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7 United States District Court  
8 Central District of California  
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13 United States , ) Case: 8:25-cv-01370  
14 Plaintiff, ) Hon. David O. Carter Presiding  
15 vs. ) Motion for leave of court to file an  
16 Robert Page, Orange County Registrar ) Amicus Curiae in favor of the plaintiff,  
17 of voters ) United States, based on personal  
18 Defendant ) knowledge  
19 ) To be filed by Orly Taitz ESQ,  
20 ) President of Defend our Freedoms  
21 ) Foundation  
22 )  
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26 Movant, Dr. Orly Taitz, ESQ, the President of Defend Our Freedoms Foundation,  
27 dedicated to constitutional rights, as well as an attorney-observer during 2024  
28 election and a former candidate for office in the state-wide elections, respectfully

1 move this court for leave to file an Amicus Curiae in support of the Plaintiff  
2 herein.

3 **DISTRICT COURTS HAVE AUTHORITY TO ACCEPT AMICUS**  
4 **BRIEFS.**

5 Federal district courts possess the inherent authority to accept amicus briefs.  
6 *In re Bayshore Ford Truck Sales, Inc.*, 471 F.3d 1233, 1249 n.34 (11th Cir. 2006)  
7 (“[D]istrict courts possess the inherent authority to appoint ‘friends of the court’ to  
8 assist in their proceedings.”); *Hoptowitz v. Ray*, 682 F.2d 1237, 1260 (2d Cir. 1982);  
9 *United States ex rel. Gudur v. Deloitte Consulting Llp*, 512 F. Supp. 2d 920, 927  
10 (S.D. Tex. 2007) (“The extent to which the court permits or denies amicus briefing  
11 lies solely within the court’s discretion.”). “No statute, rule, or controlling case  
12 defines a federal district court’s power to grant or deny leave to file an amicus  
13 brief, . . . and in the absence of controlling authority, district courts commonly  
14 refer to [Federal Rule of Appellate Procedure] 29 for guidance.” *Gudur*, 512 F.  
15 Supp. 2d at 927. “Factors relevant to the determination of whether amicus briefing  
16 should be allowed include whether the proffered information is ‘timely and useful’  
17 or otherwise necessary to the administration of justice.” *Id.* *Amici’s* role is to assist  
18 the court “in cases of general public interest by making suggestions to the court, by  
19 providing supplementary assistance to existing counsel, and by insuring a complete  
20 and plenary presentation of difficult issues so that the court may reach a proper  
21 decision.” *N.A.A.C.P. v. Town of Harrison*, 940 F.2d 792, 808 (3d Cir. 1991).

22  
23 This authority supports the Court’s exercise of its discretion to accept this amici  
24 brief.

25  
26 **INTEREST OF THE MOVANT**

27 The movant, Dr. Orly Taitz, ESQ, is the President of the Defend our  
28 Freedoms Foundation dedicated to preservation of the constitutional rights. She

1 obtained personal knowledge relevant in this case being an attorney-observer in  
2 2024 election and as a former candidate in state-wide CA elections.

3 On the grounds and for the reasons set forth below, movant is seeking for a leave  
4 of court to file Amicus Curiae in support of the plaintiff United States, whereby the  
5 plaintiff is seeking unredacted voter records from the defendant, Robert Page,  
6 Registrar of the Orange County, California. Movant relies on Rule 29 (a) of FRAP,  
7 which is applied by analogy in district courts.

8 Movant is filing the motion at hand due to public interest in legitimacy of  
9 elections. Movant is filing this motion based on her knowledge as an attorney -  
10 observer in 2024 presidential and federal elections, prior knowledge as a candidate  
11 in state-wide elections, where she was a recipient of voter information from the  
12 Secretary of State, prior investigations of elections and elections fraud from 2008  
13 till 2024 and as a president of Defend Our Freedoms foundation, which is  
14 dedicated to the preservation of constitutional rights.

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16 This motion is based on pleadings below, declaration of Attorney Orly Taitz,  
17 Declaration of computer expert David Yun and a 148 page file with compilation of  
18 evidence of forgery, fraud, use of stolen Social Security numbers and bogus IDs.  
19 Movant, attorney Orly Taitz, possesses the following personal knowledge, which  
20 she believes would be helpful in ruling in favor of the plaintiff, United States:  
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- 23 1. Movant, Orly Taitz, (Hereinafter Taitz) is an attorney, duly licensed in the state  
24 of California, federal courts and admitted to the bar of the Supreme Court
- 25 2. Previously, Taitz ran for state-wide office in the state of California and, as a  
26 candidate, she received a computer disk of all the registered voters with their  
27 unredacted information.  
28

1 3. Additionally, she was one of the attorney observers for the GOP and Trump  
2 campaign in 2024 presidential election.

3 4. As an attorney-observer she was assigned the area of city of Irvine by the GOP  
4 coordinator.

5 5. She personally visited each and every voting place in the city of Irvine during  
6 the 2024 election.

7 6. When she visited the voting place at the University of California at Irvine, she  
8 observed a large line in front of the voting place. She talked to the captain in  
9 charge of the voting place and she advised the captain that she was an attorney -  
10 observer. The Captain of the voting place stated that her name was Elena. Taitz  
11 noticed that Elena spoke with an accent and asked where she was from. She stated  
12 that she was from Russia and Taitz continued the conversation with her in Russian  
13 and the voting place captain was more comfortable to share her observations. Elena  
14 disclosed to Taitz that some 80% of people waiting in line were not registered to  
15 vote. All of them were given registrations on the spot and all were allowed to vote  
16 immediately. No verification of anything was done. The directions from the  
17 registrar's office were to allow everyone to vote.

18 7. UCI (University of California at Irvine) has some 40,000 students. 80% of that  
19 is 32,000. Taitz is not saying that exactly 32,000 were not previously registered,  
20 but it is clear that thousands were not previously registered to vote. It is Taitz's  
21 understanding that this was going on at all campuses of UC and Cal. State system.

22 8. Thousands of students at UC and Cal State systems are not US citizens.

23 9. Additionally, thousands of students are citizens, but not residents of California.  
24 The state of California charges thousands of students out of state tuition, as out of  
25 state residents, at the same breath all of these students are allowed to vote as  
26 California residents. These university votes significantly changed the results of the  
27 elections in a number of congressional districts.  
28

1 10. Taitz observed that nobody checks whether individuals are registered to vote in  
2 multiple states. Nobody was requesting individuals to cancel their voter  
3 registrations in other states before voting in California.

4 11. As an example, in 2010 Taitz ran for Secretary of State in Republican primary  
5 in California against an individual by name Damon Dunn, who at the time he  
6 registered to run for Secretary of State in California, as a Republican, was also  
7 registered in two other states, Texas and Florida, as a Democrat. At the time, Taitz  
8 filed a complaint with the Secretary of State of California and she filed an election  
9 challenge in the Superior Court of California case 30-2020-00381664 before Hon.  
10 Jeffrey Glass. In spite of a motion for expedited handling of the case, the presiding  
11 judge postponed the case until after the general election with a promise to reverse  
12 the results of the election if fraud is found, and later dismissed the case without any  
13 explanation. If a person was allowed to run for Secretary of State in California,  
14 while being registered to vote in two other states, it is likely that thousands more  
15 out of state residents are voting in California.

16 12. Taitz ran for state -wide office twice. During her run for office, Taitz requested  
17 a computer expert to analyze the data of the computer disk with voter information,  
18 which was provided to her by the Secretary of State. Taitz attached herein  
19 affidavits of the computer expert David Yun. (Exhibit 1 to Declaration of Orly  
20 Taitz, affidavits of David Yun)

21 13. According to CA election code 2150, a voter registration is supposed to  
22 contain a valid birth date, country of origin, first and last name, prior registration,  
23 address, information disclosing whether the prospective voter is a felon or parolee,  
24 a drivers license, last 4 digits of the Social Security number or an identifier  
25 number.  
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1 14. A valid place of birth is required according to California voter registration  
2 guide. According to expert David Yun, 685,719 California records did not have a  
3 valid place of birth.

4 15. According to expert David Yun, 130,019 voters were over 100 years old.

5 16. According to expert David Yun, 140,861 were likely duplicate records.

6 17. According to expert David Yun, when all 8 required parameters are considered,  
7 there are likely hundreds of thousands of invalid registrations in California state-  
8 wide data bases.

9  
10 18. Furthermore, when Taitz, as an attorney-observer, visited a voting place in  
11 Northern Irvine, north of Irvine Valley College, Taitz asked the precinct captain if  
12 she observed any irregularities. The precinct captain stated that one woman came  
13 to vote and the records showed that she already voted or someone else voted under  
14 her name. Taitz asked, what are the policies and procedures in this situation. She  
15 stated that the registrar's directions were to let everyone vote, it was flagged and  
16 the registrar's office would sort it out later. Taitz asked, how do they sort it out. If  
17 two people voted under the same name and one voted for Trump and another for  
18 Harris, how do they know who is the real voter and who is the fraud and which  
19 candidate gets the vote. The precinct captain was clueless. This is of great concern  
20 as DOGE recently discovered 25 million active Social Security records of people  
21 over 100 years old. It was reported that recently the Social Security administration  
22 removed from active databases 12 million Social Security numbers of individuals  
23 over 120 years old. According to the Guinness book of records, the oldest American  
24 is 114 years old ([www.guinnessworldrecords.com](http://www.guinnessworldrecords.com)), which means that there were at  
25 least 12 million bogus Social Security numbers in the databases. In April 2025,  
26 Elon Musk reported that DOGE identified an individual, who stole 400,000 Social  
27 Security numbers and was reselling them. Stolen Social Security numbers are used  
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1 to steal from the US Treasury through multiple Social Programs, as well as to vote  
2 illegally and even run for office illegally. [https://abcnews.go.com/US/elon-musk-](https://abcnews.go.com/US/elon-musk-disclosure-planned-social-security-fraud-arrest/story?id=120379202)  
3 [disclosure-planned-social-security-fraud-arrest/story?id=120379202](https://abcnews.go.com/US/elon-musk-disclosure-planned-social-security-fraud-arrest/story?id=120379202)

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5 10. As an attorney, with the help of multiple licensed investigators, Taitz compiled  
6 an attached 148 page file, (Exhibit 2 to Declaration of Orly Taitz, Evidence of  
7 Forgery and Fraud) showing that former President Obama used a Connecticut  
8 Social Security number xxx-xx-4425 of an individual born in 1890, whose death  
9 was not recorded in the SSA records. Mr. Obama used this number while residing  
10 in the White House and he inadvertently published it when he posted his tax  
11 returns on WhiteHouse.gov on April 15, 2010 at around 11am and he did not  
12 properly redact the file. (the file was redacted a few hours later, but the information  
13 was already public). This was immediately a red flag, as this was a Connecticut  
14 Social Security number and Obama was never a resident of Connecticut.  
15 Aforementioned file shows evidence of forgery in multiple other IDs and  
16 documents used by Obama, such as Selective Service Registration, long form birth  
17 certificate and others. This shows a magnitude of fraud and need for the plaintiff  
18 herein, United States of America, to examine all unredacted voter registration  
19 records not only of the voters, but also of all the candidates, who ran, specifically  
20 Barack Obama's, as he ran in 2008 and 2012.  
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## 22 CONCLUSION

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24 Based on the pleadings, attached declarations, affidavits and evidence, the court  
25 should grant a leave of court to file the Amicus Curiae at hand.

26 Respectfully submitted,

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28 /s/ Dr. Orly Taitz, ESQ

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Dated this 07.22.2025

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/s/ Orly Taitz, ESQ  
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**CERTIFICATION**

Motion at hand does not exceed 7000 words and is compliant with local rule 7-12

Dated this 07.22.2025

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/s/ Orly Taitz, ESQ  
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**CERTIFICATE OF SERVICE**

I hereby certify that on July 22, 2025, I served a true and correct copy of the foregoing Motion for Leave of Court to file Amicus Curiae upon all parties and their counsel of record in this action, by the following method(s): via the court's

1 ECF system. The document was served in accordance with Rule 5 of the Federal  
2 Rules of Civil Procedure.

3  
4 Dated this 07.22.2025

5 \_\_\_\_\_  
6 /s/ Orly Taitz, ESQ  
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