

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

Captain Pamela Barnett, et al.,  
Plaintiffs,

v.

Barack Hussein Obama,  
Michelle L.R. Obama,  
Hillary Rodham Clinton, Secretary of State,  
Robert M. Gates, Secretary of Defense,  
Joseph R. Biden, Vice-President and  
President of the Senate,  
Defendants.



Civil Action:

**SACV09-00082-DOC-AN**

**Declaration of Orly Taitz**

1. My name is Orly Taitz. I am over 18 years old, am of sound mind and free of any mental disease or psychological impairment of any kind or condition.
2. I am a citizen of the United States of America and a resident of the state of California.
3. I am an attorney and an officer of the court licensed in all courts of the state of California, Supreme Court of the United States, Federal District Court in the central District of the State of California and have practiced pro hac vice in the states of Texas, Pennsylvania and Georgia.
4. I am the plaintiffs' attorney in the above captioned case. This declaration is made in response to the October 29<sup>th</sup> order in above captioned case.
5. I have done research in this case and found the following:
6. On October 1, 2009 Mr. Siddharth Velamoor, a new law clerk was hired by this court.

7. According to Martindale lawyers database Mr. Velamoor is listed as an attorney for Perkins Coie LLC
8. Perkins Coie via its senior counsel Mr. Robert Bauer acted as the defense attorney representing Mr. Obama against numerous challenges to Mr. Obama's legitimacy to presidency, similar to the current action.
9. Perkins Coie was one of the defense firms opposing the undersigned counsel and plaintiffs in this case in *Keyes et al v Bowen et al*, specifically challenging Secretary of state of CA Debra Bowen who did not verify Mr. Obama's eligibility.
10. Mr. Bauer from Perkins Coie has served as a counsel for Obama Campaign for America.
11. Mr. Bauer is an attorney for Obama's Organizing for America
12. Mr. Bauer is an attorney for the Democratic National Committee.
13. Mr. Bauer's wife Anita Dunn is the White House Communications Director.
14. According to World Net Daily magazine Mr. Obama and the Democratic National Committee have paid Perkins Coie \$1,666,397.01 since the 2008 election.
15. Mr. Bauer has sent a threatening and intimidating letter to Mr. John Hemenway, a DC attorney with 30 years of experience with JAG and State Department, whereby Mr. Bauer has threatened Mr. Hemenway with sanctions and costs, if he dares to appeal a negative decision in a similar case by Judge James Robertson in the District court for the District of Columbia. In that case Judge Robertson came up with a brilliant legal argument, that there was no need to

see the actual documentary evidence for Mr. Obama because his eligibility was “twittered and massaged on the blogs”.

16.I declare under penalty of perjury that all of the above are true and correct statements. Respectfully submitted

NOVEMBER 16, 2009

/s/ ORLY TAITZ, ESQ.

By: \_\_\_\_\_

Dr. Orly Taitz, Attorney-at-Law  
29839 Santa Margarita Parkway  
Rancho Santa Margarita CA 92688  
Tel: (949) 683-5411; Fax (949) 766-7603

California State Bar No.:223433