

FILED

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO
CENTRAL JUSTICE CENTER

AUG 28 2012

ALAN CARLSON, Clerk of the Court

1 Dr. Orly Taitz ESQ.
2 29839 Santa Margarita Pkwy Suite 100
3 Rancho Santa Margarita, CA 92688
4 Phone (949) 683-5411 fax (949) 766-7603
5 Email: Orly.taitz@gmail.com
6 CA Bar license 223433
7 Counselor for Plaintiffs

8 IN THE U.S. DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 SOUTHERN DIVISION *State Court*

11 ~~Keith Judd,~~
12 Orly Taitz,
13 ~~Thomas G. MacLoran,~~
14 ~~Leah Lax,~~
15 ~~David Farrar~~
16 ~~Larry Rappaport,~~
17 ~~Lucien Vita~~
18 ~~Carol Vita~~

19 Plaintiffs,

20 v.

21 BARACK OBAMA, ET AL.

22 Defendants

Case No.: *30-202-0058213*
Notice of Removal
First amended complaint FOR: *C17*

- 1) FRAUD
- 2) ELECTIONS FRAUD
- 3) NEGLIGENCE
- 4) BREACH OF FIDUCIARY DUTY
- 5) NEGLIGENCE
- 6) DEFAMATION
- 7) RICO predicate crimes:
FRAUD, AIDING AND ABETTING
FORGERY AND FORGED
DOCUMENTS TO COMMIT
ELECTIONS FRAUD,
RAKETEERING
- 8) ~~IIED~~
DEFAMATION OF CHARACTER
7TH AMENDEMENT JURY
REQUESTED
(CASE REMOVED FROM THE
STATE SUPERIOR COURT)

NOTICE OF REMOVAL

1
2
3 TO:

4
5 Barack Hussein Obama
6 1600 Pennsylvania Avenue NW
7 Washington, DC 20500

8 Natalie E. Tennant,
9 Bldg. 1, Suite-157K,
10 1900 Kanawha Blvd. E.
Charleston, WV 25305

11 Debra Bowen
12 1500 11th Street,
13 Sacramento, CA 95814

14 Brian P. Kemp
15 214 State Capitol,
16 Atlanta, GA 30334

17 William M. Gardner
18 State House Room 204,
19 Concord, NH 03301
20 Dean C. Logan
21 12400 Imperial Highway,
Norwalk, California 90650

22 Nancy Pelosi
23 Democratic Party Headquarters,
24 430 South Capitol St. SE,
Washington DC, 20003

25 Michael Astrue
26 Social Security Administration,
27 6401 Security Blvd.
28 Baltimore, MD 21235

1 William A. Chatfield
2 1517 Bonham Ct.
3 Irving, TX 75038

4 Alvin Onaka
5 State of Hawaii, Department of Health
6 PO Box 3378
7 Honolulu, HI 96801

8 Janet Napolitano
9 U.S. Department of Homeland Security,
10 Washington, D.C. 20528

11 Eric Holder
12 U.S. Department of Justice,
13 950 Pennsylvania Avenue, NW
14 Washington, DC 20530

15 Brian Schatz
16 1050 Ala Monana Blvd. #2660,
17 Honolulu, HI 96814

18 Lynne Matusow
19 1050 Ala Monana Blvd. #2660,
20 Honolulu, HI 96814

21 Ballot Law Commission of State of New Hampshire
22 107 North Main Street,
23 State House, Room 204,
24 Concord, N.H. 03301

25 Board of directors of California Republican party
26 1903 W. Magnolia Blvd.,
27 Burbank, CA 91506

28 Elizabeth Emken
PO Box 81
Danville, CA 94526

1 Dianne Feinstein
2 One Post Street, Suite 2450
3 San Francisco, CA 94104

4 Clay D. Land
5 Middle District of Georgia,
6 PO Box 2017,
7 Columbus, GA 31902

8 John Avlon
9 The Daily Beast,
10 7 Hanover Sq.
11 New York, NY, 10004

12 Chris Matthews,
13 MSNBC, One Microsoft Way,
14 Redmond, WA 98052

15 MSNBC,
16 MSNBC, One Microsoft Way,
17 Redmond, WA 98052.

18 KFI AM 640
19 3400 W Olive Ave Ste 550,
20 Burbank CA 91505

21 JOHN & KEN SHOW
22 3400 W Olive Ave Ste 550,
23 Burbank CA 91505

24 John Kobelt
25 3400 W Olive Ave Ste 550,
26 Burbank CA 91505

27 Forbes magazine
28 60 Fifth Avenue,
New York, N.Y. 10011

1 Kevin Underhill
2 60 Fifth Avenue,
3 New York, N.Y. 10011

4 Obama for America
5 P.O. Box 803638,
6 Chicago, IL, 60680

7 Patrick R. Donahoe
8 475 L'Enfant Plaza SW.
9 Washington DC 20260
10

11 1. Pursuant to 28 U.S.C. §1331, §1441 and §1332 (a), Plaintiff gives notice of
12 removal of the above captioned Complaint to the United States District
13 Court for the Central District of California, Southern Division. The
14 Complaint was originally served by the Plaintiffs in the Superior Court of
15 California, County of Orange in action styled Dr. Orly Taitz v. Obama, et.al;
16 Cause No. 30-2012-00582135.
17
18

19 **Federal Question Jurisdiction**
20

21 2. This Court has jurisdiction over this case pursuant to 28 U.S.C. §1331, and
22 this case is properly removable under 28 U.S.C. §1441, as the Complaint
23 alleges claims based on federal law, including violation of federal RICO
24 statutes, 18 U.S.C. §1961 et seq., based on alleged predicate acts constituting
25 alleged violations of various federal laws, and other claims requiring
26 interpretation of the Constitution and other federal laws.
27
28

- 1 3. This Court has supplemental jurisdiction over any and all purported state law
2 claims alleged in the Complaint under 28 U.S.C. §1367.
- 3
4 4. In addition removal of this case is proper because: (1) One or more Plaintiffs
5 are citizens of a State different from a one or more Defendants; and (2) the
6 amount in controversy is to be determined but exceeds \$75,000. 28 U.S.C. §
7 1332(a).
- 8
9 5. At the time of filing of the First Amended Complaint and at the time of
10 removal of this action, Plaintiffs Rappaport, and Vita are citizens of New
11 Hampshire.
- 12
13 6. At the time of filing of the First Amended Complaint and at the time of
14 removal of this action, one or more of the Defendants are citizens of states
15 other than New Hampshire.
- 16
17 7. Plaintiffs assert claims for fraud, elections fraud, breach of fiduciary duty,
18 negligence, RICO, and defamation. Plaintiffs seek actual, consequential and
19 punitive damages, as well as attorney's fees. The claims of all Plaintiffs are
20 aggregated to determine the amount in controversy but will exceed \$75,000.
- 21
22 8. This Notice of Removal is being filed with the Clerk of the District Court of
23 California, Central District, Southern Division and is being served on all
24 Defendants.
25
26
27
28

1 WHEREFORE, Plaintiffs hereby remove this action from the Superior Court
2 of California, to the United States District Court for the Central District of
3 California, Southern Division.
4



5
6 Date 08/28/12



7
8
9 /s/ Dr. Orly Taitz ESQ
10 Counsel for the Plaintiffs
11 CA Bar 223433
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28