

**IN THE UNITED STATES  
DISTRICT COURT  
FOR THE EASTERN DISTRICT  
OF LOUISIANA**

**HORNBECK OFFSHORE SERVICES, LLC §  
PLAINTIFF §**

**V. §**

**KENNETH LEE "KEN" SALAZAR, IN HIS §  
OFFICIAL CAPACITY AS SECRETARY, §  
UNITED STATES DEPARTMENT OF §  
INTERIOR; ROBERT "BOB" ABBEY, IN §  
HIS OFFICIAL CAPACITY AS ACTING §  
DIRECTOR, MINERAL MANAGEMENT §  
SERVICE; AND MINERALS §  
MANAGEMENT SERVICE §  
DEFENDANT. §**

**CIVIL ACTION #10-1663(F)(2)**

**SECTION F**

**JUDGE FELDMAN**

**MAGISTRATE 2**

**MAGISTRATE WILKINSON**

**Motion hearing by intervener Orly Taitz,  
ESQ**

**May 11, 2011 10 am**

**Magistrate Joseph Wilkinson**

**Section F**

**REPLY TO OPPOSITION TO MOTION TO INTERVENE**

Intervener respectfully opposes the opposition by the federal defendants on the following grounds

1. Federal defendants improperly characterized the case at hand. They represented it as a case relating to the moratorium on drilling only, however this case developed into a more complex matter of continuous stonewalling and unreasonable interruption of normal business of oil and gas industry of the Gulf of Mexico by the administration of Barack Hussein Obama. After Honorable judge Feldman placed an injunction on moratorium, Obama administration placed roadblocks and is stonewalling the process of granting drilling permits in the Gulf of Mexico. This policy led to de fact dissipation of the oil and gas exploration in the Gulf of Mexico. At the same time Barack Obama travelled to Rio De Janeiro and gave speeches, where he praised similar types of oil exploration in Brazil and stated that US should be the biggest customer of Brazil. At the same time Mr. Obama responded to the constitutional and civil rights attorneys, intervener, being one of them, bringing legal actions, stating that Obama is not eligible and not legitimate to US presidency due to lack of any vital records, that would show him to be a natural born citizen. Obama responded by providing to the public a record that he claimed to be a true and correct copy of his original birth certificate

and called such constitutional attorneys “carnival barkers”. This document, produced by Obama, was found to be a forgery (Exhibits 1, 2). His actions triggered persecutions of Taitz, as a civil rights and constitutional attorney, just as his actions triggered de-facto persecutions of multiple U.S. industries, such as U.S. oil and gas industry. This shows that policies of Barack Obama are not governed by concern over environment and planet earth, but represent anti –American policies, aimed at destruction of US industries, like Oil and Gas industry in the Eastern district of Louisiana, as well as attacks on civil rights attorneys, like Taitz, who are bringing legal actions, exposing Obama’s illegitimacy to the US presidency, as the root of the problem.

2. Common fact pattern and common law pattern, is the fact that Barack Hussein Obama is unlawfully occupying the position of the president of the United States of America, using an invalid Social Security number from a state, where he never resided, using an invalid selective service certificate and using a forged long form birth certificate, and is launching policies destroying different industries, harming the Plaintiffs in this case, as well as harming the intervener. Thus requirement of rule 24(b) was satisfied
3. In addition to the documents submitted in the motion to intervene, Taitz is submitting additional exhibits in order to reply to the opposition and in order to provide additional information, which was not available at the time the motion to intervene was filed. This information include: (Exhibit 1) Affidavit from an expert Douglas Vogt, attesting to the fact that a computer image released by Mr. Obama as a true and correct copy of his original long form birth certificate, represents a forgery. The affidavit provides irrefutable proof that Mr. Obama is uttering a forged document and defrauding the whole nation, and damaging both the Plaintiff and the intervener. (Exhibit 2) Affidavit from Expert Felicito Papa, attesting to the fact that Barack Obama’s birth certificate is indeed an altered computer composite, not a true and correct copy of one document. (Exhibit 3a and 3b show the difference between Obama’s “birth certificate” and birth certificate of one Susan Nordyke born within hours of Barack Obama in Kapiolani hospital, where Obama claims he was born. This exhibit shows that Obama’s birth certificate is not a true and correct copy of a an original birth certificate, which was supposed to be on white paper, bearing defined borders, embossed seal and proper certification wording as seen on exhibit 3b. Exhibit 4a and 4b show further evidence that Obama’s birth certificate is not a true and correct copy of the original typewritten 1961 birth certificate, as all the wording is misaligned and improper for a typewritten birth

certificate, which was supposed to be aligned to the left. Lastly, Exhibit 5, today's article in World Net Daily which reports a letter from Emmanuel Kisombe, permanent secretary in the ministry of immigration of the Republic of Kenya, stating that there is a criminal investigation in regards to reported birth of Barack Obama in Kenya, and the fact that there was tampering and destruction of the pertinent birth records in the birth registry. This additional information is so damning, that it actually requires a further emergency hearing, as it shows, that all the policies affecting the plaintiffs and the intervener were masterminded by one involved in criminal fraud, elections fraud, Social Security fraud, obstruction of Justice, uttering and possibly forgery.

4. Intervener attempted to satisfy requirement of Rule 7-6 by calling the attorneys for the defendants, but did not hear back.
5. In response to the jurisdictional challenge, intervener voluntarily avails herself to the jurisdiction of this court. Mr. Barack Obama availed himself to the jurisdiction of the Eastern district of Louisiana, when he fraudulently submitted his candidacy to run for the position of the U.S. president in this state and when he fraudulently masterminded policies aimed at destruction of the oil and gas industry in this district. Therefore, Taitz satisfied jurisdictional requirement per *Int'l Paper Co v. Jay*, 887 F. 2d 338, 346 (1<sup>st</sup> Cir.1989)

#### **WHEREFORE:**

1. Taitz respectfully seeks a leave of court to join the action at hand as an intervener.
2. Taitz seeks a declaratory relief deeming Obama not eligible to issue any executive orders, sign bills or perform any functions of the President or Commander in Chief due to ineligibility per article 2, section 1 of the US Constitution and due to his fraudulent election based on uttering of forged and invalid identification records.
3. Taitz seeks a declaratory relief deeming Ken Salazar, secretary of the Interior, not eligible to perform any functions as a Secretary of the Interior, as his appointment as the Secretary of the interior was not legitimate, as an appointment of the ineligible President and that moratoriums and policies by Mr. Salazar were null and void due to ineligibility for office and due to his illegal appointment by Mr. Barack Hussein Obama, who is illegally usurping the position of the U.S. president by virtue of fraud and uttering of forged identification records.
4. Taitz is seeking a declaratory relief that Presidential eligibility is not a political

question, but a legal question, to be decided by the district court as a federal law question based violation of the Constitution, specifically Article 2 question 1 of the U.S. Constitution.

5. Taitz is seeking an injunction seeking to stop persecutions of her as a dissident and as a civil rights and constitutional attorney, who brought forward evidence of Obama's fraudulent usurpation of the position of the United States President and Commander in Chief by use of fraud and uttering of forged identification records and stop and reverse any retaliatory actions and sanctions against her due to her legal work in pursuit of ending usurpation of the U.S. presidency by Barack Hussein Obama and ending the enormous damage caused to the US industries and economy at large as a result of this usurpation.

**Respectfully Submitted,**  
**05.11.2011**



**/s/ Orly Taitz, ESQ**  
**Dr. Orly Taitz ESQ**  
**29839 Santa Margarita PKWY, ste 100**  
**Rancho Santa Margarita, CA 92688**  
**phone 949-683-5411 fax 949-766-7603**  
**orly.taitz@gmail.com**

**05.11.2011**  
**Certificate of Service**

I hereby certify that on ~~03-25-2011~~ <sup>05.11.2011</sup> above brief is being filed with the clerk of the court and will be served electronically by ECF on

CarlDavid Rosenblum [crosenblum@joneswalker.com](mailto:crosenblum@joneswalker.com)

Alida C. Hainkel [ahainkel@joneswalker.co](mailto:ahainkel@joneswalker.co); [rmiller@joneswalker.com](mailto:rmiller@joneswalker.com);  
Grady S. Hurleyghurley@joneswalker.com; [dward@joneswalker.com](mailto:dward@joneswalker.com)

Guillermo A. Montero [guillermo.montero@usdoj.gov](mailto:guillermo.montero@usdoj.gov); [efile\\_nrs.enrd@usdoj.gov](mailto:efile_nrs.enrd@usdoj.gov)

Brian M. Collins [brian.m.collins@usdoj.gov](mailto:brian.m.collins@usdoj.gov); [Rosanne.alford@usdoj.gov](mailto:Rosanne.alford@usdoj.gov);

Hornbeck v Salazar Reply to opposition to motion to intervene by Dr. Orly Taitz, ESQ

Sharon Denise Smith [sharron.d.smith@usdoj.gov](mailto:sharron.d.smith@usdoj.gov); [Rosanne.alford@usdoj.gov](mailto:Rosanne.alford@usdoj.gov);  
[jerrilyn.dufauchard@usdoj.gov](mailto:jerrilyn.dufauchard@usdoj.gov)

I further certify that I am mailing the foregoing document to the following non -  
ECF participants

John F. Cooney  
Venable, LLO  
575 7th st.,NW  
Washington, DC 20004



Marjoria Ann McKeithen  
Jones Walker  
Place St. Charles  
201 St. Charles Ave., ste 5100  
New Orleans, LA 70170-5100

/s/ Dr. Orly Taitz ESQ  
29839 Santa Margarita Pkwy ste 100  
Rancho Santa Margarita CA 92688  
ph 949-683-5411 f 949-766-7603