

FILED

SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

AUG 28 2012

ALAN CARLSON, Clerk of the Court

Dr. Orly Taitz ESQ.
29839 Santa Margarita Pkwy Suite 100
Rancho Santa Margarita, CA 92688
Phone (949) 683-5411 fax (949) 766-7603
Email: Orly.taitz@gmail.com
CA Bar license 223433
Counselor for Plaintiffs

IN THE U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

~~Keith Judd,~~
~~Orly Taitz,~~
~~Thomas G. MacLeran,~~
~~Leah Lax,~~
~~David Farrar~~
~~Larry Rappaport,~~
~~Lucien Vita~~
~~Carol Vita~~

Plaintiffs,

v.

BARACK OBAMA, ET AL.

Defendants

Case No.:

~~First amended complaint FOR:~~

- 1) FRAUD
- 2) ELECTIONS FRAUD
- 3) NEGLIGENCE
- 4) BREACH OF FIDUCIARY DUTY
- 5) NEGLIGENCE
- 6) DEFAMATION
- 7) RICO predicate crimes:

FRAUD, AIDING AND ABETTING
FORGERY AND FORGED
DOCUMENTS TO COMMIT
ELECTIONS FRAUD,
RAKETEEERING

8) IIED
DEFAMATION OF CHARACTER
7th AMENDEMENT JURY
REQUESTED
(CASE REMOVED FROM THE
STATE SUPERIOR COURT)

NOTICE OF REMOVAL

TO:

Barack Hussein Obama
1600 Pennsylvania Avenue NW
Washington, DC 20500

Natalie E. Tennant,
Bldg. 1, Suite-157K,
1900 Kanawha Blvd. E.
Charleston, WV 25305

Debra Bowen
1500 11th Street,
Sacramento, CA 95814

Brian P. Kemp
214 State Capitol,
Atlanta, GA 30334

William M. Gardner
State House Room 204,
Concord, NH 03301
Dean C. Logan
12400 Imperial Highway,
Norwalk, California 90650

Nancy Pelosi
Democratic Party Headquarters,
430 South Capitol St. SE,
Washington DC, 20003

Michael Astrue
Social Security Administration,
6401 Security Blvd.
Baltimore, MD 21235

1 William A. Chatfield
2 1517 Bonham Ct.
3 Irving, TX 75038

4 Alvin Onaka
5 State of Hawaii, Department of Health
6 PO Box 3378
7 Honolulu, HI 96801

8 Janet Napolitano
9 U.S. Department of Homeland Security,
10 Washington, D.C. 20528

11 Eric Holder
12 U.S. Department of Justice,
13 950 Pennsylvania Avenue, NW
14 Washington, DC 20530

15 Brian Schatz
16 1050 Ala Monana Blvd. #2660,
17 Honolulu, HI 96814

18 Lynne Matusow
19 1050 Ala Monana Blvd. #2660,
20 Honolulu, HI 96814

21 Ballot Law Commission of State of New Hampshire
22 107 North Main Street,
23 State House, Room 204,
24 Concord, N.H. 03301

25 Board of directors of California Republican party
26 1903 W. Magnolia Blvd.,
27 Burbank, CA 91506

28 Elizabeth Emken
PO Box 81
Danville, CA 94526

1 Dianne Feinstein
2 One Post Street, Suite 2450
3 San Francisco, CA 94104

4 Clay D. Land
5 Middle District of Georgia,
6 PO Box 2017,
7 Columbus, GA 31902

8 John Avlon
9 The Daily Beast,
10 7 Hanover Sq.
11 New York, NY, 10004

12 Chris Matthews,
13 MSNBC, One Microsoft Way,
14 Redmond, WA 98052

15 MSNBC,
16 MSNBC, One Microsoft Way,
17 Redmond, WA 98052.

18 KFI AM 640
19 3400 W Olive Ave Ste 550,
20 Burbank CA 91505

21 JOHN & KEN SHOW
22 3400 W Olive Ave Ste 550,
23 Burbank CA 91505

24 John Kobelt
25 3400 W Olive Ave Ste 550,
26 Burbank CA 91505

27 Forbes magazine
28 60 Fifth Avenue,
New York, N.Y. 10011

1 Kevin Underhill
2 60 Fifth Avenue,
3 New York, N.Y. 10011

4 Obama for America
5 P.O. Box 803638,
6 Chicago, IL, 60680

7 Patrick R. Donahoe
8 475 L'Enfant Plaza SW.
9 Washington DC 20260
10

11 1. Pursuant to 28 U.S.C. §1331, §1441 and §1332 (a), Plaintiff gives notice of
12 removal of the above captioned Complaint to the United States District
13 Court for the Central District of California, Southern Division. The
14 Complaint was originally served by the Plaintiffs in the Superior Court of
15 California, County of Orange in action styled Dr. Orly Taitz v. Obama, et.al;
16 Cause No. 30-2012-00582135.
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19 **Federal Question Jurisdiction**
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21 2. This Court has jurisdiction over this case pursuant to 28 U.S.C. §1331, and
22 this case is properly removable under 28 U.S.C. §1441, as the Complaint
23 alleges claims based on federal law, including violation of federal RICO
24 statutes, 18 U.S.C. §1961 et seq., based on alleged predicate acts constituting
25 alleged violations of various federal laws, and other claims requiring
26 interpretation of the Constitution and other federal laws.
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- 1 3. This Court has supplemental jurisdiction over any and all purported state law
2 claims alleged in the Complaint under 28 U.S.C. §1367.
- 3 4. In addition removal of this case is proper because: (1) One or more Plaintiffs
4 are citizens of a State different from a one or more Defendants; and (2) the
5 amount in controversy is to be determined but exceeds \$75,000. 28 U.S.C. §
6 1332(a).
- 7 5. At the time of filing of the First Amended Complaint and at the time of
8 removal of this action, Plaintiffs Rappaport, and Vita are citizens of New
9 Hampshire.
- 10 6. At the time of filing of the First Amended Complaint and at the time of
11 removal of this action, one or more of the Defendants are citizens of states
12 other than New Hampshire.
- 13 7. Plaintiffs assert claims for fraud, elections fraud, breach of fiduciary duty,
14 negligence, RICO, and defamation. Plaintiffs seek actual, consequential and
15 punitive damages, as well as attorney's fees. The claims of all Plaintiffs are
16 aggregated to determine the amount in controversy but will exceed \$75,000.
- 17 8. This Notice of Removal is being filed with the Clerk of the District Court of
18 California, Central District, Southern Division and is being served on all
19 Defendants.
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1 WHEREFORE, Plaintiffs hereby remove this action from the Superior Court
2 of California, to the United States District Court for the Central District of
3 California, Southern Division.
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6 Date 08/28/12



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9 /s/ Dr. Orly Taitz ESQ
10 Counsel for the Plaintiffs
11 CA Bar 223433
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