

Law Offices of:
PHILIP J. BERG, ESQUIRE
555 Andorra Glen Court, Suite 12
Lafayette Hill, PA 19444-2531
Identification No. 09867
(610) 825-3134

Attorney for: Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al,	:	
	:	
	:	
Plaintiffs,	:	
vs.	:	<i>Assigned to Honorable Eduardo C. Robreno</i>
	:	
	:	
ORLY TAITZ, et al,	:	
	:	
	:	
Defendants.	:	Case No.: 09-cv-01898-ECR
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AFFIDAVIT OF MARK S. MCREW

I, Mark S. McGrew am over the age of eighteen (18) and not a party to the within action. I have personal knowledge of the facts herein and if called to do so, I could and would competently testify under oath.

I declare as follows:

1. From August of 2008 through January of 2009 I wrote 12 articles that were Published in Russia’s Pravda Online News service. In September or October of 2008, I received a telephone call from Mr. Ed Hale with Plains Radio Network radio station asking me to be a guest on his show. I agreed. On that show, Ed Hale tried to get me to agree that the Obama Divorce Decree from Hawaii stated that a male child was born in Mombassa Kenya. I did not agree and told Ed Hale on his show that I had no idea what that Divorce

Decree stated as I had not seen it. Not long after this radio show, Mr. Hale asked me to host one of his radio shows. I declined and instead, accepted a previous offer with Evelyn Adams on her Blog Talk Radio Shows.

2. In November of 2008, earlier or later, Orly Taitz called me and we talked about her being a guest on Ed Hale's radio program. I discussed with Orly Taitz, Ed Hale's propensity for lying and attacking anyone who does not support his lies. She said she knew that, but that Ed Hale had promised to raise money for her on his shows if she would come on as a guest. She expressed that she was desperate for money to continue her legal efforts against Obama and that she had decided that she would "take that chance".

3. I have heard Mr. Ed Hale refer to Evelyn Adams as a liar, a bitch and a crook on his Plains Radio Network Radio Station (AM 1610). Mr. Hale has also falsely accused Evelyn Adams of "stealing" copies of a divorce record "Obama v. Obama". The divorce records were obtained by a Private Investigator located in Hawaii.

4. Mr. Hale has also made several statements to me and telling others Mr. Philip J. Berg, was a liar and a crook. Mr. Hale has also referred to Mr. Berg's paralegal, Lisa Liberi of being a liar and a crook and maliciously speaks about a "supposed" criminal record of Mrs. Liberi.

5. I have received several emails directly from Mr. Hale from his Bar H Farms Business. On January 1, 2009, I received a blind copy of an email Mr. Hale sent to Evelyn Adams (Momma E) titled "why" accusing Ms. Adams of stealing his "host". This host he was referring too happened to be me, this email is attached as **EXHIBIT "A"**.

6. On January 4, 2009 at 12:44 a.m. I received an email from Mr. Hale titled "the bitch you work with", this email states "mark: that bitch that you are now with claims that the

document on web site is the one that Berg has had for month. Funny thing is they are my documents and I can prove it. I put secret number on each page and they are on those pages. This is the kind of trash you are now working with. I will expose her and Phil berg for the crook that they are Monday night. Look at her pages and then look at mine - your will see the number on each one of them. What low life mother fucker. Ed”, I have attached this email as **EXHIBIT “B”**.

7. I did look at Ed Hales copies and I compared them with Evelyn Adams copies and they are in fact NOT the same photo copied document as Ed Hale proclaims. The embossed stamp of the State of Hawaii Department of Vital Statistics is placed over the signature in a slightly different position on Evelyn Adams copy compared to Ed Hale’s copy. I did advise Ed Hale of the difference. Furthermore, I am the person who made the call to the Private Investigator in Hawaii to obtain a copy of the Obama Divorce Decree for Evelyn Adams. The investigator told me he would go to Vital Statistics and pick up another copy of that Divorce Decree for Evelyn Adams and send it to her personally. That Divorce Decree is public record and anyone can obtain it simply by asking for a copy at the Department of Vital Statistics of the State of Hawaii.

8. On January 4, 2009 at 3:59 a.m. I received an email titled “Copyright” where Mr. Hale accuses Mrs. Adams of being a crook and a liar. Mr. Hale continues his rant stating he is going to expose Mrs. Adams and Mr. Berg’s fraud and Mr. Berg lied through his teeth. See this email attached as **EXHIBIT “C”**. The next email I received from Mr. Hale was dated January 4, 2009 at 5:00 a.m. titled “Proof”. This email was sent directly to Mrs. Adams from Mr. Hale and a copy was sent to me and another radio station, according to the email. In this email Mr. Hale continues falsely claiming Ms. Adams stole the "Obama v. Obama"

divorce papers and states he (Mr. Hale) can't wait to expose "them". This email is attached as **EXHIBIT "D"**. January 4, 2009 at 8:50 a.m. I received an email, titled "here is the proof that Momma E is lying". This particular email sent from Mr. Hale was again regarding Mrs. Adams and the "Obama v. Obama" divorce papers. Mr. Hale is obviously attempting to convince me that Mrs. Adams has lied and he states in this email I should stay away from her or she will take me down, this email is attached as **EXHIBIT "E"**.

9. On April 14, 2009 I found a post by Ed Hale on Plains Radio Network website, www.plainsradio.com titled "Dr Orly has been scamed by Lisa Liberia (Phil Berg assistant)". On this post Mr. Hale accuses Lisa Liberi of stealing money from Orly Taitz and that he had the proof and accusing Mr. Berg of only being involved in the Constitutional Eligibility of President Obama for the money, this post is attached as **EXHIBIT "F"**. This was rather surprising to me as I have never known Lisa Liberi to have anything to do with or be associated with Orly Taitz in anyway, except for one telephone call that Lisa Liberi mentioned to me in passing just recently.

10. Around April 17, 2009, I received an email directly from Orly Taitz titled "More Explosive Information" with an attachment labeled "Dossier #6 new.doc. In this email, Ms. Taitz talks about a "supposed" criminal history of Ms. Liberi, she lists numerous names and partial social security numbers, however, towards the end, Ms. Taitz placed Ms. Liberi's date of birth and full social security number. Ms. Taitz Dossier contained nothing but malicious nasty statements about Ms. Liberi, Mr. Berg, Ms. Ostella and Mrs. Adams. On the front page of Ms. Taitz Dossier Ms. Taitz says she sent this dossier to 26,000 media outlets, including internationally and she lists law enforcement agencies and governmental agencies which she sent this dossier, by certified mail, out to and then of course, to an unknown, undisclosed

amount of other individuals. This email I received directly from Ms. Taitz was also sent to the following email addresses:

This email was addressed to: amccarthy@nationalreview.com, amy.chozick@wsj.com, ken@jhelp.com, backon@vms.huji.ac.il, shellijbaker@aol.com, johnbatchelorshow@gmail.com, mbelcher72@yahoo.com, beesba@aol.com, talkradio@live.com, tammyblog@yahoo.com, heytammybruce@yahoo.com, sean@wcbm.com, charenmail@cox.net, pchesler@phyllis-chesler.com, chuck.todd@nbcuni.com, info@hillaryclinton.com, clochhead@sfchronicle.com, nocompromisewhenyoureright@gmail.com, evil@evilconservativeonline.com, john@gopsenators.com, jrlc@optonline.net, jric@optonline.net, jric@earthlink.net, acoulter@worldnetdaily.com, carol@harrismedia.com, darlagdawald@yahoo.com, dickmorris@dickmorris.com, jdooley@honoluluadvertiser.com, drudge@drudgereport.com, editor@americanthinker.com, editor@haaretz.co.il, elouis@nydailynews.com, gdescobar@aim.com, alisia.essig@mail.house.gov, eugenerobinson@washpost.com, eva@dennisprager.com, jfarah@wnd.com, joel.fishman@gmail.com, david.freddoso@gmail.com, dfum@aei.org, mhgintn@comcast.net, kyeoj@mchsi.com, GaynorMike@aol.com, patrickgibsonmail@gmail.com, glenn.simpson@wsj.com, jonahnro@aol.com, agrobman@nj.rr.com, Patrick_Guinn@coburn.senate.gov, mh1690@hotmail.com, barhfarms@gmail.com, author@victorhanson.com, khassett@aei.org, hemingway@nationalreview.com, hhewitt@hughhewitt.com, Brannon@worldviewweekend.com, churt@nypost.com, ymibrahim@gmail.com, info@ap.org, editor@israelinsider.com, Gregg.Jackson@gmail.com, jhood@johnlocke.org, jhorowitz@observer.com, jim.manzi.nro@gmail.com, producer@infowars.com, bryant.jordan@military-inc.com, roger@aim.org, kevin@davnet.org, kincaid@comcast.net, jawaraking@yahoo.com, jklinghoff@aol.com, ck@charleskrauthammer.com, msk@cis.org, lkudlow@kudlow.com, comments.kurtz@nationalreview.com, devvyk@earthlink.net, stevenlaib@sbcglobal.net, MLANGBERT@NYC.RR.COM, larry.king.live@cnn.com, letters@cctimes.com, letters@macleans.ca, letters@msnbc.com, letters@nationalreview.com, letters@ocregister.com, letters@sun-sentinel.com, letters@washpost.com, marklevin.show@citcomm.com, ylevin@eppc.org, elrushbo@eibnet.com, david@davidlimbaugh.com, LINDABENT@aol.com, klopez@nationalreview.com, cmahtesian@politico.com, malzbergtalk@gmail.com, marc@webservicesmedia.com, McGrewMX@aol.com, doug@kabc.com, vicmord2001@yahoo.com, nate.fredman@foxnews.com, nightly@nbc.com, today@nbc.com

Due to the confidential information included with this email from Ms. Taitz, I have not attached it to my affidavit, but I am in receipt of it and will happily furnish it directly to the Court upon request or during testimony.

11. Around this same time, during a radio appearance with Mr. Hale and Orly Taitz, Mr. Hale falsely stated Lisa Ostella and Lisa Liberi were in fact one and the same person. Ms. Taitz and Mr. Hale spent this hour maliciously “attacking” Lisa Liberi, falsely accusing her of criminal activity and having multi identifications.

12. I had been keeping my distance from Mr. Hale, Caren Hale and their radio program on Plains Radio. Out of the blue, I received an email from Ed Hale from Bar H Farms on April 30, 2009 titled “Remove me”. Mr. Hale asks me to remove his two emails from my spam and also informs me that he is going to “attack” me on his radio show. This email is attached as **EXHIBIT “G”**. The next email I received from Mr. Hale was dated June 11, 2009 and titled “It’s a party and your invited”. In this email, Mr. Hale states he was having a blast this night using me and Momma E (Evelyn Adams) to make liars out of us and make us look like “fools”. This email is attached as **EXHIBIT “H”**.

13. It is apparent to me that Ms. Taitz, Mr. Hale, Mrs. Hale, Plains Radio and KPRN have teamed up together and targeted Philip J. Berg, the Law Offices of Philip J. Berg and Mr. Berg’s paralegal in their attempts to destroy them and destroy any one associated with Mr. Berg, his law firm and his paralegal, Lisa Liberi.

14. Since the beginning of the within litigation, Mr. Hale has falsely stated to his radio listeners that I was a witness for him. According to Evelyn Adams, Ed Hale listed me as a witness for him against Evelyn Adams in a Civil Action Ed Hale filed against Evelyn Adams in Texas. Both of these items are completely false. I have never discussed being a witness or made any type of agreement with Ed Hale or with any of the defendants to testify on their behalf and I have never been willing to take a stand for any of the defendants in this case or any other.

15. I have met other people who were guests and/or hosts on Ed Hale's PlainsRadio.com. It is apparent that when his guests and/or hosts refuse to or decline to back him up in his unfounded or untrue statements, Ed Hale begins telling his listeners that "so and so is bad". My experience with Ed Hale is that he is a habitual pathological liar and he will aggressively slander, libel or otherwise try to destroy anyone who does not support him in his lies.

16. My experience with the various dynamic personalities who did sue or are suing for Obama to prove he is an American citizen has taught me that most of them have their own personal goals of raising money or building a client base, using the high profile nature of a Presidential lawsuit to garner attention to themselves. From very closely observing Orly Taitz, Ed Hale, Philip Berg, Lisa Liberi and Evelyn Adams in action for the past 10 months, my belief is that Berg, Liberi and Adams are genuine and that Taitz and Hale are using the Obama phenomenon to raise money and their purpose of attacking Berg, Liberi and Adams is solely to halt any and all lawsuits that Philip Berg has initiated and further to destroy his credibility to everyone in the "Prove Obama is a US Citizen" community. I believe that their motivation is 1. greed 2. to gather attention to themselves and 3. most likely to interfere in any of the Berg, Liberi or Adams actions attempting to prove whether Obama is or is not a US Citizen.

17. I am more than willing to appear in court, produce the emails and documents which I am in possession of and testify on behalf of Evelyn Adams, Philip J. Berg, the Law Offices of Philip J. Berg, Lisa Ostella and Lisa Liberi to the information I am aware of.

I declare under the penalty of Perjury of the laws of the United States that the foregoing is true and correct. Executed this 22nd day of July, 2009.



MARK S. MCGREW, Declarant
3560 Whitetail Deer Drive
El Paso, Texas 79938

State of Texas)
County of El Paso)^s

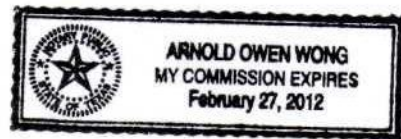
On this 22nd day of July, in the year 2009, before me Arnold Owen Wong
Notary Public Name

a notary public, personally appeared Mark S. McGrew, and proved on the basis of satisfactory evidence to be the person whose name is subscribed to this instrument, and acknowledged he executed the same. Witness my hand and official seal.


NOTARY PUBLIC

SEAL

My commission expires: 2-27-2012



Subject: why
Date: 1/1/2009 4:47:44 P.M. Mountain Standard Time
From: barhfarms@gmail.com
To: fiesty3n8@sbcglobal.net

Sent from the Internet (Details)

Why in the hell are you stealing my host and telling lies about me. I am about to come down on you like stink on shit. This is bullshit. I will have attorney on your butt tomorrow. You have gone to far this time old lady. You have nothing but a pissant radio show and maybe a 25 listener if your lucky. You say the same old shit day after day. No good guest will come on your show. You get lairs like Sammy from API and that crook Phil Berg on your show. Then you beg for money for them and get people to give to something that an't worth a damn. I will see you in court. Ed

EXHIBIT "A"

Subject: the bitch you work
Date: 1/4/2009 12:44:50 A.M. Mountain Standard Time
From: barhfarms@gmail.com
To: McGrewMX@aol.com

mark: that bitch that you are now with claims that the document on web site is the one that Berg has had for month. Funny thing is they are my documents and I can prove it. I put secret number on each page and they are on those pages. This is the kind of trash you are now working with. I will expose her and Phil berg for the crook that they are Monday night. Look at her pages and then look at mine - your will see the number on each one of them. What low life mother fucker. Ed

EXHIBIT “B”

Subject: Copyright
Date: 1/4/2009 3:59:58 A.M. Mountain Standard Time
From: barhfarms@gmail.com
To: McGrewMX@aol.com

Mark: I am sorry that you believed Momma E. People will not respect you any more after this. I have audio tapes with you talk to her about these doc. I can assure you that the people are going to send email to Pravda and make sure that you never publish anything there again. They are madder than hell at you for going along with this

here is Momma E site - look at these document and then got our site and look at our. You decide who is lying

<http://countryfirst.bravehost.com/phpBB3/viewtopic.php?f=9&t=1666>

<http://www.plainsradio.com/obma1.html>

She is a crook and come Monday night I am going to expose her and Phil Berg. You should listen at 6 pm because you will get a ear full. You can also be liabale in the lawsuit that I will bring against her and berg for this fraud. Berg was claiming he had those doc for months when he lying threw his teeth

You have been warned my friend. Goodluck

Ed

EXHIBIT "C"

Subject: proof
Date: 1/4/2009 5:00:23 A.M. Mountain Standard Time
From: barhfarms@gmail.com
To: fiesty3n8@sbcglobal.net
CC: sean@monksmedia.com, McGrewMX@aol.com

here is the proof that you stole these from us. you can still see the Plains Radio Network in this photo. If this is not removed by 12 noon today, I will sue all of you for everything you have and then some. You are liable for this. I hae tape with Momma E saying she got them from Hawaii, which is a lie. All she did was to get someone to steal them from us and try to take credit for them. I have her own word saying that. I cannot wait untill Monday night to expose all of you .

EXHIBIT “D”

Subject: here is the proof that Momma E is lying

Date: 1/4/2009 8:50:55 A.M. Mountain Standard Time

From: barhfarms@gmail.com

To: McGrewMX@aol.com

Mark: Please go to this link and look this information. It will prove beyond a doubt that she is lying threw her teeth. Break clean from her mark or she will take you down too. Ed

EXHIBIT “E”

Dr Orly has been scamed by Lisa Liberia (Phil Berg assistant)

It appears that Lisa Liberi, who works for Phil Berg has been stealing from Dr Orly. Tonight, 2 of our listeners have come forward with recipet from paypay where they thought that they were donating to Dr Orly and instead it went to this Lisa Liberi. At this point, we do not know if Phil Berg is involued, but as my mother has stated "birds of a feather flock together". These are emails that I received from Dr Orly. As I have said many times, Phil Berg was in this for nothing but money and also those who helped him also. I can assure you that we have proof that Lisa Liberi did in fact take money that was to go to Dr Orly. That whole bunch that has accused me of stealing is now actually proved that they themselves are thieves.

EXHIBIT "F"

Subject: Remmove me

Date: 4/30/2009 10:51:08 A.M. Mountain Daylight Time

From: barhfarms@gmail.com

To: McGrewMX@aol.com

Mark: Please remove this email and ed@barhfarms.net email from your spam list. Also we are going to attack you tonight on Plains Radio for these grandjuries. You are welcome to come on and defend yourself and these grand juries. Please go to our message forum and see my post. Ed

EXHIBIT “G”

Subject: **It's a party and your invited**
Date: 6/11/2009 2:03:49 P.M. Mountain Daylight Time
From: barhfarms@gmail.com
To: mcgrewmx@aol.com

I am going to have a blast tonight using you and Momma E own word to make you liars and look like fools. Would love to have you join me to explain your side of the story. Ed

EXHIBIT “H”