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**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF COLUMBIA**

| | |
|---|---|
| **Dr. ORLY TAITZ, ESQ, PRO SE** | § |
| **Plaintiff,** | § **Freedom of information violation** |
| | § **5USC §552** |
| **v.** | § **OPPOSITION TO** |
| | § **MOTION FOR SUMMARY** |
| **Michael Astrue, Commissioner of the** | § **JUDGMENT** |
| **Social Security Administration,** | § **11-cv-00402** |
| | § |
| | § **Honorable Royce Lamberth** |
| **Respondent** | § **Chief Justice presiding** |

**OPPOSITION TO MOTION FOR SUMMARY JUDGMENT**

Defendants motion for summary judgment needs to be denied based on the genuine issue of material fact. Opposition will be based on the memorandum of points and authorities attached herein and oral argument, if the court deems oral argument necessary.

## MEMORANDUM OF POINTS AND AUTHORITIES

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The crux of the complaint is in FOIA request made by the Plaintiff herein, Dr. Orly Taitz ESQ for the SS-5 (original application for the social security number)_ 042-68-[redacted], which is being used by President, Barack Obama, according to his Selective Service Certificate (Exhibit 1, 10), but which was never assigned by the Social Security Administration (SSA) according to the SSA verification letter, which is a clear evidence of fraud. (Exhibit 2). A court reviews an agency response to FOIA request de novo. See 5 USC 552(a)(4). Defendant, Commissioner of the Social Security administration filed a motion for summary judgment, seeking denial of the FOIA request. Summary judgment is appropriate when there is no genuine issue as to any material fact and the moving party is entitled to judgment as a matter of law. See Fed. R. Civ Pro 56(a); Diamond v

Atwood, 43 F 3d 1538, 1540 (DC Cir 1995). There is a genuine dispute in regards to material facts. The dispute is as follows:

1. **AGENCY PROFFERED A FRAUDULENT STATEMENT, CLAIMING THAT SOCIAL SECURITY NUMBER 042-68-[redacted] BELONGS TO A LIVE PERSON, WHILE IT'S OWN RECORDS SHOW, THAT THIS NUMBER WAS NEVER ASSIGNED.**

The main point of dispute between the Plaintiff, Dr. Orly Taitz, ESQ and the defendant commissioner of the Social Security administration, Michael Astrue, and the Department of Justice, representing him , is refusal by the defendant to release a redacted application for the above social security number, claiming, that it is used by a live person. In the motion for summary judgment Defendant is claiming that the social security number in question belongs to a live person and the interest of privacy of this person supersedes the right of the public to know.

In her complaint and multiple subsequent motions Plaintiff provided Exhibit #2, a letter from the Social Security Verifications systems**, stating that this number was never assigned**. So, how can it belong to a live person, if it was never assigned? This is clearly a fraudulent statement. Not only the application needs to be released, but this court needs to start a formal investigation of the criminal cover up, whereby it appears, that the Social Security Administration and

the Department of Justice are complicit in covering up Social security fraud, IRS fraud, elections fraud and possibly treason committed by Barack Obama.

**2. DEFENDANT PROVIDED THE PLAINTIFF A FORGED SS-5 FOR ANN DUNHAM, OBAMA'S MOTHER, WHICH SHOWS A PATTERN OF EITHER COVER UP OF FORGERY OR EXTREME RECKLESSNESS IN ALLOWING FORGED OR FRAUDULENT RECORDS TO BE FILED AS GENUINE RECORDS.**

When on July 2, 2011 the US attorneys' office filed a motion for summary judgment, in his memorandum he referred to an additional document, a list of dates for SS-5 revisions, which Plaintiff did not have. On July 5th Plaintiff got in her office a document in question Exhibit 3. It included a letter from the Social Security Administration and a copy of the SS-5 for Ann Dunham, mother of Barack Obama, where the date of revision of the form is stated as 1955. Another attachment to the same response shows compilation of dates of SS-5 revisions, which shows, that there was never a revision of this form in 1955, which in itself, shows, that the form is not valid.

Additionally, Plaintiff enlarged the form in question as a courtesy to the court. 200x and 300x enlargement not only shows, that the revision date is 1955, it also shows that the typesetting of two #5s in 1955 is different. One does not need to be an expert, to plainly see that two digits come from different type settings, which is

another sign of forgery. Additionally, Exhibit 4, an affidavit by Paul Irey, shows that the long form birth certificate provided by Barack Obama to the public on April 27, 2011, shows the same evidence of forgery, multiple type settings of the same letters and digits in the alleged copy of the long form birth certificate of Barack Obama, which makes it more likely than not and very plausible, that Obama's application to SS-5, if it even exists, is also forged, in the same manner, as his mother's application and his long form birth certificate.

Moreover, Plaintiff provided previously examples of 1959 SS-5 applications, which show different wording. Exhibit 5 shows that other applications in 1959 had in the upper left corner wording:

"Form SS-5

Department of Treasury

Internal Revenue Service"

Dunham's application does not contain such wording, which is another indication, that the form used is not genuine.

Additionally, Obama and his family are long time friends of known domestic terrorists Bill Ayers and Bernadine Dohrn. In her motion for clarification Taitz cited an excerpt from Fugitive Days, a novel by Ayers, where he admits to creating hundreds of forged Social Security numbers using the birth certificates of deceased children, as in those years, the Social Security applications were filled out later in

life, not at birth. Ayers described, how he searched through the cemeteries for graves of children, got their birth certificates and applied for the Social Security numbers under the names of the deceased. "After the Baltimore fiasco, stealing ID was forbidden. Instead we began to build ID sets around documents as flimsy as a fishing license or a laminated card available in a Times Square novelty shop called "Official ID." We soon figured out that the deepest and most foolproof ID had a government-issued Social Security card at its heart, and the best source of those were dead-baby birth certificates. I spent impious days over the next several months tramping through rural cemeteries in Iowa and Wisconsin, Illinois and North Dakota, searching for those sad little markers of people born between 1940 and 1950 who had died between 1945 and 1955. The numbers were surprising: two in one graveyard, a cluster of fourteen in another. Those poor souls had typically been issued birth certificates—available to us at any county courthouse for a couple of bucks and a simple form with information I could copy from the death announcement at the archive of the local paper—but they had never applied for a Social Security card.

Collecting those birth certificates became a small industry, and within a year we had over a hundred. For years I was a paper-made Joseph Brown, and then an Anthony Lee, remarkably durable identities. My on-paper official residences: a

transient hotel in San Francisco and a warehouse in New York." Bill Ayers, Fugitive Days.

Taitz provided affidavits of three experts showing that Obama's long form birth certificate is forged. Exhibit 4, 7, 8. That makes it more plausible, that Obama's Social Security number was obtained based on a forged and/or fraudulently obtained SS-5. It is yet another piece of evidence pointing to genuine dispute between the parties as to the material fact: Defendant claims, that the SS-5 for 042-68-[redacted] is an application of a live person, Plaintiff asserts, that based on all the evidence, there is no valid SS-5: either it does not exist at all, as according to SSA verification systems this number was never issued, or it is a SS-5 that was fraudulently obtained. As such, there is no justification for refusal to release the SS-5 pursuant to FOIA 5U.S.§552.

**3. DEFENDANT DOES NOT SPECIFY THAT THE SS-5 FOR 042-68-4425 IS A VALID DOCUMENT, THAT IT IS NOT A FRAUDULENTLY OBTAINED OR FORGED DOCUMENT.**

What is interesting, is that the defendant does not claim, that the SS-5 is not a forged or fraudulently obtained document. It only states, that it belongs to a live person. Based on the SS-5 for Ann Dunham, Obama's mother, we can see that SSA presents to the public SS-5s, implying, that those are genuine and valid, even though all the evidence points to fraud and forgery. It is reasonable to believe, that

they are utilizing the same modus operandi in relation to Obama's SS-5. One of the valid reasons to obtain FOIA, is to reveal the conduct of the agency, that affects the public and possible fraud or negligence or incompetence in actions by the agency. "the public interest to be weighed against the privacy interest in this balancing test is "the extent to which disclosure would serve the core purposes of the FOIA by contributing significantly to public understanding of operations or activities of the government". SSA providing Social Security numbers based on bogus, fraudulently obtained or forged applications, is an operation of the government, that the public definitely would like to know more about and would like to see people culpable for such conduct, prosecuted. A pattern of either negligence or cover up of fraud by the agency has tremendous applications on the nation as a whole and on the national security.

**4. SSA DID NOT PROVIDE ANY ADMISSIBLE EVIDENCE, PROVING THAT THE SS-5 IN QUESTION EVEN EXISTS AND THAT IT WAS LEGALLY ASSIGNED TO A CURRENT "HOLDER" OF THE NUMBER.**

Defendant, commissioner of SSA, simply provided a lot of smoke and mirrors, however he did not provide any admissible evidence to show that the SS-5 for 042-68-[redacted] even exists on file. The only evidence provided, is the affidavit of Dawn Wiggins, FOIA officer, who spoke in generalities, but said nothing of substance

and provided no admissible evidence to show, that the SS-5 in question exists, that it was assigned to a person, who is alive today and that the holder of the number, who might be using it today, is doing so legally. ¶6 of the Affidavit of Dawn Wiggins states: "In response to Ms. Taitz request for information that related to SSNxxx-xx-4425, SSA responded that it could not release this information, because the Privacy Act protects personally identifiable information in a system of records. See 5 USC § 552a. Therefore, an agency may not disclose an individual's records without the written consent of the individual. See 5 U.S.C.a(b)". So, what Defendant did here, in this affidavit by Dawn Wiggins, is an illusion for the court to fill in the information and connect the dots, imagining, that the SS-5 application exists and that the person who originally got this number is alive, however they never said it outright. Affidavits of licensed investigators Susan Daniels and Neil Sankey show that in national databases this number is connected to an individual born in 1890. So if Obama is illegally using this number, even though it was never legally assigned to anyone or was originally assigned or held by someone born in 1890, than the fact that Obama is simply a holder of the number (legal or illegal) will necessitate his signature according to the affidavit of Dawn Wiggins, but it does not mean that this number was legally assigned to anyone or that the person currently holding it, is doing that legally.

¶ 7 of the affidavit of Dawn Wiggins states:" In this case, the agency asserted Exemption 6 of the FOIA to withhold this information "…"the agency concluded that the personal information of the individual who holds a particular SSN falls within the category of files contemplated by exemption 6." Based on what? What is the basis for such assertion? The only basis provided, is the fact, that someone is "holding" this number today: legally or illegally. According to memoirs of Obama's friend, domestic terrorist Bill Ayers, he created hundreds of bogus SSNs for himself, his wife, domestic terrorist Bernadine Dohrn and other "outstanding citizens", he associated with, while on the run. Based on the affidavit by Wiggins and logic of the defendant, just because the "holders" of such SSNs are alive, regardless of whether the holders are legal or illegal, the public will have no access to even redacted SS-5 of hundreds of such bogus numbers. Such individuals are able to vote and negate votes of hundreds of law abiding citizens, they are able to engage in multimillion dollar illegal transactions and go under the radar of IRS and SSA, they can give or receive large campaign contributions or tax exempt non-profit donations, they can occupy the highest positions in the Federal and State governments, FBI, CIA, military, all of it can be done on an enormous scale simply because of the policies of SSA, which represent an absolute pinnacle of either complete idiocy or complete corruption. This might be the reason, why this coup d'état could go on for over two years now without anyone sounding an alarm.

## 5. COVER UP BY THE SSA AND SELECTIVE SERVICE IS AN INDICATION OF FRAUD

After Obama's fraudulent use of the SSN 042-68-[redacted] was established through the Selective Service and Social Security verification systems (Exhibits 1, 2 and 10), both agencies engaged in a cover up by denying citizens access to Obama's records. Exhibit 11 shows that the Selective Service blocked inquiry by posting a message "Sorry, your request cannot be processed at this time because you have exceeded the daily limit for the verifications of these credentials", even though the citizens did not check any other credentials. US department of Health and Human Services, Social Security Administration posted a message on their official web site: "This page has been blocked due to a positive security threat". This sudden refusal to provide information, which was readily available before, is not only an indication, that there is a genuine dispute as to the material fact, which would necessitate denial of the motion for summary judgment, but that the SSA and Selective Service are actively engaged in cover up of fraud committed. Not only they know, that the SSN in question was not assigned to a live person and that their claims, that it cannot be provided due to exception 6 of the 5USA§552 are bogus, but they know, that this number was not assigned to the person, who is using it, and they are now actively engaged in the cover up.

## 6. 5USC§552(B)(6) RELATES TO FULL SOCIAL SECURITY NUMBERS, IT DOES NOT RELATE TO THE REDACTED NUMBERS AND REDACTED APPLICATIONS.

SSA is basing its Motion for summary judgment on the fact, that courts have generally recognized that social security numbers fall within exemption 6 to FOIA, Sherman v Dep't of the Army 244 F3d 357, 364-65 (5th circuit), however, such exemption does not list redacted SS-5, and that is the record Taitz is seeking.

## 7. REDACTED SS-5 DOES NOT INVADE PRIVACY

Affidavit from recently retired deportation officer of the Department of Homeland Security, John Sampson, states, that release of redacted SS-5 is done routinely in order to ascertain SSA fraud. Exhibit 6.

"FOIA represents a balance struck by Congress between the public's right to know and the government's legitimate interest in keeping certain information confidential" Ctr. For Nat'l Sec. Studies v DOJ, 331 F3d 918,925 (D.C Cir, 2003). Redacted SS-5 represents such balance. First of all, the SSA verification form states that the number in question was never assigned. If arguendo, the number would have been assigned, viewing the SS-5 in camera and/or releasing the redacted SS-5 would be within such viable compromise. If the name of the holder

is redacted, other information, such as gender, race, zip code can assist in identifying SSA fraud and would not violate one's privacy. This is the reason, why according to officer Sampson, such redacted SS-5s are routinely provided to law enforcement. Undoubtly, Mr. Astrue, Commissioner of the Social Security administration, is aware of the fact, that redacted SS-5s are routinely provided to the law enforcement. The only reason for his refusal to provide this SS-5, is his knowledge or suspicion, that this SS-5 does not exist or was fraudulently filed.

**8. THE RIGHT OF 311 MILLION AMERICAN CITIZENS TO HAVE A PRESIDENT, WHO IS NOT A FRAUD AND WHO IS NOT USURPING THE US PRESIDENCY BY VIRTUE OF FRAUD SUPERCEDES THE RIGHT OF BARACK OBAMA TO FRAUDULENTLY USE THE SOCIAL SECURITY NUMBER, WHICH WAS NEVER ASSIGNED TO HIM.**

As stated above, according to SSA, itself, the number in question was never issued. If arguendo, it was issued, the right of public to know supersedes the right of the holder of the number to privacy.

Taitz provided this court and law enforcement affidavits from Investigators Neil Sankey, Susan Daniels (Exhibit 9) and John Sampson (Exhibit 6) , stating, that for most of his life Obama is using the SSN 042-68-4[redacted], issued in the state of CT, even though Obama never lived in CT and there is no legitimate reason or reasonable explanation for him to have such a number. The only explanation to

this fact was fraud. As this information became public and appeared in the media, millions of U.S. citizens went to the web site for the selective service www.sss.gov they entered the number in question , name Obama and his birthdate 08.04.1961 and got a response of a match. (Exhibit 10) So, the public at large already verified, that indeed Obama used this number, it became public knowledge. At issue is the cover up. Currently, as the members of the public are trying to do similar verification, they are getting a response "you exceeded your daily allowance of searches", even if they did not do any searches before. The public needs to know the reason for cover up. The public needs to know if there was a breach of the national security.

Even, as the last four digits of the SSN 042-68-4[redacted] are redacted, the public knows, that the first three digits, 042, signify the state of Connecticut-this is public knowledge. Obama's own memoirs Dreams from my father and Audacity of Hope show, that Obama was never a resident of Ct. As such, the controversy is already in public domain. The public wants to know, how the US president got a social security number from the state of Connecticut, even though he never resided there. Privacy is no longer at play.

The balance between the almost nonexistent privacy interest and the public interest in disclosure here tips very sharply in favor of disclosure. While Congress did not intend the FOIA to facilitate "disclosure of information about **private**

citizens that is accumulated in various governmental files but **that reveals little or nothing about an agency's own conduct,**"(emphasys added) *DOJ v. Reporters Committee For Freedom of Press*, 489 U.S. 749, 772-73 (1989) (quotations omitted), the former agency's conduct in assigning or re-assigning a social-security number to a **person with no apparent contact with a state**, at a time when the **former agency assigned numbers based on connection with that state**, has become an issue the subject of great public interest. "Unless a **FOIA request advances 'the citizens' right to be informed about what their government is up to,'** no relevant public interest is at issue." *National Ass'n of Home Builders v. Norton*, 309 F.3d 26, 34 (D.C. Cir. 2002) (quoting *Reporters Comm.*, 489 U.S. at 773). Google search of "Obama" and "SSN" will result in 1,730,000 hits, and demonstrates the "public interest" in this issue. The information sought here would clearly advance "the citizens" right to be informed as to what their government is, or was, up to, and whether in fact the SSA's predecessor agency's processes were possibly subverted in a scheme to evade its controls. To not release the document would simply feed the public's belief that the government has been party to, or the victim of, a fraud.

**The type of safeguard, that is envisioned in the exemption 6 of FOIA does not exist in case at hand.** This exception exists in relation **to average citizens**, whose name is not known and whose identity might be stolen by someone usng a

name and a social security number of a **private citizen**. In case at hand we have a President of the United States of America using this number. Does the statute envision a hypothetical, when some random John Doe from Any- town America is entering a bank and saying: "I am Barack Hussein Obama, here is my social security number, I want to withdraw a million dollars from this bank account." Is it likely? Is it plausible? Of course not. While our other presidents might have had more random names and one expects there to be more than one Bill Clinton or Jimmy Carter, nobody has ever found another Barack Hussein Obama in the U.S.A. Uniqness of Obama's name and his position make exemption 6 irrelevant to him and his vital records, it is safe to say, that even if an unredacted SS-5 is published, nobody will try to steal his identity, never mind with redacted SS-5.

There are too many unanswered questions, and plaintiff has identified a major public interest which will be served by disclosure of information related to this particular social-security number. A large portion of the public questions whether this number involves actions such as those recited by Bill Ayers, a known associate of Barack Obama, in *Fugitive Days*. Releasing that information would provide major insight into government functions that have been shrouded in mystery and the subject of continuing unanswered conjecture, and help Plaintiff to understand how, not the SSA, but its predecessor, fulfilled or did not fulfill its

obligations, contrary to the bare and unsupported allegations of the Wiggins Declaration ¶ 7.

In the presence of a clearly identified public interest of the sort the FOIA was intended to serve, the Court's inquiry should continue, and the exemption claimed should be overruled. This is not a situation such as that in *Consumers' Checkbook Ctr. for the Study of Servs. v. U.S. Dep't of Health & Human Servs.*, 554 F.3d 1046, 1056 (D.C. Cir. 2009), as referenced by Defendant, where the court "need not balance the non-existent public interest against every physician's substantial privacy interest in the Medicare payments he receives." The public interest here is far more than non-existent. Courts may have repeatedly recognized that "something, even a modest privacy interest, outweighs nothing every time," *Horner*, 879 F.2d at 879; but the interest here is far from nothing.

Because the agency improperly withheld the Form SS-5 under exemption 6, it is not entitled to summary judgment.

**In conclusion,** Michael Astrue, commissioner of the Social Security administration did not provide a shred of admissible evidence to show that the SS-5 even exists, and that it was not assigned to a person, who is deceased now, and that the person, who is using it now, is doing so legally. Plaintiff provided

irrefutable evidence that there is a genuine issue of material fact, due to which the motion for summary judgment needs to be denied. Additionally, Plaintiff has provided evidence, showing that there is a high likelihood of fraud, associated with the number in question and a cover up of such fraud. ObamaFraudGate, ObamaForgery Gate is much larger, than the Watergate. It will not go away until the matter is tried in court. More and more governmental officials become complicit in the cover up. Plaintiff believes, that not only the court needs to deny the motion for summary judgment and grant the FOIA request by the Plaintiff, but the court needs to start sua sponte an investigation of the massive fraud, that was uncovered within the SSA and allow the Plaintiff to conduct discovery of such fraud. This needs to be done before the 2012 election, if we are ever to have an honest election in this country. Plaintiff believes, that she might be the only person with enough strength of character to conduct such an investigation.

**If this court grants the motion for summary judgment and refuses release of the redacted SS-5 for SSN 042-68-4[redacted], this court becomes complicit in the biggest cover up in the history of this nation.** Taitz is not asking Your Honor to tilt at windmills, but rather to stand firmly on the broad and sturdy platform of the U.S. Constitution and the overwhelming factual evidence of the case.

**Respectfully submitted,**

**/s/ Dr. Orly Taitz ESQ**

## AFFIDAVIT OF ORLY TAITZ

I, Orly Taitz, am a licensed attorney, admitted in all of the courts of the state of California, 9th Circuit Court of Appeals, Third Circuit Court of Appeals and the Supreme Court of the United States. I am over 18 years old, do not suffer from mental disability and have personal knowledge of the facts listed below:

1. Affidavit of licensed investigator Susan Daniels is a true and correct copy of the original affidavit of Susan Daniels received by me

2. Affidavit of retired deportation officer with the Department of Homeland Security John Sampson is a true and correct copy of the affidavit received by me.

3. Affidavit of scanning and printing expert Douglas Vogt is a true and correct copy of the original affidavit received by me.

4. Affidavit of Adobe Illustrator expert Chito Papa is a true and correct copy of the original affidavit received by me.

5. Affidavit of typesetting and printing expert Paul Irey is a true and correct copy of the original affidavit received by me.

I declare under the penalty of perjury, that all of the above is true and correct .

/s/ Dr. Orly Taitz, ESQ

07.13.2011

Proof of service

I, Lila Dubert, am over 18 years old, I am not a party in this case and I served the US attorneys' office with above pleadings by first class mail on 07.13.2011

Us Attorney -district of Columbia
555 4th street NW
Washington DC 20530

Signed

Dated 07.13.2011

cc

cc Congressman Darrell Issa
Chairman
House Oversight Committee
2347 Rayburn House Building
Washington DC, 20515

cc Congressman Mike Rogers
Chairman
House Intelligence Committee
133 Cannon House Office building
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cc Congressman Sam Johnson

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cc Congressman Dana Rohrbacher

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| | **§ MOTION FOR SUMMARY** |
| **Michael Astrue, Commissioner of the** | **§ JUDGMENT** |
| **Social Security Administration,** | **§ 11-cv-00402** |
| | **§** |
| | **§ Honorable Royce Lamberth** |

**Respondent** **§ Chief Justice presiding**

**OPPOSITION TO DEFENDANTS STATEMENT OF FACTS NOT IN DISPUTE**

2. Defendant intentionally misrepresented the Plaintiffs FOIA request in ¶2. Defendant states: "Specifically, this request sought:…

2. the redacted Form SS-5 for the living individual, who holds the social security number xxx-xx-4425."

This is an absolutely false statement of fact.

Plaintiff provided the Defendant and the court information, showing that this number was never assigned according to the SSA own records and that in National databases this number was originally used by an individual born in 1890, who is presumed to be deceased, and from around 1980 was illegally assumed by Barack Hussein Obama. Plaintiff did not request the SSA to provide her with the SS-5 of a live individual, who is "holding" the number today, most probably illegally. She requested to know if this SS-5 was ever assigned, and if it was assigned, she wanted an application of the original owner, who was born in 1890 and who would be 121 years old today and is presumed to be deceased. SS-5s of the deceased individuals are readily provided to the public through FOIA.

/s/ Dr. Orly Taitz ESQ

07.13.2011

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(proposed) ORDER

This court, having considered defendant's motion for summary judgment, the memoranda of the parties, and the whole record herein, and being of the opinion that the defendant is not entitled to the summary judgment,

MOTION FOR SUMMARY JUDGMENT BY THE DEFENDANT IS DENIED. SO ORDERED

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SIGNED CHIEF JUDGE ROYCE C. LAMBERTH

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DATED

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| | **§ Honorable Royce Lamberth** |
| **Respondent** | **§ Chief Justice presiding** |

**OPPOSITION TO DEFENDANTS STATEMENT OF FACTS NOT IN DISPUTE**

2. Defendant intentionally misrepresented the Plaintiffs FOIA request in ¶2. Defendant states: "Specifically, this request sought:…

2. the redacted Form SS-5 for the living individual, who holds the social security number xxx-xx-4425."

This is an absolutely false statement of fact.

Plaintiff provided the Defendant and the court information, showing that this number was never assigned according to the SSA own records and that in National databases this number was originally used by an individual born in 1890, who is presumed to be deceased, and from around 1980 was illegally assumed by Barack Hussein Obama. Plaintiff did not request the SSA to provide her with the SS-5 of a live individual, who is "holding" the number today, most probably illegally. She requested to know if this SS-5 was ever assigned, and if it was assigned, she wanted an application of the original owner, who was born in 1890 and who would be 121 years old today and is presumed to be deceased. SS-5s of the deceased individuals are readily provided to the public through FOIA.

/s/ Dr. Orly Taitz ESQ

07.13.2011