305 million US citizens Taitz is the only person who was damaged due to fraud, committed by Obama. It was not generalized, it was so particularized, that it applied only to one person, Taitz.

B. Intention to defraud

In prior pleadings Taitz has provided evidence showing that Obama committed fraud in order to attain the position of US president and Commander- in-Chief. Without going into dozens of pages of recital of prior pleadings and to summarize prior evidence, Taitz states:

1. Obama does not possess a valid US Social Security number of his own. According to an affidavit from a recently retired Senior Deportation Officer from the Department of Homeland Security John Sampson, Obama has used most of his life and is still using today a Social Security number 042-68-4425, which was issued to another individual in CT. L:ack of a valid Social Security number is an evidence of foreign birth and lack of proper citizenship status.

2. Licensed investigator Susan Daniels issued an affidavit concurring with Sampson, that Obama does not have a valid Social Security number of his own, but rather used multiple numbers, none of which was issued in HI, where he claims to be born. This is additional evidence of fraud committed by Obama.

3. Licensed investigator and a retired senior Scotland Yard officer Neil Sankey concurred with Sampson and Daniels, stating that according to national databases Obama used multiple Social Security numbers, none of which was issued in HI.

4. Obama never presented to the public a long form birth certificate from HI.

5. A short form birth certificate does not contain any corroborating evidence of Hawaiian birth: it does not provide a name of the doctor, name of the Hospital and the names of three witnesses in attendance during birth, rendering such

certification of live birth to be a worthless piece of paper, not in any way sufficient to prove the birth in HI, particularly in light of the fact that HI has statute 338-17 (and precursor statutes) that allow foreign born children of Hawaiian residents to attain Hawaiian birth certificates. Hawaii also has statute 338-5, that allows one to get a birth certificate based on a statement of one relative only without any corroborative evidence from any hospital.

6. Taitz previously submitted to this court a transcript from the March 25 session of the assembly of Kenya, where minister of lands James Orengo stated that Obama was born in Kenya.

7. Even if arguendo Obama was to be born in US, the fact that his father was never a US citizen, would make him a Native born at best, but not a natural born citizen, which is a requirement for the US presidency.

8. Obama was well aware of all these facts, but in his quest for power and control of the US 13 trillion dollar economy and military intentionally misrepresented his eligibility and fraudulently posted on his candidate for office certification, that he is eligible for the US presidency according to the US Constitution.

C. Chain of Causation

Obama intended to defraud the public and induce them to believe that he is a constitutionally eligible president. When Taitz presented her cases in front of Judge Land, he indeed relied on representation by Obama, that he is a legitimate President and therefore found a legal action questioning Obama's legitimacy to be frivolous and sanctioned Taitz $20,000. The chain of causation was not broken.

D. Sanctions were the actual and proximate result of fraud committed by Obama.

At the time of running for the US presidency Obama was a US Senator, a high ranking politician and it was foreseeable that other high ranking government

officials, politicians and judges would believe Obama's claims to be true. As such it was foreseeable that a judge like judge Land would consider an action doubting Obama's legitimacy to be frivolous and would sanction an attorney. As such, the chain of causation was not broken. Damages suffered by Taitz were actual and were proximately related to fraud committed by Obama.

D. Damages were actual, not conjectural , not hypothetical.

In over 100 legal actions brought against Obama, the cases did not go to trial, as the judges considered damages to be hypothetical or conjectural. For example in this very jurisdiction Judge Robertson dismissed a legal action on behalf of Col. Hollister in Hollister v Soetoro, stating that a potential request of deployment pursuant to orders by Obama was hypothetical and conjectural. In Taitz's case no judge cauld cause the damages to be hypothetical or conjectural, as she paid $20,000 and **has 20,000 reasons to call the damages actual.**

E. Damages are not generalized, but rather specific.

Again, as was previously stated, over a 100 legal actions were dismissed, on the grounds that the damages of US citizens, involved in litigation, seeking proof of Obama's eligibility were generalized, as damage was non specific, but rather suffered by the public at large.

As stated, Taitz is the only citizen who has a specific damage of $20, 000, which was specific only to her, therefore no US attorney representing Obama, nor any jurist can state that the damages were generalized. As such there is no impediment in granting Taitz's standing to proceed.

No Collateral Estoppel, no Res Judicata.

The issue of fraud, committed by Obama, was never heard on the merits, the evidence was never presented to any judge or jury. As such there is no res Judicata or Collateral estoppel in proceeding in this claim.

F. Newly discovered evidence -additional last name for Barack Obama, Barack Soebarkah, as noted in his mother's recently released passport.

After two years of continuous FOIA requests sent to different governmental agencies, submitted by hundreds of US citizens, the State Department finally released a certified copy of the 1967 passport for Stanley Ann Dunham, mother of Barack Obama. That passport showed yet another name, that has not been seen before: Soebarkah, which apparently comes from the full name of Obama's stepfather Lolo Soetoro Soebarkah. This is **additional new evidence,** which tends to show that Obama indeed committed fraud, that **he was sworn in as the US president under a name, which is not legally his,** that Taitz was correct in representing Flight Surgeon Capt. Connie Rhodes, Major Stephan Cook, Lt. Col. David Earl-Graef and Major General Carroll Childers, who doubted Obama's legitimacy for the US Presidency; that legal actions brought by Taitz were not frivolous, and that if not for fraud committed by Obama, Taitz would not be sanctioned, that **discovery and favorable decision in this case would likely redress her injury in the form of reimbursement by Obama for the damages, that she has suffered due to fraud committed by him.** This is more new evidence, that tends to show that Taitz has satisfied the three prong test under Lujan v Defenders of Wildlife and that she has standing and that the motion for Reconsideration should be granted.

Good Samaritan, rescuer theory warrants a finding of foreseeability of injury and granting Motion for Reconsideration.

Yet another theory shows that damages suffered by Taitz are proximately related to fraud committed by Obama,- and that is the theory of damages suffered by a rescuer, a good Samaritan, are foreseeable and proximately related.

If one was to burglarize a home, and try to take someone else''s valuable possessions, then potential damages to a Good Samaritan, who came to rescue the inhabitants of such home are foreseeable, the chain of causation was not severed.

In this case Taitz acted as a Good Samaritan, working pro bono and defending the Constitutional Rights of the members of the US military, specifically their Constitutional right to take orders only from **a legitimate US president and not one, who managed to get into the White House by virtue of fraud and obfuscation of his vital records.**

When one is accused of a minor speeding violation with a potential $500 fine, he has a right to a hearing, to face the police officer, who issued a ticket.

$20,000 were taken from Taitz, so she has a right to a hearing on the merits to prove that it was not a justified taking. If Taitz is not granted a hearing on the merits of her case, that sends a message to the World Community, that we don't have rule of law in the US, but we instead have a rule of tyranny. It sends a message to the rest of the country, that one's First amendment, as well as the Fourth, Fifth, Ninth and Fourteenth amendment rights can be taken without a trial, that US citizens do not have a meaningful access to courts and the system of justice.

If today under the Obama regime members of the US military are told to go to foreign countries and follow orders issued by Obama as the Commander- in- Chief, without any right for redress about of Obama's legitimacy, without a right of meaningful representation by an attorney, then tomorrow, any citizen, who expresses any doubts about Obama's legitimacy can be deemed a domestic terrorist and indefinitely detained under the Patriot Act, and no judge or attorney will be there to redress a grievance by such citizen.

This is the most dangerous slippery slope this country has ever followed. This path was followed before by different totalitarian regimes. The Stalinist Soviet

Union had beautiful court buildings, had "attorneys" and "judges" wearing beautiful black robes, but no real, meaningful system of justice. People were routinely sent to their deaths or to GULAG camps, without any discovery or any trial on the merits. How is what is happening today to Taitz is any different from what happened to Constitutional attorneys and civil rights leaders in the Communist dictatorships of the Soviet Union? So far Taitz has not been given any trial on the merits, no opportunity of any meaningful redress and to show that Obama committed fraud and her damages in the form of $20,000 are not warranted, not justified and need to be paid in restitution by Obama or reversed .

During the 1933-1945 rule of the National--Socialist (Nazi Party) in Germany there were beautiful court buildings in Germany with "attorneys" and "judges" in black robes, but there was no meaningful access to the system of justice, no meaningful hearing of cases **on the merits**, just as what was seen by Taitz and her clients in the courtroom of Judge Land in GA. In Germany millions of people were sent to Buchenwald and Dachau without any hearings, via summary orders and by virtue of intimidation. "Judges" and "attorneys' were intimidated, harassed, scared that if they opened their mouths to defend human rights, the Constitutional rights of people before them, they would be next on a freight train rushing to Auschwitz or Treblinka, just as today US Attorneys are scared, that if they actually follow their oath of office to defend the Constitution, they would be summarily fired, as the judges are afraid that Eric Holder Department of Justice would look for some reason to find some illegality in their actions and will submit a recommendation for impeachment of those judges. At the end, massive violations of human rights in Germany ended with Allied military assault, with US Marines storming the beaches of Normandy. Let's hope that methodical deprivation of the Constitutional rights of US citizens under the Obama regime will end soon through legal means of discovery and hearing on the merits and not through the

means of the US Marines storming the beaches of the Potomac. As such Taitz acted as a Good Samaritan, as a defender and rescuer of the US Constitution, specifically Article Two, Section One of the Constitution, and sustained specific damages due to fraud and violation of the Constitution by Obama. Proceeding to discovery is likely to redress her damages in the form of an award for damages to be paid by Obama. Taitz has satisfied the three prong test per Lujan v Defenders of Wildlife and Motion for reconsideration is warranted.

Alternative Theory-Taitz action constitutes an action of an "interested person" to challenge an illegal act under Quo Warranto doctrine and DC code §16-3501, §16-3502. §16-3503

Taitz received an order from the Department of Justice to pay immediately $20,000. Taitz contention is that she is an interested parson, who suffered a $20000 damages complying with an illegal order, coming from a putative Attorney General Eric Holder, who is an appointee of a putative President, who usurped the franchise of the President by virtue of fraud.

Originally, as a CA licensed attorney,-Taitz brought Quo Warranto in the Central District of CA, based on diversity, on behalf of an interested person, a Presidential candidate from the American Independent Party Ambassador Alan Keyes, asking the District Court to use the DC Quo Warranto statutes 16-3501-16-3503. CA District Court refused to use DC statutes, even though diversity action would allow it and even though CA choice of law provision would allow it. Taitz properly asked for the court to grant ex-relator status to her client after Attorney General Holder and US Attorney for the District of Columbia Phillips did not respond to the request to institute Quo Warranto, which was filed with their offices on March1st, 2009.

When CA Central District refused to grant Taitz's client, presidential candidate Alan Keyes, an ex-relator status, as an interested person, Taitz asked CA District court, Judge David O. Carter to simply transfer her action to the DC court. CA court refused to transfer with no explanation and dismissed the case citing lack of jurisdiction to apply D.C. Quo Warranto statutes and stating that Quo Warranto needs to be brought in D.C. As Taitz is not licensed in D.C. and as D.C. layers, typically working with the federal government are paralyzed with fear about instituting a Quo Warranto action against the sitting President, Taitz filed a Quo Warranto action on her own behalf as prose litigant and asked this Honorable court to grant her pro hac vice to represent her client Ambassador Alan Keyes to proceed with the Quo Warranto as an interested person ex-relator in DC after the Attorney General Holder and US Attorney Jeffrey Taylor failed to respond or to act. This pro hac vice could have been signed by a sitting judge as a member of the DC bar. As such pro hac vice was not granted, Taitz is not acting in Quo warranto directly as an interested person in the sense of a contender to a franchise per Newman v. United States ex rel. Frizzell, 238 U.S. 537 (1915), in a case involving a public office one would have to have "an interest in the office itself peculiar to himself…" and be filing an action against another who allegedly usurped that office. Taitz is bringing forward a collateral attack, stating that as fraud was committed by Obama in order to get into office and occupy the franchise of the president, his further acts will be invalid, among them appointment of the Attorney General, as such actions of this putative Attorney General will be illegal acts, and Taitz was harmed by this illegal act which was $20,000 of de facto intimidation and extortion and using the office of the Attorney General and Department of Justice to keep her quiet about the illegality, which existed and brought about illegal usurpation of franchises of the President and Attorney General and an

illegal order, commanding her to pay $20,000 or liens will be placed on her properties.

H. Damages suffered by Taitz represent a direct result of violation of Honest Services act under USC 18 §1346

18 USC §1346 states: "For the purposes of this chapter, the term, *scheme or artifice to defraud* includes a scheme or artifice to deprive another of the intangible right of Honest Services." Taitz has filed proper requests with Attorney General Eric Holder and the US attorney Jeffrey Taylor petitioning them to institute a Quo Warranto action against Barack Obama. Neither the US attorney for the District of Columbia nor Attorney General Holder, both Obama appointees, instituted such actions and provided no response or justification, as to why such action was not instituted. Later, when Taitz brought two actions on behalf of her clients, members of the US military, challenging Obama's legitimacy to the position of the Commander in Chief, US District Judge Clay D. Land believed that Obama was properly vetted by the authorities, decided that such challenge is frivolous and sanctioned Taitz $20,000. Taitz was deprived of Honest Service through a scheme to defraud, whereby Obama's appointment of the Attorney General and the US attorney for the District of Columbia and a salary received by the Attorney General and the US Attorney for the District of Columbia became a de-facto bribe to keep the public silent about fraud perpetrated by Obama to obtain the franchise of the President. Taitz was directly harmed and denied an inalienable intangible right of Honest Services. The $20,000 sanctions assessment represents a further instrument , a tool within such scheme to defraud and deprive Taitz of Honest Services.

Correction in regards to the Health Care act and Taxpayer standing under Flast v Cohen

In 06.18.10. order Your Honor has stated that Taitz cannot proceed under the Commerce Clause, but can proceed under the Establishment Clause under Flast v Cohen, 392 U.S. 8(1968).

Taitz alleges that indeed Patient Protection and Affordable Care Act, Pub. L, No111-148 (Hereinafter Healthcare Act) is invalid as violative of the Commerce Clause and the 14th Amendment Equal Protection Clause for a number of reasons:

1. Currently passed Healthcare Act made it mandatory for everyone to pay into the Healthcare program or be penalized. It created a national Healthcare system, that will be used by everyone, regardless of religious affiliation, however this act exempts millions of individuals, who happen to be Muslims from paying a cent into the system, as according to Sharia law, insurance is considered a form of usury and gambling, so those individuals will be using the benefits of the National healthcare, but not paying anything into it.

Currently Taitz and her husband are paying some $18,000 a year for them and their three children for health insurance. As the healthcare bill will be enforced, they will have to pay for Muslim families who do not pay for the insurance, but will get the benefits. Moreover, such schemes encourage individuals to convert into the Muslim religion, as it provides them with perks and benefits. This is a clear violation of the Establishment clause and 14th amendment equal protection clause. Taitz is seeking to proceed on this cause of action and to obtain a class certification, not only for her, but for millions of other families, who happen to be Christian or Jewish and who will have to participate in this plan against their will and in violation of the Establishment clause and 14th Amendment Equal Protection Clause.

2. Taitz is a Doctor of Dental Surgery and currently pays around $6,000 per year for the Healthcare insurance for each of her dental Assistants. Under the new Healthcare plan employers, who are similarly situated and who

happen to be Muslims, will have an unfair advantage in not having to pay for such insurance. As such Taitz is seeking a class certification for millions of employers, who are similarly situated, who are Christian or Jewish, and who will have to participate in this plan against their will and in violation of the Establishment Clause and 14th Amendment Equal Protection Clause.

3. Taitz is a doctor and a medical provider who took a Hippocratic oath and finds it morally repugnant to participate in a scheme, where a state is promoting a Muslim religion, which is teaching stoning, lashing and beating as part of the religious ritual. Taitz is attaching a recent article, describing a Muslim judge, seeking a surgeon to sever a spinal cord of a defendant and artificially paralyze him as a punishment for leaving a victim paralyzed as a result of a brawl. Taitz would like a certification of a class to form a class of plaintiffs, doctors, nurses and other Healthcare providers, who find such Healthcare act to be violative of their moral believes and violative of the Establishment clause and the 14th Amendment Equal Protection Clause.

4. Taitz provides Exhibit 4, a newspaper article, showing stoning of victims, which is a ritual of Muslim religion. Taitz finds such practices to be barbaric and violative of Judeo-Christian beliefs. Taitz is seeking a class certification of millions of similarly situated individuals, who find that the fact that the State is promoting Muslim religion and de facto repressing of the Christian and Jewish religion is violative of the establishment Clause and the 14th amendment Equal Protection Clause.

5.Taitz submits an Exhibit 5, a picture of beating of a Muslim woman, per Sharia law. As an educated American woman Taitz is horrified by the fact that under the Healthcare Act she is forced to tolerate and financially support a religion, which is so repressive and barbaric against women. Taitz is seeking a certification of a class for millions of similarly situated American women, who are

forced to participate in a plan, set by the state that promotes Muslim religion in violation of their 14th amendment equal protection rights and establishment clause.

Taitz is seeking discovery to show that Obama indeed committed fraud in wrongfully claiming his eligibility for office, by obfuscation of his vital records, that as a result of this scheme he pushed for the Healthcare act, which constitutes a veiled attempt to promote his Muslim beliefs (Obama was educated in a Muslim Madrasa and both his father and step father were Muslim). As stated, above five distinct large groups of US citizens were damaged by this act, which was signed into law by an ineligible individual. A favorable decision in this case would redress the plaintiff's injury, as the Healthcare act will be found invalid, as signed by the ineligible individual and violative of the 14th Amendment equal protection rights and of the Establishment clause. As such Taitz has perfect standing to proceed under the Establishment clause and the 14th Amendment Equal Protection Clause and moves the court to grant her Motion for Reconsideration.

G. New legal finding.

On July 30th Your Honor rendered a decision and issued an order in case

1:05-cv-01548-RCL AGUDAS CHASIDEI CHABAD OF UNITED STATES v. RUSSIAN FEDERATION et al (hereinafter Agudas).

This decision was applauded in the World Press as using a moral compass in seeking parties accountable for fraud and deceit in violation of international laws. US main stream media did not cover it, probably being preocupied with "more important" news, such as escapades of Lindsey Lohan, Mel Gibson and Snooky.

While Taitz whole heartedly supports the Agudas decision, she would like to extrapolate the fidings and reasoning Your Honor used in Agudas v Russian Federation to her current action. In Agudas Your Honor found that he has jurisdiction to order the President of the Souvereign Nation, the Russian

Federation, to produce certain books, belonging to Agudas, using an exception of fraud or deceit within 28U.S.C.§1605(a)(3) and stating that "it serves no public purpose" to keep those books.

If Your Honor feels that **he has jurisdiction** to order the president of a foreign nation under sovereign immunity to produce certain documents and books, clearly Your Honor has jurisdiction to order discovery and order Barack Obama to produce his original birth certificate, currently sealed in the Health Department in HI, to refute the evidence of fraud committed by him in order to obtain the franchise and the position of the President.

Members of Agudas are US citizens, seeking certain religious books and writings of Rebbe Schneersohn, which are located in Russia. Agudas Hasidei Habad is a US branch of a religious movement, that is spread all over the World. If members of the US branch of a religious movement have standing to bring a claim against President Dimitri Medvedev or Prime Minister Vladimir Putin, then clearly US citizens have standing to bring a claim against the US President Barack Obama.

It is noteworthy, that when Rebbe Yosef Yitschak Schneersohn, of righteous memory, put his teachings on paper, Agudas Hasidei Chabad of New York didn't even exist. Immigration to the US was only starting, there was no specific will for Agudas of New York or Agudas of Moscow or Agudas of Tel Aviv to inherit those manuscripts, as Chabad is not a centralized movement. After all, ChaBaD in itself is an acronym, consisting of three Hebrew Words: Chochma, Bina and Daat, meaning Intelligence, Wisdom and Knowledge (knowledge of the word of God and general knowledge). There is no formal first communion, catechism or confirmation in Chabad, as you would find in Catholicism, there is no specific test or specific conversion for one to be a member of Chabad or to **show standing in court to inherit a book,** written by a specific Chabad rebbe in Russia or a book

lost or taken in Poland. Anyone who believes and follows the tenets of Chochma, Bina and Daat is a chabadnick. Your Honor found the rights of inheritance to be more along the lines **of moral rights.**

Similarly, there is a moral right for each and every US citizen and each and every member of the US military to have a President and Commander in Chief, who is eligible for the position and who is not usurping the position by virtue of fraud and deceit. In her legal actions Taitz was an attorney, who pro bono, selflessly defended such rights and suffered damages.

If members of Chabad of New York have standing to come to the US District Court in DC and seek discovery and vindication of their rights of possession in Russian Federation, clearly the US citizens have a right and standing to enforce an action for fraud per DC Code §12-301(8) and 18 US Code §1343. Such right and standing includes Taitz's right and standing to proceed in her action for fraud under US or DC or Ca statutes. At stake is much more than $20,000. At stake is furtherance of public policy and the need to protect U.S. citizens, the 14 trillion a year US economy, national security, and access to the U.S. nuclear arsenal.

Taitz is asking this court to follow the moral compass given to us by Rebbe Schneersohn, by Ahad Ha Am, by the founders of Chabad, the three pillars of Chochma, Bina and Daat- Intelligence, Wisdom and Knowledge and grant Taitz 60 B motion for reconsideration, granting her standing to proceed.

Wherefore, Taitz respectfully requests this Honorable court to grant her 60 B motion for reconsideration.

/s/ DR ORLY TAITZ ESQ

By:_____

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PROOF OF SERVICE

I CERTIFY THAT TRUE AND CORRECT COPY OF THE ABOVE PLEADINGS WERE SERVED on 08.26.10. on

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/s/Orly Taitz

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