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**UNITED STATES DISTRICT
COURT FOR THE DISTRICT OF
COLUMBIA
CASE # 10-151**

**DR ORLY TAITZ ESQ,
Plaintiff**

V.

**BARACK OBAMA ET AL,
Defendant.**

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**HONORABLE CHIEF JUSTICE
ROYCE LAMBERTH
PRESIDING
REPLY TO OPPOSITION TO 60
B MOTION**

On September 15, 2010 Steven Breyer, Justice of the Supreme Court, appeared on CNN Larry King show. When asked whether he will attend future "State of the Union" addresses in light of Barack Obama's verbal attack on the Justices of the Supreme Court during the last "State of the Union Address", Justice Breyer wisely responded, that he will attend, that the public needs to know, that they are protected, that these judges and this court will protect even ones that are not popular, institutions that are not popular, that this document (meaning U.S. Constitution o.t.) protects them. He proceeded by reminiscing about his trip to Russia in 1993. He was invited by Boris Yeltsin to a meeting with thousands of judges from all over Russia to assist them in building a new fledgling democracy after

years of Marxist tyranny. Yeltsin promised those judges, that he would protect them from "telephone justice". U.S. Supreme Court Justice Steven Breyer was on hand to assure thousands of Russian judges that democracy is possible, that real justice is possible.

In the case at hand the plaintiff Dr. Orly Taitz is specifically the type of individual described by Justice Bryer. She is an attorney, who previously represented active members of US military, requesting verification of eligibility of Barack Obama as a Commander in Chief in light of the mountain of evidence, showing lack of proper vital records for such eligibility. She is that unpopular individual, greatly unpopular with the Obama administration, who was damaged. She became a victim of a form of "telephone justice". The only way for her to get compensation for damages suffered, to be made whole, is to proceed with her legal action for fraud committed by Barack Obama prior to election. While this court previously found no particularized damages, in her FRCP 60 B motion Taitz presented new evidence of particularized damages suffered recently, new evidence of fraud committed by Obama and a nexus between those damages and fraud committed. This case is akin to *Horn v Huddle*, 647 F.Supp 2d (DDC 2009) and 699F. Supp. 2d (DDC 2010), where just last year, both the DC circuit court of Appeals and Your Honor reinstated a case, where an individual was harmed by actions of the Federal Government and CIA and by "fraud on the court" committed by top federal

officials and an attorney representing the federal government. In the current case Taitz was damaged and had to pay \$20,000 in sanctions, after she was threatened by the Department of Justice with her home will be subject to sale to cover this lien and all of her bank records were subpoenaed by the Federal government as a result of fraud committed by Obama and a cover up by some attorneys of the Department of Justice. In *Horn v Huddle*, Your Honor requested that top federal officials and attorneys provide justification, why sanctions should not be assessed against them for “fraud on the court”. In this case, similar “Misrepresentations to this Court that were material and intentional ” were committed and similar questions should be posed to Obama and the US Attorney’s office.

August 1 2010 the State Department released to the public some of passport records of Ann Dunham, Obama’s mother. It clearly shows that Obama was listed on those records under name Soebarkah, not Obama. There is no evidence of Obama ever officially changing his name from Soebarkah to Obama, therefore he took an oath of office as US president under a name not legally his, which makes his oath invalid. Taitz could not obtain those records, as Department of Justice refused to cooperate in her prior cases, or in prior FOIA requests, however this information was readily available to the attorneys of the Department of Justice. This information provides a necessary confirmation and link to a previously released AP(Associated Press) report of Obama’s school registration in Indonesia,

where he is listed as Indonesian citizen. This fits with the fact that recently released immigration file of his stepfather, citizen of Indonesia Lolo Soetoro, contain redaction of some 11 pages in the interest of privacy, while due to the fact that Lolo Soetoro and his immigration sponsor, his wife Ann Dunham, are legally deceased, provide no justification for redaction, since there is no consideration of privacy of deceased individuals. **The only consideration of privacy can be a cover up of the fact that Barack Obama used a different last name and was part of the immigration file of Lolo Soetoro. This would negate his claim of Natural Born Citizen status, a necessary prerequisite for U.S. presidency.**

This new information provides a necessary link to the fact that the released Dunham – Obama divorce agreement contains a missing page and Dunham-Soetoro divorce agreement states that the couple has two children, which is an indication of adoption of Obama by Lolo Soetoro, since Sotoro and Dunham had only one biological child, Maya Soetoro, who was born in 1970, long after Soetoro's immigration papers were submitted to INS.

It, also, shows an egregious pattern of fraud and intent to cover up by Obama, which ultimately led to Taitz damages, since in his Illinois bar application Obama states, that he did not use other names. However, recently released 1969 passport records (Exhibit 1) show that he went by the name Soebarkah and his School registration from Indonesia (Exhibit 2) shows him using name Barry Soetoro.

A. Defendant did not provide opposition to the merits of the motion and therefore conceded the motion. Defendant intentionally misrepresented the case in order to confuse the court.

Defense intentionally misrepresented to the court the main point of 60B motion, namely the fact that Taitz suffered \$20,000 damage as proximate cause and foreseeable result of fraud committed by Obama.

Previously this court ruled that Taitz did not have standing, due to the fact that her damages were generalized, not particularized. Defendant claims that the fact that Taitz was sanctioned \$20,000 when Judge Land believed Obama's assertions of being legitimate and ruled that challenge of this assertion is frivolous "lacks any articulated or plausible connection to the actions of Defendant."

This statement represents misrepresentation of the facts, made simply because the U.S. attorney for the District of Columbia, making the shots in this defense is not acting as a U.S. Attorney representing the people of the United States, but rather as a private attorney for Mr. Obama, defending him in the matter of fraud committed before the election.

Taitz has presented a mountain of evidence showing that Obama committed fraud in his assertion of eligibility to U. S. presidency. Evidence previously submitted include the transcript of the March 25 th session of the Assembly of Kenya, when James Orengo, Minister of Lands, clearly stated that Obama was born in Kenya.

Affidavits of three licensed investigators, including John Sampson, retired senior Deportation Officer from the Department of Homeland Security show that Obama has been using, for most of his life, Social Security number 042-68-4425, issued to another individual in the state of CT. An affidavit of one of the top forensic document experts, Sandra Ramsey Lines, states that the short version abbreviated Certification of Live Birth, obtained by Obama recently, in 2007, and posted on the Internet, cannot be evidence of birth in HI without seeing the original with the name of the doctor, name of the hospital and signature, that Obama refuses to release in spite of over 100 legal actions filed and reportedly \$1.7 million spent to keep those basic documents sealed. Taitz was damaged by \$20,000 in sanctions due to the fact that Judge Land believed fraudulent statements by Obama and believed that the challenge is frivolous. The only way for Taitz to proceed is in a legal action for fraud, unsealing the records, showing that Obama indeed committed fraud, therefore Taitz's actions were not frivolous and Taitz is entitled to these proximately related and foreseeable damages suffered as a result of fraud committed by Obama. Taitz clearly satisfied requirement of the damage to be not conjectural and hypothetical, not generalized but particularized, as required by *Lujan v Defenders of Wildlife*, 504 U.S. 555, 560 (1992). Until now the court could rule that the damages were conjectural, however after Taitz's payment of \$20,000,- the damage became actual and particularized. The clear cause for those

damages was fraud committed by Obama, the chain of causation was not broken, the actions by Judge Land were foreseeable.

Now the defendant does not claim lack of particularized damages, but rather claims lack of nexus

Defendant's opposition no longer claim lack of damages, but rather claims lack of nexus.

New evidence submitted

Taitz submitted new evidence, that was not available previously, namely the fact that a newly released passport of Ann Dunham, deceased mother of Obama, show him under the name Soebarkah. While previously one might have had doubts about fraud being performed, new evidence of his use of a different last name, while in Indonesia, shows that fraud indeed was committed and gives more weight to previously submitted school registration for Barack Obama, showing him as a citizen of Indonesia.

Act by the defendant-Intend to defraud

Fraud on the court

Obama had an intent to defraud. Newly discovered passport records for his mother show him listed in her passport under last name Soebarkah. Clearly Obama knew those facts. Obama came back from Indonesia to the U.S. not as an infant, but rather at age 10. Clearly he knew that he went by a different last name in

Indonesia. Until a couple of weeks ago nobody in the country even heard the name Soebarkah. There are no records of a change of name. When this is combined with Affidavits of Senior Deportation officer of the Department of Homeland Security John Sampson, stating that Social Security number used by Obama could not have been legally obtained, you get a picture of serious massive fraud of all the U.S. citizens by Obama, which included Taitz.

This intend to defraud included intend to commit fraud on the court and specifically defraud Judge Land, who presided over two cases brought by Taitz in GA on behalf of members of the military. Believing in good faith that Obama is legitimate, Judge Land found Taitz's legal action to be frivolous. As chain of causation was not severed, there was nexus and Taitz's damages were foreseeable.

Good Samaritan theory

When someone commits fraud and sells to a hospital expired or tainted medications, a doctor believing that medication was valid,- will give it to a patient. If a patient end's up with severe complications or dies, then the distributor will be liable for damages suffered due to fraud.

If manufacturer or distributor of a fire extinguisher commits fraud and sells an extinguisher that he knows to be defective, he will be liable not only to the buyer of such extinguisher and inhabitants of the house, but also to the Good Samaritans, who got injured, trying to rescue such inhabitants from the burning house.

As Taitz argued in her motion, she acted as a good Samaritan, as a rescuer, who worked pro bono and represented members of the U.S. military, seeking to protect the US Constitution and their Constitutional rights.

Why is U.S. Attorney Machen completely misrepresenting the pleading and the motion.? One possible reason, is that he is an attorney, who specialized in white collar crimes and who comes from Wilmer Hale LLP, which donated over half a million dollars , specifically \$542,618 to get Barack Obama elected. After this generous donation by Wilmer Hale, Mr. Obama appointed Mr. Machen to be the U.S. Attorney for the District of Columbia, dealing with all of the prosecutions and criminal complaints against the federal government. This looks like a form of "telephone justice". A firm will not spend over half a million dollars to get an individual into office, so that their own attorney, specializing in white color crimes, will remove this person out of office for fraud, white color crime, committed before taking office and in order to get into office. As a matter of fact, if Your Honor will look at the table of contributions to Obama campaign , Wilmer Hale law firm is only second to Sidley Austin LLP, where both Michelle and Barack Obama used to work, in terms of magnitude of donations to the Obama presidential election campaign. As Your Honor surely knows, several judges, who

used to be employees of Wilmer Hale, made highly questionable decisions in relation to Obama, his eligibility and his actions.

The timing of Mr. Machen's appointment was highly questionable. In March of 2009 Taitz submitted to the Attorney general Holder and U.S. Attorney for the District of Columbia Jeffrey Taylor petitions to file Quo Warranto or consent to the petitioners filing Quo warranto as ex-relators. She filed it on behalf of her clients Ambassador Keyes, who was a Presidential candidate on the ballot in the 2008 election, and on behalf of a number of state representatives and members of the military. As the 60 days deadline to respond neared, U.S. Attorney for the District of Columbia Jeffrey Taylor suddenly left his position amidst the rumors of being pressured to resign. Neither Attorney General Holder, nor new U.S. attorney for the district of Columbia ever responded.

In the two cases , that Taitz brought in GA on behalf of active members of the military, the lead attorney, who represented the Department of Defense and Obama was Rebecca Elaine Ausprung. Again, there was a conflict of interest, as Ms. Ausprung personally donated to the campaign of Mr. Obama and the Democratic Party. As presiding judge Clay D. Land believed Obama to be eligible for office, he decided that the challenge of such eligibility was frivolous and sanctioned Taitz for \$20,000. At the same time Taitz represented other clients in

the US District Court in CA, where Presiding Judge David O. Carter stated on the record, in the July 13, 2009 hearing that the case was important for the military and the country as a whole, that there was jurisdiction in his courtroom and scheduled the eligibility case for trial for January 2010. After Judge Carter stated that there was jurisdiction, the Obama administration was able to place an attorney Sidharth Velamoor from Perkins Coie, Obama defense firm, as a law clerk for Judge Carter. After this placement judge Carter abruptly decided that he no longer had jurisdiction and stated in his order, that the case needs to be heard in the District of Columbia. The order by the judge was written by a law clerk, who is, also, an attorney for the defendant, the President of the United States. This turn of events resembled old "telephone Justice" of the old Soviet Union. After the order by Judge Carter came out at the end of October 2009, and Obama knew that the legal action for fraud and QuoWarranto would be shortly re-filed in DC, he appointed as a U. S. Attorney for the District of Columbia, Ronald Machen, an attorney practicing white color crimes defense from a law firm, which happened to be one of the largest donors to his campaign. As such, while one expects the U.S. Attorney's office to act on behalf of "We, the People of the United States of America", in reality we have a pattern of the U.S. Attorney's office acting as a personal white color crimes defense attorney for Mr. Obama.

The U. S. Attorneys' office did not provide any due diligence in handling Quo Warranto petitions, repeatedly misrepresented the pleadings, withheld or did not disclose important evidence, aided and abetted fraud by Obama and acted against the interest of “We the People of the United States”.

Further indication of fraud and concealment of fraud evident via comprehensive analysis of Immigration file of Obama’s step father Lolo Soetoro and passport file of his mother Ann Dunham

Taitz provides a 09.23.10 sworn affidavit of Senior Deportation officer of the Department of Homeland Security John Sampson and his expert analysis of I-130 U.S. immigration file A30481285 of Lolo Soetoro, Obama’s Indonesian step father and passport file of Ann Dunham,

While Obama’s memoirs show Soetoro as an Indonesian patriot, who left US around 1965 to build his Nation of Indonesia, and was estranged from Obama’s mother since around 1970-1971, that was not the case. From around 1965 Soetoro was petitioning U.S. immigration for a Green Card, a Permanent Resident visa, with Ann Dunham actively working on the file and petitioning for him until around 1974. What is important, that at the time Ann Dunham excluded her son Barack Obama (Soebarkah) from her passport, she was working on the Soetoro immigration file. INS redacted part of the file due to the matters of privacy. The

question is: Whose privacy? Both Lolo Soetoro and Ann Dunham are reported to be deceased for a long time. There would not be a redaction due to the interest of privacy of deceased individuals. Immigration file was opened around 1965, full five years prior to birth of his sister Maia. Clearly it would not be her privacy, since she was not listed in any documents from 1965-1970. If Obama was a U.S. citizen, he would not be a part of the immigration file for his step father Lolo Soetoro. What is the only logical deduction? The only logical explanation, is that the redacted portion contained information relating to Obama, and he was not a U.S. citizen at a time. That means, that he traveled on Indonesian passport together with his stepfather and used either last name Soetoro or Soebarkah. A question might be asked, why Obama's school records from Indonesia show him a citizen of Indonesia by name Barry Soetoro, while Ann Dunham's passport records show him under name Barack Obama (Soebarkah) ? The answer probably comes from a combination of an Eastern tradition and Ann Dunham's "proletariat united" upbringing and set of mind.

As a federal judge Your Honor surely resided over some matters dealing with immigration from South-Easian countries, where names are often combined. For example, a couple where the wife's name is Ranga and the husband's name is Raj, would take a last name Rangaraj. Ann Dunham believed in some type of smorgasbord of religions and cultures . It looks like she followed the Eastern

tradition and combined the name of her second husband: Soetoro , Obama's step father and the name of his biological father- Barack Obama and came up with the name Soebarkah, which she originally listed and later excluded from her 1968 passport application. Taitz provides an affidavit from John Sampson as exhibit A, Lolo Soetoro's immigration file as an exhibit B and Ann Dunham's passport file as an exhibit C. These documents show clear evidence of fraud and intentional concealment of material evidence by the defendant, which not only cost plaintiff \$20,000 in monetary damages, but also an enormous emotional distress. Such distress was caused by actions of the defendant and his legal representative, Department of Justice, which harassed Taitz with threats of sale of her house in satisfaction of the sanctions, invaded her privacy by issuing subpoena of all of her bank records and watched her and her family being subjected to harassment by Obama supporters and operatives in the media, while they clearly knew that indeed fraud was committed by the defendant.

Establishment Clause

As this court stated in the previous order of 06.18.10 by Your Honor, Taitz cannot proceed under the Commerce Clause, but can proceed under the Establishment clause as a taxpayer under *Flast v Cohen* , 392 U.S. 8 (1968).

Under *Flast v Cohen* Taitz does not need to have special particularized damages for standing. **Your Honor reiterated that the U.S. Supreme Court has recognized that taxpayer standing can be sufficient in an Establishment Clause challenge to governmental action, in *Flast v Cohen*.**

Taitz is a taxpayer and in her motion, asked the court to reconsider her challenge to the Constitutionality of the Patient Protection and Affordable Care Act, Pub. L. 111-148 (hereinafter Act), also commonly called Health Care act or Obamacare act, which is probably more appropriate, as it doesn't protect patients , neither does it provide affordable care, while it definitely violates the Establishment Clause by de facto creating a dominant position and establishing Muslim religion and encouraging the insured to switch from the Christian and Jewish religions to Islam, as under the Act Muslim patients will not be required to pay for the Universal insurance, while members of both Christian and Jewish religion will have to pay. .

The "Act" page 128(2) RELIGIOUS EXEMPTIONS- (A) RELIGIOUS CONSCIENCE EXEMPTION- Such term shall not include any individual for any month if such individual has in effect an exemption under section 1311(d)(4)(H) of the Patient Protection and Affordable Care Act which certifies that such individual is a member of a recognized religious sect or division thereof described in section 1402(g)(1) and an adherent of established tenets or teachings of such sect or division as described in such section.

So, based on this paragraph of the act, people conscientiously opposed to paying for health insurance don't have to do it where the conscientious objection arises from religion. According to a March 23 article on an authoritative Islamic Web site managed by Sheikh Muhammed Salih Al-Munajjid, various fatwas (religious decrees) absolutely forbid Muslim participation in any sort of health care or other risk insurance: Health insurance is haraam, like other types of commercial insurance, because it is based on ambiguity, gambling and riba (usury). This is what is stated in fatwas by the senior scholars. In Fataawa al-Lajnah al-Daa'imah (15/277) there is a quotation of a statement of the Council of Senior Scholars concerning the prohibition on insurance and why it is haraam: It says in Fataawa al-Lajnah al-Daa'imah (15/251):

Firstly: Commercial insurance of all types is haraam because it involves ambiguity, riba, uncertainty, gambling and consuming people's wealth unlawfully, and other shar'I Secondly: It is not permissible for a Muslim to get involved with insurance companies by working in administration or otherwise, because working in them comes under the heading of cooperating in sin and transgression, and Allaah forbids that as He says: "but do not help one another in sin and transgression. And fear Allaah. Verily, Allaah is Severe in punishment".

Taitz simply corrected her pleadings based on the 06.18.10 order by this court and in compliance with the 06.18.10 order. Defense did not provide any opposition to Taitz standing under the establishment clause. Nothing in the opposition by the defense implies that Taitz cannot proceed under the taxpayer standing. This court already ruled on 06.18.10 that taxpayer standing will be sufficient under the Establishment Clause, therefore Taitz moves this court to grant her motion and grant her standing to proceed under the Establishment Clause.

FOIA

Again, defendant and his attorneys misrepresent the FOIA request by stating: “...the Social Security number she ascribes to him. “(R.34 at 3-4.) This too tracks the same argument she made earlier (R.30 at 3) and does nothing to undermine the Court’s rejection of her FOIA claims on the basis of her failure to exhaust administrative remedies.

This is a clear misrepresentation of the facts of the case. Taitz did not ascribe a number to Obama, she did not make up this number. According to an official government record (Selective Service record), Obama used this number. According to a sworn affidavit of a Senior Deportation Officer John Sampson this number was assigned in CT. Obama never resided in CT. Sworn affidavits of a licensed investigator Neil Sankey show this number

connected to a date of birth 1890. Similar affidavit of Susan Daniels show that this number was connected to birthdates 1890,)4.08.1961 and 08.04.1961. It is clear that it is a Social Security number issued originally to an individual born in 1890, whose death was not reported to Social Security administration, and whose number was later assumed by Obama. A questions arose, why a person born in 1890 got his Social Security number between 1976-1979, why didn't this person get it earlier, as Social Security administration existed from 1930s. There are several plausible explanations. If this individual immigrated to US at an old age, he would get his Social Security number at an old Age. There are a lot of elderly immigrants to this country, who either come to the country with their children and grand children or get Green Cards to join their children, who came earlier in search of jobs. There are other instances where individuals got Social Security numbers of others. As Your Honor served as a Presiding Judge of Foreign Intelligence Surveillance Court, your Honor can easily ascertain those hypotheticals.

Taitz Brings forward yet another Affidavit of Senior Deportation officer from the Department of Homeland Security John Sampson.

Mr. Sampson states, that in situation of possible illegal use of Social security numbers it is customary for the court to issue limited orders, granting limited FOIA requests, which would include:

- 1. Zip code of the address, where the SS card was mailed by the Social Security administration**
- 2. Gender of the holder of the card**
- 3. The age of the person to whom the original card was issued at the time of issuance**
- 4. The date, the application was signed by the applicant.**
- 5. The exact date the number was issued.**

While this information is too generalized to identify the person, who received the card and even a match does not necessarily mean, that it was issued to Obama, it does help identify situations, when Social Security fraud was committed. For example, there is no legitimate reason for a person residing in HI to apply for a Social Security number in CT. If FOIA request comes back 20 days from now, showing that the original card was mailed to a ZIP code other than HI, that is an even stronger indication of Social Security fraud, that should warrant further discovery and subpoena of other vital records, not only in the interest of current action for damages due to fraud filed by

Taitz, but in the interest of the country as a whole and in the interest of National Security. After all the FOIA request filed by Taitz does not state that private Social Security information of Obama needs to be revealed, but rather it states that it is a Social Security number of another individual, which is being used by Obama according to official Selective Service records.

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"

Although Exemption 6 of the FOIA does not require agencies to disclose information that would be a clearly unwarranted invasion of personal privacy, there is an exception to this. *Department of the Air Force v. Rose*, 425 U. S. 352 (1976), specifically from the ruling : Exemption 6 does not create a blanket exemption for personnel files. With respect to such files and "similar files," Congress enunciated a policy, to be judicially enforced, involving a balancing of public and private interests. Regardless of whether the

documents whose disclosure is sought are in "personnel" or "similar" files, nondisclosure is not sanctioned unless there is a showing of a clearly unwarranted invasion of personal privacy, and redaction of documents to permit disclosure of nonexempt portions is appropriate under Exemption 6.

Pp. 425- U.S. 370-376.

Since use of his number is prima facia evidence of a felony Title 42 USC 408(a)(7)(B) and the court was notified of the felony (as well as the DOJ attorneys - who are supposed to be defending the interests of the United States -Social Security fraud is a crime against the United States), and redaction of the document is permitted per *Department of the Air Force v. Rose*, you could have the court request the record with all the info redacted except the birth date of the applicant (or barring that the first names of the parents) - in camera. Since the name of the applicant is not requested, there definitely is no showing of clearly unwarranted invasion of personal privacy. The privacy interest of the owner of the number is not violated since the identity of the owner is unknown and is not being requested. The FOIA does not define “personal,” but it does define “person” to include an “an individual, partnership, corporation, association, or public or private organization other than an agency.” In *AT&T Inc. v. Fed. Communications Commission*, 582 F.3d. 490 (3rd Cir. 2009)., the Third Circuit found that it “would be very odd

indeed for an adjectival form of a defined term not to refer back to that defined term.” 582 F.3d. at 497. The court reasoned it is a “grammatical imperative” that the definition of “person” in the FOIA also defines the term “personal.” So, having said that, in order to have an invasion of personal privacy, there must be an individual. Since Taitz is not requesting the court to seek the identity of the individual to whom the number belongs, there is not an individual to which the invasion of personal privacy can apply..

As such, Taitz is requesting a redacted copy of the Social Security application for number 042-68-4425.

Wherefore:

The plaintiff moves the court to grant her 60 B motion for reconsideration of the defendant’s motion to dismiss and order discovery.

/s/ DR ORLY TAITZ ESQ

By:_____

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I CERTIFY THAT TRUE AND CORRECT COPY OF THE ABOVE PLEADINGS
WERE SERVED on 09.23.10. on

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