

Dr. Orly Taitz, ESQ

29839 Santa Margarita Parkway, STE 100

Rancho Santa Margarita CA 92688

Tel: (949) 683-5411; Fax (949) 766-7603

E-Mail: dr_taitz@yahoo.com, orly.taitz@gmail.com

President of Defend Our Freedoms Foundation

**FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND**

2013 SEP 25 AM 10: 22

**CLERK'S OFFICE
AT BALTIMORE**

BY [Signature] DEPUTY

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF Maryland

Orly Taitz

§ Case # 13-1878

Plaintiff,

§ Presiding Hon. Ellen L. Hollander

§

v.

§

§

Carolyn Colvin , Commissioner of the

§

Social Security Administration,

§

REPLY TO OPPOSITION TO MOTION FOR SUMMARY JUDGMENT

STANDARD OF REVIEW

Under Rule 56(a) of the Federal Rules of Civil Procedure, summary judgment is appropriate only “if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.” A fact is “material” if it “might affect the outcome of the suit under the governing law.” *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248, 106 S.Ct. 2505, 91 L.Ed.2d 202 (1986). In resolving a summary judgment motion, a court must view all of the facts, including reasonable inferences to be drawn from them, in the light most favorable to the non-moving party. See *Matsushita Elec. Indus. Co. v. Zenith Radio Corp.*, 475 U.S. 574, 587, 106 S.Ct. 1348, 89 L.Ed.2d 538 (1986); see also *Dennis v. Columbia Colleton Med. Ctr., Inc.*, 290 F.3d 639, 645 (4th Cir.2002)

STATEMENT OF FACTS

Plaintiff, , President of Defend Our Freedoms Foundation, Dr. Orly Taitz Esq, filed the legal action at hand under 5 US 552, Freedom of Information Act, seeking release under SSA 120 year rule of SS-5, Social Security application of one Harry Bounel, aka Harrison J. Bounel, born in 1890. Defendant, Acting Commissioner of Social Security Administration, Carolyn Colvin,

responded and submitted a sworn declaration of Dawn Wiggins, Deputy Executive Director for the Office of Privacy and Disclosure (OPD), claiming that the responsive records could not be located.

Plaintiff responded and sought a Motion for Summary Judgment in favor of the Plaintiff and presented a prior letter from the same Dawn Wiggins, dated November 16, 2012, where Wiggins stated that records of Harry Bounel could not be released due to considerations of privacy of Mr. Bounel. Plaintiff argued that 12.162012 letter shows that SSA located the records of Mr. Bounel, but had privacy concerns. In the Motion for Summary judgment Plaintiff argued that since Bounel was born in 1890, SSA could not use privacy as an excuse in refusing records, as based on 120 year rule records of individuals who were born 120 years ago or earlier have to be released and according to census Bounel was born in 1890, 123 years ago.

Defense provided several excuses. One of them was that the census documents were not legible and they could not see the year written there. Further they claimed that they needed a death certificate, even though 120 year rule specifically stated that the release is required either with a death certificate or if a person is 120 years old or older. Further, defense responded that the first time they searched for records, they somehow did not look at the name of the person, whose records they were searching and that is why they stated that the records could not be released due to consideration of privacy of Harry Bounel. Second time, when the request was made, they claimed that some secondary information submitted by the plaintiff did not match the record, which in itself confirmed that there is a record for Harrison J. (Harry) Bounel, but there was some discrepancy in some secondary information plaintiff

believed to be correct, such as date of arrival of Bounel in the U.S. and the date of his receipt of the SSN.

ARGUMENT

1. DEFENDANT, ACTING COMMISSIONER OF SOCIAL SECURITY, IS CONFIRMING THE POSITION OF THE PLAINTIFF AND AUTHENTICATING NOVEMBER 16, 2012 LETTER BY DAWN WIGGINS SUBMITTED BY THE PLAINTIFF AS EXHIBIT 1 OF THE MSJ, WHICH SHOWS THAT SSA HAS THE RECORDS OF BOUNEL BUT REFUSED TO RELEASE THEM DUE TO CONSIDERATION OF PRIVACY, POSSIBLY NOT KNOWING OR HIDING THE FACT THAT BOUEL WAS BORN 123 YEARS AGO AND HIS RECORDS HAVE TO BE RELEASED UNDER 120 YEAR RULE.

a. In her opposition Commissioner of SSA admits that Dawn Wiggins indeed sent November 16, 2012 letter where SSA stated that they cannot provide the Social Security application of Harry Bounel due to considerations of privacy. (Exhibit B to the opposition to MSJ).

b. IN COMPARING 2012 AND 2013 RESPONSES BY DOWN WIGGINS, IT IS CLEAR THAT 2013 RESPONSE IS A COVER UP AND DOES NOT HOLD WATER.

On November 16 2012 Dawn Wiggins signed a FOIA response where she stated that she cannot release Harry Bounel's SS-5 due to privacy. (exhibit 1 MSJ and Exhibit B, opposition to MSJ) Now she claims that she in 2012 she searched only by Social Security number and did not look at the name of the person whose record she is searching, and for that reason she cannot locate the record now.

This is the most ridiculous response one can imagine.

It is suffice to read the response itself to see that Wiggins is simply not telling the truth.

November 16, 2012 letter starts:

"This letter is in response to **your Internet request for a numident of Harry Bounel**" She is **not** stating that this is a response for a request for numident for Social Security number xxx-xx-4425. She states that it is in response for a request relating to Harry Bounel, which shows that she clearly searched under the name Harry Bounel. She goes on in saying:

The Privacy Act of 1974 (5 U.S.C. § 552a) restricts disclosure of the information you requested. The only exception that might permit us to disclose these records to you without consent would be the exception for disclosure required by the Freedom of Information Act (FOIA) (5 U.S.C. § 552).

Clearly the wording of the letter indicates that Wiggins found the SS-5 of Harry Bounel and using the privacy excuse.

Explanation by Wiggins that she originally did not look at the name, but later in 2013 looked at the name and did not locate the record is simply totally unreasonable based on the wording of her own letter.

More reasonable explanation is that Wiggins indeed found the SS-5 based on the name Harry Bounel and saw that at a later date this number was illegally used by Barack Obama (see exhibits 2-9), just like thousands of other Social Security numbers are being illegally used by others. Wiggins was either intimidated or received a consideration to cover this up.

The original inquiry was submitted by someone who is not an attorney, 120 year rule was made available to the public only recently, in 2011 in an obscure

publication by SSA and Wiggins believed that she can get away with claiming privacy, she believed that the requester is not aware of the 120 year rule. When Taitz resubmitted the request and Wiggins saw that the request came from a licensed attorney who knew the birth-date of the subject, she realized that she can no longer rely on privacy due to the 120 year rule. She did not respond timely and only when the law suit was filed, she responded by claiming that she cannot locate the required document, as this is the only excuse she could come up with. Wiggins did not think that Taitz would submit to the court her 2012 letter, which Wiggins sent to another petitioner, a letter where Wiggins refused to release Bounel's SS-5 due to privacy consideration. Taitz believes that the administration applied pressure on the woman who made the initial FOIA request and Wiggins believed that 11.16.2012 letter will not be submitted to court.

It is telling that the main information under which the searches are done, was the same in both request: first and last name of the subject and his Social Security number. Other information submitted in the 2013 request is secondary, this information is not mandatory, there is not rule or statute saying that a minor discrepancy in secondary information can be used as an excuse for not providing records,. but it is clear that Wiggins is using one of the additional parameters as an excuse to claim that she cannot find the records. For example, Plaintiff provided Wiggins information in regards to the approximate date when the SSA was issued, Taitz wrote that the date of issuance of the SSA was in and around March 28, 1977. Taitz estimated that date as the SSN for Thomas Woods, who is deceased and whose Connecticut SSN xxx-xx-4424 was immediately prior to

Bounel's xxx-xx-4425, was issued around that date. (Exhibit 3 SS-5 and numident of Thomas Woods) If, for example, Wiggins has in her records that Bounel's SSN was issued in April of 1977, she feels she can hang her hat on it, and due to additional information, which does not match (April 1977 instead of "in and around March 28, 1977") , she can state that she did not find a matching record. She is simply playing games and claiming that she cannot find a matching record due to some minor discrepancy in secondary information.

Due to this obvious game, on 08.08.2013 Taitz submitted to Wiggins yet another FOIA request seeking SS-5 based on limited information: SS-5 of Harry Bounel, born in 1890, no other secondary information. Based on FOIA guidelines Wiggins was supposed to respond within 20 business days by August 31st. As of September 22, 2013, no FOIA response was received from Wiggins. This is yet another piece of circumstantial evidence that the only basis for Wiggins's claim of not locating matching record, was a minor glitch, typo or some other minor discrepancy in one of the secondary indicators, such as date of receiving the SSA or the date of arrival to the U.S. Without these secondary indicators, based only on the name of the individual, Harry Bounel, and his date of birth, Wiggins can't find an excuse to refuse the release of the SS-5 and for this reason she is not responding to the 08.08.2013 FOIA request for SS-5 of Harry Bounel born in 1890. Considering importance of the matter to the U.S. National security, Wiggins is obligated to disclose in which specific indicator did she find a discrepancy and she is obligated to respond to 08.08.2013 FOIA request.

c. TAITZ IS NOT REQUESTING RECORDS BASED ON A NUMBER, SHE IS REQUESTING A RECORD BASED ON A NAME OF AN INDIVIDUAL BORN 123 YEARS AGO, WHICH SSA IS OBLIGATED TO RELEASE.

Defense is stating that in their database holder of xxx-xx-4425 is listed as live person. this can happen in two situations: either nobody provided SSA with evidence of death of Harry Bounel, who would be 123 years old or someone fraudulently started using Bounel's SSN. The fact that SSA does not have Bounel's death certificate is irrelevant, as a 120 year rule specifically states that death certificate is not necessary.

The fact that another individual is fraudulently using Bounel's Social Security number today does not relieve Social Security administration from their obligation to release the records for Harry Bounel, as he was born in 1890 and according to the 120 year rule the Social Security administration is obligated to release his SS-5, his Social Security application.

120 year rule states:

“We have revisited longstanding decisions regarding the withholding of certain frequently requested data, to determine if our recommended guidance is still applicable and reflects the presumption of openness. **For instance, we issued new guidance for disclosing extremely aged individuals’ original Social Security Applications (SS-5) when our records do not indicate a date of death.** We developed a new policy that establishes a “120 year rule” and assumes that an individual is alive **UNLESS THEIR BIRTH DATE EXCEEDS 120 YEARS** or we

have proof of the individual's death. This new policy enabled us to release more information and potentially reduced requests on appeal.

(emphasys added) Social Security Administration, Chief FOIA Officer Report, 2011.

Because 1940 census shows that Harry Bounel was 50 years old in 1940, it means that he was born in 1890 and his birth-date exceeds 120 years.

Currently worldwide there are only two men over 110 years old. The oldest living male in the world is Arturo Licata in Italy, born in 1902, 111 years old and second oldest is Dr. Alexander Imich, born in 1903, 110 years old. There are no 123 year old men residing in the U.S. today or anywhere else in the world for that matter. Harry Bounel might be listed as a living individual in the SSA databases because his death was not reported to SSA. However, 120 year rule specifically prescribes SSA to release the SS-5 even without a proof of death, without a death certificate.

120 year rule was enacted specifically because we have a rampant Social Security fraud which costs tax payers billions of dollars, when individuals steal Social Security numbers of individuals, who are deceased and whose death was not reported to SSA and who fraudulently receive benefits or use those numbers for illegal financial transactions, for hiding under the table incomes, donations, non-profit contributions, campaign contributions and so on.

Social Security and Death Information: Hearing Before the H. Comm. on Ways and Means and Subcomm. on Social Security, 112th

Cong., Feb. 2, 2012 (statement of Michael J. Astrue, Comm'r, Social Security Admin.), Reply Ex h. 5 (E C F 42-5) ("Identity theft is a spreading plague on our Nation.... Unfortunately, public access to the DMF has created opportunities for criminals. The media has reported incidents involving the use of death data to commit tax fraud."). For this reason 120 year rule exists and the SSA has to release SS-5, Social Security application of individuals born 120 years ago or earlier, even if other individuals, who are alive today, fraudulently using this number. By refusing to release Bounel's SS-5 Commissioner of Social Security, FOIA officer and their attorneys become complicit in Social Security fraud and should be criminally prosecuted for it.

d. Defendant is making a fraudulent statement "Though Plaintiff's April 26, 2013 FOIA request seeks information about Mr. Bounel, her appeal makes clear that Plaintiff's request is yet another attempt to obtain SSA records about this SSN, which belongs to a living individual." Opposition to MSJ

TAITZ IS NOT ASKING FOR RECORDS BASED ON A SPECIFIC NUMBER. TAITZ IS ASKING FOR A SS-5, SOCIAL SECURITY APPLICATION FOR HARRY BOUNEL, BASED ON HIS NAME, WHICH SOCIAL SECURITY ADMINISTRATION IS OBLIGATED TO PROVIDE FOR HER BASED ON 120 YEAR RULE, AS HE WAS BORN IN 1890.

If upon release of SS-5 it is found that another individual fraudulently obtained Social Security number that was Assigned to Harry Bounel, then this individual has to be criminally prosecuted.

Let's imagine Your Honor and her husband is going on vacation and upon coming back Your Honor finds a squatter in her house, who is using a fabricated deed to her house and who paid off a crooked clerk in the city hall to keep the original deed and recording sealed. When Your Honor tries to get an original deed on file, a corrupt clerk refuses to release it, because the thief is squatting in the house and claiming that the house is his. The difference between this hypothetical and what is happening in the case at hand is that we are talking about the White House and the National Security of these United States is at stake.

f. It is quite telling that the SSA is not stating that the SSA xxx-xx-4425 was not issued to Bounel, that it was issued to another individual, they are conveniently stating that another person is "holding" the number now. They are not saying that the SS-5, the original application, was filed by another person. They are not saying that the number was originally assigned to another person, they are saying that someone is using it now. Firstly, just because someone else is illegally using the number now, does not give SSA any right to violate the law, commit fraud and not release Harry Bounel's application. Secondly, as stated previously, Taitz is not requesting a record by number, she is demanding a record based on a name of a 123 year old individual, which SSA is obligated to release to her, no matter what is the number on this record.

**2. DEFENDANT IS DEFRAUDING THE COURT OR
MISREPRESENTING THE CASE THAT IS NOW IN FRONT OF JUDGE
LAMBETH IN DC.**

Very conveniently the defense is not telling the court that Judge Lamberth gave Taitz a leave of court to file a motion for reconsideration based on new evidence (Exhibit 1 Leave of Court given by Judge Lamberth). Further, they are not mentioning the fact that Taitz v Astrue 11-cv-402 was based on a different premise. This is a case dealing with Barack Obama's SSN and his use of a SSN which failed E-Verify and SSNVS, it was not filed in relation to Harry Bounel. Taitz v Astrue was filed after Barack Obama posted his tax returns on line and forgot to flatten the PDF file and the full, unredacted number he is using became available to the public and this number **FAILED BOTH E-VERIFY AND SSNVS**. (Exhibit 8.9) When Taitz initially filed this case, she did not know to whom the number was issued, she only knew that the number used by Obama failed both E-Verify and SSNVS and she had sworn affidavits of experts and high ranking law enforcement officials that showed that Obama used other fabricated IDs as well, among them a fabricated Selective Service certificate with a fabricated cancellation U.S. stamp affixed to it, fabricated birth certificate and evidence of Indonesian citizenship. (Exhibit 6 Sworn affidavit of Jeffrey Stephan Coffman, Chief Investigator of the Special Investigations unit of the US Coast Guard (Ret) and sworn affidavit of Sheriff Joe Arpaio). Originally, request by Taitz to release an application for a specific number (just by the number, without the name of an individual to whom it was assigned, was denied due to consideration of privacy). In 2013 Taitz received a sworn affidavit from a researcher and professional skip tracer and debt collector Albert Hendershot, who found in Merlins Information Systems database evidence that the number in

question was assigned to Harry Bounel. (See Exhibit 2 Declaration and a sworn affidavit of Albert Hendershot.) Taitz filed a motion for reconsideration with the presiding judge, Royce C. Lamberth. Judge Lamberth does not automatically grant leave of court to file motions for reconsideration after the case was closed and went through the court of Appeals, he does so, when there is a justifiable reason and good cause. Judge Lamberth reviewed the motion and attached documents and granted the leave of court to file and he did not rule on the motion yet. Motion for reconsideration with new evidence has not been ruled upon yet.

Assistant U.S. Attorney Andrew Norman and attorney for the Social Security administration Jessica Vollmer had an ethical obligation to disclose this fact. They violated their ethical obligation by hiding these facts from this court. Even if arguendo Judge Lamberth will deny this current motion for reconsideration, it has no bearing on the case at hand, as 11-402 Taitz v Astrue, is related to Obama's use of a Social Security number which he himself made public by posting it on whitehouse.gov and which failed E-verify and SSNVS. Obama is not 120 years old and SSA does not have an obligation to release his SS-5 under the 120 year rule. Case at hand is different as the request is related to Harry Bounel born over 120 years ago and SSA is obligated to release his SSA application.

**3. HARASSMENT, INTIMIDATION AND BULLYING BY THE FBI OF
THE WHISTLE BLOWER AND INVESTIGATOR WHO DISCOVERED
HARRY BOUNEL'S INFORMATION.**

As stated previously, Barack Obama himself published his unredacted tax returns with Social Security number xxx-xx-4425, which failed E-Verify and SSNVS.

Two licensed investigators: Neil Sankey and Susan Daniels using national databases, such as Choice Point, Lexis Nexis, SSN Verifier Plus and others were able to establish that this number was originally issued to an individual born in 1890, later used by Obama born in 1961, however Taitz did not know the name of the individual, who was born in 1890 and whose SSN Obama was illegally using. (SEE EXHIBITS 4, 5 affidavits of Neil Sankey and Susan Daniels. Due to the local rule of total of 50 page limitation for pleadings and exhibits, plaintiff submits only pertinent pages out of total of 45 pages of Sankey exhibits and out of 14 pages of Daniels exhibits). In 2011 US Census released 1940 census data and during the same time Investigator and debt collector Albert Hendershot located in Merlins Information Systems a record of Harry Bounel with SSN xxx-xx-4425 . Cross check with 1940 census showed only one and only Harry Bounel, who was 50 in 1940, at the time of the census, therefore born in 1890.(see declaration of Orly Taitz attesting to the fact that there is only one Harry Bounel in census records). This provided additional confirmation and match with the findings by investigators Daniels and Sankey who used different national databases such as Choice Point, Lexis Nexis, SSN Verifier Plus and others. In February of 2013 Hendershot provided Plaintiff herein, attorney Orly Taitz, with a sworn affidavit in regards to his findings and attached November 16, 2012 letter from Dawn Wiggins, which showed that SSN xxx-xx-4425 was issued to Bounel, and that Wiggins wrongfully denied release of SS-5, as Bounel was born 123 years ago and Wiggins was obligated to release the number without a death certificate and had no right to use privacy exemption. In April of 2013 Taitz made all of the

above public and submitted another request to Wiggins and submitted the documents to court in a different case dealing with Obama's records. Shortly thereafter Hendershot was visited by the FBI. (Exhibit 2, Declaration by Albert Hendershot and exhibits.) Hendershot states in his declaration that he was thrown to the ground and was handcuffed. While having him handcuffed, FBI agent Jacob U. Blair and his superior, who did not provide Hendershot his name, demanded that Hendershot sign a "consent" to search his computers and give the FBI agent Jacob U. Blair the pass-code to his computer, to make it easier for the FBI to search it. Hendershot was threatened that if he does not cooperate, he will be hauled to jail and was told that they can do it in "easy way or the hard way" *id*, exhibit 2, Declaration by Albert Hendershot. Such actions by the FBI represent an unthinkable violation of the Fourth amendment constitutional protection against unwarranted searches and seizures done under the color of authority, which is a criminal offense. FBI would not be told by their superiors to act in such a criminal manner resembling NAZI Gestapo, to risk their careers and risk being sent to prison for violation of civil rights, unless findings by Hendershot were indeed correct and extremely harmful to Obama. If Hendershot were to be wrong in his findings, he would be simply ignored, SS-5 for Bounel would be issued and it would have exonerated Obama. The only reasonable explanation for fraud, misrepresentation and stonewalling by Wiggins and her attorneys and harassment, intimidation and bullying by the FBI is because Hendershot was correct in his findings, Obama is indeed fraudulently using Bounel's number and high ranking employees of the Obama administration are criminally complicit in the cover up.

Furthermore, typically FOIA responses are signed by one attorney. Current opposition was signed by two attorneys: one from the Department of Justice and one from the SSA, which might be an indication that Wiggins is apprehensive of being ultimately prosecuted for fraud and misrepresentation and she demanded an extra protection and extra buffer in the form of a signature by the second attorney, legal counsel from the SSA. Further, when the affidavit by Susan Daniels is examined, it shows that at some point Obama used the Social Security number of deceased Lucille Ballantyne, who just happens to be the mother of Harry Ballantyne, long time Chief Actuary of Social Security administration. Obama would not be using a stolen SSN of the mother of the Chief Actuary of SSA, if he was not certain that he has the cover and would not be criminally prosecuted. Taitz believes that Ballantyne was the one or one of several individuals who made the switch in the SSA computer file, which allowed Obama to start using Bounel's number since 1980s, however neither Ballantyne nor anyone else can replace the SS-5, the original application, which was hand written. This is the reason, why Wiggins and Colvin and their attorneys refuse to release the SS-5 for Bounel, that is why FBI was harassing and bullying Hendershot. Plaintiff hopes that this court will not become complicit in this cover up.

4. PRECEDENTS QUOTED BY THE DEFENSE ARE IRRELEVANT FOR THIS CASE AND QUOTATIONS MISREPRESENT THE LAW AND THE FACTS OF THE CASE.

Defense provided the court with several precedent case, which can be summarized to two fact patterns:

a. cases, where the plaintiffs sought an unreasonably large number of documents or the document release would have undermined national security, such as CIA documents. **MILITARY AUDIT PROJECT**, Felice D. Cohen, Morton H. Halperin,

Appellants,

v.

William CASEY, Director of Central Intelligence, et al. 656 F.2d 724, 211 U.S.App.D.C. 135 relates to FOIA request of sensitive CIA records, which is not the case here. 614 F.3d 1070, 10 Cal. Daily Op. Serv. 11,814, 2010 Binyam MOHAMED; Abou Elkassim Britel; Ahmed Agiza; Mohamed Farag Ahmad Bashmilah; Bisher Al-Rawi, Plaintiffs–Appellants, v. JEPPESEN DATAPLAN, INC., Defendant–Appellee, United States of America, Intervener–Appellee. No. 08–15693. On rehearing en banc, the Court of Appeals, Fisher, Circuit Judge, held that foreign nationals' action would be dismissed pursuant to state secrets privilege under Reynolds. Case at hand is related to the request for release of the SS-5 for an individual born 123 years ago, which does not involve any state secrets.

Havemann v. Astrue Not Reported in F.Supp.2d, 2012 WL 4378143 joiodd (D.Md.)

This is the case where Your Honor presided. In Havemann Social Security administration has provided the LA Times reporter with some 140 million records and argued that further disclosure would violate privacy consideration. In Havemann your Honor painstakingly analyzed pros and cons of the release in light of the balancing test of privacy versus public interest. The case at hand deals

with the release of one page record and not 140 million records sought in Havermann, and the record requested by the Plaintiff in the case at hand SSA is obligated to release under their own 120 year rule. SSA cannot claim privacy. **Neither the defense, nor the court have any right or jurisdiction to apply privacy exception or apply privacy/public interest balancing test, as in this case the release of the SS-5 is mandatory, statutory.** Further, Taitz, as the president of Defend Our Freedoms Foundation is seeking this information due to tremendous public interest, namely identity theft, illegal use of Bounel's SSN by another individual and criminal cover up by high ranking employees of the SSA and their attorneys.

2. Second type of cases quoted y the defense, are cases, were affidavits by employees of the SSA were presumed to be true.

This case is different. Plaintiff is not seeking millions of records and is not seeking records which relate to CIA activity. In the case at hand the plaintiff is seeking one record, a Social Security application of an individual born 123 years ago, who was just a poor immigrant with three years of elementary school education, a helper in a fruit store, whose application SSA is obligated to release under its' own 120 year rule. There is no justification in withholding the record. Further, the court cannot accept the declarations by Dawn Wiggins as a truthful statement, as her own letters and declarations conflict with each other and Wiggins and her attorneys are flagrantly misrepresenting the facts and the law and defrauding the court.

In her 11.16.2012 letter Wiggins claimed that she cannot release the SS-5 for Harry Bounel due to considerations of privacy. In her 2013 letter she originally claimed that she could not locate

the records, even though she located them in 2012. In her second, supplemental declaration, she further contradicts herself.

She claims that the census record is not legible, she could not verify the age. Well, if it is not legible, how did she determine that the additional information provided to her did not match her records? If she could not read the record, how did she know that what is written there does not match? In the abundance of caution plaintiff submits herein yet another copy of the 1940 census, which clearly shows that Harry Bounel was 50 in 1940, which means he was born in 1890. (Exhibit 7, enlarged 1940 census record)

Further, Wiggins claims that even if she could read the record and it stated that Bounel was born in 1890, she needed his death certificate in order to release his SS-5.

This is a flagrant lie, flagrant fraud on the court. Aforementioned 120 year rule expressly state that there is no need to provide a death certificate for extremely aged individuals who were born a 120 years ago or earlier. So, even if SSA does not have a death certificate for Bounel, and for that reason it states in their records that Bounel is alive today, Wiggins still was obligated to release his SS-5 under the the 120 year rule, as an executive director of the Office of Privacy and Disclosure she was well aware of the rule set by her own office and she acted with malice, seeking to defraud the court and cover up an egregious crime, namely Social Security fraud and possibly treason. If this court does not order release of the SS-5, Social Security application of Harry Bounel, which SSA located and referred to in November 16, 2012 letter from Dawn Wiggins (exhibit B of Supplemental Declaration of Dawn S. Wiggins), this court itself will become complicit to the aforementioned cover up of Social Security fraud, identity theft and possibly treason.

Conclusion

Due to all of the above Social Security Administration is obligated to release under the 120 year rule , SS-5, Social Security application of Harry Bounel, born in 1890, which SSA located and referred to in November 16, 2012 letter from Dawn Wiggins, Exhibit 1 of the Motion for Summary Judgment and Exhibit B of Supplemental Declaration of Dawn S. Wiggins affixed to the opposition to the Motion for summary Judgment.

Respectfully submitted

Dr. Orly Taitz, ESQ



09.22.2013

DECLARATION OF ORLY TAITZ

I, Orly Taitz, am over 18 years old, plaintiff herein, I am an attorney and an officer of the court. I have personal knowledge of facts listed herein, I can and will competently testify to the following

1. Only one Harrison J. (Harry) Bounel was found in the Census and other databases which are connected to www.geneology.com. I personally searched www.geneology.com, which lists all U.S. census records and there is only one Harry Bounel listed there.

2. The only Harry Bounel found in census data, is Harry Bounel, residing in Bronx, N.Y., and being 50 years old in 1940, which means that he was born in 1890 and falls under the 120 year rule.

3. Declaration by Albert Hendershot regarding records of Harry Bounel is a true and correct copy of the original declaration received by me.

3. I work with multiple licensed investigators and researches. Among them Licensed investigator Susan Daniels and former Scotland Yard anti-organized crime and anti-communist proliferation unit officer, Neil Sankey. They did not find any other Harry Bounels in National databases.

4. Affidavits and excerpts from the exhibits of investigators Neil Sankey and Susan Daniels are true and correct copies of aforementioned affidavits and excerpts of exhibits received by me.

5. Affidavit of Jeffrey Stephan Coffman, Former Chief Investigator of Special Investigations unit of the U.S. Coast guard is a true and correct copy of such affidavit received by me.

6. Affidavit of Sheriff Arpaio is a true and correct copy of such affidavit published by Sheriff Arpaio.

I declare under the penalty of perjury that all of the foregoing is true and correct to the best of my knowledge and informed consent.

/s/ Dr. Orly Taitz, ESQ



09.22.2013

cc Inspector General of the Social Security Administration

cc senator Chuck Grassley ranking member of the Senate Judiciary Committee

cc Congressman Bob Goodlatte Chair of the House Judiciary Committee

cc Daryl Issa, Chair of the House Oversight Committee

Certificate of Service

I, Lila Dubert, attest that a copy of the attached Reply to Opposition to Motion for Reconsideration was sent to the defense on 09.23.2013 by first class mail at the following address:

Andrew Norman

Assistant U.S. Attorney

36 South Charles str., 4th Floor

Baltimore, MD 21201

Lila Dubert

09.23.2013

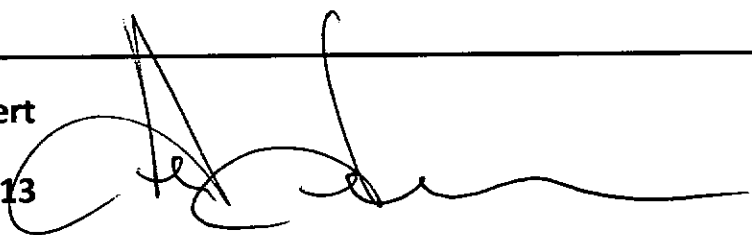


EXHIBIT 1

Attention clerk of the Court:

on 06.07. 2013 Judge Lamberth declined to give the leave of court to docket attached motions, as he found some areas, where redaction was insufficient. Please, find the motions with corrected redactions to be submitted to Judge Lamberth to be docketed ASAP

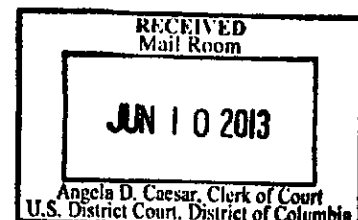
Sincerely



/s/ Orly Taitz, ESq

06.07.2013

*Let this be filed
along with the
attached motions
and documents.
Respc. Lamberth
U.S.D.J. 6/13/13*



Dr. Orly Taitz, ESQ

29839 Santa Margarita Parkway, STE 100

Rancho Santa Margarita CA 92688

Tel: (949) 683-5411; Fax (949) 766-7603

E-Mail: dr_taitz@yahoo.com, orly.taitz@gmail.com

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

Dr. ORLY TAITZ, ESQ, PRO SE

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Plaintiff,

§

§

v.

§ **EMERGENCY**

§ **MOTION FOR**

Michael Astrue, Commissioner of the

§ **RECONSIDERATION**

Social Security Administration.

§ **11-cv-00402**

§ **a hearing within 20 days**

§ **requested**

§ **Honorable Royce Lamberth**

Respondent

§ **Chief Justice presiding**

Taitz v Astrue Motion for Reconsideration 05.21.2013, 6 Requests for JN

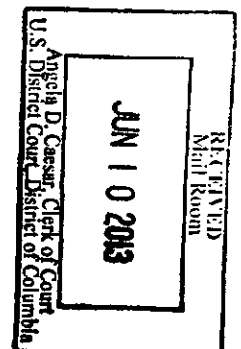


EXHIBIT 2

DECLARATION OF ALBERT HENDERSHOT

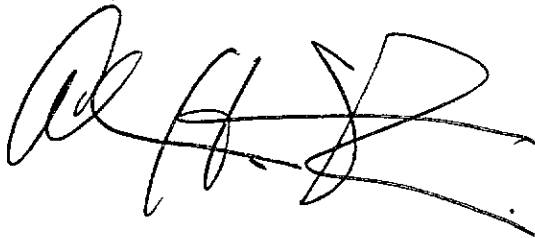
I, Albert Hendershot, am over 18 years old, I am a debt collector and investigator residing in Birmingham Alabama area. I have personal knowledge of facts listed below and I am willing and able to testify in the court of law in regards to the following facts:

1. I am working with attorney Orly Taitz on the issue of a Connecticut Social security number xxx-xx-4425, which Barack Obama listed on his 2009 tax return posted on WhiteHouse.gov. Originally Mr. Obama did not flatten the PDF file, the full SSN number became available to the public and it subsequently failed both E-Verify and SSNVS.
2. I am greatly concerned with the fact that we have an individual in the White House with an invalid Social Security number which was not issued to him.
3. I embarked on research and found that the number xxx-xx-4425 was assigned to Harry Bounel.
4. On February 4 2013 I signed and notarized an affidavit relating to my findings and I mailed it Attorney Taitz . Exhibit 1 is my true and correct affidavit.
5. In my affidavit I stated that I performed a search in Merlin Information Systems database <http://www.acxiom.com/identity-solutions>, which is routinely used by debt collectors.
6. I found that in the above databases Barack Obama and Harry Bounel are listed as holders of the same Social Security number xxx-xx-4425 and listed at the same address at 5046 s. Greenwood Ave. Chicago, Illinois
7. Aforementioned record shows Michelle Obama being a relative of both Harry Bounel and Barack Obama
8. Attorney Taitz made this affidavit public and submitted it to court.
9. On April 10, 2013 I was visited by FBI agent who asked me for my computer and the password for my computer.
10. I asked if they had a warrant, they said that they did not have a warrant and I told them to go away and get off my property.
11. I called the local FBI office in Birmingham AL and asked if there is a warrant for any of my property and if they are aware of FBI employees going to my house. FBI employee answering the phone did not have any such information.
12. Shortly thereafter the same FBI agents came to my house with several police officers. I was thrown to the ground and handcuffed. FBI officer by name Jacob U. Blair (see his signature on Exhibit 2) gave me his FBI ID. A supervisor got out of his car and told me "we can do it the easy way or the hard way". He proceeded saying that if I voluntarily give my computers and the pass-code to my computers, I will not be arrested.

13. As I was handcuffed and being concerned of being hauled to jail, under duress I signed a "consent" to search my computer and FBI officers gave me a receipt. (Exhibit 2 Consent to search computers and receipt by the FBI). Two weeks later FBI returned my computer.

I declare that all of the aforementioned is true and correct to the best of my knowledge and informed consent

Albert Hendershot 09.16. 2013

A handwritten signature in black ink, appearing to read 'Albert Hendershot', with a large, stylized flourish extending from the end of the name.

CONSENT TO SEARCH COMPUTER(S)

I, Albert Henderson, have been asked by Special Agents of the

Federal Bureau of Investigation (FBI) to permit a complete search by the FBI or its designees of any and all computers,

any electronic and/or optical data storage and/or retrieval system or medium, and any related computer peripherals,

described below:

Hewlett Packard G72 S/N 00196-
CPU Make, Model & Serial Number (if available)

Storage or Retrieval Media, Computer Peripherals

and located at _____, which I own, possess,

control, and/or have access to, for any evidence of a crime or other violation of the law. The required passwords, logins,

and/or specific directions for computer entry are as follows: _____

I have been advised of my right to refuse to consent to this search, and I give permission for this search, freely and voluntarily, and not as the result of threats or promises of any kind.

I authorize these Agents to take any evidence discovered during this search, together with the medium in/on which it is stored, and any associated data, hardware, software and computer peripherals.

4/10/2013
Date

4/10/2013
Date

[Signature]
Signature

[Signature]
Signature of Witness

Jacob U. Blair
Printed Full Name of Witness

6843 Roper Rd, Trussville, AL
Location

UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION
Receipt for Property Received/Returned/Released/Seized

File # 355B-WF-2750307

On (date) 4/10/2013

item(s) listed below were:

- ☒ Received From
☐ Returned To
☐ Released To
☐ Seized

(Name) Albert Hendershot

(Street Address) _____

(City) _____

Description of Item(s): _____

Hewlett Packard G72 S/N 00196-

Last Item

Received By: [Signature]
(Signature)

Received From: 4/10/2013
[Signature]
(Signature)

Affidavit of Albert Hendershot

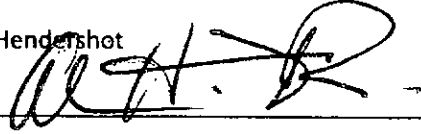
I, Albert Hendershot am a professional debt collector, I am over 18 years old, I have personal knowledge of the facts provided herein and I will be able to competently testify in court of the facts as listed in this affidavit:

1. I personally performed a search with Merlin Information Systems and <http://www.acxiom.com/identity-solutions> database which is routinely used by professional debt collectors
2. I found that both Barack Obama and Harry J. Bounel are listed as holders of the same Connecticut Social Security number ~~88-4425~~ and resided at the same address 5046 S. Greenwood Ave, Chicago, Illinois, Exhibit 1 attached herein is the true and correct copy of the printout from <http://www.acxiom.com/identity-solutions> database. Exhibit 2 attached herein is the (FOIA) Freedom of Information Act request which was completed for numident ~~88-4425~~ with Harry Bounel as the name associated with said numident ~~88-4425~~. Exhibit 2 clearly states that the aforementioned numident belongs to Harry Bounel and not Barack H Obama as detailed in the response from the Social Security Administration dated November 2012.
3. Michelle Obama is listed as a relative of both Harrison (Harry) J. Bounel and Barack Obama.
4. <http://www.acxiom.com/identity-solutions> database shows that the last change in the record of Harry J. Bounel Social security number ~~88-4425~~ was performed by Michelle Obama in and around November 2009, who is listed as a relative of Harry J. Bounel.

I attest under the penalty of perjury that all of the foregoing is true and correct to the best of my knowledge and informed belief.

Affiant further says naught.

Signed Albert Hendershot

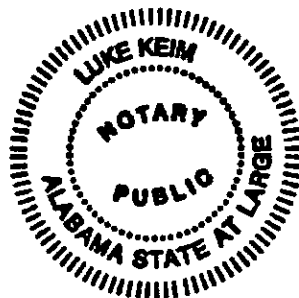


Dated

Feb 1, 2013.

Signature of the Notary Public

Luke Reim



Relatives Search Results (1)

Searched: BOUNEL HARRISON

Records 1 to 1 of 1

Personal Information

MICHELLE L OBAMA
 Aliases: BARACK H
 OBAMA, MICHELLE E
 OBAMA, MICHELLE L
 ROBINSON, MICHELLE
 OBAMA, MICHELLE
 ROBINSON, ROBINSON
 MICHELLE
 DOB: 01/1964
 Gender: F
 SSN: 350-60-XXXX
 Possible Relationship:
 Sister/Spouse
 CSCORE
 RELATIVES

Cell Phone(s) Available \$

5046 S GREENWOOD AVE
 CHICAGO, IL 60615
 Single-Family Dwelling
 7436 S EUCLID AVE
 CHICAGO, IL 60649
 Single-Family Dwelling
 5450 S EAST VIEW PARK
 Apt. 1
 CHICAGO, IL 60615
 Single-Family Dwelling
 5470 S EVERETT AVE
 Apt. 1S
 CHICAGO, IL 60615
 Multi-Family Dwelling
 5470 S EVERETT AVE
 Apt. 1S
 CHICAGO, IL 60615
 Multi-Family Dwelling
 180 N LA SALLE ST
 Apt. 2200
 CHICAGO, IL 60601
 3550 S RHODES AVE
 Apt. 1002
 CHICAGO, IL 60653
 Multi-Family Dwelling

07/2005 -
 12/2010

09/2006

02/2004

09/1997

Not Available

Not Available

Not Available

UNLISTED

People Search Results (2)

Searched: SSN: 042-68-XXXX

Records: 1 to 2 of 2

Personal Information

BOUNEL HARRISONJ
 Aliases: HARRISONJ
 BOUNEL
 Gender: U
 SSN: 042-68-XXXX
 (C) CSCORE
 (C) RELATIVES

5046 S GREENWOOD AVE
 CHICAGO, IL 60615
 Single Family Dwelling

11/2009

BARBACK H OBAMA
 Aliases: BARACK H
 OBAMA, BARACK H
 OBAMA, BARACK
 OBAMA, BARACK
 OBAMA, OBAMA BARACK
 DOB: 08/1981
 Gender: M
 SSN: 042-68-XXXX
 (C) CSCORE
 (C) RELATIVES

227 6TH ST NE
 WASHINGTON, DC 20002
 Single-Family Dwelling
 5046 S GREENWOOD AVE
 CHICAGO, IL 60615
 Single-Family Dwelling
 300 MASSACHUSETTS AVE NW
 WASHINGTON, DC 20001
 Multi-Family Dwelling
 5450 S EAST VIEW PARK
 Apt 1
 CHICAGO, IL 60615
 Single-Family Dwelling
 7436 S EUCLID AVE
 CHICAGO, IL 60649
 Single-Family Dwelling
 365 BROADWAY
 Apt B1
 SOMERVILLE, MA 02145
 Multi-Family Dwelling

02/2006 -
 12/2006

11/2006

09/2006

09/2006

10/1997

Not Available

Cell Phone(s) Available \$



SOCIAL SECURITY

Refer to:
S9H: A17967

November 16, 2012

This letter is in response to your Internet request for a Numident for Mr. Harry Bounel.

The Privacy Act of 1974 (5 U.S.C. § 552a) restricts disclosure of the information you requested. The only exception that might permit us to disclose these records to you without consent would be the exception for disclosure required by the Freedom of Information Act (FOIA) (5 U.S.C. § 552).

When we receive a request from a member of the public to release personal information about another individual from our records, we must balance the individual's privacy interest in withholding the information against the public interest in disclosing the information. We must determine whether disclosure would affect a personal privacy interest. There is clearly a substantial privacy interest in the personal details furnished to the Government. The only public interest we must consider is if the information sought would shed light on the way an agency performs its statutory duties. We may not consider the identity of the requester or the purpose for requesting the information. While there clearly is a public interest in knowing how the Social Security Administration administers the Social Security Act, disclosing records containing personal information about named individuals would not shed light on how the agency performs its statutory duties. Therefore, disclosing this information would be a clearly unwarranted invasion of personal privacy, and the FOIA (5 U.S.C. § 552(b)(6)) does not require disclosure.

If you disagree with this decision, you may request a review. Mail your appeal within 30 days after you receive this letter to the Social Security Administration, Office of Privacy and Disclosure, 617 Aluneyer Building, 6401 Security Boulevard, Baltimore, Maryland 21235. Mark the envelope "Freedom of Information Appeal."

Sincerely,

A handwritten signature in cursive script that reads "Dawn S. Wiggins".

Dawn S. Wiggins
Freedom of Information Officer

Barack H Obama aka Harrison J Bounel Alias Has Been Scrubbed From Databases

03/11/2011 The alias of Harrison J Bounel is discovered sharing the same SSN and home address as Barack H Obama as of 11/2009 by AL Hendershot.

03/11/2011 Conflicting information is discovered as to the registered Owners of 5046 S Greenwood Ave., the supposed home owned by the Obama's showing that it is not the Obama's as the true owners of the Hyde Park Mansion.

03/14/2011 Harrison J Bounel alias hits the internet as a searchable term for Barack H Obama's alias as of 2009



04/20/2011 WND and Jerome Corsi re-open the case concerning 5046 S Greenwood with the article, "Why Do 3 Supporters Own Obama Home"

05/14/2011

The Obama Hustle Blog

[www.theobamahustle@wordpress.com](http://www.theobamahustle.wordpress.com)

Goes live exposing evidence on Barack H Obama

08/14/2011 WND and Jerome Corsi re-open the case concerning the the \$104,500.00 "Obama Buffer Zone" in an article, "Tax fraud suspected in Obama land deal".

As of 08/20/2011 a recent search was completed on the Obama SSN ~~000-63-4425~~ of the same database that was used when Harrison J Bounel alias was originally discovered and the alias had been completely scrubbed and all evidence has been eliminated. The following graphic images will point that out.

05/20/2011 Al Hendershot is interviewed by Trunews Radio (with a combined 300K plus hits on youtube as of 08/2011) concerning the Obama alias of "Harrison J Bounel" and the real estate and tax fraud issues associated with 5046 S Greenwood Ave.

EXHIBIT 3



SOCIAL SECURITY

CERTIFICATION

Pursuant to the provisions of Title 42, United States Code, Section 3505, and the authority vested in me by 45 F.R. 47245-46, I hereby certify that I have legal custody of certain records, documents, and other information established and maintained by the Social Security Administration, pursuant to Title 42, United States Code, Section 405, and that the annexed are true and complete copies of certain of such documents in my custody as aforesaid.

I also certify that the annexed computer printouts showing the dates the information was recorded are true and complete copies of such documents in my custody for Social Security Number 042-68-4424 in the name of Thomas Louis Wood.

IN WITNESS WHEREOF, I have hereunto set my hand and caused the seal of the Social Security Administration to be affixed this 28th day of February, 2011.



Georgiana Wilson-Johnson
Deputy Director
Division of Earnings Record Operations
Office of Central Operations

[illegible]

*** REC 2011046 112048 HF7738E0 B2CL CIPQYA6 POA6 (F-B2C) ***

NUMI DTE:02/15/11 SSN:042-68-4424 XC:X UNIT:FITCH PG:001+

ACCOUNT SSN:042-68-4424 ETC:0 RPN:77083608349 DOC:086 IDN:P
NAME NAA: THOMAS , LOUIS , WOOD
BIRTH DOB:07/15/1962 PLB: NEW BRITAIN , CT SEX:M ETB:1
PARENT MNA: CAROLE F GEANE
FNA: HECTOR L WOOD
INTERNAL FMC:1 CYD:03/28/1977

EXHIBIT 4

AFFIDAVIT

The State of California)
) S.S.
City of Simi Valley)

I, Neil SANKEY, of Simi Valley, California, MAKE OATH AND SAY THAT:

1. I, Neil Sankey am over the age of eighteen years.

If called to do so, I could and would competently testify under oath as follows.

I am a Licensed Investigator in the State of California License number P.I. 10905. I have been so licensed for twenty five years. I am a Naturalized American Citizen.

I am experienced in all types of Investigation, both Civil and Criminal, having spent twenty years in the British Police, serving as a Detective Sergeant at New Scotland Yard. In the interest of our Country I have been assisting with research and investigation wherever necessary.

2. During the course of the work that I was doing in the latter part of 2008, regarding the activities and qualifications of Mr. Obama, I have compiled a record of all of the addresses in regards to which I have seen the use of his name. The records and databases which I use are many and varied having been accumulated for many different reasons but all are Public Record and the documents I have used are available to the General Public with, or without the payment of fees.

3. On January 2, 2009 I forwarded to Doctor Taitz a complete list of my efforts to that time. A true and complete copy of that document accompanies this document attached and marked "Exhibit A".

4. On July 6, 2009, I forwarded to Doctor Taitz an updated version of that list, accurate as of that date and having been updated, by me, during the weekend of July 4th and 5th

CALIFORNIA JURAT WITH AFFIANT STATEMENT

- ☒ See Attached Document (Notary to cross out lines 1-6 below)
☐ See Statement Below (Lines 1-5 to be completed only by document signer[s], *not* Notary)

 Signature of Document Signer No. 1

 Signature of Document Signer No. 2 (if any)

State of California

County of Ventura



Subscribed and sworn to (or affirmed) before me on this

6th day of July, 2009, by
Date Month Year

(1) Neil Sankar
Name of Signer

proved to me on the basis of satisfactory evidence
 to be the person who appeared before me (.) ☒

(and)
 (2) _____
Name of Signer

proved to me on the basis of satisfactory evidence
 to be the person who appeared before me.)

Signature _____
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

*Though the information below is not required by law, it may prove
 valuable to persons relying on the document and could prevent
 fraudulent removal and reattachment of this form to another document.*

Further Description of Any Attached Document

Title or Type of Document: Affidavit

Document Date: 7/16/09 Number of Pages: 1/2

Signer(s) Other Than Named Above: na

**RIGHT THUMBPRINT
 OF SIGNER #1**
 Top of thumb here

**RIGHT THUMBPRINT
 OF SIGNER #2**
 Top of thumb here

Age -
Date of Birth -
Deceased - **No**
Date Record Verified - **Jun 05**

Name - **OBAMA, BARACK HUSSEIN**
Gender - **Male**
Street Address - **5046 S GREENWOOD AVE**
City, State, Zip - **CHICAGO IL 60615-2806**
Probable Current Address - **No**
Telephone - **773-684-4809** - CDT
Telephone Accountholder -
Social Security -
Age -
Date of Birth -
Deceased - **No**
Date Record Verified - **Jun 05**

Name - **OBAMA, BARACK HUSSEIN**
Gender - **Male**
Street Address - **54501 E VIEW PARK S**
City, State, Zip - **CHICAGO IL 60615**
Probable Current Address - **No**
Telephone -
Telephone Accountholder -
Social Security - **042-68-xxxx**
Age -
Date of Birth -
Deceased - **No**
Date Record Verified - **Jun 97 - Aug 04**

Name - **OBAMA, BARACK HUSSEIN**
Gender - **Male**
Street Address - **PO BOX 49798**
City, State, Zip - **CHICAGO IL 60649**
Probable Current Address - **No**
Telephone - **773-684-4809** - CDT
Telephone Accountholder -
Social Security - **042-68-xxxx**
Age - **47**
Date of Birth - **Aug 04, 1961**
Deceased - **No**
Date Record Verified - **Sep 99**

Name - **OBAMA, BARACK HUSSEIN**
Gender - **Male**
Street Address - **365 BROADWAY APT B1**
City, State, Zip - **SOMERVILLE MA 02145-2440**
Probable Current Address - **No**
Telephone -

Telephone Accountholder -
Social Security - **042-68-xxxx**
Age - **119**

* Date of Birth - **1890** *

Deceased - **No**

Date Record Verified -

Name - **OBAMA, BARACK J SR**
Street Address - **225 ROBINSON S**
City, State, Zip - **STRATFORD TX 79084**
Probable Current Address - **No**

Telephone -
Telephone Accountholder -
Social Security -
Age -
Date of Birth -
Deceased - **No**
Date Record Verified - **Feb 09 - Jun 09**

Name - **OBAMA, BARACK OBAM**
Street Address - **5131 RFD**
City, State, Zip - **LONG GROVE IL 60047**
Probable Current Address - **No**

Telephone -
Telephone Accountholder -
Social Security -
Age -
Date of Birth -
Deceased - **No**
Date Record Verified - **May 09 - Jul 09**

Name - **OBAMA, BARACK USSEN**
Street Address - **1911 52ND AVE**
City, State, Zip - **MOLINE IL 61265-6381**
Probable Current Address - **Yes**
Telephone - **309-736-1217 - CDT**
Telephone Accountholder - **OBAMA BARACK USSEN**

Social Security -
Age -
Date of Birth -
Deceased - **No**
Date Record Verified -

Name - **OBAMA, BARAK**
Street Address - **1619 S BENTLEY AVE**
City, State, Zip - **LOS ANGELES CA 90025-3586**
Probable Current Address - **No**
Telephone -
Telephone Accountholder -
Social Security -

EXHIBIT 5

Dr. Orly Taitz, Attorney-at-Law
(California SBN 223433)
Orly Taitz Law Offices
26302 La Paz, Suite 211
Mission Viejo, California 92691
Telephone: (949) 683-5411
E-Mail: dr_taitz@yahoo.com

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA (SOUTHERN) DIVISION

Captain Pamela Barnett, et al.,
Plaintiffs,

v.

Barack Hussein Obama,
Michelle L.R. Obama,
Hillary Rodham Clinton, Secretary of State,
Robert M. Gates, Secretary of Defense,
Joseph R. Biden, Vice-President and
President of the Senate,
Defendants.

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Civil Action:

SACV09-00082-DOC (Anx)

Affidavit of Susan Daniels

1. My name is Susan Elizabeth Daniels. I am over 18 years old, am of sound mind and free of any mental disease or psychological impairment of any kind or condition.
2. I am a citizen of the United States of America, I am 68 years old and I was born and raised in the State of Ohio.
3. I am licensed by the State of Ohio as a private investigator; I am president of Daniels and Associates Investigations, Inc., incorporated in March 1995, license number 65199565509.
4. I have personal knowledge of all the facts and circumstances described herein below and will testify in open court to all of the same.
5. I located a social security number for Barack Hussein Obama and found that it was issued between 1977-1979 in the State of Connecticut but as I investigated

further, I found an additional eight social security numbers. One of the numbers had (Deceased) behind it. I was able to find the name of the person the SSN actually belonged to and printed it from the Social Security Administration death index.

6. I researched social security numbers for Michelle Obama. When I ran her name, two different social security numbers appeared for her, including one that does not belong to her but is listed for her at 1600 Pennsylvania Ave., Washington, D.C.

7. The true and correct copies I personally obtained are attached.

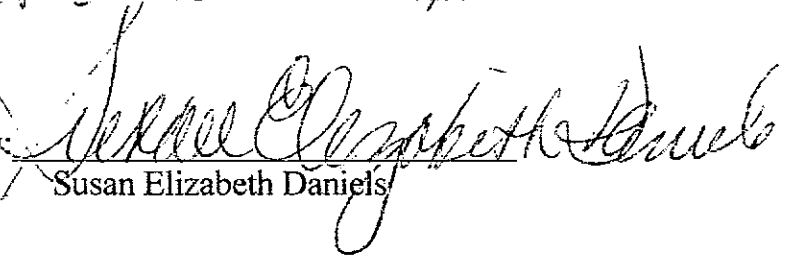
8. I solemnly swear under penalty of perjury that all the facts stated and circumstances described above are true and correct statements.

9. I have not received any compensation for making this affidavit.

Further, Affiant saith naught.

Signed and executed in Mentor, OH on this 19th day of October, 2009.

By:


Susan Elizabeth Daniels

NOTARY'S JURAT

Susan Elizabeth Daniels appeared before me in person on this 19 day of October, 2009, in Mentor (city), Lake County Ohio (state), U.S.A (country) and having presented to me her driver's license and having been sworn by me duly under oath and having been admonished that she did so under penalty of perjury, she did then and there depose herself and give the above-listed statements in my presence in the form of his written affidavit.

Specifically but without limitation, Susan Elizabeth Daniels did in my presence authenticate the documents attached here as a true and correct copy of the documents she obtained and described in her affidavit.



Notary Public in the State of Ohio

Business Address of Notary: 8052 BROADMOOR, MENTOR, OH 44060




























JAMES V. LOIACONO, Notary Public, State of Ohio
My Commission Has No Expiration Date
Section 147.03 O.R.C.

My Seal Appears Above this line.

My Printed Name is: JAMES V. LOIACONO; my notarial commission or license expires on: LIFETIME & STATEWIDE

	OBAMA BARACK HUSSEIN	5450 S EAST VIEW PARK PK CHICAGO IL 60615 Reported: 08/20/2008 - 08/20/2008 County: Cook	1x Map It	-4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48	Landline: (773)684-4809	N
	OBAMA BARACK LWYR	14 WERIE ST CHICAGO IL 60654 (POSSIBLE HIGH RISK) Reported: 08/20/2008 - 08/20/2008 County: Cook	1x Map It		Cell: (312)310-0069	N
E-mail: bobama@lawmbg.com (No IP Address Reported) Phone: (312)751-1170						
	OBAMA BARACK	NO ADDRESS REPORTED CHICAGO IL 60615 Reported: 08/18/2008 - 08/18/2008 County: Cook				N
	OBAMA BARACK	180 N LASALLE CHICAGO IL 60601 (POSSIBLE HIGH RISK) Reported: 08/18/2008 - 08/18/2008 County: Cook	1x Map It			N
*	OBAMA BARACK	83775 BATES RD JACKSON NJ 08527 Reported: 02/2008 - 08/2008 County: Ocean	2x Map It	485-40-5154 (DECEASED) Issued: 1954-1955 in IA	See attached "A"	N *
	OBAMA BARACK	1000 33RD AVE FORT WORTH TX 76180 Reported: 08/2008 - 08/2008 County: Tarrant	1x Map It			N
	OBAMA BARACK	505 FARR C COLUMBUS GA 31907-6275 Reported: 01/2008 - 08/2008 County: Muscogee	3x Map It	420-67-2965		N
	OBAMA BARACK	1603 RUCKER RD ALPHARETTA GA 30004-1435 Reported: 08/2008 - 08/2008 County: FULTON	1x Map It			N
	OBAMA BARACK HUSSEIN	180 N LA SALLE ST 2200 CHICAGO IL 60601-2610 (POSSIBLE HIGH RISK) Reported: 05/01/2007 - 05/01/2008 County: Cook	4x Map It	-4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48	Landline: (773)684-4809	N
Reports	Name	Address	Maps	SSN / DOB	Phone	AR
	OBAMA BARACK	OBAMA LN FRANKLIN WI 53132 Reported: 05/2008 - 06/2008 County: Milwaukee	1x Map It			N
	OBAMA BARACK	123 WHITE HOUSE IRVINE CA 92618 Reported: 06/2008 - 06/2008 County: ORANGE	1x Map It			N
	OBAMA BARACK	15 A 1A MANALAPAN FL 33462 Reported: 05/2008 - 05/2008 County: Palm Beach	1x Map It			N
	OBAMA BARACK HUSSEIN	5046 S GREENWOOD AVE CHICAGO IL 60615-2805 (POSSIBLE HIGH RISK) Reported: 12/01/2007 - 04/01/2008 County: Cook	5x Map It	-4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48	Landline: (773)684-4809	N

		County: Cook					
	OBAMA BARACK	5450 EASTVIEW PK 1 CHICAGO IL 60615 Reported: 08/01/1993 - 09/01/1993 County: Cook	1x	Map II	 4425 Issued: 1977-1979 in CT		N
	OBAMA BARACK	7436 S EUCLID AVE CHICAGO IL 60649-3825 Reported: 08/1993 - 08/1993 County: Cook	2x	Map II	 4425 Issued: 1977-1979 in CT		N
	OBAMA BARACK HUSSEIN	365 W BROADWAY BOSTON MA 02127 (110) 364-4808 Reported: 07/01/1991 - 07/01/1991 County: Suffolk	1x	Map II	 4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48	Landline: (773) 364-4808	N
	OBAMA BARACK H	5327 S OXFORD AVE CHICAGO IL 60615-3207 Reported: 09/01/1986 - 12/1986 County: Cook	3x	Map II	 4425 Issued: 1977-1979 in CT DOB: 02/04/1961 Age: 48		N
	OBAMA BARACK HUSSEIN	365 BROADWAY ST SOMERVILLE MA 02145 Reported: 08/01/1986 - 09/01/1986 County: Middlesex	1x	Map II	 4425 Issued: 1977-1979 in CT DOB: 1990	Landline: (617) 823-1235	N
	OBAMA BARACK HUSSEIN	CHICAGO IL 60615 Reported: 01/01/1988 - 01/01/1988 County: Cook	1x	Map II	 4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48	Landline: (773) 364-4808	N
	OBAMA BARACK H	CHICAGO IL 60615 Reported: 01/1988 - 01/1988 County: Cook	2x	Map II	 4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48		N
	OBAMA BARACK HUSSEIN	5429 S HARPER AVE 1N CHICAGO IL 60615 Reported: 10/01/1986 - 10/01/1986 County: Cook	1x	Map II	 4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48	Landline: (773) 364-4808	N
	OBAMA BARACK H	5429 S HARPER AVE 1N CHICAGO IL 60615-5540 Reported: 08/01/1986 - 10/1986 County: Cook	3x	Map II	 4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48		N
Report	Name	Address	Map	SSN / DOB	Phone	AR	
	OBAMA BARACK H	1440 E 52ND ST CHICAGO IL 60615-4101 Reported: 04/1986 - 04/1986 County: Cook	1x	Map II	DOB: 08/1961 Age: 48		N
	OBAMA BARACK H	5450 EASTVIEW PARK 1 CHICAGO IL 60615 County: Cook	2x	Map II	 4425 Issued: 1977-1979 in CT DOB: 08/1961 Age: 48		N
	OBAMA BARACK HUSSEIN	365 BROADWAY ST SOMERVILLE MA 02145-2440 County: Middlesex	2x	Map II	 4425 Issued: 1977-1979 in CT DOB: 1990		N
	OBAMA BARACK H	5450 E VIEW PARK 1 CHICAGO IL 60615 County: Cook	2x	Map II	 4425 Issued: 1977-1979 in CT		N
	OBAMA BARACK H	5450 E VIEW PARK 1 CHICAGO IL 60615 County: Cook	2x	Map II	4425 Issued: 1977-1979 in CT DOB: 08/04/1961 Age: 48	684-4808	N

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Field Value Records Results
SSN 485405154 1

Search
Hundreds of
Thousands
of
Family Tree

Viewing 1-1 of 1

Name	Birth	Death	Last Residence	Last Benefit	SSN	Issued Tools	Order Record?
LUCILLE BALLANTYNE	22 Dec 1912	13 Sep 1998 (V)	50140 (Lamoni, (none specified))	(none specified)	485-40-5154	Iowa SS-5 Letter Birth Certificate Death Certificate	

First Name:

Viewing 1-1 of 1

Last Name:

(V)=(Verified) Report verified with a family member or someone acting on behalf of a family member.
(P)=(Proof) Death Certificate Observed.

Search

You can now order the SS-5 Form for deceased individuals directly from the Social Security Administration online at <http://www.ssa.gov/online/ss-5form.html>

Last name Exact

First Name

Middle Name (initial)

SSN 485405154

Last Residence

Last Benefit

Zip

State

County

City

Birth

EXHIBIT 6

State of Texas)
) ss.
County of Montgomery)

AFFIDAVIT

Jeffery Stephen Coffman, being duly sworn, on oath deposes and says:

1. I am a resident of Texas. The information contained in this affidavit is based on my personal knowledge.
2. I am a licensed Private Investigator (licensed A620963) in the State of Texas.
3. I am a retired Resident Agent in Charge/Special Agent from the Department of Homeland Security having retired after 20 years during June 2007.
4. I am a retired Chief Investigator with the United States Coast Guard Investigative Service (Reserve) having retired after 22 years during March 2010.
5. I was formerly an Investigator with the Office of the Attorney General with the State of Texas serving from August 2008 until I quit during September 2009.
6. On my own and not as an Investigator or Special Agent with any state or federal agency I looked into circumstances surrounding then U.S. Senator Barack Obama's Selective Service registration.
7. I have utilized the Selective Service's "Check A Registration" online function (www.sss.gov) numerous times to verify whether a required registration was properly completed.
8. On or about February 13, 2008, I sent an email to information@sss.gov asking why Senator Obama's registration didn't show up when queried on the Selective Service website (www.sss.gov).
9. On the same day (February 13, 2008) I received an email from information@sss.gov stating "Sir: There may be an error in his file or many other reasons why his registration cannot be confirmed on-line. However, I did confirm with our Data Management Center that he is, indeed, registered with the Selective Service System, in compliance with Federal law. Sincerely, Janice L. Hughes/SSS".
10. On September 7, 2008 I viewed a televised interview in which then Senator Obama stated that he registered for the Selective Service when he graduated from high school. I recalled that Senator Obama graduated from high school in 1979 and the Selective Service registration requirements were not reinstituted until 1980.
11. I submitted a Freedom Of Information Act (FOIA) to the Selective Service System for Senator Obama's Selective Service registration. I received a copy of a Selective Service registration in the name of Barack Hussein Obama and a copy of a computer screen print out with a date of 09/09/08.
12. Reviewing these copies I noted several areas of concern. For example, I noted that on the registration copy the signature of the registrant was dated July 30, 1980, but the United States Postal cancellation stamp indicating date received was dated the previous day of July 29, 80. I also noted that the "No ID" block was checked indicating that the registrant did not present an ID when the registration




was said to have been presented to the postal clerk. The most outstanding aspect of the registration card was that the aforementioned U.S. Postal Cancellation Stamp had only a two digit year instead of the usual four digit year.

13. During my active military service with the US Army from 1973 to 1977, I served as a collateral duty as one of my unit's mail clerk. During that service I was familiar with US Postal regulations and procedures. It was my understanding that the US Postal Cancellation stamp was a four digit year and not a two digit year. I also knew that the day, month, and year of that model postal cancellation stamp are removable inserts that the postal clerk changes as appropriate. I have never seen a two digit insert for that model postal cancellation stamp.
14. Over several weeks, I researched the issue on the internet attempting to find any other incident where that model cancellation stamp had a two digit year instead of the usual four digit year. I was unable to find any other instance where that model postal cancellation stamp had a two digit year instead of the usual four digit year.
15. Using my training and experiences, I analyzed the image of the postal cancellation stamp on the copy of the registration. It is my conclusion that a four digit year insert ending in "08" was modified by cutting off the first two digits and reinserting the "08" upside down into the postal cancellation stamp to indicate a year of "80". The only four digit year ending in "08" I felt that would be reasonably available would be a "2008" year insert.
16. On the copy of the computer screen printout received under the FOIA I noticed that there was a line marked DLN and the number of "8089 708 0632". I also noted that on the copy of the Selective Service registration card there was a similar number in the upper right hand corner. This number was "0897080632". The number on the registration card appeared to be a "Bates" type print that automatically changes with each impression.
17. The differences between the DLN number on the computer screen printout and the registration card printout appears to be the addition of the digit "8". I know of no reason for the addition of the "8" in the DLN.
18. Based on my observations, research, experience and training, it is my belief that the Selective Service registration card I received under the Freedom Of Information Act request under the name of Barack Obama has been altered.


Jeffery Stephen Coffman

Sworn to me and subscribed before me this

2nd day of January 2013.


TYLER G. WELLS
Notary Public



RIMS HISTORY INQUIRY SCREEN

PAGE 001 OF 002
DATE: 09/09/08

SSN: 51 1125539
LAST NAME: OBAMA
FIRST NAME: BARACK HUSSEIN
CURRENT ADDRESS: 1617 S BERETANIA APT 1008
CITY/STATE/ZIP: HONOLULU HI 96826
PERMANENT ADDRESS: 1617 S BERETANIA APT 1008
CITY/STATE/ZIP: HONOLULU 96826
DATE OF BIRTH: 08/04/61
SSAN: [REDACTED]
TELEPHONE: 808 000 0000
DLN: 8089 708 0632
TRANSACTION DATE: 09/04/80
REASON:
LAST ACTION DATE: 09/04/80
ID INDICATOR: 2
RELATED SSN: 00 0000000 0

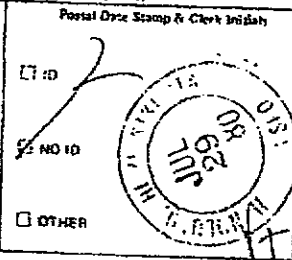
PRESS: CLEAR ==> END PF7 ==> PAGE BACKWARD PF8 ==> PAGE FORWARD



SELECTIVE SERVICE SYSTEM
Registration Form
 READ PRIVACY ACT STATEMENT ON REVERSE
 PLEASE PRINT CLEARLY

0697050632

1	DATE OF BIRTH August 4 1961 <small>Month Day Year</small>		2	SEX <input checked="" type="checkbox"/> MALE <input type="checkbox"/> FEMALE	
4	PRINT FULL NAME O DRAMA				
5	CURRENT MAILING ADDRESS 1617 S. BERETANIA APT. 1008 HONOLULU HAWAII 96826 <small>Number and Street City State or Foreign Country Zip Code</small>				
6	PERMANENT RESIDENCE SAME AS ABOVE				
7	CURRENT PHONE NUMBER 808 949 2317 <small>Area Code Number</small>				
8	<input type="checkbox"/> Check here if we may give your name, address and telephone number to Armed Forces recruiters. <input type="checkbox"/> I AFFIRM THE FOREGOING STATEMENTS ARE TRUE				
9	Today's Date: JULY 30, 1980 Signature of Registrant: Barack H. Obama				



SSS Form 1 (Feb 80)

(Previous Editions Will Not Be Used)

GARS Approved 78-10002

State of Arizona)
) ss.
County of Maricopa)

AFFIDAVIT


I, the undersigned, being first duly sworn, do hereby state under oath and under penalty of perjury that the facts are true:

1. I am over the age of 18 and am a resident of Arizona. The information contained in this affidavit is based upon my own personal knowledge and, if called as a witness, could testify competently thereto. I am the duly elected Sheriff of Maricopa County, Arizona, and I have been a law enforcement officer and official, in both state and federal government, for 51 years.
2. In August of last year, a group of citizens from the Surprise Arizona Tea Party organization met with me in my office and presented a petition signed by approximately 250 residents of Maricopa County, asking if I would investigate the controversy surrounding President Barrack Obama's birth certificate authenticity and his eligibility to serve as the President of the United States.
3. This group expressed its concern that, up until that point, no law enforcement agency in the country had ever gone on record indicating that they had either looked into this or that they were willing to do so, citing lack of resources and jurisdictional challenges.
4. The Maricopa County Sheriff's Office is in a rather unique position. Under the Arizona Constitution and Arizona Revised Statutes, as the elected Sheriff of Maricopa County, I have the authority to request the aid of the volunteer posse, located in the county, to assist me in the execution of my duties. Having organized a volunteer posse of approximately 3,000 members, I, as the Sheriff of the Maricopa County Sheriff's Office, can authorize an investigation go forward to answer these questions at virtually no expense to the tax payer.
5. The Cold Case posse agreed to undertake the investigation requested by the 250 citizens of Maricopa County. This posse consists of former police officers and attorneys who have worked investigating the controversy surrounding Barack Obama. The investigation mainly focused on the electronic document that was

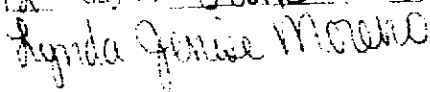
presented as President Obama's long form birth certificate to the American people and to citizens of Maricopa County by the White House on April 27, 2011.

6. The investigation led to a closer examination of the procedures regarding the registration of births at the Hawaii Department of Health and various statements made by Hawaii government officials regarding the Obama birth controversy over the last five years.
7. Upon close examination of the evidence, it is my belief that forgery and fraud was likely committed in key identity documents including President Obama's long-form birth certificate, his Selective Service Registration card, and his Social Security number.
8. My investigators and I believe that President Obama's long-form birth certificate is a computer-generated document, was manufactured electronically, and that it did not originate in a paper format, as claimed by the White House. Most importantly, the "registrar's stamp" in the computer generated document released by the White House and posted on the White House website, may have been imported from another unknown source document. The effect of the stamp not being placed on the document pursuant to state and federal laws means that there is probable cause that the document is a forgery, and therefore, it cannot be used as a verification, legal or otherwise, of the date, place or circumstances of Barack Obama's birth.
9. The Cold Case Posse law enforcement investigation into Barack Obama's birth certificate and his eligibility to be president is on-going. The on-going nature of the investigation is due to additional information that has come to light since we held the press conference in March, 2012. As soon as that information has been properly verified by the Cold Case Posse, I will release that information to the public.

Executed this 11 day of June, 2013, in
Maricopa County, Arizona.


Joseph M. Arpaio, Maricopa County Sheriff

Sworn to and subscribed before me this
12th day of June, 2012.



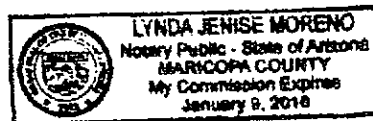


EXHIBIT 7

[illegible]

EXHIBIT 8

Social Security Online

Business Services Online

www.socialsecurity.gov
Navigation | Logout

[BSO Main Menu](#) | [BSO Information](#) | [Contact Us](#) | [Keyboard](#)



Social Security Number Verification System (SSNVS)

[SSNVS Help](#)

SSN Verification Results

Employer's EIN:

Records Submitted: 1

Failed: 1

Verified Records: 0

The following table displays your submitted results. The first column indicates if the submitted record verified, failed or employee is deceased. The first five digits of the SSN will be masked for verified records and records with a verification results code of 2, 3, 4 or 6.

[Verify More SSNs](#)

[What to do if an SSN fails to verify](#)

[Field Office Locator](#)

- **Failed** - Data does not match Social Security Administration's records. Select [What to do if an SSN Fails to Verify](#) for more information.
- **Deceased** - Data matches Social Security Administration's records, and our records indicate that the person is deceased. For more information, please contact our general SSA information line at 1-800-772-1213 (TDD/TTY 1-800-325-0778) or your local Social Security field office. Select [Field Office Locator](#) to find the office nearest you.
- **Verified** - Data matches Social Security Administration's records.

Results	SSN 999999999	First Name	Middle Name	Last Name	Suffix	Date of Birth MMDDYYYY	Gender F/M	Verification Results
Failed	■■■■■34425	BARACK	-	OBAMA	-	08041961	M	1

Verification Results	
Code	Description
1	SSN not in file (never issued).

Have a question? Call 1-800-772-6270 Mon. - Fri. 7AM to 7PM Eastern Time to speak with Employer Customer Service personnel. For TDD/TTY call 1-800-325-0778.

EXHIBIT 9

Self Check: Notice of Mismatch with Social Security Administration

<https://selfcheck.kids.gov/SelfCheckUssat/noticePrint>

Self Check

Notice of Mismatch with Social Security Administration (SSA) Records

Print

Ver en Español

Bring this notice with you when you visit SSA

For SSA Field Office Staff: Do not use EV-STAR; See POMS RM 10250.000ff

Obama Barack H

Name of the employee (Last Name First Name MI)

08/17/2011

Date of Mismatch

4425

Employee's Social Security Number (SSN)

201122911431GY

Case Verification Number

Reason for this Notice

SSN does not match. The Social Security Number (SSN) entered in Self Check is valid, but the name and/or date of birth entered do not match SSA records.

SSN is invalid. The Social Security Number (SSN) entered in Self Check is not a valid number.

SSA unable to confirm U.S. Citizenship. Cannot confirm that the employee is eligible to work because the SSA records do not show that the SSN Holder is a U.S. Citizen.

✓ SSA record does not verify. Other reason. SSA found a discrepancy in the record.

SSA unable to process data. SSA found a discrepancy in other data in the record.

Instructions

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF Maryland

Orly Taitz

§ Case # 13-1878

Plaintiff,

§ Presiding Hon. Ellen Hollander

§

v.

§

§

Carolyn Colvin , Commissioner of the

§

Social Security Administration,

§

STATEMENT OF FACTS

Plaintiff, President of Defend Our Freedoms Foundation, Dr. Orly Taitz Esq, filed the legal action at hand under 5 US 552, Freedom of Information Act, seeking release under SSA 120 year rule of SS-5, Social Security application, of one Harry Bounel, aka Harrison J. Bounel, born in 1890. Defendant Carolyn Colvin, Acting Commissioner of Social Security Administration, responded and submitted a sworn declaration of Dawn Wiggins, Deputy Executive Director for the Office of Privacy and Disclosure (OPD), claiming that the responsive records could not be located.

Plaintiff responded and sought a Motion for Summary Judgment in favor of the Plaintiff and presented a prior letter from the same Dawn Wiggins, dated November 16, 2012, where Wiggins stated that records of Harry Bounel could not be released due to considerations of privacy of Mr. Bounel. Defense argued that when they searched for records in 2012, when request was submitted by another individual, they somehow did not look at the name of the person, whose records they were searching and stated that the records could not be released due to consideration of privacy of Harry Bounel. Second time, when the request was made, they claimed that some secondary information submitted by the plaintiff did not match the record, which in itself confirmed that there is a record for Harrison J. (Harry) Bounel, but there was some discrepancy in some secondary information plaintiff believed to be correct, such as date of arrival of Bounel to the U.S. or the date of his receipt of the SSN. They also claimed that they could not read the census record provided, due to the fact that the copy was not so good, but if they could read it, and it indeed stated that Bounel was born in 1890, they claimed that they needed Bounel's death certificate. They did not provide any explanation, why did they need the death certificate, in light of the fact that Taitz quoted 120 year rule verbatim and it clearly stated that the death certificate is not needed for release of SS-5 of extremely aged individuals, like Bounel who were born 120 years ago or earlier.

DISCUSSION

This court rules in favor of the plaintiff for following reason: Defense provided different, often conflicting explanations, which were not credible and not reasonable and conflicted with the rule of law.

Firstly, defense claimed that the first time it refused the release of the records of Harry Bounel due to privacy, it did not look at the name of the individual whose record they were searching. Response by the defense own witness, Dawn Wiggins, clearly shows that Wiggins searched under the name Harry Bounel and Social Security number xxx-xx-4425. If this Social Security number belonged to another individual, they would have stated that there is no record for Harry Bounel with Social security number xxx-xx-4425. The fact that they did not state that indicates that they indeed located a record of Harry Bounel with Social Security number xxx-xx-4425. In 2013, when second request was provided with the 1890, as the date of birth of Harry Bounel, SSA was cornered with the fact that they cannot use the excuse of privacy any more due to 120 year rule, as Bounel was born 123 years ago, they sought another excuse, claiming that due to a discrepancy in some secondary information, such as Bounel's date of receipt of the Social Security number or some other secondary information, they have justification to claim that they could not find records responsive to the request. The court does not have in front of it the required document and does not know if there is any discrepancy in any secondary information.

In order to resolve the dispute the court orders the Social Security administration to release the Social Security application for Harry Bounel that the SSA already located in its first search, and which it is obligated to release based on census data showing Bounel being born in 1890. Defendant is obligated to release SS-5, Social Security application of Harry Bounel, SSN xxx-xx-4425, who based on 1940 U.S. Census was born in 1890 and whose records have to be released based on 120 year rule.

Claim by SSA that the death certificate is needed, is not credible, as it contradicts the SSA own 120 year rule, which compels SSA to release the SS-5, Social Security application of individuals born 120 years go or earlier.

Based on aforementioned it is ORDERED and ADJUDICATED that Defendant, Acting Commissioner of Social Security Administration, is required to release to the plaintiff SS-5, Social Security Application of Harry Bounel, born in 1890, under the provisions of 120 year rule. Defendant has 10 business days to release aforementioned application.

The court is also concerned in regards to the report by investigator Hendershot, who uncovered Harry Bounels records and who was according to the sworn declaration by Hendershot, thrown on the ground, handcuffed and threatened by the FBI with being hauled to jail in order to provide the FBI with the pass-code and consent to search his computers. This court is greatly concerned with reported violations of civil rights and warns the defense not to repeat such searches and not to make any changes to records.

Signed Ellen L. Hollander

US District Judge

Dated