

**IN THE COMMONWEALTH OF KENTUCKY**

**FRANKLIN CIRCUIT COURT**

**48TH JUDICIAL CIRCUIT**

CIVIL ACTION NO. \_\_\_\_\_

**L. Todd House**, Plaintiff;

vs.

**Barack Obama,**  
**Democratic National Committee,**  
**Secretary of State,** and  
**State Board of Elections,**  
Defendants.

**MOTION FOR TEMPORARY  
RESTRAINING ORDER**

Plaintiff requests that the court issue a temporary restraining order ("TRO")  
restraining the Secretary of State from printing ballots with the name of defendant  
Obama on them as a candidate for President of the United States until the final  
resolution of this case, based upon the following:

## **Necessity of TRO**

As shown below, the TRO is necessary because, without it, there is a high likelihood that defendants Obama and DNC will resist discovery and delay this case, perhaps beyond the November election. On the other hand, once the TRO in place, defendants Obama and DNC will be more likely to cooperate with the discovery needed to resolve the factual questions necessary to the proper resolution of this case.

## **Likelihood of Success on the Merits**

Defendants might claim that plaintiff's case is groundless and ask the court to dismiss this case, rather than rule on the merits. Nonetheless, substantial grounds exist to question the eligibility of defendant Obama, and, if the court permits plaintiff the discovery this case needs, there is a good likelihood that plaintiff will prevail on the merits. For example:

## **Evidence Suggesting That Defendant Obama Was Born in Kenya**

In 1991, defendant Obama's literary agents produced and distributed a promotional booklet<sup>1</sup> which stated that defendant Obama was "born in Kenya."

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<sup>1</sup> A grayscale copy of the relevant portion of that booklet, as retrieved from [breitbart.com](http://breitbart.com), is accompanying, labeled as "Exhibit 1."

Twelve years later, in promoting the publication of defendant Obama's best selling book, *Dreams from My Father: A Story of Race and Inheritance*, his agents were still stating<sup>2</sup> that defendant Obama was "born in Kenya."

Defendant Obama's agent's website,<sup>3</sup> [dystel.com](http://dystel.com), listed defendant Obama's birthplace as "Kenya" until as recently as 2007, the same year he launched his presidential campaign.

### **Evidence Suggesting That Defendant Obama's Birth Certificate Is a Forgery**

On March 1, 2012, the sheriff of Maricopa County, Arizona, released a report<sup>4</sup> of an official investigation into the PDF document purporting to be a genuine copy of defendant Obama's long-form birth certificate, stating, e.g.:

1. "The PDF birth certificate document released by the White House ... is a completely manufactured and fabricated computer generated image." Id at page 1.<sup>5</sup>

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<sup>2</sup> A grayscale screenshot of the relevant portion of an archived web page from 2003 is accompanying, labeled as "Exhibit 2."

<sup>3</sup> A grayscale screenshot of the relevant portion of an archived web page from 2007 is accompanying, labeled as "Exhibit 3."

<sup>4</sup> A true and correct copy of which is posted at: <http://personal.crocodoc.com/CSoMq3L>.

<sup>5</sup> Page 5 of the above cited investigation report PDF file.

2. “The White House wants us to believe the PDF document started out in printed form (on green basketweave safety paper) and [was] retrieved from Hawaii—but this is not possible.” Id.
3. “...this computer generated image never started out as a paper source document and was never scanned in as described by the White House—it was digitally created and manufactured [emphasis in original].” Id.
4. “Inconsistencies within text characters: ... which is impossible in a legitimate document.” Id.
5. “This is physics and occurs in all color scans but is absent in Obama's PDF document.” Id.
6. “... Indicate that components were pasted into the file, rotated, and resized.” Id.
7. “... another inconsistency that could NOT [emphasis in original] happen if the document was simply scanned with no further manipulation and released by the White House—but this inconsistency would only happen if the White House document is a manufactured file.” Id at page 4.<sup>6</sup>

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<sup>6</sup> Page 8 of the above cited investigation report PDF file.

8. “A key problem with the document, as presented, is that it is riddled with inconsistencies.” Id.
9. “... a strong indicator that the document was manipulated.” Id.
10. “The layers in Obama's PDF clearly display a decision-making process that would be present with image manipulation.” Id at page 5.<sup>7</sup>
11. “... clear indications of image manipulation. This cannot happen in a normal document.” Id at page 6.<sup>8</sup>
12. “This is simply not possible in a normal scan and can only happen in image manipulation.” Id.
13. “The layer results seen in the Obama PDF cannot be duplicated through optimization, but can be easily duplicated (and explained) with an understanding of image manipulation.” Id at page 7.<sup>9</sup>
14. “This is a clear and important indication of image manipulation ....“ Id.
15. “This clean separation can only be accomplished through image manipulation of document elements.” Id.

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<sup>7</sup> Page 9 of the above cited investigation report PDF file.

<sup>8</sup> Page 10 of the above cited investigation report PDF file.

<sup>9</sup> Page 11 of the above cited investigation report PDF file.

16. "... the safety paper background layer was added as the last step to create the illusion of an image in which text was imprinted on basketweave safety paper. However, the text had in fact been placed and arranged on a solid white background. This last application gives a created image the false appearance of being an official document." Id at page 9.<sup>10</sup>

17. "Any official document obtained by legitimate procedures and scanned would not have the white halo ." Id at page 10.<sup>11</sup>

18. "... every anomaly can be easily explained as a manufactured document."  
Id.

19. "... the AP [Associated Press] version of the long form certificate contains a different set of problems ...." Id.

20. "... all of these additional problems displayed in the AP version would not occur if the source document presented to the AP had been a legitimate scanned document without manipulation." Id.

21. "... there is probable cause to believe that President Barack Obama's long-form birth certificate released by the White House on April 27, 2011,

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<sup>10</sup> Page 13 of the above cited investigation report PDF file.

<sup>11</sup> Page 14 of the above cited investigation report PDF file.

is a computer generated forgery.” Sheriff’s press release accompanying the investigation report, at page 1.<sup>12</sup>

### **History of Public Disclosure on The Issue of Obama’s Birthplace**

22. On or about June 12, 2008, defendant Obama publicly released, via third parties, an alleged copy of his Hawaii “Certificate of Live Birth.”
23. Plaintiff is informed and believes that said Certificate of Live Birth is not genuine.
24. On or about April 27, 2011, defendant Obama had posted, on the Internet, an alleged copy of his Hawaii long form birth certificate.
25. Plaintiff is informed and believes that said long form birth certificate is not genuine.
26. No hospital records of defendant Obama’s birth, original or copies, have ever been released to the public.
27. Defendant Obama has repeatedly promised that he would have “the most transparent administration in U.S. history.”
28. However, defendant Obama, and his supporters and agents, have spent sums of money and made repeated efforts to keep the public from seeing the original governmental and hospital documentary and microfiche records of his alleged birth in Hawaii.
29. Plaintiff stipulates that the issue of defendant Obama's birth records has been brought before many courts.

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<sup>12</sup> Page 1 of the above cited investigation report PDF file.

30. Nonetheless, despite repeated attempts by other plaintiffs, no **original** governmental or hospital documentary or microfiche records of the alleged birth, in Hawaii, of defendant Obama, which would easily resolve the issue of defendant Obama's birthplace, have yet been made public.
31. On or about August 21, 2010, in his weekly address to the nation, defendant Obama stated: "The only people who don't want to disclose the truth are people with something to hide," or words to that effect. Plaintiff stipulates to the truth of said statement.

#### **Other Issues Related, to Obama's Citizenship**

Also related to the issue of defendant Obama's citizenship:

32. Plaintiff is informed and believes that a social security number that defendant Obama has regularly used since about 1980, 042-68-XXXX, was never lawfully issued to defendant Obama.
33. Plaintiff is informed and believes that said social security number, 042-68-XXXX, was issued in Connecticut, a state in which defendant Obama has never resided, to a person born in or about 1890.
34. Said social security number, 042-68-XXXX, does not pass E-Verify as a valid number for defendant Obama.
35. Plaintiff stipulates that the use of a valid social security number is not one of the Eligibility Requirements.



36. Nonetheless, the use of a false social security number is indicative of potential identity and/or immigration fraud.
37. Plaintiff is informed and believes that defendant Obama either did not properly register with the Selective Service System or registered with false information.
38. Plaintiff is informed and believes that, while various versions of documentation of an alleged Selective Service registration of defendant Obama have been and are currently posted on the Internet, none of them are genuine copies of valid original documents, and, any that are genuine copies are genuine copies of fraudulent and/or invalid original documents.
39. Plaintiff stipulates that the filing of of a valid Selective Service registration is not one of the Eligibility Requirements.
40. Nonetheless, not registering with the Selective Service System or filing a false Selective Service registration is indicative of potential identity and/or immigration fraud.
41. Plaintiff is informed and believes that defendant Obama filed applications for school admission and/or scholarships claiming a foreign birthplace and/or citizenship.
42. Plaintiff stipulates that, even if defendant Obama did claim such foreign birthplaces or citizenship, such claims would not, in and of themselves, make him fail to meet the Eligibility Requirements.
43. Nonetheless, a previous claim of a foreign birthplace and/or citizenship would be indicative of potential identity and/or immigration fraud.

Respectfully Submitted,

August 10, 2012

L.Todd House

Plaintiff Pro Se