

Dr. Orly Taitz, ESQ.

29839 Santa Margarita Parkway, Ste. 100

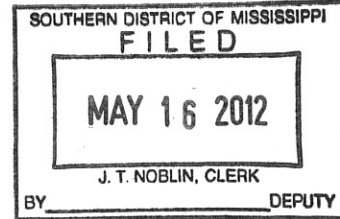
Rancho Santa Margarita, CA 92688

Ph 949-683-5411 F949-766-7603

Orly.Taitz@gmail.com

CA Bar License 223433

In propria Persona in MS



US DISTRICT COURT

SOUTHERN DISTRICT OF MISSISSIPPI

DR. ORLY TAITZ, ESQ)
 BRIAN FEDORKA)
 LAURIE ROTH)
 LEAH LAX)
 TOM MacLERAN)
)
 V)
 DEMOCRAT PARTY OF MISSISSIPPI,)
 SECRETARY OF STATE OF MISSISSIPPI)
 BARACK HUSSEIN OBAMA) CASE# 3:12-cv-280
 OBAMA FOR AMERICA)
 NANCI PELOSI)

DR. ALVIN ONAKA)
LORETTA FUDDY)
MICHAEL ASTRUE)
JANE DOES, JOHN DOES 1-100)

MOTION FOR SANCTIONS

Plaintiff Dr. Orly Taitz, ESQ is seeking sanctions against the defendant Democratic Party of Mississippi and its attorneys Samuel Begley and Scott J. Tepper for uttering forged documents and attempting to incriminate this court and making Honorable judge Wingate and Honorable Magistrate Anderson complicit in aiding and abetting forgery by seeking a judicial notice of forged documents.

MEMORANDUM OF POINTS AND AUTHORITIES

Judicial notice is appropriate pursuant to *Fed. R. Evid.* Rule 201. Under *Fed. R.Evid.* Rule 201(b), a Court may take judicial notice of any matter “not subject to reasonable dispute in that it is either (1) generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.

On 05.04.2012 attorneys Samuel Begley, member of the Mississippi Bar (Hereinafter Begley) and Scott J. Tepper, member of the California Bar, admitted in Mississippi pro hac vice (Hereinafter Tepper) submitted a motion in the case

CIVIL ACTION NO. 3:12cv280-HTW-LRA which contained documents (motion for a judgment on the Pleadings and Exhibits), which represent forgeries (long Form Birth Certificate) (Exhibit 1). Begley and Tepper requested for such forgeries to be accepted by the court for a judicial notice and ruling on the pleadings. Begley and Tepper acted knowingly, with malice and with moral turpitude, with an intent to defraud the court and to defraud the public at large.

When such documents were presented Begley and Tepper were in possession of testimony showing such documents to be forgeries.

Tepper and Begley had in their possession:

1. Sworn testimony for a computer expert Felicito Papa, attesting that a document in question, an alleged copy of a long form birth certificate is a computer generated forgery (Exhibit 2, Affidavit of Felicito Papa first Amended Complaint)
2. Transcript of the Public announcement and press conference by Sheriff Joe Arpaio of Maricopa County, Arizona and investigator Zullo, advising the public that the long form birth certificate in question is a forgery (Exhibit 3 First Amended Complaint, Transcript of Sheriff Joe Arpaio)

3. Sworn testimony by a senior deportation officer John Sampson, attesting to the fact that the document in question is a forgery (Exhibit 4) (First Amended Complaint, affidavit of senior Deportation officer john Sampson)

4. Sworn testimony by a scanning and copying machines expert Douglas Vogt, attesting to the fact that the document in question is a forgery. (Exhibit 5) (First Amended Complaint Affidavit of Scanning and Copying machines expert Douglas Vogt)

5. Begley and Tepper knew that neither the original document not a certified copy of a long form birth certificate in question was ever provided to any court of law and were never authenticated. they were well aware that Plaintiff Taitz repeatedly travelled to Hawaii, served with Federal subpoenas both Director of Health Loretta Fuddy and Registrar Onaka, and both refused to produce the original birth certificate for Barack Obama, refused to produce a microfilm of the original document and refused to testify in the court of law and refused to authenticate under the penalty of perjury that the long form birth certificate posted by Obama on Whitehouse.gov is indeed a true and correct copy of the 1961 long form birth certificate, which was created in 1961 and kept in records from 1961. Defendant, Democratic Party of Mississippi by and through its attorneys Begley and Tepper is attempting to use this honorable court and judges Wingate and Anderson to sanitize and legitimize a flagrant forgery with an ultimate goal of defrauding 311

million American citizens. Such behavior represents moral turpitude, ethical violation, sanctionable by this court.

6. Tepper and Begley submitted those documents in order to defraud honorable US District Judge Henry Travillion Wingate and Honorable Magistrate judge Linda R. Anderson and in order to defraud the public at large, as well as to dispose of a valid legal action brought by the plaintiffs. Federal court has inherent power to sanction the parties. question elsewhere. *In re Wilson*, 2011 WL 1337240 at *9 (Bankr. E.D.La. Apr. 7, 2011) (imposing sanctions after finding that LPS had issued “sham” affidavits and perpetrated fraud on the court). This is a matter of national importance. We have clear evidence of forgery. Defendants and their attorneys know so. at the very minimum they know that the evidence they seek this court to take judicial notice of does not fall under Rule 201 “not subject to reasonable dispute in that it is either (1) generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned.

Attempt to trick this court into issuing a judicial notice in order to sanitize and legitimize a forgery and seek an expedient judgment on the pleadings without any discovery and without as much as an answer from the other defendants, is done with one purpose only: purpose of a cover up of the biggest case of elections

fraud and forgery in the history of this nation. Taitz prays this court will not allow itself to be used as a tool in this scheme.

PRAYER FOR RELIEF:

MATTER AT HAND SHOULD BE EXPEDITIOUSLY PROSECUTED DUE TO NATIONAL IMPORTANCE. ATTORNEYS SAMUEL BEGLEY AND SCOTT J. TEPPER SHOULD BE SEVERELY SANCTIONED FOR ACTING WITH MALICE AND MORAL TURPITUDE AND SUBMITTING TO THE COURT OF LAW FORGED DOCUMENTS WITH AN ATTEMPT TO DEFRAUD THE COURT AND TO DEFRAUD THE PUBLIC AND SEEKING TO MAKE THIS HONORABLE COURT COMPLICIT IN LEGITIMIZING A FORGERY.

Respectfully,



/s/ Dr. Orly Taitz, ESQ

CERTIFICATE OF SERVICE

I, Lila Dubert, am not a party to this case and I attest that on 05.15.2012 I served all of the parties in this case with above pleadings by first class mail.



/s/ Lila Dubert

Darrel Issa
Chairman of the House oversight committee
2157 RAYBURN HOUSE OFFICE BUILDING,
WASHINGTON, DC 20515

Congressman Lamar Smith,
Chairman of the Judiciary Committee
House of Representative
2409 2157 RAYBURN HOUSE OFFICE BUILDING,
WASHINGTON, DC 20515

Public Integrity Unit Department of Justice
U.S. Department of Justice
Criminal Division
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Michael E. Horowitz
Inspector General
Department of Justice
Office of the Inspector General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Room 4706
Washington, D.C. 20530

Tony Rackauckas
District Attorney Orange County, CA
401 CIVIC CENTER DR
SANTA ANA, CA 92701

Steve Cooley District Attorney

**District Attorney's Office
County of Los Angeles
210 West Temple Street, Suite 18000
Los Angeles, CA 90012-3210**

**District Attorney Hinds County, MS
Hinds County District Attorney's Office
PO Box 22747 - Jackson Mississippi 39225-2747**

**State Bar California
180 Howard Street
San Francisco, CA 94105**

**William L. Waller
Chief Justice Supreme Court of MS
Court
Carroll Gartin Justice Building
450 High Street
Jackson, MS 39201**

**UN Nations committee for civil rights defenders
OHCHR in New York
UN Headquarters
New York, NY 10017
USA**

**Inter-American Commission for Human rights
1889 F St., NW,
Washington, D.C., USA 20006**