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AT BALTIMORE  
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DISTRICT OF MARYLAND

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DEPUTY

**IN THE US DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

Dr. Orly Taitz, ESQ

) Civil Action 13-cv-1878

Plaintiff

) Hon. Ellen Lipton Hollander

v

) Presiding

Carolyn Colvin,

)

in her official capacity as Acting Director

)

of Social Security Administration

)

**SECOND AMENDED COMPLAINT**

**PARTIES**

Dr. Orly Taitz, ESQ- Plaintiff, resident of California, 29839 Santa Margarita Pkwy, ste 100, Rancho Santa Margarita, CA 92688

Carolyn Colvin, in her official capacity as an acting director of Social Security Administration, located at Baltimore MD.

**JURISDICTION AND VENUE**

Jurisdiction is proper due to the fact that the defendant is an Acting Director of a Federal Government Agency located in the District of Maryland, there is a diversity of citizenship and the Federal law question -Freedom of Information Act 5 US §552 is the basis of the complaint.

**ALLEGATIONS AND APPEAL OF REFUSAL BY THE DEFENDANT TO PROVIDE REQUESTED SS-5 FOR HARRY (HARRISON) BOUNEL**

1. On April 26 Plaintiff submitted Freedom of Information request to the Social Security Administration (Hereinafter SSA), seeking under 5 USC §552 (Hereinafter FOIA) a release of SS-5, Social Security Application for Harry (Harrison) Bounel and two other individuals.
2. Agency has an obligation to respond to FOIA request within 20 days business days.
3. Taitz did not receive any response of information for 60 days and brought forward a legal action at hand.
4. After the legal action was filed, defendant, Acting SSA Commissioner, filed an answer claiming not to have any records for Harry (Harrison) Bounel. Defendant submitted an affidavit by Senior FOIA officer, Dawn Wiggins, who claimed not to have records for Harry (Harrison) Bounel.

5. Taitz responded by filing a Motion for Summary Judgment (Hereinafter MSJ) in favor of the Plaintiff, asserting that Colvin and Wiggins are defrauding the court, as SSA indeed has requested SS-5. As proof Taitz provided the court with November 16, 2012 letter signed by the same senior FOIA officer Dawn Wiggins, which showed that SSA has records for Harry Bounel, but refused to release them due to alleged considerations of privacy. Exhibit 4 (November 16, 2012 letter from Wiggins included with an affidavit of Albert Hendersot, stating that disclosing this (Harry Bounel's) information would be a clearly unwarranted invasion of privacy, and the FOIA (5USC §552(b)(6) does not require disclosure.

Taitz responded that not only Dawn Wiggins, SSA and defendant Carolyn Colvin are defrauding this honorable court in claiming that they have no records for Harry Bounel, they are also violating their own rules and regulations and specifically 120 year rule, which states that the Social Security Administration has to release without a proof of death or a death certificate SS-5 applications for "Extremely aged individuals" who were born 120 years ago or earlier. "120 year rule" was adopted in 2010 and made public in 2011 in the Chief FOIA officer report. "120 year rule" was included as an exhibit with Complaint and first Amended Complaint and is part of the record of this case. Taitz provided the court with a true and correct copy of the 1940 Census from Bronx, New York, showing that in 1940 Bounel was 50 years old, therefore in 2013, when the request was made, he

was 122-123 years old, well over 120 year requirement to be considered an extremely aged individual and SSA violated its own FOIA and 120 year rule by refusing to release the information, which justifies an order from the court directing SSA to release the SS-5 for Bounel. (Exhibit 4 1940 Census information for Bounel included with affidavit of Albert Hendershot).

6. In a response from the defense, SSA claimed that when Taitz submitted her request, she provided additional information, such as date of birth of Harry Bounel, place of birth, year of immigration to the U.S., and that SSA could not find SS-5 with matching information, therefore SSA used minor discrepancies in secondary information as an excuse not to provide requested SS-5.

**7. On August 8, 2013 Taitz submitted to SSA a second FOIA request seeking SS-5 for Harrison (Harry) Bounel without any secondary information.** She sought SS-5 based only on first and last name, so that SSA would not claim plausible deniability and would not use minor discrepancies in secondary information as an excuse for denial of requested documents. According to 5USC § 552 an agency is obligated to respond within 20 days. SSA did not respond in over 130 days.

8. On December 13, 2013 this court issued an order and memorandum opinion, stating that since the defense filed a response and the First Amended complaint

was seeking a response, First Amended Complaint became moot, however information provided by the plaintiff in subsequent pleadings shows that she might be correct and SSA did not do a proper search of the records and therefore the court gave the plaintiff 21 days to file a Second Amended complaint and provide her allegations of failure to do a proper search in the Second Amended Complaint which is due on January, 3, 2014.

As such this Second Amended complaint at hand is being submitted on January 2, 2014 by Federal Express, with delivery on January 3, 2014, within allowed period, and Plaintiff alleges that:

a. Defense did not provide any evidence of adequate search for documents. Defense provided a response with an affidavit by FOIA officer Dawn Wiggins and was supposed to provide an affidavit that is "reasonably detailed, setting forth the search terms and the type of search performed and avering that all files likely to contain responsive materials (if such records exist) were searched so as to give the requesting party an opportunity to challenge the adequacy of the search." *Ethyl Corp v U.S. e.P.A.* 25 F. 3d 1241, 1246-47 (4th Cir. 1994) . Defendant has offered the declaration of Dawn S. Wiggins, who avers, ECF 12-2 ¶6; "SSA conducted a search f the Numident for a record that matched for a record provided by Plaintiff but could not provide a record for Mr. Bounel". Wiggins did not explain the manner in which the search was conducted, whether the multiple searches were conducted using different combinations of the information provided by plaintiff (to ensure that a minor discrepancy in the information submitted by plaintiff did not sabotage the search), or any other details related to the thoroughness of the search. Defense simply used secondary information provided by the plaintiff, such as date of birth of Bounel, place of birth, year of immigration to the United States, as plausible deniability, whereby minor discrepancy in secondary information was used an excuse for refusal to provide requested information.

Further, defendant and FOIA officer acted with malice, with a flagrant intent to defraud this court, as they intentionally replaced in their response a request for SS-5 with "numident request".

Taitz requested the SS-5, which is the original application for a Social Security number. SS-5 contains the name and the actual signature of the applicant. A forensic document expert can compare SS-5 for Bounel with SS-5s that were issued before and after for authenticity of paper, ink, sequence, stamp and so on.

Numident is a computer printout which can be easily changed at any time by anyone with access to the database.

So, instead of responding that SSA conducted a search for **SS-5** for Harry (Harrison) Bounel, Wiggins responded "SSA conducted a search for the **Numident** for a record that matched the information by Plaintiff but could not find a record for Mr. Bounel". ECF 12-2 ¶6.

In her prior reply to opposition for Motion for Summary Judgment in favor of the plaintiff, she provided an example of SS-5: ECF-13-3 09.25.13 Exhibit 3, pp2-3 shows a certified SS-5 for CT SSN 042-68-4424, one number before Bounel's, which belonged to deceased Thomas Louis Wood. (Social Security numbers of deceased individuals do not need to be redacted and full unredacted number is public knowledge). This document is handwritten, contains a signature of the mother of the applicant. On the other hand, ECF 13-3 p4 shows the numident for the same person, which is a short printout of the same information and can be easily changed.

Further, in the same document ECF 13 Plaintiff have provided sworn affidavits of licensed investigators Albert Hendershot, Neil Sankey and Susan Daniels (Exhibits 1 through 6 herein) and has shown that SSN assigned to Harry Bounel was later unlawfully used by Barack Obama, whose other IDs, such as alleged Selective Service Registration (Exhibit 7, 19 herein) and Birth certificate (Exhibits 8-16 herein) were found to be computer generated forgeries as well, which shows that Colvin and Wiggins had a motif to defraud this court in order to cover up fraud committed by Obama.

Moreover, even the numident for Harry Bounel existed as late as November 2012, based on the letter by Wiggins, which was submitted to this court by the plaintiff and acknowledged by Wiggins.

b. When Plaintiff subsequently submitted on August 8, 2013 yet another FOIA request seeking SS-5 for Harry (Harrison) Bounel, defendant flagrantly violated FOIA, 5USC 552 and did not provided any response for 141 days, even though according to 5USC 552 provisions, an answer is required within 20 days.

As such defendant flagrantly and repeatedly violated provisions of 5USC 552 and this court should rule in favor of the plaintiff and order the defendant to release SS-5 for Harry (Harrison) Bounel.

**PLAINTIFF SEEKS AN ORDER FROM THE COURT DIRECTING THE  
DEFENSE TO SERVE THE PLAINTIFF WITH A COPY OF THE  
RESPONSIVE PLEADINGS, WHICH IT SUBMITS TO THE COURT.**

Previously, when Defense filed an opposition to Vaughn index, it filed it with this court and did not serve the plaintiff. Defense knows that Plaintiff is not a member of Maryland bar and is not served with pleadings electronically via ECF. When defense does not serve the plaintiff by mail, she is not aware of the filings and cannot respond timely. Additionally, failure to serve the opposing party with pleadings is a violation of professional ethics by the attorney for the defense and is sanctionable.

**REQUEST UNDER 18 USC 3332 (A) FOR THIS HONORABLE COURT  
TO PRESENT EVIDENCE TO THE FEDERAL GRAND JURY OR GRANT**

**THE PLAINTIFF AN EX RELATOR STATUS TO STEP IN THE SHOES OF THE ASSISTANT U.S. ATTORNEY AND PRESENT EVIDENCE OF OFFENSES AGAINST THE CRIMINAL LAWS OF THE UNITED STATES ALLEGED TO HAVE BEEN COMMITTED WITHIN THE DISTRICT OF MARYLAND.**

**Plaintiff incorporates all prior paragraphs as if fully pled herein.**

**18 USC 3332 (a) states**

It shall be the duty of each such grand jury impaneled within any judicial district to inquire into **offenses against the criminal laws of the United States alleged to have been committed within that district. Such alleged offenses may be brought to the attention of the grand jury by the COURT or by any attorney appearing on behalf of the United States for the presentation of evidence. Any such attorney receiving information concerning such an alleged offense from any other person shall, if requested by such other person, inform the grand jury of such alleged offense, the identity of such other person, and such attorney's action or recommendation.**" 18 USC 3332(a).

1. Plaintiff provided this court with the sworn affidavit of investigator and debt collector Albert Hendershot ECF 13-2 pp1-10 that according to Merlins

Information Systems two individuals used Social Security number xxx-xx-4425: Harrison(Harry) J. Bounel and Barack Obama. (Exhibit 4)

2. On April 15, 2010, at 11:15:29 am Barack Obama posted his 2009 tax returns on line, on official White House website, whitehouse.gov. He did not flatten the PDF file and the full unredacted Social Security number, which he used in this tax return, became available to the public. About three hours later Mr. Obama removed the file, redacted and flattened it, however by that time it was too late and thousands of individuals got the full unredacted Social Security number used by Obama. (Exhibit 1)

3. Subsequent checks through E-verify and SSNVS, two agencies set by the U.S. government to check for unlawful use of Social Security numbers, which are stolen or otherwise unlawfully used by illegal aliens and others, showed that Obama failed both E-verify and SSNVS, that he is using a Social Security number, which was never assigned to Barack Obama. (Exhibits 1-6)

4. On December 23, 2013 it was announced by Barack Obama that he signed up for Affordable Care act (ACA) (Obamacare).

5. Plaintiff Taitz immediately published an open criminal complaint and demand for information sent to HHS, demanding an explanation, how could Obama sign up for ACA with a Social Security number, which failed E-verify and what safeguards

are there in place to make sure illegal aliens and other individuals with stolen SSNs do not sign up for ACA.

6. Within hours White House announced that Barack Obama was not able to sign up for ACA (Obamacare) using an online web site, because the system could not verify his identity and his aide had to submit Obama's application in person. (12.23.2013 report by FOX news network White House correspondent Ed Henry "we learned today from the White House. Initially, they said he signed up for what they called a bronze plan, paying about four hundred dollars a month in premiums. But, then they came back to us and said – wait, he didn't actually enroll.... Healthcare.gov could not actually verify his identity, oddly enough...").

7. Plaintiff Taitz sought from SSA SS-5 of Harrison Bounel, however SSA by and through its employees, FOIA officer Dawn Wiggins, engaged in obfuscation of records and obstruction of justice. As shown in this complaint Wiggins repeatedly wrongfully withheld aforementioned application in order to cover up the fact that Barack Obama has committed massive fraud and has stolen the franchise of the U.S. President using a stolen Social Security number and fabricated IDs.

8. Wiggins and possibly defendant, Acting Commissioner of Social Security Administration Carolyn Colvin acted in concert with a number of other individuals in a RICO conspiracy (Racketeering Influenced Corrupt Organization) to defraud

the United States of America and aid and abet Barry (Barack) Soebarkah, aka Barry (Barack Soetoro) aka Barry (Barack) Obama in stealing 2008 and 2012 Presidential election, stealing the franchise of the U.S. Presidency, cover up and Obstruction of Justice in cover up of stolen and fabricated IDs used by Obama.

9. Loretta Fuddy, director of Health Department of the State of Hawaii was complicit with Barack Obama, Dawn Wiggins and others by writing a letter to the White House on April 25, 2011 and citifying a flagrant forgery as a true and correct birth certificate for Barack Obama. On April 8, 2011 Taitz appeared at the Health Department of Hawaii with two experts and a subpoena from the U.S. District Court for the District of Hawaii ordering Fuddy to provide for examination the original 1961 birth certificate for Barack Obama allegedly on file in the Health Department for the state of Hawaii. Taitz was greeted by the deputy Director Keith Yamamoto, who advised Taitz that Fuddy will not comply with the subpoena and will not produce the original (wet ink) birth certificate for Barack Obama.

10. On December 11 at 5 am PST/ 3am Hawaiian time Taitz posted a press release advising the public that there is evidence of forgery in the "control" Hawaiian birth certificate of Johanna Ah'Nee Randolph and that it was found that Fuddy was defrauding the public claiming that Obama's alleged copy of the Alleged long form birth certificate was released as a special exception for Obama, as a president, as

Taitz found other long form birth certificates released by Fuddy at the same time as she released Obama's long form birth certificate. Fifteen hours later, around 6pm Hawaiian time, it was announced that Director of Health Fuddy died, being the only victim of an emergency water landing of Cessna Caravan plane of Makani Kai air. Fuddy died under suspicious circumstances amidst conflicting reports. Airplane crash and death of Fuddy are still being investigated by the Maui county, HI, Police Department and NTSB. According to the Fire Department Fuddy's body was found in the fuselage of the plane (Exhibit 24). This report was made a full week before the plane was recovered and anyone knew what was in the fuselage of the plane. According to reports of other passengers, such as C. Philip Hollstein and captain Clyde Kawasaki, Fuddy did not remain in the fuselage of the plane, but got out, was wearing her life vest and together with other passenger was waiting to be lifted by the helicopter. (Exhibit 25). Both Hollstein and Kawasaki stated that they were "shocked" by an announcement of her death. All other passengers and pilot got out of the plane alive, had life vests on and were awaiting to be lifted by a helicopter.

Similarly, in 2008 it was reported that Lieutenant (sic. not a title but an unusual first name) Quarles Harris, who according to Washington Times was cooperating with the FBI in relation to the reported breach of Obama's passport records, was found assassinated in his car. No arrests were made in this case since 2008.

Saliah Sobah, who resided with Obama's mother and step father in Indonesia and whose story was different from Obama's official life story, as according to her Obama did not come to Indonesia together with his mother, but rather came sometime later. Saliah Sobah was found dead shortly before scheduled trip of Obama to Indonesia. She was healthy until her untimely death at the age of 52.

Sobah's story is supported by Scott Inoue, former Obama's classmate in elementary school in Hawaii. According to Inoue Obama did not go to Indonesia in 1967, but rather lived in Hawaii until 1969. Inoue provided a picture of himself and Obama together in 1969. (Exhibit 23). This shows a discrepancy with Obama's school records from Assisi elementary school in Indonesia, where Obama was a student from 1967-1969 and went by last name Soetoro (his step father's last name), citizenship Indonesian, religion Islam.(Exhibit 17). This discrepancy shows that for a period of two years there were two separate individuals: Barry Obama, who lived in Hawaii 1967-1969 and went to Noelani school in Honolulu, Hawaii together with Scott Inoue and a completely different person, Barry Soetoro, who lived in Indonesia 1967-1969 and was a student at Assisi school in Jakarta, Indonesia. In 1969 Barry Obama went to Indonesia and one of these two young men came back to the United States in 1971. Taitz believes that the person who came back is Barry Soetoro, not Barry Obama. All individuals who knew circumstances of Obama's trip to Indonesia died untimely death: his mother, father,

step father, grandmother (two days before the election), grandfather, step brother and former foster child of Ann Dunham and Lolo Soetoro, Saliah Soetoro-Sobah.

Obama continued with egregious identity theft upon his application as an attorney to Illinois state bar. Attached Exhibit 21, Obama's application shows further fraud. On application he is asked whether he used other names and he put down "None", even though his official school records from Indonesia show him using last name Soetoro (Exhibit 17) and his mother's passport records show him using last name Soebarkah. (Exhibit 8), When Taitz contacted IL bar and complained that Obama is hiding his identity under different last names, Obama withdrew from the bar and the bar responded that they no longer have jurisdiction. Bar applications are done under oath. Hiding ones identity under two different last names represents two felony counts of perjury and fraud and applying to become an officer of the court while hiding two identities. This fact alone justifies referral of this case by this court to the Federal grand jury for criminal investigation and prosecution, as we have an individual holding a position of the U.S. President while hiding prior identities.

Further, Exhibit 22, Barack Obama's student record from National Student Clearing house shows further eviedence of fraud. According to Obama's official biography he was a student at Columbia university for two years, however his

official record shows him attending Columbia for nine months only, from September 1, 1982 to May31, 1983.

Exhibit 20 shows that OCON, official certificate of a candidate for President sent to the State of Hawaii commissioner for elections shows that OCON for his predecessors John Kerry and Al Gore contain wording "legally qualified to serve under the provisions of the U.S. Constitution". This wording was removed from official certification of Barack Obama.

Lastly Exhibit 18 shows destruction and falsification of NARA immigration records for August 1-7 1961, time when Barack Obama and his mother Stanley Ann Dunham believed to have arrived in the United States.

Taitz sought quo warranto with Attorney General Holder and provided this information to Holder repeatedly both directly and through the U.S. Attorneys. Due to the fact that AG Holder and U.S. Attorneys are employees of the executive branch, Obama is their ultimate superior and CEO of the executive branch and due to Eric Holder's close personal relations and friendship with Obama, all of the evidence of identity theft, identity fraud, elections fraud, theft of the franchise of the U.S. Presidency by using stolen and fabricated IDs by Obama, have not been investigated by the U.S. Attorney's office and Attorney General and will not be investigated and prosecuted unless a judge submits this evidence to the Federal

grand Jury as the judge is entitled to do under 18 USC 3332(a) or the court ordering the U.S. Attorney for the District of Maryland to present this evidence of offenses against the criminal laws of the United States or grant plaintiff an ex-relator status to present to the Federal Grand jury all the evidence of offenses committed by Barry Soetoro, aka Barry Soebarkah, aka Barry Obama, aka using identity of Harry Bounel and his accomplices **against the criminal laws of the United States.**

**List of US criminal laws that were violated to be forwarded to the Federal Grand Jury:**

- 1. 18 US §1031 Major Fraud against the US**
- 2. 18 USC Chapter 47 Fraud and False statements**  
**§1001 Statements generally**
- 3. 18 USC §1002 possession of false papers to defraud United States**
- 4. 18 USC §4 Misprision of Felony –Misprision of Fraud**
- 5. 18 USC §4 Misprision of Felony– misprision of forgery**
- 6. 18 USC §2382 Misprision of Treason**
- 7 18 USC §2381 Treason**

8. 18 USC §2391 Treason

9. 18 USC §1341 Fraud

10. 18 USC §1028 Fraud and related activity in connection with identification

11. 42 USC 1983 Violation of Civil rights under the color of authority

12. 18 USC 1962 RICO (Racketeering influenced corrupt organization) with predicate acts

a. fraud

b mail and wire fraud

c. social Security fraud

d elections fraud

e. IRS fraud

f. conspiracy to commit fraud

g conspiracy to commit identity fraud

**Obama, Colvin, Wiggins and others defrauded the United States in covering Obama's use of a stolen Social Security number and stealing the franchise of the US Presidency and Commander in Chief with the aid of fraudulently obtained, fabricated IDs.**

**Further, recent suspicious death of Loretta Fuddy, prior murder of Lieutenant Quarles Harris, suspicious death of healthy 52 year old Saliah (Lia) Soetoro-Sobah and a number of others, show that there is a pattern of murders and suspicious deaths of individuals who are key witnesses to fraud committed by Obama or accomplices to this fraud.**

**SSA FOIA officer Dawn Wiggins and possibly the defendant, acting SSA commissioner Carolyn Colver, as well as former commissioner Michael Astrue are witnesses and accomplices. Their lives are in danger. There is a high likelihood for disappearance of witnesses, accomplices and original records. This justifies forwarding this evidence of offenses against the U.S. criminal laws to the Federal Grand Jury under 18US 3332 (a) by Honorable Judge Hollander or by the plaintiff, if Judge Hollander grants her Ex Relator status.**

**Such submittal of evidence is justified as it is in the best interest of the public and is essential for the U.S. National security.**

**Ex Relator status for plaintiff is justified and essential, as US Attorney and Attorney General did not take any action in relation to aforementioned actions against the criminal laws of the U.S. and they are not likely to take any action in the future, which represents the most serious threat to the U.S. National Security.**

**REQUEST UNDER 28 USC 1002 FOR EXAMINATION OF THE  
ORIGINAL (WET INK) SS-5 OF HARRY BOUNEL IN LIGHT OF  
EVIDENCE OF FORGERY AND FRAUD IN OTHER IDS.**

**Rule 1002. Requirement of the Original**

An original writing, recording, or photograph is required in order to prove its content unless these rules or a federal statute provides otherwise.

As described above Social Security number of Harry Bounel was stolen and is being fraudulently used by Barack Obama. Aside from the stolen Social Security number Obama is using other fraudulently created and fabricated IDs. As such Plaintiff is seeking an order from this court allowing her not only to receive a certified copy of the SS-5 for Harrison (Harry) Bounel, but also to allow her and

two experts to examine the original (wet ink) SS-5 for authenticity and compare with other original SS-5s issued.

### **REQUEST FOR PREPARATION OF VAUGHN INDEX**

"Vaughn Index" originated from *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974), wherein the court rejected an agency's conclusory affidavit stating that requested FOIA documents were subject to exemption. *Id.* at 828. "A Vaughn Index must: (1) identify each document withheld; (2) state the statutory exemption claimed; and (3) explain how disclosure would damage the interests protected by the claimed exemption." *Citizens Comm'n on Human Rights v. FDA*, 45 F.3d 1325, 1326 n.1 (9th Cir. 1995). This detailed affidavit " 'permit[s] the court system effectively and efficiently to evaluate the factual nature of disputed information.' " *John Doe Agency v. John Doe Corp.*, 493 U.S. 146, 149 n.2 (1989) (quoting *Vaughn*, 484 F.2d at 826).

#### **Taitz requests :**

**1. SS-5 for Harrison Bounel**

**2. SS-5 For Harry Bounel**

**3. SS-5 Harrson J. Bounel**

**4. SS-5 for Harry J. Bounel**

**5. any and all records on file with SSA under the last name Bounel**

**6. Any and all records on file with the SSA used by the SSA in preparation of November 16, 2012 letter by FOA officer Dawn Wiggins Reference number S9H A17967 response for request of Numident for Mr. Harry Bounel, where Dawn Wiggins claimed that she cannot release the numident for Harry Bounel due to consideration of privacy**

**7. SS-5 for Social Security number 042-68-4425**

Prayer for Relief:

Plaintiff is respectfully requesting this court to order the following:

1. This court should release under Freedom of Information Act 5 USC §552 SS-5 Social Security application for Harry (Harrison) Bounel.
2. Due to a pattern of five years of release of forged IDs, Plaintiff is seeking an order from this court allowing the Plaintiff and Forensic Document experts examination of the original (wet ink) SS-5 for Harry Bounel and ability to compare it to other SS-5s created around the same time.

3. The court should forward to the Federal Grand Grand Jury evidence of offenses against the Criminal Laws of the United States, which are provided herein and which include fraud, forgery, conspiracy to obstruct justice, Social Security fraud, identity theft and treason in conspiring with a foreign national, citizen of Indonesia to steal and usurp the US Presidency while using a stolen Social Security number and fabricated IDs.

4. The court should forward to the Attorney General of the US and US attorney General of Maryland evidence of fraud, Social Security fraud, Identity theft, obstruction of Justice and conspiracy to obstruct Justice which were presented to this court in the case at hand.

5. The case should be expedited in the interest of National security.

6. Defendant should prepare Vaughn index as evidence tends to disappear and key witnesses tend to die under suspicious circumstances.

7. Defends should be ordered to serve the plaintiff with pleadings as they did not serve her with the opposition for Vaughn index.

Respectfully submitted,



Dr. Orly Taitz, ESQ

01.02.2014

List of exhibits

1. Barack Obama's tax return for 2009 posted on April 15 2010, showing him using CT SSN 042-6-4425 of Harry Bounel
2. Authentication affidavit of Linda Jordan and E-Verify report showing that 042-68-4425 was not assigned to Obama, "Record does not verify"
3. SSNVS report showing that Barack Obama failed SSNVS check and authentication by Colonel Greg Hollister
4. Affidavit of Albert Hendershot and Merlins information systems report showing Obama using a Social Security number of Harry Bounel
5. Affidavit by Licensed Investigator Susan Daniels showing Obama using invalid Social Security numbers
6. Affidavit by a senior Deportation officer John Sampson attesting that there is no legal basis for Obama to use a Connecticut Social Security number.
7. Affidavit by Chief Investigator of special Investigations unit of the US coast Guard stating that Obama's alleged Selective Service Registration is a forgery with a fabricated postal stamp attached to it.
8. Stanley Ann Dunham's (Obama's mother's) passport records showing Obama listed under the last name Soebarkah in his mother's passport.
9. Affidavit of Honolulu county Senior elections clerk that no birth certificate for Barack Obama was found in any hospital in Hawaii
10. Statement by the James Orenge, minister of Lands of Kenya relating to Obama's birth in Kenya.
11. Obama's biography submitted by Obama to his literary agent in 1991, stating that he was born in Kenya.
12. Affidavit of IT expert Felicito Papa attesting to the fact that Obama's alleged birth certificate is a forgery.
13. Affidavit of Scanning and copying machine expert Douglas Vogt attesting to forgery in Obama's birth certificate.
14. An article typesetting and printing expert Paul Irely attesting to forgery in Obama's birth certificate.
15. Affidavit of typesetting and typing machines expert Charles Coombs attesting to forgery in Obama's alleged birth certificate.
16. Affidavit by Sheriff Arpaio regarding forgery in Obama's IDs.

17. Barack Obama's school registration #203 from Assisi school in Jakarta, Indonesia showing him to be Indonesian citizen and his legal last name to be Soetoro, the last name of his step father
18. Evidence of destruction and forgery of immigration/ arrival NARA records for August 1-7 1961
19. Selective Service record showing Obama committing Selective Service fraud and using a Social security number 042-68-4425, which was not assigned to him
20. OCON, Official certificate of Nomination for candidate for President of Al Gore, John Kerry and Barack Obama, whereby words "legally qualified to serve under the provisions of the United States Constitution" removed from Obama's certification
- 21 Obama's registration as an attorney in Illinois with Obama hiding his identity under prior names and defrauding the bar, claiming not to use in the past any other names, even though he used last names Soetoro and Soebarkah
22. Barack Obama's School record from National Student clearing house, showing Obama making fraudulent statements regarding his education, as records show him attending Columbia for 9 months only, from 09.01.1982-05.31.1983, not two years as Obama claims.
23. Picture of Obama's elementary school friend Scott Inoue, showing him and Obama together at Noelani elementary school in 1963, with notation "1963, 3rd grade". According to Obama's official biography he was in Indonesia from 1967-1971 and did 1-4th grade there.
24. December 12, 2013 Los Angeles Times article by Soumya Karlamanga quoting an interview to KHON given by Honolulu Fire Captain Terry Seelig stating that the body of Director of Health Loretta remained in the fuselage of the submerged plane.
25. December 20, 2013 Associated Press article by Jennifer Sinco Kelleher quoting Hawaii-based National Transportation Safety Board investigator Jim Struhsaker, who stated that the captain and the passenger attested that Director of Health Fuddy got out of the plane alive and they were shocked that she was pronounced dead