

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

KEITH JUDD FOR PRESIDENT.US, Plaintiff,

v.

No. 2:13-cv-0537-KJM-A-(ps)

BARACK OBAMA (an individual;
Deborah Bowen, Secretary of State of California;
Democratic Party of California, Defendants.

FILED

MAR 18 2013

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY 
DEPUTY CLERK

COMPLAINT FOR DECLARATORY JUDGMENT

Plaintiff, KEITH JUDD, Pro Se, a Democratic Candidate for President of the United States of America, asks this Court to Grant Declaratory Judgment:

- 1.) To Declare Barack Obama Was Born A British Citizen of Kenya, East Africa;
- 2.) To Declare Keith Judd is a Natural Born Citizen of the United States.

STATEMENT OF THE CASE

During the 2007-2008 Election cycle, KEITH JUDD, was an active Democratic Candidate for President of the United States, and was wrongfully denied Ballot Access to this State's Democratic Presidential Primary Election Ballot and/or this State's Democratic Party Caucus. However, KEITH JUDD, was a Certified Write-In Democratic Candidate for President in several States, including California. The State of Idaho placed KEITH JUDD on the 2008 Primary Ballot as a Democratic Candidate for President of the United States. However, the Democratic Party of Idaho expressed anger and instead held a Caucus and denied KEITH JUDD participation. As the Democratic Party Presidential Caucuses are authorized by the State, the Caucus is unconstitutional denial of Citizens Right to Vote.

During the 2007-2008 Election cycle, KEITH JUDD filed Petitions with this State's Chief Election Officer challenging placement of BARACK OBAMA on the 2008 Presidential Primary Election Ballot or Caucus and the 2008 General Election Ballot, based on the legal fact that Barack Obama was born a Citizen of Kenya, East Africa. The Chief Election Officer failed to render any opinion or decision.

During the 2011-2012 Election cycle, KEITH JUDD, again sought to gain Ballot access to this State's Primary Election and/or Caucus, as a Democratic Candidate for President of the United States. The Democratic Party denied KEITH JUDD any access or participation in the 2012 Presidential Caucus, and the Chief Election Officer of this State wrongfully denied KEITH JUDD a Ballot position.

However, KEITH JUDD was placed on the May 8, 2012, Primary Election Ballot in West Virginia. The reported results of the May 8, 2012, Democratic Presidential Primary Election in West Virginia showed KEITH JUDD with **43% percent of the Vote**, and beating BARACK OBAMA in Southern West Virginia and at least eleven Counties.

KEITH JUDD filed several petitions with the Chief Election Officer of this State challenging BARACK OBAMA's legal qualifications for President of the United States, or for Primary or General Election Ballot placement, because BARACK OBAMA was born a Citizen of Kenya, East Africa. However, no opinion or decision issued.

KEITH JUDD filed several petitions with the State Democratic Party also challenging BARACK OBAMA's legal qualifications for President of the United States, or for Delegates to the Democratic National Convention, or for Nomination or for Electors, because BARACK OBAMA was born a Citizen of Kenya, East Africa. However, the State Democratic Party failed to render any opinion or decision.

KEITH JUDD FOR PRESIDENT.US campaigned heavily as a Write-In Candidate for President of the United States for the 2012 General Election, raising numerous issues, including the legal fact that BARACK OBAMA was born a Citizen of Kenya, East Africa (a British colony).

RELATED LAWSUITS

On October 30, 2012, a lawsuit was filed by KEITH JUDD in the United States District Court for the Central District of California as a Complaint for Damages, with a Demand for Jury Trial. See, Keith Judd v. Barack Hussein Obama, et al., No. 2:12-CV-9319-DDP(PLA). This lawsuit involves as Defendants, Barack Obama, the

Democratic National Committee, Debbie Wasserman-Schultz, Earl Ray Tomblin, the Democratic Party of West Virginia, Elizabeth Warren, Sherrod Brown, Tim Kaine, Debbie Stabanow, Tammy Baldwin, Bob Casey, Jr., Jon Tester, Joe Donnelly, and others. The claims include: 1.) Violation of Civil Rights; 2.) Violation of State Civil Rights; 3.) Intentional Infliction of Emotional Distress; and 4.) Violation of Federal and State Election Laws. Judd v. Obama, No. 2:12-CV-9319 (C.D. Cal.).

There are lawsuits in all 50 States, in both State and Federal Courts Nationwide, in which KEITH JUDD is among the Plaintiffs represented by Attorney Orly Taitz, challenging BARACK OBAMA's eligibility for Office of the President of the United States as a Citizen of Indonesia, and use of fraudulent Identification, including at least eight Social Security Numbers not assigned to him. See generally: James Grinols, Robert Odden, in their capacity as Presidential Electors, Edward C. Noonan, Thomas Gregory MacLeran, **KEITH JUDD** in their capacity as **Candidates for the U.S. President** v. Electoral College, President of the Senate, Governor of California, Secretary of State of California, U.S. Congress, **No. 12-CV-02997**, in the United States District Court for the Eastern District of California. See also, Edward Noonan, et al., v. Deborah Bowen, Secretary of State of California, No. 12A606 in the United States Supreme Court.

STANDING

Plaintiff, KEITH JUDD has standing as a Democratic Candidate for President of the United States, and as a Presidential Candidate in general. As a Natural Born Citizen of the United States, KEITH JUDD also has standing to challenge that BARACK OBAMA was born a British Citizen of Kenya, East Africa, which is not a Natural Born Citizen eligible to hold Office of the President of the United States. Lujan v. Defenders of Wildlife, 504 U.S. 555, 556-61, 112 S.Ct. 2130, 119 L.Ed.2d 351 (1992). The claims are not moot to determine whether BARACK OBAMA is Constitutionally qualified for Office of President and for removal from Office.

KEITH JUDD is still campaigning as a Presidential Candidate to replace Obama for the remainder of the Term. KEITH JUDD was the only eligible Candidate for the 2012 Nomination as Democratic Candidate for President at the Democratic National Convention. As a Candidate, KEITH JUDD has standing to raise Citizens' rights to Vote and rights of Freedom of Assembly and Privacy of Association and Belief.

BARACK OBAMA WAS BORN A BRITISH CITIZEN OF KENYA, EAST AFRICA

Kenya was a British colony until it gained Independence in 1963. Upon gaining Independence, Kenyans were retroactively full Citizens of Kenya, East Africa. According to the Kenya Citizenship and Immigration Act, Section 7:- **"A person born outside of Kenya shall be a citizen by birth if on the date of birth that person's father was or is a citizen by birth."** The applicable British Nationality Act, made a child a British Citizen by birth outside of Kenya, when the father was a British Citizen of Kenya. This Court can take judicial notice of British and Kenyan Law.

Barack Obama's own released Long Form Birth Certificate show that he was born on August 4, 1961, to Ann Dunham, born in Wichita, Kansas, and Barack Obama, Sr., an African, born in Kenya, East Africa. Barack Obama's father was born a Citizen of Kenya, East Africa, a British colony.

When Barack Obama was two years old, his parents separated and later divorced. His biological father, Barack Obama Sr., returned to Kenya and was killed in an automobile accident in 1982. Obama's mother eventually married Lolo Soetoro, an Indonesian student, and eventually the family moved to Indonesia. As Legal Guardians, Obama's parents facilitated Obama to become a Citizen of Indonesia, where he attended school. On January 1, 1968, Obama entered the Roman Catholic Franciscus Assisi Primary School in Jakarta, Indonesia, registered under the name of **Barry Soetoro, an Indonesian Citizen**. Three years later in 1971, Obama enrolled in the Besuki Primary School, a government school, as **Barry Soetoro, an Indonesian Citizen**. All Indonesian students are required to study religion at school, and

registered as **Barry Soetoro**, Obama studied his religion listed as Islam.

In 1988, Barack Obama entered Law School at Harvard, and graduated Magna cum laude in 1991, with a doctor of law degree.

While a Senator, Barack Obama returned to Kenya to campaign for his cousin, Raila Odinga, who was seeking election as President of Kenya. After a disputed election December 27, 2007, that drew criticism from European and Kenyan monitors, Kenya's Electoral Commission declared Kibaki the winner over challenger, Raila Odinga. Weeks of factional violence followed, in which some 1,500 people died and 600,00 were displaced. Under a February 28, 2008, power-sharing deal mediated by former UN General Kofi Annan, Kibaki remained President and Odinga took the newly created post of Prime Minister. During this same time in the United States, Barack Obama was campaigning for the Democratic Nomination for President of the United States. During his campaign appearances, Obama drew criticism for refusing to salute the American Flag in demonstrated defiance. Obama also refused to wear the American Flag pin on his lapel or his tie. Due to more criticism, Obama eventually wore the American Flag pin. However, his message had been received.

Hillary Clinton won the popular Vote in the 2008 Democratic Presidential Primary, but the Obama Machine forced Hillary to relinquish half of her earned Delegates in Florida and Michigan. Along with the Super-Delegates, a design to ensure that Obama won the Democratic Nomination, Obama was Nominated at the Democratic National Convention, and defeated Republican Candidate, John McCain.

A barrage of complaints have been filed and voiced regarding questions over whether Barack Obama is a Natural Born Citizen or even a Citizen at all. Obama has refused to place an original or Certified Copy of his Birth Certificate into evidence in any judicial or administrative proceeding.

Why is Obama afraid to put his Birth Certificate, documents regarding his Passports, and School Transcripts available for Public and Judicial review ?

And why are Obama supporters so sensitive about any inquiry into whether Obama is a Natural Born Citizen ?

Nevertheless, given the publically released Long Form Birth Certificate and undisputed facts proves that Barack Obama was born a British Citizen of Kenya, East Africa.

BARACK OBAMA WAS BORN A BRITISH CITIZEN OF KENYA, EAST AFRICA

Barack Obama's own released Long Form Birth Certificate show his father was a Blood-Born Citizen of Kenya, East Africa, at the time of Obama's birth on August 4, 1961. Under the Law of Kenya, East Africa (and British Law), Barack Obama was born a Citizen of Kenya, East Africa, governed by **jus sanguinis**, because his father was a Citizen of Kenya, East Africa, by birth. See, Stipa v. Dulles, 233 F.2d 551 (3rd Cir. 1956); Kenji Kamada v. Dulles, 145 F.Supp. 457 (N.D.Cal. 1956). According to the Kenya Citizenship and Immigration Act of 2011, Section 7:- "**A person born outside Kenya shall be a citizen by birth if on the date of birth that person's father was or is a citizen by birth.**"

There is no doubt that Barack Obama was born a British Citizen of Kenya, East Africa, under **jus sanguinis**, where Citizenship is determined by the fact that his father was a British Citizen of Kenya, East Africa, by birth, regardless of where Barack Obama was born.

At birth Barack Obama acquired his alien father's domicile of origin. See, Yarborough v. Yarborough, 290 U.S. 202, 54 S.Ct. 181, 78 L.Ed. 269 (1933); Dunlap by Wells v. Buchanan, 741 F.2d 165 (8th Cir. 1984). Barack Obama's father, who was not a citizen of the United States, cannot be a citizen of a State. See, Scott v. Sandford, 60 U.S. 393, 15 L.Ed. 691 (1856). And an alien father cannot have a domicile in any particular State of the United States. See, Farhner v. Gentzsch, 355 F.Supp. 349 (E.D.Pa. 1972). Therefore, at birth, Barack Obama's domicile of origin was Kenya, East Africa. Aquirre v. Nagel, 270 F.Supp. 535 (E.D.Mich. 1967).

The first sentence of the Fourteenth Amendment concerns acquisition of citizenship regulated by Congress in exercise of its power to establish a uniform rule of naturalization. Rogers v. Bellei, 401 U.S. 815, 28 L.Ed.2d 499, 91 S.Ct. 1061 (1971). The phrase "**subject to its jurisdiction**" excludes from its operation children of ministers, counsuls, and citizens and subjects of foreign states born within the United States. Slaughter-House Cases, 83 U.S. 36, 21 L.Ed. 394 (1873). Persons not subject to the jurisdiction of the United States at the time of birth cannot afterwards become so except by being naturalized individually, or collectively by force of treaty. Elk v. Wilkins, 112 U.S. 94, 5 S.Ct. 41, 28 L.Ed. 643 (1894).

Therefore, Barack Obama was born a British Citizen of Kenya, East Africa by **jus sanguinis** (blood), **cannot be a Natural Born Citizen of the United States**, as required qualification under Article II, Section I, Clause 5, of the United States Constitution. See, Minor v. Happersett, 88 U.S. 162, 167, 22 L.Ed. 627 (1875) (confirming those born to "citizens" "within the United States" were never in doubt of being "Natural Born Citizens."). Barack Obama, a British Citizen of Kenya, East Africa, **by birth**, is not qualified for President of the United States. Barack Obama was not qualified to be on the 2012 Primary or General Election Ballot or the 2008, Primary or General Election Ballot, or to receive Delegates to the Democratic National Convention or the Democratic Party Nomination or to be Commander and Chief of the Military of the United States of America.

KEITH JUDD IS A NATURAL BORN CITIZEN OF THE UNITED STATES

Plaintiff, KEITH JUDD, was born on May 23, 1958, at St. Luke Hospital in Pasadena, California. KEITH JUDD's mother was Lillian Mildred Russell, born in Little Rock, Arkansas on August 17, 1922. KEITH JUDD's father was Homer Tipton Judd, born in Olivet, Illinois, on January 20, 1914.

Keith Judd's father Homer Tipton Judd's parents were Anna M. Tipton and Elvin S. Judd, who were married on April 6, 1893, at the Friends Church in

Vermilion County, Illinois, and both are buried in the Cemetery next to the Friends Church in Vermilion County, Illinois.

Homer Tipton Judd's Social Security number is: 332-12-2224, and he had a Z number of 023694 used to access the Los Alamos National Laboratory. According to the January 21, 2011, decision in FOIA Request No. 10-00054-P, the Los Alamos National Laboratory "confirmed that Mr. Homer Tipton Judd was an Atomic Energy Commission (AEC) employee." For questions call NNSA at (505)845-4519. Keith Judd's Birth Certificate lists his father's employer as the Federal Government. Homer Tipton Judd has a "Q Clearance", the highest security clearance available in the Federal Government.

There is no doubt that KEITH JUDD is a Natural Born Citizen of the United States.

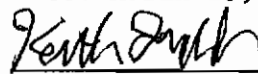
PRAYER FOR RELIEF

Given the facts accepted as true by Barack Obama's own released Long Form Birth Certificate, this Court should determine as a matter of Law that Barack Obama was born a British Citizen of Kenya, East Africa.

Given the facts available in KEITH JUDD's Birth Certificate, this Court should determine as a matter of Law that KEITH JUDD is a Natural Born Citizen of the United States.

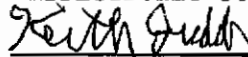
WHEREFORE, Plaintiff, KEITH JUDD, Pro Se, asks this Court for Declaratory Judgment to Declare that: 1.) Barack Obama was Born a British Citizen of Kenya, East Africa; and that, 2.) Keith Judd is a Natural Born Citizen of the United States of America; 3.) plus any other relief appropriate and just.

Date: March 13, 2013

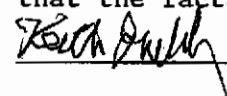


KEITH JUDD FOR PRESIDENT.US
P.O. Box 3779
Beverly Hills, CA, 90212

RESPECTFULLY SUBMITTED,



KEITH JUDD, Plaintiff
Reg.#11593-051, Unit A-1
Federal Correctional Institute
P.O. Box 7000
Texarkana, Texas, 75505

VERIFICATION: I, Keith Judd, declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the facts contained herein are true to the best of my knowledge and belief. 

STATE OF HAWAII		CERTIFICATE OF LIVE BIRTH		DEPARTMENT OF HEALTH	
			FILE NUMBER 151		61 10641
1a. Child's First Name (Type or print)		1b. Middle Name		1c. Last Name	
BARACK		HUSKIN		OBAMA, II	
2. Sex	3. This Birth	4. If Twin or Triplet, Was Child Born		5a. Month Birth Date	5b. Day
Male	Single <input checked="" type="checkbox"/> Twin <input type="checkbox"/> Triplet <input type="checkbox"/>	1st <input type="checkbox"/> 2nd <input type="checkbox"/> 3rd <input type="checkbox"/>		August	4
6c. Place of Birth: City, Town or Rural Location				6b. Island	
Honolulu				Oahu	
6e. Name of Hospital or Institution (If not in hospital or institution, give street address)				6d. Is Place of Birth inside City or Town Limits? If not, give Judicial District	
Kapiolani Maternity & Gynecological Hospital				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
7a. Usual Residence of Mother: City, Town or Rural Location		7b. Island		7c. County and State or Foreign Country	
Honolulu		Oahu		Honolulu, Hawaii	
7d. Street Address				7e. Is Residence inside City or Town Limits? If not, give Judicial District	
6085 Kalaniana'ole Highway				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
7f. Mother's Mailing Address				7g. Is Residence on a Farm or Plantation?	
				Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
8. Full Name of Father		9. Race of Father		10. Age of Father	
BARACK HUSKIN OBAMA		African		25	
11. Birthplace (Island, State or Foreign Country)		12. Usual Occupation		13. Kind of Education or Industry	
Kenya, East Africa		Student		University	
13. Full Maiden Name of Mother		14. Race of Mother		15. Age of Mother	
STANLEY ANN DUNHAM		Caucasian		18	
16. Birthplace (Island, State or Foreign Country)		17a. Type of Occupation Outside Home During Pregnancy		17b. Date Last Week	
Wichita, Kansas		None			
I certify that the above stated information is true and correct to the best of my knowledge.		18a. Signature of Parent or Other Informant		18b. Date of Signature	
		<i>Barack Obama</i>		8-7-61	
I hereby certify that this child was born alive on the date and hour stated above.		19a. Signature of Attendant		19b. Date of Signature	
		<i>David A. Smiley</i>		8-8-61	
20. Date Accepted by Local Reg.		21. Signature of Local Registrar		22. Date Accepted by Reg. General	
AUG -- 8 1961		<i>Uice Lee</i>		AUG -- 8 1961	
23. Evidence for Delayed Filing or Alteration					

APR 26 2011

I CERTIFY THIS IS A TRUE COPY OR ABSTRACT OF THE RECORD ON FILE IN THE HAWAII STATE DEPARTMENT OF HEALTH.

Alvin T. Onaka, Ph.D.
STATE REGISTRAR

CITY OF PASADENA PUBLIC HEALTH DEPARTMENT

CERTIFICATE OF LIVE BIRTH

STATE OF CALIFORNIA - DEPARTMENT OF PUBLIC HEALTH

7865 1861

1. NAME OF CHILD - FIRST NAME Keith	2. MIDDLE NAME Russell	3. LAST NAME Judd
4. THIS CHILD Male	5. TYPE OF BIRTH - SINGLE TWIN OR TRIPLET Single	6. DATE OF BIRTH - MONTH DAY YEAR May 23, 1958
7. PLACE OF BIRTH - NAME OF HOSPITAL St. Luke Hospital	8. CITY OR TOWN Pasadena	9. COUNTY Los Angeles
10. MOTHER OF CHILD - FIRST NAME Ida Mae	11. MIDDLE NAME Mildred	12. LAST NAME Russell
13. AGE OF MOTHER AT TIME CHILD BORN 35	14. BIRTHPLACE (STATE OR FOREIGN COUNTRY) Arkansas	15. COLOR OR RACE OF MOTHER White
16. USUAL RESIDENCE OF MOTHER - STREET ADDRESS 1605 North Altadena Drive	17. CITY OR TOWN Altadena	18. COUNTY Los Angeles
19. STATE California	20. FATHER OF CHILD - FIRST NAME Homer	21. MIDDLE NAME Tipton
22. LAST NAME Judd	23. COLOR OR RACE OF FATHER White	24. PRESENT OR LAST OCCUPATION Resident Inspector
25. YEAR OF FATHER (AT TIME CHILD BORN) 1914	26. BIRTHPLACE (STATE OR FOREIGN COUNTRY) Illinois	27. BOARD OF ADVISORY OR BUSINESS Federal Government
28. I HAVE REVIEWED THE ABOVE STATED INFORMATION AND HEREBY CERTIFY THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE	29. PARENT OR OTHER INFORMANT SIGNATURE <i>Mildred A. Judd</i>	30. DATE SIGNED BY INFORMANT May 26, 1958
31. I HEREBY CERTIFY THAT I ATTENDED THIS BIRTH AND THAT THE CHILD WAS BORN ALIVE AT THE HOUR, DATE AND PLACE STATED ABOVE.	32. SIGNATURE <i>[Signature]</i>	33. ADDRESS <i>[Address]</i>
34. REGISTRAR'S CERTIFICATION DATE ON WHICH NAME RODED BY SUPPLY VENTRAL NAME REPORT	35. LOCAL REGISTRAR SIGNATURE <i>[Signature]</i>	36. DATE RECEIVED BY LOCAL REGISTRAR JUN 2 1958

This is to certify that this document is a true copy of the official record filed with the City of Pasadena.



ERIC G. WALSH, M.D. HEALTH OFFICER

DATE ISSUED 02/11/4/2013



This copy not valid unless prepared on engraved border displaying seal and signature of Registrar.



Department of Energy
National Nuclear Security Administration
Service Center
P. O. Box 5400
Albuquerque, NM 87185



January 21, 2011

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Keith Russell Judd
Federal Correctional Institute
Reg. # 11593-051, Unit K-2
P.O. Box 7000
Texarkana, TX 75505

Dear Mr. Judd:

This letter is the final response to your January 20, 2009 Freedom of Information Act (FOIA) request for a copy of all records related to Mr. Homer Tipton Judd.

I also contacted the Personnel Security Department (PSD) about Mr. Judd's Personnel Security File (PSF). PSD searched and could not locate a PSF for Mr. Judd, nor is he in any of their systems indicating that he had a U.S. Department of Energy access authorization.

I contacted the Los Alamos Site Office (LASO) that has oversight responsibility for the Los Alamos National Laboratory (LANL) about your request. The Site Office asked LANL to search for responsive records. LANL searched and determined that Mr. Homer Tipton Judd was not a LANL employee. LANL confirmed that Mr. Homer Tipton Judd was an Atomic Energy Commission (AEC) employee. The LANL located the enclosed medical records, radiation exposure records and H-2 Master Patient Index Card for Mr. Judd. They are provided in their entirety.

Because LANL stated Mr. Judd was an AEC employee, I contacted the Office of Human Capital Management Services about an Official Personnel File (OPF). All OPFs are sent to the National Archives within 120 days of an employee's departure. If Mr. Judd was a federal employee, you can obtain access to the OPF by sending a letter to the National Archives. The letter must include his full name, social security number, date of birth, name of the federal employing agency and the approximate dates of federal employment/separation. The National Archives address is: Rocky Mountain Region, P.O. Box 25307, Denver, CO 80225. The National Archives can be contacted at (303) 407-5740.

There are no fees chargeable to you for processing this request.

If you have any questions, please contact Ms. Elizabeth Donnelly by telephone at (505) 845-4519, by email at edonnelly@doeal.gov or the address listed above. Please reference Control Number FOIA 10-00054-P.

Sincerely,

Carolyn A. Becknell
Freedom of Information Act Officer
Office of Public Affairs

SSN: 332-12-2224

Enclosures