

FILED

**IN THE FIRST JUDICIAL DISTRICT OF HINDS COUNTY,
MISSISSIPPI**

MAR 7 2012

BARBARA DUNN, CIRCUIT CLERK

BY [Signature] D.C.

DR. ORLY TAITZ, ESQ

PLAINTIFF

VS.

CIVIL ACTION NO. 251-12-107 CIV

**DEMOCRAT PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI**

DEFENDANTS

**MOTION TO DISMISS PLAINTIFF'S PETITION FOR DECLARATORY AND
INJUNCTIVE RELIEF AND FOR SANCTIONS**

COMES NOW the Mississippi Democratic Party Executive Committee answering for the Defendant, Democrat (sic) Party of Mississippi, and hereby moves to dismiss the Plaintiff's Petition for Declaratory and Injunctive Relief and, further, to seek sanctions as follows:

The Plaintiff's Lawsuit

1. The Plaintiff seeks to have this Honorable Court declare that Barack Hussein Obama is "not constitutionally eligible for the position of U.S. President." Plaintiff's allegation is that President Obama is not a "natural born citizen" of the United States, as required by Article II, Section I of the United States Constitution. The Plaintiff further seeks "injunctive relief preventing the Democrat (sic) Party of Mississippi and the Secretary of State of Mississippi from certifying Obama as a candidate on the ballot." Additionally, the Plaintiff seeks "injunctive relief from counting any and all votes for candidate Obama in the Primary or General Presidential Election." As will be discussed below, the Plaintiff's allegations are absolutely ridiculous. The President was born in the State of Hawaii and thus is a natural born citizen of the United States.

Argument: The Plaintiff Lacks Standing

2. This action should be dismissed because the Plaintiff is a resident of the State of California and, likewise, is not a qualified elector of the State of Mississippi, and therefore lacks standing to bring this action in the Circuit Court of Hinds County. *See Hall v. City of Ridgeland*, 37 So.3d 25, 33, ¶24, fn. 6 (Miss. 2010) (Standing to sue exists if a party asserts “a colorable interest in the subject matter of the litigation or experiences an adverse effect from the conduct of the defendant as otherwise authorized by law.”); *Roe v. Town of New Fairfield*, 2012 WL 447561 (January 17, 2012) (Conn. Super.) (“To have standing as an elector, the plaintiff’s right to vote must be implicated.”); *Alliance Marana v. Groseclose*, 955 P.2d 43, 45 (Ariz. 1998) (Non-resident lacks standing to file Writ of Mandamus regarding local referendum); *United States v. Hays*, 515 U.S. 737, 745, 115 S.Ct. 2431 (1995) (As a matter of standing, Plaintiffs stating race-based equal protection challenges to redistricting must be voters who actually reside in the districts they are challenging).
3. Moreover, the Plaintiff is no different than any other citizen or voter of the United States and thus has suffered no discrete injury required to satisfy standing. *See Hollander v. McCain*, 566 F.Supp.2d 63, 68 (D.N.H. 2008) (Voter lacked standing to challenge constitutional qualifications of presidential nominee in that he suffered no cognizable injury and was not prevented from voting for someone else); *Drake v. Obama*, 664 F.3d 774, 780-781 (9th Cir. Dec. 22, 2011) (Former and active military personnel did not have standing to argue that President Obama is constitutionally ineligible to be President of the United States as they did not show concrete injury); *Berg v. Obama*, 574 F.Supp.2d 509 (E.D. Penn. 2008), *aff’d*, 586 F.3d 234, 239 (Plaintiff voter’s stake no greater than any other voter and thus suffered no injury in fact.)

Argument: Barack Hussein Obama is a Natural Born Citizen of the United States

4. Persons born within the borders of the United States are “natural born Citizens” for Article II, Section I purposes regardless of the citizenship of their parents. *Ankeny v. Governor of Indiana* 916 N.E.2d 678, 688 (Ind. App. 2009). Various lawsuits have been filed against the President, ever since Mr. Obama sought the Presidency four years ago (see cases at:

http://en.wikipedia.org/wiki/Barack_Obama_presidential_eligibility_litigation).¹ On April 27,

1. See, Federal cases: *Tisdale v. Obama*, No. 3:12-cv-00036-JAG (E.D. Va. Jan. 23, 2012); *Allen v. Soetoro*, 4:09-cv-00373, 2011 WL 2130589, (D. Ariz. May, 2010); *American Grand Jury*, 3:09mc00215; *American Grand Jury*, (Rejected); *Barnett Keyes et al v. Obama et al*, 8:09-cv-00082, 2009 WL 3861788, (C.D. Cal. Oct. 29, 2009); *Berg v. Obama et al*, 574 F.Supp.2d 509 (E.D.Pa. 2008); *Berg v. Obama*, 656 F. Supp.2d 107 (D.D.C. Cir. 2009); *Beverly v. Federal Elections Commission*, 1:08cv01933; *Bowhall v. Obama*, 2:10cv00609, 2010 WL 4932747, (M.D. Ala. November 30, 2010); *The Church of Jesus Christ Christian/Aryan Nations of Missouri et al v. Obama et al*, 6:08cv03405, 2011 WL 4916569 (W.D. MO. Oct. 17, 2011); *Cohen v. Obama*, 1:08cv02150, 2008 WL 5191864 (D.C. Dec. 11, 2008); *Connerat v. Obama*, 8:11-cv-01359; *Cook v. Good et al*, 4:2009cv00082, 2009 WL 2163535, (M.D. Ga. July 16, 2008); *Cook v. Simtech, et al*, 8:2009cv01382; *Craig v. U.S.*, 5:09-cv-00343; *Dawson v. Obama*, 2:08cv02754, 2009 WL 532617 (E.D. Cal. March 2, 2009); *Ealey v. Sarah Obama*, 4:08-mc-00504; *Easterling v. Obama*, not docketed; *Essek v. Obama*, 08-379-GFVT; *Hamblin v. Obama*, 2:09cv00410, 2009 WL 2513986 (D. Ariz. Aug. 14, 2009); *Hamrick v. Fukino*, 1:08-cv-00544, 2009 WL 1404535 (Haw. May 20, 2009); *Herbert v. Obama & US*, 3:08-cv-01164-HES-TEM; *Herbert v. US*, *John Roberts et al*, 3:08-cv-00634-TJC-MCR; *Herbert v. US*, *Obama*, *John Roberts*, 3:08cv01201, 2009 WL 129585, (S.D.Cal. Jan. 15, 2009); *Hollander v. McCain*, 566 F. Supp.2d 63 (D.N.H. 2008); *Hollister v. Soetoro*, 601 F. Supp.2d 179 (D.D.C. Cir. 2009); *Hunter v. U.S. Supreme Court, et al*, 2:08cv00232, 2009 WL 111683, (N.D.Tex. Jan. 16, 2009); *Jones v. Obama*, 2:10-cv-01075; *Judy v. McCain*, 2:08cv01162; *Kerchner et al, v. Obama et al*, 612 F.3d 204 (D.N.J. 2010); *Liberty Legal Foundation v. DNC*, CH-11-1757; *Mackay v. Obama*, 2:11-cv-05458-JP; *McLanahan v. Obama*, 2:11-cv-00374-EFS; *Morrow v. Barak Humane Obama*, 1:08-cv-22345; *Neely v. Obama*, 2:08-cv-15243; *Patriot’s Heart Network v. Soetoro*, 1:09-mc-00442-RCL; *In Re Paul Andrew Mitchell*, 2:08-cv-04083, 2008 WL 5381436 (3rd Cir. Dec. 22, 2008); *Purpura v. Sebelius*, 3:10-cv-04814, 2011 WL 1547768, (N.J. Apr. 21, 2011); *Rhodes v. Gates*, 5:09-cv-00703-XR; *Rhodes v. MacDonald*, 670 F. Supp.2d 1363 (M.D. Ga. 2009); *Robinson v. Bowen*, 567 F.Supp.2d 1144 (N.D.Cal. 2008); *Roy v. Fed. Election*, 2:08cv01519, 2008 WL 4921263, (W.D. Wa. Nov. 14, 2008); *Stamper v. US*, 2008 WL 4838073; *Strunk v. NY State Board of Elections*, 1:08cv04289; *Strunk v. U.S. Dept. of State*, 693 F.Supp.2d 112 (D.C. Cir. 2010); *Super American Grand Jury*, 1:09-mc-00346-RCL; *Taitz v. Obama*, 707 F.Supp.2d 1 (D.D.C. Cir. 2010); *Taitz v. Astrue*, 1:11-cv-00402, 2011 WL 3805741, (D.C. Aug. 30, 2011); *Taitz v. Astrue*, 1:11-mc-00158; *Taitz v. Ruemmier*, 1:11-cv-01421; *Thomas v. Hosemann*, 1:08mc00280; *Thomas v. Hosemann*, 2:08-cv-00241-KS-MTP. State cases: *Ankeny v. Daniels*, 916 N.E.2d 678 (Ind. Ct. App. 2009); *Brockhausen v. Andrade*, No. 08-1001-C365; *Broe v. Reed*, 82473-8; *Connerat v. Browning*, 999 So. 2d 644 (Fla. Dist. Ct. App. 2008); *Connerat v. Obama*, No. 09003103SC; *Connerat v. Obama*, No. 09005522SC; *Constitution Party v. Lingle*, No. 29743, 2008 WL 5125984 (Haw. Dec. 5, 2008); *Corbett v. Bowen*, No. 2009cv01382; *Craig v. Oklahoma*, MA-109808; *Donofrio v. Wells*, No. AN-1053-08T2 (NJ. Nov. 03, 2008); *Fitzpatrick v. Obama*, no docket number; *Greenberg v. Brunner*, No. 2008cv1024; *In re John McCain’s Ineligibility to be on Presidential Primary Ballot in Pa*, 944 A.2d 75 (Pa. 2008); *Justice v. Fuddy*, 253 P.3d 665 (Haw. 2011); *Keyes v. Bowen*, 189 Cal. App. 4th. 647 (Cal. Ct. App. 2010); *US v. LTC Terrence L. Lakin*, MCAT-JA-SC; *Liberty Legal Foundation v. DNC*, CH-11-1757; *Lightfoot v. Bowen*, No. 168690; *Marquis v. Reed*, No. 08-2-34955-1; *Martin v. Lingle*, No. 29414, 2008 WL 4684786, (Haw. Oct. 22, 2008); *Martin v. Lingle*, No. ICC08-1-002147, 2009 WL 2372096, (Haw. Aug. 3, 2009); *Martin v. Bennett*, No. ICC10-1-000969; *Meroni et al v. McHenry County Grand Jury Foreman et al*, No. 09mr399;

2011 the White House released a copy of the President's long form birth certificate (see: <http://www.whitehouse.gov/blog/2011/04/27/president-obamas-long-form-birth-certificate>) establishing his birth in the State of Hawaii. Accordingly, President Obama, as evidenced by his Hawaii birth certificate, is a natural born citizen of the United States and thus qualified to be President.

Argument: Neither the Mississippi Secretary of State Nor the Democratic Party Have Any Statutory Duty to Determine Candidate Qualifications

5. Under *Miss. Code Ann.* §23-15-1089, complete responsibility for placing presidential candidates on the ballot for presidential preference primaries is vested in the Secretary of State. The Secretary of State is required by law to place each "generally recognized" candidate on the presidential primary ballot. Section 23-15-1089 does not authorize the Secretary of State to review whether a generally recognized candidate meets the federal law specifications to be president. Section 23-15-1089 provides no authority for the Secretary of State to refuse to place on the ballot a generally recognized presidential candidate.
6. In *Keyes v. Bowen*, 189 Cal.App.4th 647, 117 Cal.Rptr.3d 207 (Cal. App. 3 Dist. 2010) the court considered a statute nearly identical to Section 23-15-809 and affirmed the dismissal of a mandamus action against the California Secretary of State seeking to remove Barack Obama from the primary ballot. The California statute required a candidate's name to be placed on the presidential primary ballot if it was determined that the candidate is "generally advocated for or recognized throughout the United States or California as actively seeking the nomination of the

Neal v. Brunner, No. 2008cv72726; Patriot's Heart Media Network v. Illinois Board of Elections, No. 10H000605; Schneller v. Cortes, 199 MM 2008; Sorsensen v. Riley, cv-2008-1906; Spuck v. Sec. of State, 2008 cv1116; Stampo v. Granholm, 09-140-MM; Stunk v. Patterson, 029641/2008; Strunk v. Patterson, 029642/2008; Strunk v. NY State Board of Elections, 006500/2011; Sullivan v. Sec. of State, 08cv1076; Sullivan v. Marshall, 08cvs-021393; Taitz v. Fuddy, 1cc11-1-001731; Terry v. Handel, 08cv158774S; Wrotnowski v. Bysiewicz, SC 18264.

Democratic Party for President of the United States...” *Id.* at 658. The Court found that the California statute did not impose any duty on the Secretary of State to determine whether a presidential candidate meets the eligibility criteria of a citizen under the United States Constitution. Accordingly, using the reasoning in *Keyes v. Bowen*, the instant lawsuit brought by the Plaintiff against the Mississippi Secretary of State must be dismissed because the Secretary of State had no duty to determine whether a candidate is qualified to be president before placing him on the party primary ballot.

Argument: State Courts Have No Jurisdiction Over the Qualifications of Candidates for President of the United States

7. State courts do not have jurisdiction over the subject of a candidate’s eligibility under the U.S. Constitution for the office of President of the United States. As the *Keyes v. Bowen* decision noted, “the presidential nominating process is not subject to each of the fifty States’ election officials independently deciding whether a presidential nominee is qualified, as this could lead to chaotic results.” 189 Cal.App.4th at 660. Rather, federal law sets forth exclusive procedure by which objections to the qualifications of a presidential candidate may be registered and resolved. “Mechanisms exist under the Twelfth Amendment and 3 U.S.C. §15 for any challenge to any candidate to be ventilated when electoral votes are counted, and the Twentieth Amendment provides guidance regarding how to proceed if a president elect shall have failed to qualify. Issues regarding qualifications for president are quintessentially suited to the foregoing process.” 189 Cal.App.4th at 661. Therefore, any challenge to President Obama’s eligibility to run as a candidates is committed under the United States Constitution to the electors and the legislative branch, at least in the first instance—not to the Mississippi Secretary of State, the Mississippi Democratic Party, or this Court. See, *Robinson v. Bowen*, 567 F.Supp.2d 1144, 1147 (N.D. Cal.

2008).

Argument: The Petition is Time Barred Under *Miss. Code Ann. §23-15-961*

8. The Plaintiff is required to file a petition for judicial review challenging the candidate's qualifications no later than fifteen days after the date the contest petition was originally filed with the appropriate party executive committee. According to the Plaintiff's lawsuit, she filed her petition on January 8, 2012 with the Democratic Executive Committee. Section 23-15-961 states that the challenge must be filed with the executive committee within ten days after the qualifying deadline. The qualifying deadline for presidential preference primaries was January 14, 2012. The Democratic Committee must rule on the challenge within ten days of receiving the petition. Assuming that the Plaintiff filed her petition on January 8, 2012, the petition would need to be ruled on by the Committee by January 18, 2012. If it is not ruled on by the Executive Committee, which is the case here, the Plaintiff has fifteen days to file a petition for judicial review with the Circuit Court. However, the Plaintiff did not file her judicial petition until February 14, 2012, far outside of the fifteen day window, thus making her petition time barred and requiring dismissal. *Gourlay v. Williams*, 874 So.2d 987, 988 (Miss. 2004).

Argument: The Court Should Assess Sanctions Against the Plaintiff Under the Mississippi Litigation Accountability Act

9. The Defendant seeks sanctions in the form of the imposition of attorney's fees and costs pursuant to the Mississippi Litigation Accountability Act, *Miss. Code Ann. §11-55-5* and Rule 11 of the *Mississippi Rules of Civil Procedure* for bringing this frivolous action. Although the Plaintiff did bring her action *pro se*, she also is a practicing attorney and a member of the California Bar. She has been prolific in bringing lawsuits, and there is even a Wikipedia page devoted to her court crusade. http://en.wikipedia.org/wiki/Orly_Taitz. Additionally, she has developed an extensive

webpage at www.orlytaitzesq.com which discusses her extensive litigation activity on the “birther” issue. The Plaintiff was also sanctioned for bringing a frivolous action as discussed in *Rhodes v. McDonald*, 670 F.Supp.2d 1373 (M.D.Ga. 2009). Clearly, this suit is frivolous and sanctions should be imposed.

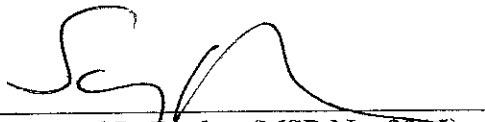
Prayer For Relief

WHEREFORE, PREMISES CONSIDERED, the Defendant prays that this Court will enter an Order and Judgment dismissing the Plaintiff’s Petition with prejudice and shall likewise assess the Plaintiff with all costs and reasonable attorney’s fees for bringing this frivolous action.

Respectfully submitted,

**THE MISSISSIPPI DEMOCRATIC
EXECUTIVE COMMITTEE, RESPONDENT**

By: _____


Samuel L. Begley (MSB No. 2315)

BEGLEY LAW FIRM, PLLC
P. O. Box 287
Jackson, MS 39205
(601)969-5545 (Telephone)
(601)969-5547 (Facsimile)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the date set forth hereinafter, a true and correct copy of the above and foregoing document was caused to be served via email, telefax or U.S. mail on the following:

The Honorable R. Kenneth Coleman
Special Circuit Judge
P.O. Box 1995
New Albany, Mississippi 38652

Orly Taitz, Esq.
29839 Santa Margarita Parkway, Suite 100
Rancho Santa Margarita, CA 92688

Harold E. Pizzetta, Esq.
Justin L. Matheny, Esq.
Office of the Attorney General
550 High Street, Suite 1200
P.O. Box 220
Jackson, MS 39205

This the 6th day of March, 2012.



SAMUEL L. BEGLEY

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Jackson, Mississippi 39205

Samuel L. Begley
sbegley1@bellsouth.net

Telephone
(601)969-5545

Facsimile
(601)969-5547

March 6, 2012

Via U.S. Mail

The Honorable Barbara Dunn
Hinds County Circuit Clerk
P.O. Box 327
Jackson, MS 39205
601-968-6628 (office)

RE: *Dr. Orly Taitz, Esq. v. Democrat (sic) Party of Mississippi, Secretary of State of Mississippi, Civil Action No. 251-12-107 CIV*

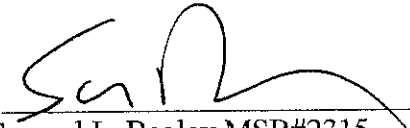
Dear Ms. Dunn:

I am enclosing for filing and docketing with your office one original and one copy of the Defendant Democratic Party of Mississippi's Motion to Dismiss Plaintiff's Petition for Declaratory and Injunctive Relief and for Sanctions in the above captioned matter. Please stamp "filed" on the copy and return it in the self-addressed stamped envelope enclosed.

Thank you for your assistances in this matter.

Sincerely,

BEGLEY LAW FIRM, PLLC

By: 
Samuel L. Begley MSB#2315

cc: The Honorable R. Kenneth Coleman
Orly Taitz, Esq.
Harold Pizzetta, Esq.

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
CA Bar License 223433
In propria Persona in MS

*Copy of Complaint must
accompany process - fee for
copying Complaint is \$288 a
piece -
Mail address for Democrat
Party - Sheriff cannot serve
PO Box -
Please advise*

FIRST JUDICIAL DISTRICT
Circuit Clerk's Office
P.O. BOX 327
Jackson, MS 39205
Phone: (601) 968-6628

DR. ORLY TAITZ, ESQ

) PETITION FOR INJUNCTIVE
) RELIEF

V)
DEMOCRAT PARTY OF MISSISSIPPI,)
SECRETARY OF STATE OF MISSISSIPPI)

Petitioner herein is inclosing \$120 additional fee per letter from the clerk of the court
Petitioner is inclosing a check for \$70 for the sheriff's department of Hinds county for service of
process of two defendants. Petitioner is requesting the clerk of the court to issue summons and
forward the summons, cover sheet and the petition to the sheriff's department for service of
process.

Respectfully,

Orly Taitz ESQ



Dr. Orly Taitz, ESQ.

29839 Santa Margarita Parkway, Ste. 100

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In propria Persona in MS

FIRST JUDICIAL DISTRICT

Circuit Clerk's Office

P.O. BOX 327

Jackson, MS 39205

Phone: (601) 968-6628

) PETITION FOR INJUNCTIVE
DR. ORLY TAITZ, ESQ) RELIEF
V) PETITION FOR
DEMOCRAT PARTY OF MISSISSIPPI,) DECLARATORY RELIEF
SECRETARY OF STATE OF MISSISSIPPI) CASE # 251-12-107civ

ATTENTION CLERK OF THE COURT

Please, find 2 checks for \$288.00 each as quoted for copying of the complaint and a check for \$70.00 for the Sheriff's department for service of process.

Please, serve the complaint and summons on the Secretary of State and on the Executive commission of the Democrat party, which is represented by

Samuel L. Begley

854 N Jefferson str.

Jackson, MS 39202

Please, serve the Executive Committee of the Democrat Party at the above address.

Additionally, please find the opposition to Respondent's motion to dismiss, which is included herein.

Sincerely,

A handwritten signature in black ink, appearing to be 'Orly Taitz', written in a cursive style.

Dr. Orly Taitz, ESQ

FILED
MAR 15 2012
BARBARA DUNN, CIRCUIT CLERK
D.C.

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DR. ORLY TAITZ, ESQ
V
DEMOCRAT PARTY OF MISSISSIPPI,
SECRETARY OF STATE OF MISSISSIPPI

) PETITION FOR INJUNCTIVE
) RELIEF
) PETITION FOR
) DECLARATORY RELIEF
) CASE # 251-12-107civ

OPPOSITION TO MOTION TO DISMISS

**MOTION FOR SUMMARY JUDGMENT IN FAVOR OF THE
PETITIONER AGAINST RESPONDENT SECRETARY OF STATE
MOTION TO RECUSE OFFICE OF THE ATTORNEY GENERAL FROM
REPRESENTATION OF THE SECRETARY OF STATE**

Petitioner herein moves this honorable court to Deny Respondent's motion to dismiss, as frivolous, irrelevant, impertinent, non-responsive to the complaint, grant Petitioner's motion to recuse the Attorney General from Representing Secretary of State of Mississippi due to conflict of interest and grant the Petitioner's motion for summary judgment against the Respondent Secretary of State of Mississippi, as both causes of action by the petitioner were unopposed.

SUMMARY OF THE FACTS

HISTORY OF THE CASE

Petitioner filed a petition for Declaratory relief and for injunctive relief seeking a declaration by this court that candidate Barack Hussein Obama (Hereinafter "Obama") is not eligible for the US Presidency and an injunction, preventing the secretary of State of Mississippi from placing on the ballot the name of Obama for a number of reasons:

- a. Barack Obama is using a computer generated forgery instead of a valid birth certificate as basis for his natural born citizen status
- b. Barack Obama is using a stolen Connecticut Social Security number, which was issued in 1977 to a resident of the state of Connecticut, who was born in 1890.

- c. Barack Obama's legal name as listed in his school registration in Indonesia is Soetoro, which is his step father's last name. In his mother's passport records he is listed under the last name Soebarkah, which appears to be blending of Barack and Soetoro according to South-East Asian tradition. Obama cannot be on the ballot, as Obama is not his legal last name and there is no evidence of him being a natural born US citizen.
- d. On March 1, 2012, sheriff of Maricopa county Joe Arpaio held a press conference, where he announced results of six month investigation, where he confirmed results obtained by Taitz and her experts. Arpaio announced Obama's alleged copy of his birth certificate to be a computer generated forgery. Additionally, Arpaio confirmed 2009 report by Taitz, that Obama's selective service certificate is forged as well. One has to have a valid registration with the selective service in order to serve in the federal government. Arpaio also reported that US entry Immigration information for August 1-August 7 1961 are missing, which serves as additional circumstantial evidence of a cover up of evidence of the international travel of Stanley Ann Dunham, Obama's mother.
- e. Evidence shows that Barack Obama is residing in the White House and attempting to get on the ballot yet again by virtue fraud and of use of forged

documents. He is being aided and abetted by a number of corrupt bureaucrats and judges.

- f. Actual witness testimony in relation to Barack Obama's eligibility January 26, 2012 trial in Atlanta Georgia and March 1, 2012 press conference by sheriff Arpaio is included in links below.

January 26, 2012 Georgia trial of Barack Obama-lack of eligibility

Part 3

http://www.youtube.com/watch?v=XvIHMZmlwAg&feature=BFa&list=PL54FAA29E29AD9139&lf=plpp_video

Part 4

http://www.youtube.com/watch?v=n-Czlpm5vWQ&feature=BFa&list=PL54FAA29E29AD9139&lf=plpp_video

Part 5

<http://www.youtube.com/watch?v=k-o2M4Pszv4&feature=related>

Part 6

http://www.youtube.com/watch?v=W2OrGv7zKTM&feature=BFa&list=PL54FAA29E29AD9139&lf=plpp_video

Part 7

<http://www.youtube.com/watch?v=FBKDI6T4V7w&feature=related>

Orly Taitz providing evidence to Sheriff Arpaio

http://www.youtube.com/watch?v=79rKCT1EbpE&list=PL54FAA29E29AD9139&index=3&feature=plpp_video

all the parts to Sheriff Joe Arpaio's expose of evidence.

Pt 1

http://www.youtube.com/watch?feature=player_embedded&v=QQqkFar5QMI

Pt 2

<http://www.youtube.com/watch?v=bih0ImX9jo4&feature=youtu.be>

Pt 3

<http://www.youtube.com/watch?v=pu3XpWh4HRM&feature=youtu.be>

Pt 4

http://www.youtube.com/watch?v=C-5_AWYJUs&feature=youtu.be

Pt 5

<http://www.youtube.com/watch?v=diYEOBERyZg&feature=youtu.be>

Pt 6

http://www.youtube.com/watch?v=Q_EGEIqY6S0&feature=youtu.be

<http://nation.foxnews.com/sheriff-joe-arpai/2012/03/01/sheriff-joe-arpai-obama-birth-certificate-forgery>

Approv

On March 1, 2012 Attorney General of Mississippi filed a motion to dismiss current action.

ARGUMENT

Motion to dismiss does not oppose the cause of action for Declaratory Relief. Indeed, a Circuit Judge has jurisdiction to review evidence and issue Declaratory judgment as to whether a candidate running for office is eligible or not and whether he is committing elections fraud. As the respondent Secretary of State did not oppose the motion for Declaratory relief, the Petitioner moves the court to grant the motion for declaratory relief against respondent Secretary of State.

Motion to dismiss does not oppose the cause of action for Injunction. Circuit court judge is indeed free to issue an injunction to placing a candidate on the ballot, when the candidate is not eligible. As the Respondent Secretary of state does not oppose the cause of action for Injunction, it should be granted.

Respondent made up a cause of action, which the Petitioner never filed, specifically a cause of action for a Writ of Mandamus and argued that it should be denied and the Petition needs to be dismissed.

A respondent cannot make up a cause of action, which is not a part of the complaint and argue that the complaint should be dismissed because this made up cause of action fails.

Regardless of whether this made up cause of action for a Writ of Mandamus stands or fails, this is not a cause of action, which was filed by the Petitioner.

Though the Petitioner is not obligated to disprove or oppose a cause of action, which is not a part of her complaint, in abundance of caution Petitioner will address it.

The essence of this Motion to Dismiss, is that the Secretary of State has no duty to verify an investigate the eligibility of the candidates, there is no specific provision in MS law, that states that a candidate, who is known to be a fraud and who is using a forged birth certificate and other forged identification papers, needs to be

removed from the ballot. As such, as the Secretary of State does not have to do it, any fraud, any criminal can be on the ballot in MS.

1. The fallacy of this premise is precisely in that the Petitioner did not file a Writ of Mandamus and is not asking the Secretary of State to do anything. She is asking the court to review the evidence and come up with the Declaratory finding, as to whether the candidate is eligible and if he is indeed using forged identification papers, to issue an injunction preventing him from being on the ballot.
2. Injunctions are common. This injunction is not any different from other injunctions, that are issued by Circuit Court judges. We see injunctions preventing abusive spouses from being in contact with their families. We see injunctions preventing drunk drivers from holding driving licenses and endangering the public. If a judge finds a doctor using a forged medical diploma, he would issue an injunction, preventing such "doctor" from practicing medicine and potentially hurting patients. If an architect is using a forged diploma, a Circuit judge might issue an injunction, preventing such "architect" from holding a license and potentially hurting people. When a fraud and a usurper is using a stolen Social Security number and a forged birth certificate in order to get into the position of the US president, he can cause an enormous damage to the country as a whole. We really don't know,

who is this man and where does his allegiance lie. Here are but a few possible repercussions on the U.S. national security and U.S. economy of usurpation:

- a. Recently Barack Obama proposed a unilateral disarmament of the United States, whereby up to 80% of the U.S. nuclear arsenal would be destroyed. This means, that current U.S. arsenal of some 1550 nuclear war heads will be reduced to some 300 -400 warheads, significantly less, than Russia's arsenal and even less than the arsenal of the red China.
- b. Obama imposed an moratorium on offshore oil drilling, which killed some 80,000 jobs in the gulf of Mexico. When an **injunction to moratorium** was issued by a federal judge Martin Feldman in LA, Obama went around the Federal Judge and continued with the de facto moratorium. At the same time he traveled to Brazil, where his biggest benefactor, George Soros, is heavily invested in off shore drilling through Petrobras, and announced that the U.S. will be the biggest buyer of Brazilian oil. These and other schemes led to doubling of oil prices in the US and American citizens are currently paying some \$5 per gallon.
- c. Obama incurred over 6 trillion dollars of national debt, which nearly equals to the National debt incurred by 43 Presidents before him.

3. These and many other examples highlight an enormous danger to the U.S. national security and economy, when a usurper with unknown allegiance is allowed to occupy the White House by virtue of fraud and forgery.
4. Further, the motion by the office of the AG is so utterly ridiculous, that one can easily highlight this absurd by using a following hypothetical.

Attorney General Hood is saying that the fact that Obama is using a forged birth certificate and a stolen Social Security number as a basis of his legitimacy is o'k and a Circuit Judge cannot issue a Declaratory relief and injunction because there is no specific law that states that the Secretary of State should remove from the ballot a person, who is a fraud and a criminal and who is using forged and stolen identification papers as the basis of his eligibility to run for office. Well, recently it was published, that a citizen of New Mexico created forged IDs for his dog and got a voter registration card for his dog. He did it in protest against the pervasive corruption that we have today in our judiciary, law enforcement, elections and top positions of power.

Using this scenario Attorney General of Mississippi, Democrat Jim Hood, would allow a dog to run for President in the state of Mississippi, too. As long of course, as the dog in question happens to be a Democrat. Hood would argue, that there is no specific law, no specific duty for the Secretary of State to question the eligibility of a dog to run for the US president. He would argue that the Secretary

of State has no specific duty to remove a dog from the ballot. This partisan insane approach is bordering on complete stupidity or treason against the state of Mississippi and the United States of America.

Not everything is spelled out in statutes. For example, the statutes do not write that Attorney General and the Secretary of State should be paid a salary and how much should they be paid. However, it is understood, that they need to be paid some salary for their work in order to feed their families. It is also understood that the Attorney General and the Secretary of State should possess a minimal IQ and minimal common sense while doing their work in order not to place on the ballot the name of a person, who is using a forgery instead of a birth certificate, a stolen Social Security number and a name, that is not legally his as a basis of his eligibility for the U.S. Presidency.

**SECRETARY OF STATE FAILED HIS DUTY REGARDING
PRESIDENTIAL PRIMARY BALLOT**

Respondent quotes Code Section 23-15-1089 as the basis for his allegation, that the Secretary of State fulfilled his duty in relation to Obama's candidacy.

On the contrary, this statute only strengthens and supports the Petitioner's position.

The statute states" The Secretary of State shall place the name of the candidate upon the presidential preference primary ballot when the Secretary of State **shall have determined** that such a **candidacy** is generally recognized throughout the Unites States or Mississippi as a candidate for the nomination of **President of the United States"** (emphasis added)

Let's look at the construction of the statute.

1. First, it does not state that the Secretary of State shall have assumed or guessed or figured by the tarot cards, it says "**shall have determined**" .

While Petitioner was not born in this country and English is not her first or second language, she never the less believes that there is a big difference between the words assumed or determined. Dictionary on line by Farlex states:

determined - having been learned or found or determined especially by investigation
undetermined - not yet having been ascertained or determined; "of undetermined species"

determined -
dictated, set
settled - **established or decided beyond dispute or doubt**

So, the Secretary of State needs to **determine- to establish something beyond dispute or doubt.**

2. What does Mr. Hosemann, the Secretary of State of Mississippi, need to establish, decide beyond dispute or doubt? He needs to establish:

a. that Obama is a candidate for the US Presidency

b. that he is a generally recognized candidate

3. how does one establish beyond dispute or doubt that a person is a candidate for the US Presidency?

What does it mean to be a **candidate**? For example, in order to be a candidate for licensure of a doctor, one needs to have a valid diploma from a medical school and a valid certificate of passing medical boards? When he has those documents, he can be considered a candidate for obtaining a license to practice medicine in Mississippi.

What are the requirements, prerequisites to be a candidate for the US. Presidency?

According to the Article 2 Section 1 of the U.S. Constitution a candidate has to be :

a. Natural born citizen

b. 35 years old

c. resided in the country for 14 years

4. How does one **establish beyond dispute or doubt** that a person is a natural born citizen and at least 35 years old?

In her complaint Taitz provided an argument that according to the intent of the framers of the Constitution and Minor v Happersett 88 US 162(1875), natural born means born in the country to two citizen parents. Some believe that it means only born in the country regardless of the citizenship of the parents. Even if you assume for the purpose of this discussion the most minimal requirement of only being born in the country, there is still a **need to establish beyond dispute or doubt that one was born in the country**

5. How does one **establish beyond dispute or doubt** that one is born in the country? By examining candidate's primary identification papers, such as the original long form birth certificate, valid SS-5, valid hospital birth certificate. Taitz has provided with her complaint court transcripts with competent witness testimony which was admitted in court records, showing Obama's birth certificate and Social Security number to be a forgery. She is providing this court with the original signed court transcript with an embossed seal.

6. Can the Secretary of State establish beyond dispute or doubt, that a person with a forged birth certificate is a valid candidate for the White House?

No. For the "Big House"-most probably, but not for the White House.

7. As the first prong of establishing that one is a candidate for the U.S.

Presidency fails due to lack of valid identification records, the other prong of being recognized throughout Mississippi or US is irrelevant.

Additional argument can be made that common sense would tell one that

“candidate generally recognized throughout the U.S. ” means recognized as a

legitimate candidate. After the January 26 eligibility hearing in Georgia and

March 1 press conference by sheriff Arpaio in Arizona Obama is **no longer**

known as a legitimate candidate. He is known as a fraud, as a criminal, who is

using forged documents. Attached links and press releases attest to that. Both

January 26 hearing and March 1 press conference were videotaped by all major

networks. So, for that reason alone, respondents argument fails, as Obama is no

longer known and a legitimate candidate, but as a fraud, who is kept in office

and on the ballot by corrupt governmental officials, AGs, and judges, who

were either intimidated, blackmailed or bribed to be complicit in the biggest

case of elections fraud, forgery and treason, ever to take place in this country.

There are no precedents, which would be relevant to this case, as normally people do not reach such level of criminality and arrogance, as to assume the top position of power, while using forged documents.

There is a belief that president Chester Arthur might have burnt his identification papers, however it was found that Arthur was born in this country. President Chester Arthur's handicap was only in that possibly his father was not a U.S. citizen yet at the time Arthur was born. In Obama's case not only his father was never a U.S. citizen and Obama was a foreign national with foreign allegiance at birth, but he is also using forged identification papers as proof of his U.S. birth.

Respondent brings forward the case Keyes v Bowen, 189Cal. App.4th 647(Cal.App. 3 Dist.2010). Keyes is vastly different from the case at hand. If Respondent were to look at the caption of the case, as it was filed in the Superior court of CA, Respondent would see that Taitz was actually the lead counsel on the case. The difference between Keyes and the case at hand, is that Keyes was filed after the election. Keyes challenged the elected President. Due to the fact that the co-counsel in Keyes, Garry Kreep, left the state prior to the electoral college meeting, the hearing on Keyes was postponed to March of 2009, which was after not only the election, but also after the swearing of the

President. Requirements in a challenge of the sitting President are different from requirements for challenging a candidate in the primary election, who is seeking to be on the ballot. Additionally, a decision of a California court of Appeals in Sacramento, who happens to be to the left of Lenin, is not binding on the Circuit Court in the state of Mississippi.

Additionaly, standing in this case is statutory. Section 23-15-961 allows any party to challenge a candidate on the ballot by first lodging a complaint with the party. The same statute provides a party, aggrieved by a negative action or inaction of the party, to file an action challenge with the Circuit court. As the standing is provided by the statute, the argument of lack of standing is without merit.

Respondent's claims regarding lack of summons are erroneous

a. This assertion of improper service is absolutely wrong. Exhibit 1, Electronic docket shows that the summons were issued on February 28th and sent to the Petitioner. Apparently it takes some time for the mail to reach a recipient, when the mail travels from MS to Orange County, CA. Summons issued on February 28th, were received by the petitioner only 7 days later on March 5th. Copy of the summons is attached herein. The Respondent simply jumped the gun and did not wait a reasonable amount of time to get the summons.

b. Respondent was indeed served with the complaint and the respondent responded, therefore the issue of service is moot

c. Petitioner did not delay the service of process, but rather was trying to ascertain, where the trial will be held. The case was filed in the First Circuit in Hinds county and originally was assigned to Judge Gowan. Judge Gowan forwarded the case to the Supreme Court. Chief justice Dickenson assigned the Honorable judge Coleman from Union county to preside over the case. This decision was made on February 21st. Shortly thereafter Taitz tried to ascertain, where the case will be held.

She called the Supreme Court at 601-359-3694 and the First Circuit at Hinds County at 601-968-6628 and talked to the clerk Zach Wallace.

She also called 601-968-6656 Anna Livingston, staff attorney for judge Gowan, who originally had the case. Nobody knew, where the case would be held. Finally Ms. Livingston advised Taitz to wait for Your Honor to contact her and advise where the case will be held. Staff attorney Livingston stated, that she believed the case will be held in the Union county, but she was not sure. Taitz waited for a few days in order to find out the location of the case and advise to respondents in the summons. As she did not hear from anyone, she wrote to the Circuit Court in Hinds county, asking to issue the summons in Hinds county. Summons were issued

within one week since the case was assigned by Justice Dickenson. Taitz did everything she possibly could to ascertain the location of the case and advise the respondents.

Similarly, there were no laches in filing the case. Democrat party of Mississippi was not responding and several times claimed that they never received the challenge. Taitz waited till the 24th of January and waited additional 15 days after the deadline of the 24th, as she was supposed to, in order to give the Democrat party time to respond. She filed the complaint timely and the filing is controlled by the **mailbox rule**. February 14th is the date of docketing of the complaint, not the date of filing. As shown with the summons, it takes a week for the mail to reach Mississippi after being mailed from California, which explains later docketing date. Additionally, Taitz talked to the manager of the mail room, Tabitha Ward, and found out, that the same mail room is sorting the mail for the Circuit court, County court and the sheriff's department, which causes an additional delay.

**MOTION TO RECUSE THE OFFICE OF THE SECRETARY OF STATE
OF MISSISSIPPI**

Petitioner herein is seeking to recuse the office of the Attorney General of Mississippi from representing the Secretary of State of Mississippi in above litigation for following reason:

Petitioner filed with the Attorney General a Criminal complaint (Exhibit 2), advising the attorney general of the recent finding by the Sheriff of Maricopa county that the alleged birth certificate by Barack Obama is a computer generated forgery. This evidence necessitates criminal prosecution of the person of interest in this case, Barack Hussein Obama for fraud and use of forged documents in order to get into the position of the US President. Additionally this evidence necessitates criminal prosecution of the members of the Executive Committee of the Democrat party of Mississippi for aiding and abetting elections fraud and forgery. Office of the Attorney General of Mississippi would be in conflict of interest prosecuting parties and being involved in defense of the same parties at the same time. As such, office of the Attorney General of Mississippi needs to be recused from representing the Secretary of State.

Additionally, Secretary of state here is not being sued for something done by the Secretary of State. Secretary of State will simply need to comply with the injunction by this court and not place on the ballot a candidate, who is not eligible. Petitioner is willing to waive any costs and fees, that she is entitle to receive from the Secretary of State. As such, the secretary of state does not stand to suffer any losses and there is no need for the Attorney General to represent the Secretary of state and compromise the office of the Attorney General and compromise this case with the conflict of interest. Petitioner believes that the Secretary of State will be

well represented by its' internal counsel or if the court chooses so, by an independent counsel.

**MOTION FOR SUMMARY JUDGMENT IN FAVOR OF THE
PETITIONER AGAINST THE RESPONDENT SECRETARY OF STATE**

1. Petitioner incorporates all of the above paragraphs as if fully pled herein.
2. Respondent filed a motion to dismiss, which shows, that the respondent was indeed served with the complaint.
3. Respondent did not object in any form or shape to the cause of action for Declaratory Relief, as such Petitioner moves this court to deem the cause of action for Declaratory relief to be unopposed by the Respondent Secretary of State of Mississippi and grant the judgment in favor of the petitioner.
4. Respondent did not oppose the cause of action for injunction, therefore the Petitioner moves the court to grant her motion for Injunctive relief against the Respondent Secretary of state as unopposed by the Respondent.
5. Respondent filed a motion to dismiss Petition for a Writ of Mandamus. Petitioner never filed a petition for a Writ of Mandamus and moves the court to deny the petition as frivolous, irrelevant, impertinent and moot, as Petitioner never petitioned for a Writ of mandamus. Even if the court were to grant the motion to

deny the Petition for a Writ of Mandamus, the court still has to grant the Petitioner's motion for Summary judgment against respondent Secretary of State for Declaratory Relief and Injunction, as those causes of actions were not opposed.

CONCLUSION

Due to all of the above this Honorable court should

1. Deny Respondent's motion to dismiss
2. Recuse Attorney General of Mississippi from representing the Secretary of State of Mississippi
3. Grant Petitioner's motion for summary judgment in favor of the Petitioner

Respectfully submitted,

/ s/ Dr. Orly Taitz, ESQ



Proof of Service

I, Rita Momtazian, am not a party to above action, I am over 18 years old and I declare that I served the respondent's by certified mail with the above pleadings on March 6, 2012 at the following addresses:

Attorney General of Mississippi

Counsel for Respondent Secretary of State

Taitz v Secretary of State and Democrat Party of MS Motion for Summary judgment for the Petitioner

550 High Str. POBox 220

Jackson, MS 39205

Samuel L. Begley

Counsel for the Respondent

Democrat Party of MS

Begley law firm, PLLC

P.O. Box 287

Jackson, MS 39205

Signed

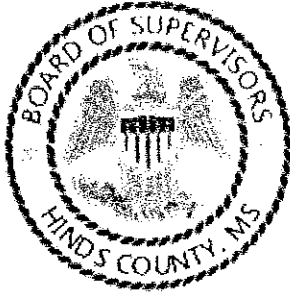


Rita Momtazian

Dated

03.06.2012

Exhibit 1



Quick Links Online Services Report Problems Search

Circuit Court Civil Case Detail

- Home
- Board Meeting Agendas
- Board Meeting Minutes
- County Departments +
- Courts +
- Elected Officials +
- FAQ
- Flood Information +
- Job Opportunities
- Online Databases
- Sex Offender Registry
- Veterans Services
- Phone Numbers
- Human Services +
- Public Health +
- Charitable Organizations
- Culture & Recreation +
- Municipalities +
- Schools +
- Public Parks
- Cooperative Extension *
- Econ. Development *
- CMPDD *
- Pearl River Basin *
- Library System *
- Federal Government +

Case #	2012-107	Filed:	02/14/2012	Case Type:	COMPL
Judge	GOWAN	Closed:		District :	1
Style:	TAITZ ORLEY DR				SELF REPRESENTI
Vs	DEMOCRAT PARTY OF MISSISSIPPI ET AL SECRETARY OF STATE OF MISSISSIPPI				
LINE	DATE	EVENT	DESCRIPTION		
1	02/14/2012	PETITION	FOR INJUNCTIVE RELIEF PETITION FOR DECLARATORY RELIEF		
2	02/14/2012	COURT REGISTRY	CHECK #1267 FOR \$300 RECEIVED AS BOND FROM DEFEND OUR FREEDOM FOUNDATION		
3	02/21/2012	MISC	EMAILED ORDER APPOINTING SPECIAL JUDGE TO ATTY OF RECORD		
4	02/21/2012	ORDER	OF SUPREME COURT - R KENNETH C OLEMAN APPOINTED SPECIAL JUDGE		
5	02/28/2012	PAYMENT	REC FROM DEFEND OUR FREEDOM FOUNDATION		
6	02/28/2012	SUMMONS ISSUED	AND RET TO PL- NO COPIES OF COMPLAINT PROVIDED- COPY COST \$288.00 PER COPY		
7	03/01/2012	MOTION	OF SECRETARY OF STATE TO DISMISS HAROLD E PIZZETTA III, JUSTIN		
8	03/01/2012	MISC	BEGLEY, DR ORLY TAITZ		

[Back](#) [Search](#)

IN THE CIRCUIT COURT OF THE FIRST JUDICIAL DISTRICT
OF HINDS, COUNTY, MISSISSIPPI

TAITZ ORLEY DR Plaintiff DATE: 02-28-12
VS.
DEMOCRAT PARTY OF MISSISSIPPI ET AL Defendant No. 251-12-000107-CIV

SUMMONS

TO THE SHERIFF OR ANY PERSON AUTHORIZED BY STATUTE:

You are hereby commanded to Summons:

DEMOCRATIC PARTY OF MISSISSIPPI -----

SECRETARY OF STATE OF MISSISSIPPI -----

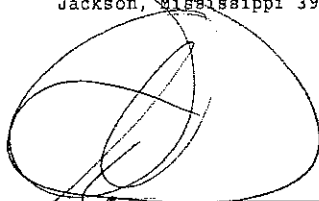
NOTICE TO DEFENDANT

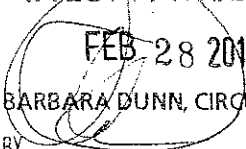
THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS BY FILING YOUR ANSWER AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE.

THIS ANSWER MUST BE FILED AS PROVIDED BY LAW AND/OR THE MISSISSIPPI RULES OF CIVIL PROCEDURE WITHIN 30 DAYS OF THE DATE YOU ARE SERVED OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

BARBARA DUNN
Circuit Clerk
Hinds County, Mississippi
Post Office Box 327
Jackson, Mississippi 39205

DR ORLY TAITZ
ATTORNEY FOR PLAINTIFF
29839 SANTA MARGARITA PARKWAY, STE 100
ADDRESS
RANCHO SANTA MA CA 92688
CITY, STATE, ZIP
949-683-5411
PHONE NUMBER

By  D.C.

ATTEST A TRUE COPY
FEB 28 2012
BARBARA DUNN, CIRCUIT CLERK
BY  D.C.

RETURN

Exhibit 2

DR. ORLY TAITZ, ESQ
29839 SANTA MARGARITA STE 100
RANCHO SANTA MARGARITA CA 92688
PH. 949-688-5411 FAX 949-766-7603 ORLY.TAITZ@GMAIL.COM

03.01.2012

Via overnight mail

CRIMINAL COMPLAINT

Attention Mr. Jim Hood

Attorney General of the State of Mississippi

550 High Str.

POBox 220 Jackson, MS 39205

RE: elections fraud, use of a fraudulent Social Security number, forged birth certificate and a name that is not a legal name by a candidate for the U.S.

President Barack Hussein Obama (Hereinafter "Obama")

Criminal complicity in elections fraud, use of forged documents and treason by members of the Executive Committee of the Democrat party of Mississippi

Dear Mr. Hood,

1. Recently you received my complaint Taitz v Democrat Party of GA, Secretary of State of GA 2012-107, with some 300 pages of evidence which show undeniable proof of candidate Barack Hussein Obama, whose candidacy was submitted to be on the ballot in the state of Mississippi, committing elections fraud by use of a stolen Connecticut Social Security number of a resident of Connecticut, born in 1890, as well as using a forged birth certificate, as well as using a name, which is not legally his.

2. Executive committee of the Democrat party of Mississippi received above information and failed to respond and failed to remove Mr. Obama's name from the ballot. As such, members of the Executive Committee of the Democrat Party State of Mississippi became criminally complicit in the biggest elections fraud in the history of the United States, complicit in uttering of forged documents, Social Security fraud, identity theft and high treason against the state of Mississippi and against the United States of America.

3. On March 1, 2012 Sheriff Joe Arpaio of Maricopa county Arizona held a press conference , where he confirmed my findings and announced that Obama's birth certificate is indeed a computer generated forgery and there is no other

document attesting to Obama's birth in this country. See links to press conference

below:

Pt 1

http://www.youtube.com/watch?feature=player_embedded&v=QOqkFar5QMI

Pt 2

<http://www.youtube.com/watch?v=blh0ImX9jo4&feature=youtu.be>

Pt 3

<http://www.youtube.com/watch?v=pu3XpWh4HRM&feature=youtu.be>

Pt 4

http://www.youtube.com/watch?v=C-5_AWIYJUs&feature=youtu.be

Pt 5

<http://www.youtube.com/watch?v=diYEOBERyZg&feature=youtu.be>

Pt 6

http://www.youtube.com/watch?v=Q_EGEIqY6S0&feature=youtu.be

Part 7

<http://nation.foxnews.com/sheriff-joe-arpaiio/2012/03/01/sheriff-joe-arpaiio-obama-birth-certificate-forgery>

Orly Taitz providing evidence to Sheriff Arpaio

http://www.youtube.com/watch?v=79rKCT1EbpE&list=PL54FAA29E29AD9139&index=3&feature=plpp_video

January 26, 2012 Georgia trial of Barack Obama-lack of eligibility

Part 3

http://www.youtube.com/watch?v=XvIHMZmlwAg&feature=BFa&list=PL54FAA29E29AD9139&lf=plpp_video

Part 4

http://www.youtube.com/watch?v=n-CzIpm5vWQ&feature=BFa&list=PL54FAA29E29AD9139&lf=plpp_video

Part 5

<http://www.youtube.com/watch?v=k-o2M4Pszv4&feature=related>

Part 6

http://www.youtube.com/watch?v=W2OrGv7zKTM&feature=BFa&list=PL54FAA29E29AD9139&lf=plpp_video

Part 7

<http://www.youtube.com/watch?v=FBKDI6T4V7w&feature=related>

4. Due to all of the above I demand criminal charges filed against Obama for elections fraud, use of a forged birth certificate, stolen Social Security number, Social Security fraud. I demand criminal charges filed against the members of the executive committee of the Democrat party of Mississippi for aiding and abetting all of the above felonies, as well as misprision of above felonies and high treason against the United States of America.

5. Due to the above conflict of interest I demand that you and your office recuse yourselves from representing the Secretary of State of Mississippi in the case of

Taitz v Democrat party of Ms and Secretary of State of MS. First Circuit Court 251-12-107

6. I demand that you withdraw your most frivolous motion to dismiss submitted to judge Coleman.

7. Please, advise me within 7 days, whether you will agree with above requests. If I do not hear from you within 7 days and if criminal action is not brought against Obama and members of the Executive Committee of the Democrat party of MS, I will be filing a motion with Judge Coleman and Justice Dickenson, asking them to bring sue sponte charges against Obama, Executive committee of the Democrat party of Mississippi and against you personally for all of the above felonies and high crimes and misdemeanors.

Sincerely,



Dr. Taitz, Esq

cc Hon. R Kenneth Coleman

Special Circuit Judge

PO Box1995

New Albany, MS 38652

cc Chief Justice Dickenson

Supreme Court of Mississippi

P. O. Box 249, Jackson, **Mississippi** 39205. **Phone:** (601) 359-3694. **Fax:** (601) 359-2407.

2542-107CW

FILED
APR 02 2012
BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.

Camera Coverage Notice

Rule 5 of the Mississippi Rules for Electronic and Photographic Coverage of Judicial Proceedings requires that media representatives give at least **48 hours** notice prior to the commencement of a proceeding if they propose to photograph, videotape, make an audio recording or engage in any other form of electronic coverage.

Notice should be given to the clerk of the court and the court administrator in the court in which the proceeding will occur.

Note: the notice requirement does not apply to reporters who wish to attend a trial without taking pictures or making broadcast recordings.

To assist the court, please provide the following information:

Style of case Taitz v. Secretary of State, Mississippi Democratic Party

Cause number 2012-107

Court Hinds County Circuit

Judge Kenneth Coleman

Date of proceeding April 16, 2012

Media organization Jackson Jambelaya / Northside Sun

Name(s) of journalist(s) and contact number(s)
James Hendrix 601214 7397

Medium:

- still photography
- videotape
- audio recording only

Type of coverage anticipated:

- spot coverage
- complete coverage*
- opening and closing arguments
- specific witnesses, if known _____

A complete copy of the Mississippi Rules for Electronic and Photographic Coverage of Judicial Proceedings is available on the web site of the Mississippi Supreme Court at www.mssc.state.ms.us. Journalists are expected to be familiar with and comply with the rules.

Date submitted 4-2-12 Submitted by [Signature]
Signature

* I plan to videotape & publish entire hearing; C-SPAN style coverage.

BEGLEY LAW FIRM, PLLC
Post Office Box 287
Jackson, Mississippi 39205

Samuel L. Begley
sam@begleylawfirm.com

FILED

APR 02 2012

BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.

Telephone
(601)969-5545

Facsimile
(601)969-5547

March 30, 2012

Via Hand Delivery

The Honorable Kathy Gillis
Mississippi Supreme Court Clerk
450 High Street
Jackson, Mississippi 39205
Phone: 601-359-3697

RE: *Dr. Orly Taitz, Esq. v. Democrat (sic) Party of Mississippi, Secretary of State of Mississippi; In the Circuit Court of Hinds County, Mississippi; Civil Action No. 251-12-107 CIV*

Dear Ms. Gillis:

I am enclosing for filing and docketing with your office, in connection with the above captioned civil action, the Defendant Mississippi Democratic Party Executive Committee's Motion for Admission of Counsel *Pro Hac Vice* and Verified Application of Scott J. Tepper, Esq. that was filed today with the Circuit Court of Hinds County, Mississippi, pursuant to M.R.A.P. 46(b)(5). As you can see from the enclosed correspondence, I am likewise paying the Mississippi Bar the sum of \$200.00. Also, I am enclosing a check payable to the Mississippi Supreme Court in the amount of \$25.00 to pay for the required docket fee for this matter. In accordance with M.R.A.P. 46(b)(5), I am requesting that you provide me with a statement indicating all causes or other matters in which the applicant, Mr. Tepper, previously requested leave to appear as counsel *pro hac vice*. Upon our receipt, we will file your statement with the Circuit Court of Hinds County, Mississippi.

Thank you for assistance in this matter.

Sincerely,

BEGLEY LAW FIRM, PLLC

By: _____
Samuel L. Begley MSB#2315

Enclosures

cc: The Honorable R. Kenneth Coleman, Special Judge (via email and U.S. Mail)
The Honorable Barbara Dunn, Hinds County Circuit Clerk (via U.S. Mail)
All Counsel of Record (via email and U.S. Mail)

BEGLEY LAW FIRM, PLLC

Post Office Box 287
Jackson, Mississippi 39205

Samuel L. Begley
sam@begleylawfirm.com

Telephone
(601)969-5545

Facsimile
(601)969-5547

March 30, 2012

Via Hand Delivery

FILED

APR 02 2012

BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.

Ms. Ashley Sasser, Membership Records
The Mississippi Bar
643 North State Street
Jackson, MS 39202

RE: *Dr. Orly Taitz, Esq. v. Democrat (sic) Party of Mississippi, Secretary of State of Mississippi*; In the Circuit Court of Hinds County, Mississippi; Civil Action No. 251-12-107 CIV

Dear Ms. Sasser:

I am enclosing the Defendant Mississippi Democratic Party Executive Committee's Motion for Admission of Counsel *Pro Hac Vice* and Verified Application of Scott J. Tepper in the above referenced case that was filed today with the Circuit Court pursuant to M.R.A.P. 46(b)(5). I am also enclosing a check in the amount of \$200.00 for filing the Motion and Application.

Thank you for your kind consideration to this matter. Please call if you have any questions.

Sincerely,

BEGLEY LAW FIRM, PLLC

By: _____
Samuel L. Begley MSB#2315

Enclosures

cc: The Honorable R. Kenneth Coleman, Special Judge
The Honorable Kathy Gillis, Supreme Court Clerk
All Counsel of Record

BEGLEY LAW FIRM, PLLC
Post Office Box 287
Jackson, Mississippi 39205
FILED
APR 02 2012
BY BARBARA DUNN, CIRCUIT CLERK
D.C.

Telephone
(601)969-5545
Facsimile
(601)969-5547

Samuel L. Begley
sml@begleylawfirm.com

March 30, 2012

Via Email and U.S. Mail

FILED
APR 02 2012
BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.

The Honorable R. Kenneth Coleman
Special Circuit Judge
P.O. Box 1995
New Albany, Mississippi 38652

RE: *Dr. Orly Taitz, Esq. v. Democrat (sic) Party of Mississippi, Secretary of State of Mississippi*; In the Circuit Court of Hinds County, Mississippi; Civil Action No. 251-12-107 CIV


Dear Judge Coleman:

I am providing you for your consideration the Motion and Verified Application of Scott J. Tepper, Esq., a member in good standing of the California Bar, for admission of counsel *pro hac vice* for the Defendant, the Mississippi Democratic Party Executive Committee, in accordance with M.R.A.P. 46(b). I am also enclosing my correspondence to the Mississippi Bar, in which I enclosed a \$200.00 check in accordance with M.R.A.P. 46(b)(5). Also, upon my receipt, I will forward you the Statement of the Supreme Court Clerk concerning other *pro hac vice* appearances of Mr. Tepper in Mississippi. Should you deem the Motion and Verified Application meritorious, I am providing for your consideration a proposed order, which I am also emailing you in Microsoft Word format in case you care to edit it in any way.

Please feel free to contact me should you have any questions concerning this matter.

Sincerely,

BEGLEY LAW FIRM, PLLC

By: 
Samuel L. Begley MSB#2315

Enclosures
cc: All Counsel of Record

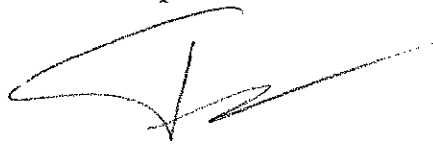
Dr. Orly Taitz, ESQ
29839 Santa Margarita pkwy, ste 100
Rancho Santa Margarita, CA 9268
Ph 949-683-5411 fax 949-766-7603

Attn Ms. Ann Giles,

Dear Ms. Giles, per our conversation, please send back to me the Priority mail box, which contained my pleadings and checks. Please, find a self addressed postage prepaid envelope. I am investigating with the post office in order to ascertain, why it took 10 days to deliver my Priority mail 2 day package.

My case deals with elections fraud and problems with delivery of my mail happened before.

Sincerely,



Dr. Orly Taitz, ESQ

Cc Special Judge R.Kenneth Coleman
Cc Secretary of State
Cc law offices of Mr. Begley,
Counsel for the Democratic party of MS

*returned
3-19-12
[Signature]*

FILED
MAR 19 2012
BARBARA DUNN, CIRCUIT CLERK
BY _____ D.C.