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OFFICE OF STATE ADMINISTRATIVE HEARINGS
STATE OF GEORGIA

DAVID FARRAR,
LEAH LAX,
CODY JUDY,
THOMAS MacLAREN

Plaintiffs,

v.

BARACK OBAMA, BRIAN KEMP,
GA SECRETARY OF STATE,
EXECUTIVE COMMITTEE OF THE
DEMOCRAT PARTY OF GA

Defendant.

DOCKET #: OSAH-SECSTATE-
CE-1215136-60-MALIHI

AMENDED COMPLAINT
FOR DECLARATORY RELIEF
INJUNCTIVE RELIEF

Filed: December 9, 2011

COMES NOW, Plaintiffs DAVID FARRAR (“Farrar”), LEAH LAX, (“Lax”),
CODY JUDY (“Judy”), THOMAS MacLAREN (“MacLAREN”), COMPLAINING
AND AVERRING AS FOLLOWS:

This is an AMENDED COMPLAINT, superseding the original complaint
filed only by Farrar on or about ____ NOV 9, 2011.

This Amended Complaint adds Plaintiffs Lax, Judy and MacLaren who ARE
candidates for the 2012 Presidential election and, in the case of Lax and Judy, for the
Democratic Primary Election as well as defendants Brian P. Kemp, Secretary of State of
the state of Georgia, Executive committee of the Democratic party of Georgia.

PARTIES

1. David Farrar- registered voter state of Georgia
2. Leah Lax, presidential candidate, registered with the Federal Elections Commission,
running in the 2012 Democrat party primary
3. Cody Robert Judy, presidential candidate, registered with the Federal Elections
Commission, running in the 2012 Democrat party presidential primary, hereinafter
“Judy”
4. Thomas MacLeran, Presidential candidate, registered with the Federal Elections
Commission, hereinafter “MacLeran”
5. Barack Obama, presidential candidate, registered with the Federal Elections
Commission, running in the Democrat party presidential primary, hereinafter “Obama”
6. Brian P. Kemp, Secretary of state, state of Georgia, hereinafter “Kemp”
7. Executive committee of the Democrat Party of Georgia, hereinafter “Committee”

SUMMARY OF THE COMPLAINT

Plaintiffs pray for declaratory and injunctive relief, for this court to declare that Defendant Barack Obama is not eligible to be on the ballot due to the fact, that recently obtained passport records show his legal name to be Barack Obama Soebarkah (Exhibit 10), not the name, listed on the November 1, 2011 nomination letter from the Executive Committee of the Democratic party of Georgia. One cannot be on the ballot under a name, that is not legally his. Additionally, Obama's school records from Indonesia, released by the Associated Press, list him under the last name Soetoro (last name of his step father, Indonesian citizen, Lolo Soetoro). (Exhibit 11). There is no evidence of Obama ever legally changing his name from Soetoro or Soebarkah to Obama. Same school records show his citizenship to be Indonesian, which makes him ineligible as well. He does not satisfy the "natural born citizen" constitutional requirement for President to be on the ballot due to his foreign citizenship and allegiance to three other nations and due to the precedent of Minor v Happersett (88 U.S. 162 1875). Not only is Obama not qualified to be on the ballot, but evidence, provided in the complaint, shows that defendant Obama does not possess any valid U.S. identification papers needed for the natural born status, that in his tax returns and in his Selective Service certificate, he is using a Connecticut Social Security number 042-68-4425, which according to E-Verify and SSNVS (Social Security Number Verification Systems) was never issued to Barack Obama. (Exhibits 1-7) (Full unredacted number is provided in these pleadings, as it is being fraudulently used). Additionally, multiple expert affidavits show Obama's recently released alleged copy of his long form birth certificate to be a computer-generated forgery, created by cutting and pasting bits and pieces from different documents and filling in the blanks with computer graphics, and not a valid document. (Exhibits 3, 8, 9).

Plaintiffs are seeking injunctive relief preventing the Executive committee of the Democrat Party and Secretary of State of Georgia from placing Obama's name on the ballot in the Democrat 2012 primary, as well as 2012 general election.

FIRST CAUSE OF ACTION

DECLARATORY RELIEF

APPLICABLE LAWS AND REGULATIONS

United States Constitution (U.S. Const. art. II, § 1)

O.C.G.A. §§ 21-2-5(a) and (b)

O.C.G.A. § 21-2-193

The case of *Haynes v. Wells*, 538 S.E.2d 430 (Ga. 2000) establishes that a candidate seeking to hold office through an election in the state has the affirmative duty to prove their eligibility. The case notes that under the Official Code of Georgia, when filing a notice of candidacy, a candidate must swear by affidavit “[t]hat he or she is an elector of the county or municipality of his or her residence eligible to vote in the election in which he or she is a candidate.” Ga. Code Ann. § 21-2-132(e)(4) (1998).

The court therefore held, “**Thus, the statutes place the affirmative obligation on Haynes to establish his qualification for office. Wells is not required to disprove anything regarding Haynes's eligibility to run for office, as the entire burden is placed upon Haynes to affirmatively establish his eligibility for office. He failed to make that showing. Hence, his candidacy for the fifth district seat was invalid.**” *See Haynes*, 538 S.E. 2d 430, 433 (Ga. 2000). (emphasis added)

This principal is expressed in earlier decisions by the United States Supreme Court. For example in the case of *Bute v. Illinois*, 333 U.S. 640, 653 (1948), the court there stated: "The burden of establishing a delegation of power to the United States * * * is upon those making the claim." And if each of the General Government's powers must be proven (not simply presumed) to exist, then every requirement that the Constitution sets **for any individual's exercise of those powers must also be proven (not simply presumed) to be fully satisfied before that individual may exercise any of those powers.** (emphasis added)

In *O'Brien v. Gross* (2006) OSAH-SECSTATE-CE-0829726-60MALIHI, this court noted the threshold standard that "**all candidates for state office must meet all the constitutional statutory requirements for holding the office sought by the candidate.**" *O'Brien* at page 11. The court further cited the *Haynes* decision in support of its finding that the Defendant in that matter had not met his burden of proving his eligibility requirements for the particular office he sought. (emphasis added)

While it is true that these cases construe statutes designed for those running for state office, it is necessary to argue by analogy that the constitutional principles of the Georgia Constitution are enshrined in that statutory scheme and thus should be observed by the Secretary of State in assessing the qualifications of Presidential candidates who are to be placed on the Ballot in the State of Georgia.

¹The U.S Constitution is the Supreme Law of the land. According to the U.S. Constitution Article 2, Section 1, Clause 4 a U.S. President has to be a natural born U.S.

citizen. In 2008, when Mr. Obama ran for the U.S. Presidency, he was never vetted and he never provided any valid documentary evidence of his natural born status.

2. A natural born citizen would be expected to have valid U.S. identification papers, such as a valid long form birth certificate and a valid Social Security number, which was lawfully obtained by presenting a valid birth certificate to the Social Security administration and which can be verified through official U.S. Social Security verification services, such as E-Verify and SSNVS. The most glaring evidence of Obama's lack of natural born status and legitimacy for the US Presidency, is Obama's lack of most basic valid identification papers, such as a valid Social Security Number ("SSN") and his use of a fraudulently obtained Social Security Number from the state of Connecticut, a state where he never resided, and which was never assigned to him according in part to SSN verification systems "E-Verify" and SSNVS.

3. Reports from licensed investigator Susan Daniels ("Daniels") show that for most of his life Obama used a Connecticut Social Security Number 042-68-4425 issued in 1977, even though he was never a resident of the State of Connecticut. In 1977 Social Security numbers were assigned according to the state where the Social Security applications were submitted. In 1977 Obama was nowhere near Connecticut, but rather a young student at the Punahoa school in Hawaii, where he resided.

3. Additionally, according to the review performed by licensed investigators Sankey and Daniels, and as publicly available, national databases revealed another birth date associated with this number, a birth date of 1890. In or around 1976-77, due to changes in the Social Security Administration, many elderly individuals who never had Social Security numbers before, had to apply for their Social Security numbers for the

first time in order to obtain Social Security Benefits. It appears that the number in question was assigned to an elderly individual in Connecticut around March of 1977. The death of this elderly individual was never reported, and from around 1980 this number was fraudulently assumed by Barack Obama. *See Exhibit 1* attached hereto, Affidavit of Susan Daniels.

4. Counsel for the Plaintiffs (Dr. Taitz) was a delegate at the Continental Congress Convention in 2009, where she had a discussion on the matter of Barack Obama's fraudulent use of the aforementioned Connecticut SSN with a recently retired Senior Deportation Officer from the Department of Homeland Security ("DHS"), Mr. John Sampson ("Sampson"). Sampson provided Dr. Taitz with an affidavit attesting to the fact that indeed, according to national databases, Obama is using a Connecticut SSN even though there is no reasonable justification or explanation for such use by one who resided in Hawaii in and around the time the Social Security number in question was issued. *See Exhibit 2* attached hereto, Affidavit of John Sampson.

5. In 2010 Obama posted online on WhiteHouse.gov his 2009 tax returns. Those responsible for posting those returns did not "flatten" the PDF file thereof, so all the layers of modification of the file became visible to the public. One of the pages contained Obama's full SSN 042-68-4425. Taitz received an affidavit from Adobe Illustrator program expert Mr. Chito Papa ("Papa") attesting to the fact that the tax returns initially posted by Obama contained the Connecticut SSN 042-68-4425. While the file was later "flattened" and the SSN can no longer be seen, thousands of U.S. Citizens and individuals around the world were able to obtain the original file with the full SSN. *See Exhibit 7* attached hereto, Affidavit of Chito Papa.

6. Counsel herein, Taitz checked an official site for Selective Service SSS.gov. She entered the name “Barack Obama” along with his publicly available alleged date of birth “08.04.1961” and Connecticut SSN 042-68-4425 (which Obama is using in his tax returns as indicated above). Taitz received a verification showing that Obama registered for Selective Service using the Connecticut SSN. *See Exhibit 4* attached hereto, Selective Service Verification.

7. Taitz received an affidavit from a witness named Linda Jordan (“Jordan”), who ran an E-verify check for SSN 042-68-4425. According to E-Verify, there is no match between Obama’s name and the SSN he used on his tax returns and Selective Service application. *See Exhibit 5* attached hereto, Affidavit from Linda Jordan.

8. Taitz received an email from a U.S. Army officer, Colonel Gregory Hollister, whereby he did an independent check and found that indeed Obama is using this Connecticut SSN. He also contacted SSNVS (Social Security Number Verification Systems) and found that the number Obama is using was never assigned to him. *See Exhibit 6* attached hereto, Email from Colonel Gregory Hollister.

9. Recently Obama’s uncle Onyango Obama was arrested for drunk driving and found to be using for employment a Social Security Number even though he is an illegal alien and not allowed to work. Obama’s Aunt Zeutuni Obama was stealing taxpayer dollars by living in subsidized housing and using an Indiana-issued Social Security Number, even though he is an illegal alien and was never a resident of the State of Indiana. therefore, there is a pattern of multiple members of Obama's family using fraudulently obtained Social Security numbers, at Obama's behavior is true to that pattern of Social Security fraud and immigration fraud.

10. Obama's close associate, William Ayers, in his book *Fugitive Days*, admitted to creating over a hundred fraudulent Social Security Numbers using names of deceased infants who did not get their Social Security numbers before their deaths. As he states in *Fugitive Days*, "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." *William Ayers, Fugitive Days*. Association and close friendship with Ayers is an additional indication and circumstantial evidence of Social Security fraud by Obama, and his lack of valid identification documents to prove not only natural born status, but any status for that matter.

11. For nearly three years after his inauguration Obama refused to provide to the public his long form birth certificate. On April 27, 2011, when Obama posted his alleged long form birth certificate online, just as with his tax returns, he originally did not flatten the file, which means that anyone with an Adobe Illustrator program on his computer could see layers of alterations in this alleged “birth certificate” which looked like a complete fraud and hoax. Multiple long form birth certificates from 1961 are available. In those years green safety paper was not available and was not used. Other birth certificates, as one for Susan Nordyke, born the next day on August 5, 1961, in the same hospital, and signed by the registrar on August 11, 1961, show white paper with yellow aging stains, clear borders, raised seal and a lower serial number. (Exhibit 9) Obama’s alleged birth certificate is on a safety paper, which was not used in 1961, does not have a clear paper, no raised seal, and the serial number is higher than the numbers issued later by the same Registrar. *See Exhibit 3, 9.*

12. According to the affidavit from Adobe Illustrator expert Papa (Exhibit 3, hereto), the released image digital file showed layers of alteration of the alleged birth certificate. It showed a signature of Obama’s mother, Stanley Ann D. Soetoro (her married name by her second husband), where it looks as though “Soetoro” was erased, whited out and computer graphics used to add “unham Obama” and a signature “Stanley Ann Dunham Obama” was created by pasting and filling the blanks with computer graphics.

13. Taitz received an affidavit from scanning machines expert Douglas Vogt. (“Vogt”) *See Exhibit 8 hereto*, Affidavit of Douglas Vogt. Vogt attests to further evidence of forgery, such as different types of ink used. Some of the document shows as

“gray scale” scanning, some as black and white scanning, and some as color scanning. It shows different types of letters and variations in kerning, meaning some letters are encroaching into the space of other letters which is possible only with computer graphics, not with a typewriter used in 1961. Numerous other parameters lead to the same conclusion, that the document in question is not a copy of a 1961 typewritten document, but a computer-generated forgery, created by cutting and pasting bits and pieces from different documents and filling in the blanks with computer graphics.

14. It appears that Obama used a Social Security number of a deceased elderly individual, as well as a birth certificate number of a deceased infant, to fabricate his false identity. Research pointed to the fact that one Virginia Sunahara was born in Honolulu on August 4, 1961 and passed away the next day. Recently her surviving family member demanded to see her long form birth certificate, but the department of Health provided Mr. Sunahara only with a computer generated short form birth certificate with a serial number, which was suspiciously out of sequence from all the other numbers issued to infants born August 4, 1961.

15. In spite of numerous demands, Director of Health Loretta Fuddy refused to allow the inspection of the original birth certificate of either Obama or Sunahara in lieu of the alleged certified copy, and the Social Security Administration refused to provide even a redacted application for Connecticut SSN 042-68-4425, which Obama is fraudulently using.

16. Based on all of the above, Obama does not have any valid identification papers, which are necessary to be a candidate on the ballot, running for the

Presidency of the United States, as required by Georgia Statute ____ O.C.G.A. §§ 21-2-5(a) and (b)

O.C.G.A. § 21-2-193

_____ and Article 1, Section 2 of the United States Constitution.

17. Additionally, the term “Natural Born Citizen,” as it is applied to the U.S. Presidency, means one born in the country to citizen parents. The plaintiffs submit their evidence showing that from the time of the adoption of the Constitution until today the standard was “One born in the country to parents who are citizens do not owe their allegiance to others.” The U.S. Constitution was based in no small measure upon the book *The Law of Nations* by Emer de Vattel, stating that “Natural Born Citizens” are ones born in the “Nations to citizens. (Emer De Vattel, *The Law of Nations*, p. 499, section 212). A similar definition was used by John A Bingham, drafter of the 14th amendment to the United States Constitution, who stated during Congressional Hearings that a “natural born citizen is born in the U.S. Territories to parents, who didn’t owe allegiance to other sovereignties.” A similar definition was used in the case of *Minor v. Happerset*, 88 U.S. 162 (1875).

18. In 2008 natural born citizenship of John McCain was questioned as well due to his birth in the zone of the Panama Canal. In Joint Senate Resolution 511 the Senate unanimously found Senator McCain to be a “Natural Born” U.S. Citizen. The Senate used the same Vattel two pronged test and found McCain to be eligible for the presidency due to the fact that he was born in the Panama Canal zone to two parents who were U.S. Citizens. Obama’s father was never a U.S. citizen. He never had a green card. He was in the U.S. for a few years on a student visa and, as such, Obama did not satisfy

either one of the two prongs of the test for natural born status. Even if this office was to subscribe to a more liberal modern definition of natural born citizen, Obama does not qualify as he never proved his birth in Hawaii and is using a computer-generated forgery instead of a valid long form birth certificate and he is fraudulently using a Social Security Number which was never assigned to him. This case shows an unprecedented level of corruption and lawlessness in the federal government and in the government of Hawaii, which allowed Obama to get on the ballot in 2008. This lawlessness cannot continue. As such Plaintiffs demand, complain and aver that Obama shall be removed from the ballot in the State of Georgia in the Democrat party primary and demand immediate criminal prosecution of Obama and his accomplices for elections fraud, common law fraud and uttering of forged documents.

SECOND CAUSE OF ACTION FOR INJUNCTIVE RELIEF

1. Plaintiffs incorporate by reference all of the previous paragraphs as if fully plead herein.
2. Secretary of state of Georgia has a ministerial duty to place candidates' names on the ballot. O.C.G.A. § 21-2-5 (c) The Secretary of State shall determine if the candidate is qualified to seek and hold the public office for which such candidate is offering. If the Secretary of State determines that the candidate is not qualified, the Secretary of State shall withhold the name of the candidate from the ballot or strike such candidate's name from the ballot if the ballots have been printed. If there is insufficient time to strike the candidate's name or reprint the ballots, a prominent notice shall be placed at each affected polling place advising voters of the disqualification of the candidate and all votes cast for such candidate shall be void and shall not be counted.

"The burden of establishing a delegation of power to the United States * * * is upon those making the claim." *Bute v. Illinois*, 333 U.S. 640, 653 (1948). And if each of the General Government's powers must be proven (not simply presumed) to exist, then every requirement that the Constitution sets for any individual's exercise of those powers must also be proven (not simply presumed) to be fully satisfied before that individual may exercise any of those powers."

3. Obama is not eligible to be on the ballot.

4. Executive committee of the Democrat Party of Georgia have a right and a ministerial duty to submit to the secretary of state names of candidates, eligible to be on the ballot.

5. Democrat, Presidential candidate in 2012 Presidential election, Plaintiff Leah Lax was arbitrarily forbidden to be on the ballot by the Executive Committee. Exhibit 12, Affidavit by Leah Lax. Presidential candidate, Democrat Cody Robert Judy, was similarly kept off the Democrat Presidential primary ballot by the committee, when committee members arbitrarily stated that they decided to put only Obama on the ballot.

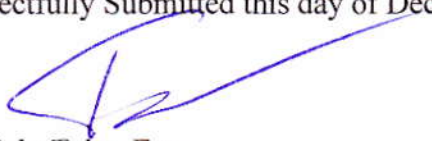
6. Due to the fact that Obama is not a natural born U.S. citizen and not eligible to be on the ballot, this honorable court is asked to issue an injunctive relief, an injunctive order prohibiting Obama from being on the ballot, due to lack of eligibility, and order to place other candidates, who are qualified to run in the Democrat party primary presidential election in the state of GA. If Obama is not removed from the ballot, this court and the office of the Secretary of State of GA will become complicit to elections fraud, Social

Security fraud, uttering of forged/ altered/fraudulently obtained identification papers and common law fraud of citizens of the state of GA and the U.S. as a whole.

7. Plaintiffs are asking this court to use its' inherent powers to prosecute Obama and individuals, who aided and abetted him, for fraud, committed by Obama during 2008 election.

Respectfully Submitted this day of December 9, 2011,

/s/



Dr. Orly Taitz, Esq.

I, John Carmichael, ESQ declare that I am not a party to this case, I served the defendants in this case by and through

Michael Jablonski attorney for defendant Obama

at michael.jablonski@comcast.net

Scott Kwain attorney for the defendant Obama

at kwainscott@barackobama.com

Honorable Brian P. Kemp

Secretary of State

214 State Capital

Atlanta GA 30334

<http://sos.georgia.gov/cgi-bin/email.asp>

EXECUTIVE COMMITTEE OF THE :
DEMOCRAT PARTY OF GA :
Defendant. :
: **Filed: December 9, 2011**

COMES NOW the Plaintiffs and file the following Pre-trial Order:

(1) The name, address, phone number, fax number and E-mail address of the attorney(s) (or Pro se party) who will conduct the hearing is as follows:

Dr. Orly Taitz, ESQ.
29839 Santa Margarita Parkway, Ste. 100
Rancho Santa Margarita, CA 92688
Ph 949-683-5411 F949-766-7603
Orly.Taitz@gmail.com

(2) The estimated time required for hearing:

Direct examination: **6 hours**
Cross examination: **4 hours**
Total: **10 hours**

(3) The following motion(s) are pending/anticipated for consideration by the Court:

None anticipated by Plaintiffs.

(4) The issues for determination by the Court are as follows:

A. Whether Barack Obama is eligible for the Presidential Ballot in Georgia.
B. Whether other candidates should be allowed on the Presidential Ballot in Georgia.

(5) The following is an in depth outline of the case and contentions including specific statutes or rules or other source of law upon which each issue is based and any special authorities relied upon (please attach a copy of any case, statute, rule, and/or regulation cited):

1. For the reasons set forth at length in the First Amended Complaint, incorporated herein by this reference, the Plaintiffs contend that Barack Obama is not eligible to be placed on the Ballot in the State of Georgia, and thus challenge his inclusion by the Democratic Party on the Ballot.

2. Further, the Plaintiffs (other than Farrar) request the Court to order their inclusion on the Ballot.

APPLICABLE LAWS AND REGULATIONS

United States Constitution (U.S. Const. art. II, § 1, cl. 5)

O.C.G.A. §§ 21-2-5(a) and (b)

O.C.G.A. § 21-2-193

The case of *Haynes v. Wells*, 538 S.E.2d 430 (Ga. 2000) establishes that a candidate seeking to hold office through an election in the state has the affirmative duty to prove their eligibility. The case notes that under the Official Code of Georgia, when filing a notice of candidacy, a candidate must swear by affidavit “[t]hat he or she is an elector of the county or municipality of his or her residence eligible to vote in the election in which he or she is a candidate.” Ga. Code Ann. § 21-2-132(e)(4) (1998).

The court therefore held, “Thus, the statutes place the affirmative obligation on Haynes to establish his qualification for office. Wells is not required to disprove anything regarding Haynes's eligibility to run for office, as the entire burden is placed upon Haynes to affirmatively establish his eligibility for office. He failed to make that showing. Hence, his candidacy for the fifth district seat was invalid.” *See Haynes*, 538 S.E. 2d 430, 433 (Ga. 2000).

This principal is expressed in earlier decisions by the United States Supreme Court. For example in the case of *Bute v. Illinois*, 333 U.S. 640, 653 (1948), the court there stated: "The burden of establishing a delegation of power to the United States * * * is upon those making the claim." And if each of the General Government's powers must be proven (not simply presumed) to exist, then every requirement that

the Constitution sets for any individual's exercise of those powers must also be proven (not simply presumed) to be fully satisfied before that individual may exercise any of those powers."

In *O'Brien v. Gross* (2006) OSAH-SECSTATE-CE-0829726-60MALIHI, this court noted the threshold standard that "all candidates for state office must meet all the constitutional statutory requirements for holding the office sought by the candidate." *O'Brien* at page 11. The court further cited the *Haynes* decision in support of its finding that the Defendant in that matter had not met his burden of proving his eligibility requirements for the particular office he sought.

While it is true that these cases construe statutes designed for those running for state office, it is necessary to argue by analogy that the constitutional principles of the Georgia Constitution are enshrined in that statutory scheme and thus should be observed by the Secretary of State in assessing the qualifications of Presidential candidates who are to be placed on the Ballot in the State of Georgia.

(6) The types of relief sought are stated as follows:

- A. Injunctive Relief**
- B. Declaratory Relief**
- C. An Order Excluding Barack Obama from the Presidential Ballot in Georgia.**
- D. An Order Allowing the Plaintiffs (other than Farrar) to be included on the Presidential Ballot in Georgia.**

(7) The following facts are stipulated (if any):

At present the Plaintiffs are not aware of any facts to which the Defendants have are willing to stipulate.

(8) The following is a list of all exhibits that will be tendered at the hearing. Unless noted, the parties have stipulated as to the authenticity of the exhibits and the exhibits listed may be admitted without further proof of authenticity. All exhibits shall be marked by counsel prior to hearing. Parties shall consolidate exhibits by eliminating duplicates

and use a common numbering system for joint exhibits so that one set of joint exhibits is presented to the Judge. Exhibits shall be pre-marked by the parties sequentially starting with “P-1” for the Plaintiff’s exhibits, and “D-1” for the Defendant’s exhibits. A copy of the exhibits shall be given to the opposing party no less than 5 days before the hearing and to the Judge when first identified in the hearing.

P1. Affidavit of Licensed investigator, certified by the Department of Homeland Security, Susan Daniels, showing Obama using a Connecticut SSN 042-68-4425

P2. Affidavit of Senior Deportation Officer with the Department of Homeland Security John Sampson, showing that Obama is using Connecticut SSN 042-68-4425 and stating, that there is no legitimate reason for him to use a Connecticut SSN, as he was never a resident of Connecticut

P3. Affidavit of Adobe Illustrator expert Felichito Papa, showing Obama's alleged true and correct copy of his birth certificate to be a computer generated forgery

P4. Affidavit of witness Linda Jordan, attesting to the fact, that SSN 042-68-4425, used by Obama, does not pass E-Verify

P5. Affidavit of attorney Orly Taitz, and Selective Service printout, showing Obama using CT SSN 042-68-44245

P6. Selective service certificate showing Obama using SSN 042-68-4425 and official printout from Social Security Number Verification Services, showing that 042-68-4425 was never issued to Barack Obama, attached e-mail from Colonel Gregory Hollister

P7. Affidavit of Adobe Illustrator expert Felichito Papa, showing that Obama is using CT SSN 042-68-4425 on his 2009 tax returns

P8. Affidavit of printing and scanning machines expert Douglas Vogt, attesting to the fact, that Obama's alleged copy of his birth certificate, is indeed a forgery

P9. Hawaiian birth certificate 61-00637 of Susan Nordyke, born a few hours after Obama in Kapiolani Hospital, looks completely different from alleged copy of birth certificate of Obama

P10. Passport records of Stanley Ann Dunham Obama, mother of Barack Obama, showing Obama listed in her passport under the name Barack Obama Soebarkah, attached affidavit by Chris Strunk, recipient of Obama's passport records under FOIA

Plaintiffs are not aware of any present possibility of settling this dispute prior to the hearing.

This is the 9th day of December 2011.

Submitted by:

Dr. Orly Taitz, Esq.

/s/ Orly Taitz



Attorney for Plaintiffs

ORDER

IT IS HEREBY ORDERED THAT the foregoing, including the attachments thereto, constitutes the PRE-TRIAL ORDER in the above case upon filing with the Clerk and supersedes the pleadings that may not be further amended except by order of the Court to prevent manifest injustice.

SO ORDERED, this _____ day of _____, 2011.
