

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

CASE NO. 02-08-CV-04083

PHILLIP BERG, ESQ.

PLAINTIFF

V.

BARACK HUSSEIN OBAMA, JR., AKA BARRY SOETORO, CITIZEN OF  
INDONESIA

DEMOCRATIC NATIONAL COMMITTEE

DEFENDANTS

---

MOTION FOR APPLICATION TO INTERVENE WITH COMPLAINT  
AND

PETITION FOR WRIT OF MANDAMUS DIRECTED TO THE AGENCIES  
OF THE UNITED STATES

AND MOTION FOR INJUNCTIVE RELIEF

COMES NOW, Dr. T.B. Bradley, Psy.D., (hereinafter "Applicant" ) hereby  
formally applies to the Court for leave to intervene in the instant case with

Complaint and Petition for Writ of Mandamus Directed to the Agencies of the United States and Motion for Injunctive Relief previously filed August 28, 2008 at the United States District Court for the District of Columbia, and petitions this Honorable Court for a Writ of Mandamus Directed to the Agencies of the United States. If leave is granted by this Court, Applicant requests this Court provide written notice to all interested parties of same.

Applicant hereby states:

1. Applicant is a Forensic Psychologist who works for the Criminal Justice System and the Courts.
2. Upon reading all of the books written by or about Barack Hussein Obama, Jr. aka Barry Soetoro, (hereinafter Obama) Applicant discerned that Obama was not a natural born citizen of the United States or if he was a natural born citizen that he had lost his citizenship when his biological mother married Lolo Soetoro, a citizen of Indonesia. And, Obama then became a citizen of Indonesia as a result of his mother's expatriation of herself and her son, by self-declaration on legal public educational records that Obama was formally known as Barry Soetoro, a citizen of Indonesia.
3. Hence, Applicant discerned that Obama was not US Constitutionally qualified to hold the Office of the United States Senator from Illinois or the Office of the President of the United States.

4. Without any knowledge whatsoever of the instant case filed August 21, 2008, Applicant filed the Complaint at the United States District Court – See Exhibit A.
5. Later, Plaintiff discovered a similar action, the instant case, and provided Judicial Notice to the US District Court of same- See Exhibit B.
6. Shortly thereafter, Applicant discerned that Obama's Mother engaged in a pattern of illegal and fraudulent conduct as a result of both of her two children's birth outside of the United States: (1) Obama, Jr. born in Kenya Africa and (2) Maya Soetoro born in Jakarta Indonesia, but the mother, a US Citizen, raced to Hawaii after each of her children's birth where she engaged in fraudulent conduct upon the United States by declaring a late registration birth for both children claiming that they were born in Hawaii.
7. In fact, this pattern of fraudulent conduct is evidenced by the fact that Obama, Jr. was born in Africa and her second child, Maya Soetoro, was born in Jakarta, Indonesia; however, both children are allegedly registered with birth certificates as born in the United States.
8. Obama's mother defrauded the United States not once, but twice due to her out of US births of her children that she desperately sought to protect by late registration births with false and fraudulent information declaring that both children were born on US soil.

9. If in fact, Obama was born on US Soil, he lost any US citizenship he may have held when his mother married Lolo Soetoro, moved to Indonesia, expatriated both herself and her son as a result of her marriage and by self-declaration on legal, public, educational records that Obama was the step-son of Lolo Soetoro, a citizen of Indonesia, and that Obama 's name was changed to Barry Soetoro, now a citizen of Indonesia.
10. For all intents and purposes, Obama, remains a citizen of Indonesia to this day.
11. Unless he has applied for naturalization of US Citizenship after the age of 18 and pledged an oath of allegiance to the US, Obama is, in fact, an illegal alien living in the United States.
12. He should be deported and stripped of his US citizenship and immediately stricken from the ballot for those natural born citizens qualified to hold the Office of the President of the United States.
13. The quickest route to obtain facts would be for this Court to direct the Agencies of the United States to obtain the Indonesia passport for Barack Hussein Obama, Jr. aka, Barry Soetoro.
14. Mr. Berg has requested additional documents from Obama; however the illegal games that this sophisticated and intelligent "master manipulator" may engage in over the next several weeks will cause great turmoil to the upcoming US Presidential elections and a constitutional crisis that may cause irreparable harm and damage to

the United States, its agencies and its US citizens, including its registered voters who have relied upon the Federal Election Commission and the Democratic National Committee to fully investigate and vet its candidates before engaging in the national disgrace of Obama, illegal alien and citizen of Indonesia being placed on the ballot of the United States Presidential Elections of 2008.

15. Applicant respectfully requests this Court review the solutions available to it by commanding the pertinent agencies of the United States as set forth in Exhibits A and B herein to take action to fully investigate the allegations contained in Exhibits A and B herein, in addition to the facts and documentary evidence in support of Mr. Berg's claims in his Complaint and Response to Defendants' Motion to Dismiss.

16. Both the Applicant and Mr. Berg have standing as natural born United States Citizens and registered voters to apply to the United States District Court and the US court systems as the only avenue to obtain relief in regards to the issues and claims of each party's Complaint.

17. To protect all US Citizens and registered voters, this Court is compelled to uphold its oath to protect its US Citizens from harm, including the name of an Indonesian citizen, an illegal alien, Barack Hussein Obama, Jr. aka Barry Soetoro, who has diligently sought to

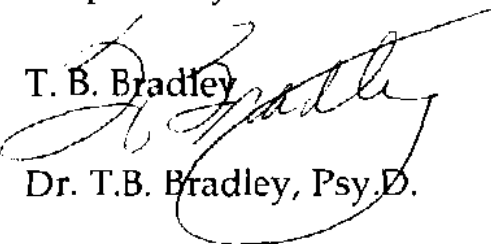
obtain the highest office of the United States government and its agencies although he is not US Constitutionally qualified.

WHEREFORE, Applicant Bradley, respectfully moves this Court to enter its Orders directed to the agencies of the United States as set forth in the claims for relief in Counts I (pages 21-24) Count II (pages 26-29) and such other relief as this Court deems just and necessary given the gravity of the facts, witnesses (Grandmother, step-sister, step-brother who claim Obama was born in Africa), and the documentary evidence in support provided by Mr. Berg to this Honorable court to avert a US Constitutional crisis .

Further, the Applicant respectfully requests this Court utilize its power and its authority given the gravity of the facts and documents in support of the fact that Obama, Jr. is not US Constitutionally qualified to hold neither the Office of the United States Senator from Illinois nor the Office of the President of the United States as it is clear that he relinquished his US Citizenship, if any, by becoming a citizen of Indonesia and traveling on an Indonesian Passport from age 6- age 18, and after the age of 18. In fact, Obama is an illegal alien attempting to fool the registered US voter in the November 2008 Presidential elections. Applicant requests this Court to enter its Writ of Mandamus directed to the third party agencies of the United States to seek out, investigate and obtain third party documentary evidence and the facts providing its report and documentary evidence to this Court. The facts can be quickly discerned by by any and all passports

issued to Barack Hussein Obama, Jr. aka Barry Soetoro , his biological mother (Stanley Ann Dunham), his biological father (Barack Hussein Obama, Sr. , and any and all public records available to this US Court or cooperating countries and international agencies of the world,

Respectfully submitted this 2<sup>nd</sup> day of October 2008,

  
T. B. Bradley

Dr. T.B. Bradley, Psy.D.

2620 17<sup>th</sup> Avenue Columbus, GA 31907

Phone: 561-676-2969

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent this 2<sup>nd</sup> day of October 2008 by either or both Email and US Mail to:

PHILIP J. BERG , LAW OFFICES OF PHILIP J. BERG

555 ANDORRA GLEN COURT SUITE 12

LAFAYETTE HILL, PA 19444

610-825-3134 Fax: 610-834-7659

Email: philjberg@gmail.com

LEAD ATTORNEY TO BE NOTICED

---

EXHIBITS

A-13



**IN THE UNITED STATES COURT  
FOR THE DISTRICT OF COLUMBIA  
CASE NO: \_\_\_\_\_**

“Jane Doe”, Pro Se, a pseudonym to protect the innocent

Plaintiff

V.

Barack Hussein Obama, Jr.

aka Barry Soetoro, citizen of Indonesia;

Democratic National Committee

Defendants

\_\_\_\_\_ /

**COMPLAINT  
WITH PETITION FOR WRIT OF MANDAMUS  
DIRECTED TO THE AGENCIES OF THE UNITED STATES**

**PRELIMINARY STATEMENT**

Plaintiff brings this action before this Court requesting hearings and investigations by the agencies of the United States and to enter Orders and Writs not for either public or financial gain, only to protect the innocent

American Voter in the Presidential elections of November 2008, and thereafter, should Defendant Barack Hussein Obama, Jr. aka Barry Soetoro, Citizen of Indonesia, be elected to hold the nation's highest office as Commander in Chief of the US Military Armed Services when Defendant's educational records while living in Indonesia clearly state that he named Barry Soetoro, citizen of Indonesia.

1. The Court has jurisdiction of the parties pursuant to USC Title 28 §1332 based upon diversity of citizenship of the parties and amount in question that exceeds \$75,000.00; and pursuant to USC Title 28 §1331 based upon federal question and potential violations of the United States Constitution Article II Section 1.
2. All conditions precedent to the filing and maintenance of this action have occurred.

## **PARTIES**

3. Plaintiff, "Jane Doe", a pseudonym to protect the innocent, is a resident of the State of Georgia with her US Mail address P.O. Box 8542 Columbus, GA 31908.

4. Defendant, Barack Hussein Obama, Jr., aka Barry Soetoro, citizen of Indonesia, is a resident of the District of Columbia with his US Mail address US Senator from the State of Illinois, Barack Hussein Obama, Jr. Russell Senate Office Bldg. Washington, DC 20005.
5. Defendant , Democratic National Committee has its headquarters located at 430 S. Capitol St. SE Washington, DC 20003.

**FACTS AND GENERAL ALLEGATIONS APPLICABLE TO ALL  
COUNTS AND TO PETITION FOR WRIT OF MANDAMUS**

6. Defendant, Barack Hussein Obama, was born on August 4, 1961, the actual whereabouts and circumstances are unclear.
7. The location of his birth is in controversy as witnesses have reported that Obama's mother (Ann Dunham hereinafter "Dunham") left Hawaii and went to Kenya, Africa in search of the baby's biological father, Barack Hussein Obama, Sr., only to discover that Obama, Sr. was married and had many children in Kenya from this marriage. And, a birth certificate for this illegitimate conception placed on the internet campaign sites for Barack Hussein Obama, Jr. has been investigated by third and deemed a forgery.

8. Further, it is alleged that Defendant's Mother (Dunham) placed demands upon Obama, Sr. to divorce his then current Kenyan wife and marry Dunham prior to the immediate arrival of the son that she and Obama, Sr. had conceived. If there was a "marriage' between Obama, Sr. and Dunham it was polygamous as Obama, Sr. was already married in Kenya, Africa. Thus, Defendant was born illegitimately location unknown.
9. It is alleged that Defendant Barack Hussein Obama was born in Nyangoma-Kogel, Kenya, Africa illegitimately as Obama, Sr. refused to divorce his then Kenyan wife, but the exact whereabouts of Defendant's birth is in controversy.
10. Shortly thereafter, it is alleged that Dunham left Kenya, travelled back to Hawaii and registered her newborn son, Barack Hussein Obama, Jr. as born in Hawaii. This island state had recently been admitted into the United States, but it allowed after the fact late registration birth certifications unlike any continental US state.
11. Mother and son (Obama, Jr.) lived in Hawaii for several years.
12. When her son(the Defendant) was five years of age, Dunham married Lolo Soetoro, a citizen of Jakarta, Indonesia, a practicing Muslim whom

she meet at the University in Hawaii, and the Defendant along with his mother moved to Jakarta, Indonesia in late 1967. Upon their arrival, Defendant was legally declared as the step-son of his mother's new husband (Soetoro) and, more importantly, **a citizen of Indonesia.**

13. Hence, Defendant's mother effectively legally renounced the US Citizenship, if any, of Barack Hussein Obama, Jr. along with making a public legal name change from Barack Hussein Obama, Jr. to Barry Soetoro, named after her Indonesian husband, Lolo Soetoro.

14. In late 1967 Barry Soetoro and his mother and step-father Soetoro lived continuously Jakarta, Indonesia from 1968 to the mid-to- late 1970's, the date is uncertain. Mr. Soetoro worked as an official of the Director General's Office in the TNI Topography Division of the Indonesian Army

15. In either Hawaii after Dunham's marriage to Soetoro or prior to his move to Indonesia or after the family's move to Jakarta, Indonesia, Obama, Jr. legally changed his name to Barry Soetoro and the Defendant referred to his mother's husband as his "step-father" in all legal, public and educational records and by personal reference as "his father (Soetoro)."

16. Dunham and her son, Defendant Obama aka Barry Soetoro settled into Indonesia as Indonesian citizens with all intents and the purpose to remain married forever and to remain in Jakarta, Indonesia forever. Hence, the self-renunciation of US citizenship, if any, by self-declaration on legal, public and educational records that Defendant was as citizen of Indonesia.
17. Mrs. Soetoro enrolled her son in two schools in Jakarta, Indonesia as a citizen of Indonesia under his newly changed legal name: Barry Soetoro formerly declaring Defendant as a citizen of Indonesia on all legal, public and educational records, thus renouncing his US Citizenship, if any.
18. Barry Soetoro (formerly Barack Hussein Obama, Jr.) enrolled on January 1, 1968 in the Franciscan Assisi Primary School in Jakarta, Indonesia with serial number 203 and he sat in class 1B with the school records indicating that both he and his mother had declared Barry Soetoro (Defendant) as a citizen of Indonesia. These records are factual and a matter of public record.
19. Mrs. Soetoro, Barry Soetoro's mother and Barry himself, listed himself and referred to himself as Barry Soetoro and all parties listed his father as "Lolo Soetoro" who worked for the Indonesian Army.

20. And, more importantly, both Defendant and his mother listed himself as a citizen of Indonesia, not the United States when given the opportunity to do so, in lieu of making a legal and public renunciation formerly declaring her son, the Defendant, as a citizen of Indonesia.
21. Further, Barry Soetoro (formerly Barack Hussein Obama, Jr. ) listed his religion as Islam, which he has recently and vehemently denied to the US public on his campaign internet sites.
22. Later, Barry Soetoro enrolled in a second school in Jakarta, Indonesia and again enrolled under his name, Barry Soetoro, a citizen of Indonesia and a Muslim.
23. While married and declaring herself and her son as citizens of Indonesia, Mrs. Soetoro had a second child born in Indonesia, Maya Soetoro; and like her son Barry Soetoro also declared her as a citizen of Indonesia by Mrs. Soetoro on Maya's birth certificate and school records in Jakarta.
24. Thus, for all intents and purposes, Defendant, his mother, and his half-sister were formally declared as citizens of Indonesia as early as 1967 and lived in this capacity for a significant period of time with the intent to remain in Indonesia forever, thus renouncing US Citizenship held by any party, if any.

25. Mrs. Soetoro, her son Barry, and her daughter, Maya resided as a legal residents of and self-declared citizens of Jakarta, Indonesia from late 1967 for + or – 7-10 years while Mrs. Soetoro remained legally married to Barry's step-father, Lolo Soetoro. The parties divorced 12 years later in 1980. When Barry and Mrs. Soetoro re-entered the US they did so under old US passports to live in Hawaii for a brief period of time. Dunham later returned to Indonesia where she remained her entire life or travelled and worked in foreign countries, not in the United States.
26. At this current time August 25, 2008, Barry Soetoro (formerly Barack Hussein Obama, Jr.) is now presumptive, soon to be the actual Democratic nominee candidate for the Office of the President of the United States.
27. The facts and evidence will show that Barry Soetoro (formerly Barack Hussein Obama, Jr.) is not US Constitutionally qualified to hold the Office of the President of the United States as he lost his US Citizenship and US Nationality citizenship by voluntarily declaring himself to be a citizen of Indonesia for a significant period of time by notification for a this protracted period to all parties on legal, public and educational records in Indonesia that he was now "Barry Soetoro" and that he is a citizen of Indonesia; and that his father was Lolo Soetoro, listed as



either father or step-father on all public, legal and educational records in Indonesia.

28. The Defendant lost his US Citizenship, if any, by declaring on legal, public, and educational records for a significant period of time that he was a citizen of Indonesia. Thus, he is not qualified to hold the Office of President of the United States or US Senator from Illinois.

**COUNT I – VIOLATIONS OF THE  
UNITED STATES CONSTITUTION  
Article II Section I and USC Title 8 § 1481**

29. Plaintiff, Jane Doe hereby incorporates Paragraphs 1 – 28 as if stated herein and alleges a cause of action against the presumptive or actual Democratic nominee for the Office of President of the United States, Defendant Barack Hussein Obama, Jr. aka Barry Soetoro, self-declared citizen of the Indonesia and the Democratic Party of the United States for intentional violations of the United States Constitution Article II, Section I, and states:

30. The law of this case entails the intertwining of the US Constitution Article II, Section 1 Qualifications to be President of the United States and by USC Title 8 § 1481. Loss of nationality by native-born or naturalized citizen; voluntary action; burden of proof; presumptions.

### 31. First, the US Constitution

#### *Age and Citizenship requirements - US Constitution, Article II, Section 1*

*"No person except a natural born citizen, or a citizen of the United States, at the time of the adoption of this Constitution, shall be eligible to the office of President; neither shall any person be eligible to that office who shall not have attained to the age of thirty-five years, and been fourteen years a resident within the United States."*

#### *Term limit amendment - US Constitution, Amendment XXII, Section 1 – ratified February 27, 1951*

*"No person shall be elected to the office of the President more than twice, and no person who has held the office of President, or acted as President, for more than two years of a term to which some other person was elected President shall be elected to the office of the President more than once. "*

### 32. Second, USC Title 8 1481

#### **§ 1481. Loss of nationality by native-born or naturalized citizen; voluntary action; burden of proof; presumptions**

*(a) A person who is a national of the United States whether by birth or naturalization, shall lose his nationality by voluntarily performing any of the following acts with the intention of relinquishing United States nationality –*

*(1) obtaining naturalization in a foreign state upon his own application or upon an application filed by a duly authorized agent, after having attained the age of eighteen years; or*

*(2) taking an oath or making an affirmation or other formal declaration of allegiance to a foreign state or a political subdivision thereof, after having attained the age of eighteen years; or*

*(3) entering, or serving in, the armed forces of a foreign state if*

*(A) such armed forces are engaged in hostilities against the United States, or*

*(B) such persons serve as a commissioned or non-commissioned officer; or*

*(4)*

*(A) accepting, serving in, or performing the duties of any office, post, or employment under the government of a foreign state or a political subdivision thereof, after attaining the age of eighteen years if he has or acquires the nationality of such foreign state; or*

*(B) accepting, serving in, or performing the duties of any office, post, or employment under the government of a foreign state or a political subdivision thereof, after attaining the age of eighteen years for which office, post, or employment an oath, affirmation, or declaration of allegiance is required; or*

*(5) making a formal renunciation of nationality before a diplomatic or consular officer of the United States in a foreign state, in such form as may be prescribed by the Secretary of State; or*

*(6) making in the United States a formal written renunciation of nationality in such form as may be prescribed by, and before such officer as may be designated by, the Attorney General, whenever the United States shall be in a state of war and the Attorney General shall approve such renunciation as not contrary to the interests of national defense; or*

*(7) committing any act of treason against, or attempting by force to overthrow, or bearing arms against, the United States, violating or conspiring to violate any of the provisions of section 2383 of title 18, or willfully performing any act in violation of section 2385 of title 18, or violating section 2384 of title 18 by engaging in a conspiracy to overthrow, put down, or to destroy by force the Government of the United States, or to levy war against them, if and when he is convicted thereof by a court martial or by a court of competent jurisdiction.*

*(b) Whenever the loss of United States nationality is put in issue in any action or proceeding commenced on or after September 26, 1961 under, or by virtue of, the provisions of this chapter or any other Act, the burden shall be upon the person or party claiming that such loss occurred, to establish such claim by a preponderance of the evidence. Any person who commits or performs, or who has committed or performed, any act of expatriation under the provisions of this chapter or any other Act shall be presumed to have done so voluntarily, but such presumption may be rebutted upon a showing, by a preponderance of the evidence, that the act or acts committed or performed were not done voluntarily."*

33. It is unclear whether or not Barry Soetoro (formerly Barack Hussein Obama, Jr.) was born a natural citizen in the United States as there are reports that his mother (Dunham) in the late stages of her pregnancy with the Defendant, travelled to Kenya, Africa placing demands upon Obama, Sr. to leave and to divorce his then Kenyan wife and to marry her (Dunham), which Obama, Sr. refused. Thus, Defendant's birth location is unclear but he was born illegitimate as Obama, Sr. was married to a woman in Kenya, Africa at the time of Defendant' birth.

34. Further, Defendant's certification of birth states "date filed" on its date, unlike other certifications of birth in Honolulu, Hawaii and it is claimed to be a forgery. See Exhibit A herein.

35. It is reported by third parties and witnesses that her son (Barack Hussein, Jr. later changed to Barry Soetoro) was born in Kenya, Africa and Dunham later returned to Hawaii where his mother obtained his birth certificate listing Barack Hussein Obama, Sr. as the father, although born illegitimately as Obama, Sr. was married with children of his own.
36. It is a fact that Dunham was legally married to Lolo Soetoro in 1967 or early 1968 and that her son's name was later changed to Barry Soetoro on public, legal and educational records in Jakarta, Indonesia.
37. It is a fact that Barry Soetoro listed his citizenship as Indonesia, not the United States in public, legal and educational records from 1968 to the mid to late 1970s, and he remained a citizen of Indonesia by his renunciation of US Citizenship, if any, on all legal, public, and educational records filed in Indonesia for Barry Soetoro aka Barack Hussein Obama, Jr., the presumptive or actual Democratic Candidate for the Office of the President of the United States.
38. If elected and sworn in by the Chief Justice, Defendant would be the first Indonesian Citizen and citizen of a foreign country to hold the Office of the United States – clearly an egregious violation of the US Constitution Article II Section 1.

39. It is a fact that Defendant Obama attended a Muslim school in Jakarta. It is a fact that the school is Wahabi Sunni Islamic segment of Mohammedanism that is followed by many of the Muslim terrorists who are now waging the 'Holy War' Jihad against the USA infidels.
40. Yet, Defendant's campaign web site vehemently declares, in contradiction to Defendant' educational records in Indonesia, that he ever studied or practiced the Muslim religion. In fact, many witnesses have come forward who recall Barry Soetoro (Defendant) and his step-father attending Muslim services.
41. Since it is politically expedient to be a Christian when seeking major public office in the United States, Barack Hussein Obama has joined the Black Baptist United Church of Christ, in an attempt to downplay his Muslim upbringing.
42. It is a fact that the United States is currently at war with Muslim Wasabi Sunni Islamic segment of Mohammedanism that is followed by many of the Muslim terrorists who are now waging the 'Holy War' Jihad against the USA infidels.
43. It is a fact that Defendant is lying when he states that he has never practiced the Muslim religion.

44. It is a fact that a forged birth certificate has been posted at the Defendant's campaign site.
45. It is a fact that Defendant spent many years going to two schools in Indonesia with both his mother and himself declaring himself to be a citizen of Indonesia, not the United States although she had knowledge, intelligence, and the opportunity to protect this right, if any, held by her son.
46. It is a fact that Mrs. Soetoro bore a second child in Indonesia, and listed her as a citizen of Indonesia on public, legal and educational records. Hence, she was aware of the magnitude of making this declaration for her son, the Defendant in this case. And, the Defendant self-declared himself to be a citizen of Indonesia from the age of 7 for many years thereafter.
47. It is a fact that Mrs. Soetoro resided in Indonesia for over 10 years and intended to stay married to Soetoro and to remain with her children (Defendant and her daughter) in Indonesia as a citizen of Indonesia, including Indonesian citizenship for her son, the Defendant.

48. It is a fact that Mrs. Soetoro from late 1997 to the late 1970's self-declared herself and her children to be citizens of Indonesia on public, legal and educational records and, likewise, for her son now legally declared as Barry Soetoro, citizen of Indonesia.
49. It is a fact that Defendant's Mother and Defendant intended to relinquish their US citizenship, if any, and to remain in Indonesia by their self-declaration that Mother and Defendant, and later the daughter born to Dunham in Indonesia were citizens of Indonesia, not the United States, on all public, legal and educational records.
50. It is a fact that Defendant's birth record differs from the majority of birth records filed in Hawaii in 1961. Defendant's certification of birth states "Date filed" when other Honolulu birth certificates on the same form says 'Date Accepted.'" It is quite possible that Defendant's mother applied for a "late arrival" birth certificate after-the-fact of his birth outside of the United States, which Hawaii allows under certain circumstances.
51. Images of Defendants 'certification of birth' in the United States (Honolulu, Hawaii) are fake and have been demonstrated to be forged, intentionally altered with a graphics program edited with Adobe Photoshop CS3 on a MAC running OS2.0 saved at 8:42 am on June 12, 2008 posted at Defendant's campaign sites for the Office of President of the

United States as the Democratic Candidate nominee. **See Exhibit A herein.**

52. It is a fact that Defendant has performed acts to relinquish any US citizenship that Defendant may have had rights to claim while living in Indonesia as either natural born or naturalized citizens of the United States for a protracted period of time late 1997 to mid-to-late 1970's, at which time in 1980 Mrs. Soetoro divorced Lolo Soetoro and returned to Hawaii.
53. Along with his mother, the Defendant entered into the US under the guise that they were citizens of the US using their old passports with an egregious, intentional, and illegal failure to report that while in Indonesia they had lost their US Citizenship and US Nationality citizenship status by voluntarily relinquishing US Citizenship and self-declaring themselves to be citizens of the Indonesia, not the United States for a protracted period of time.
54. In sum, the Defendant and his mother failed to report upon re-entering the United States while legal residents of Indonesia and self-declared citizens of Indonesia that they had voluntarily relinquished and renounced their US Citizenship by self-declaring themselves to be citizens of Indonesia and by performing acts of expatriation for a protracted period of time, from late 1967 to mid-to late 1970s while



residing continuously in Indonesia with the intent to remain their forever.

55. In fact, Mrs. Soetoro although divorced in 1980 remained a US expatriate from Defendant's years at age 7 to age 18; and she traveled around the world, pursuing a career in rural development that took her to Ghana, India, Thailand, Indonesia, Nepal and Bangladesh. In 1986 Ann Dunham worked on a developmental project in Pakistan. Dunham died February 8, 1992.
56. It is clear that as early as 1967 she voluntarily relinquished US citizenship for both herself and her son when she married Lolo Soetoro and declared her son to be a citizen of Indonesia on all public, legal and educational records, including changing his name to Barry Soetoro on all public and educational records.
57. In the event Defendant was, in fact, a natural born citizen of the US by the prolonged, protracted, and voluntary acts of both Defendant and his mother, Defendant caused the loss of his US Nationality by both parties' self-declaration on public, legal and educational records that he was, in fact, a citizen of Indonesia, not the United States.
58. Thus, Defendant is not US constitutionally qualified to be President of the United States. If he is elected, the Chief Justice of the Supreme

Court would be in violation of the United States Constitution Article II Section 1 should he swear in Defendant into the Office of the President of the United States.

59. Upon Defendant's loss of US nationality by engaging in acts of self-declaration on public, legal and educational records that he is a citizen of Indonesia, the Defendant lost all natural born and/or naturalized rights to later claim that he is now a US Citizen, natural born, constitutionally qualified to hold the Office of the President of the United States.
60. The facts of Defendant's self-declaration to be a citizen of Indonesia prohibits him from being either the nominee or elected by the registered US voters or sworn by the Chief Justice of the US Supreme Court to hold the Office of the President of the United States as he lost his US nationality by his own self-declarations and conduct while living in Indonesia with the intent to remain their forever as the step-son of Lolo Soetoro, his mother's legal husband.
61. Naturalized US citizens cannot hold this country's highest office, President of the United State. Likewise, those expatriates who move to a foreign country and who renounce or engage in conduct to inform the public and all legal and educational records that Defendant is a citizen of Indonesia, not the United States when the opportunity was available,

engaged in acts of self-renunciation of US Citizenship rights held by Defendant, if any.

62. In fact, Barry Soetoro's (formerly Barack Hussein Obama, Jr.) is intentionally violating and intends to violate the United States Constitution and the United States Code Title 8, as well as engaging in rampant fraud upon the American public voter.

63. At a minimum, there is cause for **grave concern** that the campaign site or a site affiliated with Defendant's election has posted his birth certificate that may be forgery and includes words not typically found in Hawaii birth certification records. Further, the words included may indicate that Defendant was registered late with a birth in Hawaii when, in fact, he was not actually born in Hawaii or any state of the United States.

64. It is a **grave concern** that Defendant was or is a practicing Muslim, a fact that he denies, and attended the Muslim Wasabi School in Jakarta. Wahabism is a Sunni Islamic segment of Mohammedanism that is followed by many of the Muslim terrorists who are now waging the 'Holy War' Jihad against the USA and with whom we are now at War in Iraq.

65. Barry Soetoro (Defendant) and his mother engaged in repeated and protracted voluntary acts of renunciation of US Citizenship and by self-declaration as citizens of a foreign country, Indonesia; and Defendant communicated this to “the world” for a protracted period of time with the intent to remain in Indonesia and by living continuously in Indonesia as citizens of Indonesia, indicated by legal, public, and educational documents and records. If his mother had intended to retain US citizenship for her son, if any, she was educated and knew how to assert her rights in the public, legal and educational records that clearly stated that Defendant is a citizen of Indonesia, not the United States. Hence, this was no mistake. It was a self-renunciation to the world that Defendant was now a citizen of Indonesia on all public, legal and educational records.
66. After engaging in this self-renunciation of US Citizenship conduct for many years as self-declared citizens of Indonesia, one does not just enter back into the US with “insto-presto” US citizenship magically reinstated. **See USC Title 8 Nationality & Immigration.**
67. Defendant Barack Hussein Obama, Jr. aka Barry Soetoro, self-declared citizen of the Indonesia is not US Constitutionally qualified to hold the office of the President of the United States; and he may not be US Constitutionally qualified to hold the Office of the US Senator of the United States.

68. And, Defendant Obama/Soetoro, is a Muslim educated at Muslim Wasabi Sunni School in Jakarta. Wahabism is a Sunni Islamic segment of Mohammedanism that is followed by Muslim terrorists who we are now engaged in a War on Terror in Iraq.

**WHEREFORE,** Plaintiff "Jane Doe" hereby requests this Court hold hearings as it deems just and proper and enter its Orders, Injunctions Writs, and Judgment against the Defendant, Barrack Hussein Obama, Jr. aka Barry Soetoro, and the Democratic Party of the United States, as follows:

- a) Temporary injunction enjoining the Democratic Party of the United States from nominating Defendant Barack Hussein Obama, Jr. aka Barry Soetoro, self-declared citizen of Indonesia as its nominee for the Office of the President of the United States, until further investigation, hearings and order of this Court;
- b) Temporary injunction, enjoining the Chief Justice of the US Supreme Court from swearing in the Defendant, Barack Hussein Obama, Jr. aka Barry Soetoro, from holding the Office of the President of the United States should he win the general election November 2008 until further investigations, hearings and order of this Court.
- c) Enter a Writ of Mandamus directed to the United States Senate directing a non-partisan investigatory committee to open a full

investigation into allegations contained in this Complaint, including obtaining certified public records, certified copies of Defendant's educational records while attending schools in Indonesia, and all other public records with regards to Barry Soetoro, step-son of Lolo Soetoro while his mother was legally married to Soetoro from 1967 to 1980.

- d) Enter a Writ of Mandamus directed to the States of Hawaii and to the Country of Kenya, Africa to provide certified copies of marriage, birth, divorce, educational, and other public records in regards to Barack Hussein Obama, Jr. and for Barry Soetoro, son of Lolo Soetoro while living in Indonesia.
- e) Enter a Writ of Mandamus directed to the United States Department of State Consular Affairs Office Washington, DC to open an investigation into and to obtain a certified copy of the birth certificate from Hawaii of Defendant Barack Hussein Obama, Jr. aka Barry Soetoro comparing a Certified copy with the birth certificate published on the internet by the Defendant or others; and to open an investigation into all public, legal and educational records of Barack Hussein Obama, Jr. aka Barry Soetoro, from the date of his birth to age 18, particularly all educational records while his mother, Dunham, was married to Lolo Soetoro and divorced during the years from Defendant's date of birth until the date of the divorce of Ann Dunham in 198- to Lolo Soetoro filed in Jakarta, Indonesia.
- f) Enter a Writ of Mandamus directed to the United States Department of State Consular Affairs Office Washington, DC to open an investigation

into the US Passports or other country passports or documents that allow legal entry into the United States held by Anne Dunham, Barack Hussein Obama, Jr. aka Barry Soetoro, Barrack Obama, Sr., and Lolo Soetoro issued by the United States at any time or by Indonesia or by any country of the world particularly Indonesia during the time period of 1960 to 1980 for all of the above named parties.

- g) Plaintiff prays for entry of judgment in an amount the Court deems appropriate for her costs, fees, and expenses to bring this matter to the attention of the Court, and such other relief as the Court deems just and proper in order to protect the innocent American Voter who has the right to a full investigation into known educational records in Jakarta, Indonesia where the Defendant engaged in conduct to declare himself a citizen of Indonesia during his educational years in Indonesia.
- h) Upon due consideration of the power and the authority this Court upon full investigation of the United States State Department, and its other agencies, the Plaintiff requests the Court issue a permanent injunction upon Barack Hussein Obama, Jr. aka Barry Soetoro, citizen of Indonesia from serving as the Democratic nominee, the President-elect, or to hold the Office of the President of the United States, or the Office of the US Senator from Illinois, or any other public office in the United States as a result of self-renunciation and conduct that Defendant is or was at any time a citizen of Indonesia or any other foreign country.

- i) Plaintiff requests this Court to enter Orders and Writs not for either public or financial gain, only to protect the innocent American Voter in the Presidential elections of November 2008, and thereafter, should Defendant be elected to hold the nation's highest office as Commander in Chief of the US Military Armed Services when Defendant's educational records while living in Indonesia clearly state that his name is Barry Soetoro, citizen of Indonesia.
  
- j) Plaintiff requests this Court to duly consider the magnitude of the issues and the facts that the Democratic Candidate for Office of the President of the United States has renounced his US Citizenship, if any, as a self-declared citizen of Indonesia on legal, public, educational records. If the facts indicate, the Plaintiff requests the Court to direct the Office of the United States Attorney for the District of Columbia to take immediate action to prohibit and remove the Defendant as the named Democratic nominee for the Office of President of the United States; and to take action to remove the Defendant from the Office of the US Senator from Illinois in order to protect its US citizens from further harm and damage as a result of Defendant's renunciation and declaration that the Defendant Barry Soetoro, formerly Barack Hussein Obama, Jr. or vice-versa is a citizen of Indonesia placed on public, legal and educational records in Jakarta, Indonesia by any party, at any time.



## COUNT II – NEGLIGENCE

69. Plaintiff incorporates Paragraphs 1 – 68 as if stated herein and alleges a cause of action against the Defendant Democratic National Committee for negligence, and states:
70. It is the duty and the responsibility of the Defendant Democratic National Committee to vet a candidate for public office, including Office of the President of the United States.
71. It is a fact, that Defendant Obama changed his name to Barry Soetoro while living with his mother and step-father in Jakarta, Indonesia, and that he placed on the legal public and educational records his renunciation of his US Citizenship, if any, by stating formal on all public and educational documents that he is a Citizen of Indonesia, not a citizen of the United States when he had the opportunity to do so.
72. The United States Constitution Article 2 Section 1 is quite clear in that neither a non-citizen, a citizen of Indonesia, or naturalized citizen can hold the Office of President of the United States.
73. The Defendant was negligent in its due diligence to the American Voter, the Plaintiff, by its failure to fully investigate the Defendant Obama's background, including the fact that he had renounced his US Citizenship, if any, on legal public and educational records by declaring himself a citizen of Indonesia, a country where he had moved to with

his mother due to marriage to Lolo Soetoro, and where the parties fully intended to declare themselves as citizens of Indonesia, and did in fact do so on public records.

**WHEREFORE,** Plaintiff "Jane Doe" hereby requests this Court hold hearings as it deems just and proper and enter its Orders, Injunctions Writs, and Judgment against the Defendant, Barrack Hussein Obama, Jr. aka Barry Soetoro, and the Democratic Party of the United States, as follows:

- a) Temporary injunction enjoining the Democratic Party of the United States from nominating Defendant Barack Hussein Obama, Jr. aka Barry Soetoro, self-declared citizen of Indonesia as its nominee for the Office of the President of the United States, until further investigation, hearings and order of this Court;
- b) Temporary injunction, enjoining the Chief Justice of the US Supreme Court from swearing in the Defendant, Barack Hussein Obama, Jr. aka Barry Soetoro, from holding the Office of the President of the United States should he win the general election November 2008 until further investigations, hearings and order of this Court.
- c) Enter a Writ of Mandamus directed to the United States Senate directing a non-partisan investigatory committee to open a full investigation into allegations contained in this Complaint, including obtaining certified public records, certified copies of Defendant's educational records while attending schools in Indonesia, and all

other public records with regards to Barry Soetoro, step-son of Lolo Soetoro while his mother was legally married to Soetoro from 1967 to 1980.

- d) Enter a Writ of Mandamus directed to the States of Hawaii and to the Country of Kenya, Africa to provide certified copies of marriage, birth, divorce, educational, and other public records in regards to Barack Hussein Obama, Jr. and for Barry Soetoro, son of Lolo Soetoro while living in Indonesia.
- e) Enter a Writ of Mandamus directed to the United States Department of State Consular Affairs Office Washington, DC to open an investigation into and to obtain a certified copy of the birth certificate from Hawaii of Defendant Barack Hussein Obama, Jr. aka Barry Soetoro comparing a Certified copy with the birth certificate published on the internet by the Defendant or others; and to open an investigation into all public, legal and educational records of Barack Hussein Obama, Jr. aka Barry Soetoro, from the date of his birth to age 18, particularly all educational records while his mother, Dunham, was married to Lolo Soetoro and divorced during the years from Defendant's date of birth until the date of the divorce of Ann Dunham in 198- to Lolo Soetoro filed in Jakarta, Indonesia.
- f) Enter a Writ of Mandamus directed to the United States Department of State Consular Affairs Office Washington, DC to open an investigation into the US Passports or other country passports or documents that allow legal entry into the United States held by Anne

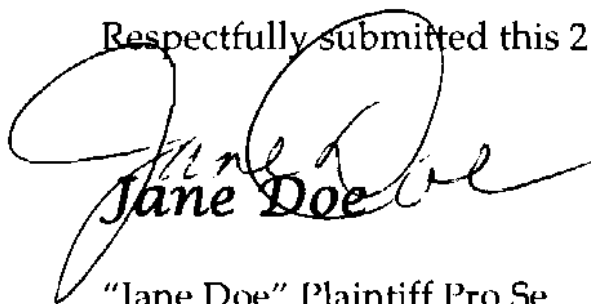
Dunham, Barack Hussein Obama, Jr. aka Barry Soetoro, Barrack Obama, Sr., and Lolo Soetoro issued by the United States at any time or by Indonesia or by any country of the world particularly Indonesia during the time period of 1960 to 1980 for all of the above named parties.

- g) Plaintiff prays for entry of judgment in an amount the Court deems appropriate for her costs, fees, and expenses to bring this matter to the attention of the Court, and such other relief as the Court deems just and proper in order to protect the innocent American Voter who has the right to a full investigation into known educational records in Jakarta, Indonesia where the Defendant engaged in conduct to declare himself a citizen of Indonesia during his educational years in Indonesia.
- h) Upon due consideration of the power and the authority this Court upon full investigation of the United States State Department, and its other agencies, the Plaintiff requests the Court issue a permanent injunction upon Barack Hussein Obama, Jr. aka Barry Soetoro, citizen of Indonesia from serving as the Democratic nominee, the President-elect, or to hold the Office of the President of the United States, or the Office of the US Senator from Illinois, or any other public office in the United States as a result of self-renunciation and conduct that Defendant is or was at any time a citizen of Indonesia or any other foreign country.

i) Plaintiff requests this Court to enter Orders and Writs not for either public or financial gain, only to protect the innocent American Voter in the Presidential elections of November 2008, and thereafter, should Defendant be elected to hold the nation's highest office as Commander in Chief of the US Military Armed Services when Defendant's educational records while living in Indonesia clearly state that his name is Barry Soetoro, citizen of Indonesia.

**PLAINTIFF DEMANDS TRIAL BY COURT**

Respectfully submitted this 25<sup>th</sup> day of August, 2008



*Jane Doe*  
Jane Doe

"Jane Doe" Plaintiff Pro Se

P.O. Box 8542 Columbus, GA 31908

# EXHIBIT A

## Atlas Shrugs

**Sunday, July 20, 2008**

### **ATLAS EXCLUSIVE: FINAL REPORT ON OBAMA BIRTH CERTIFICATE FORGERY *CHANGE YOU CAN BELIEVE IN***

Techdude delivers a final report that exceeds my wildest expectations. It is irrefutable, empirical evidence - Obama's birth certificate is a forgery. *Why? Why a COLB (certificate of live birth) forgery? That is the question.*

My deepest thanks and appreciation for Techdude's unwavering commitment to the truth despite the threats and harassment, the slashed tires and the dead animal on his porch.

Insofar as "techdude's" credentials, he is an active member of the Association of Certified Fraud Examiners, American College of Forensic Examiners, The International Society of Forensic Computer Examiners, International Information Systems Forensics Association - the list goes on. He also a hoard certified as a forensic computer examiner, a certificated legal investigator, and a licensed private investigator. He has been performing computer based forensic investigations since 1993 (although back then it did not even have a formal name yet) and he has performed countless investigations since then.

Here is his analysis:

#### **Obama's Birth Certificate – CHANGE you can believe in.**

I have decided to leave out the low level technicalities and the how-to section of this report due to a lack of time and more importantly I want to get the facts out as quickly as possible. As some of you may or may not know some asshole decided to track me down and vandalize my car and hang a dead mutilated rabbit from my front door in a lame attempt to intimidate me from proceeding with releasing any details of my analysis. They did succeed in delaying the report by a few days but instead of deterring me they just really pissed me off. To their credit, if I had not taken a few days off from the analysis I would have missed the most damning piece of evidence – the remnants of the previous security border. So to the demented retard who slaughtered an animal to make a point – f\*ck you and thank you. And because of the amazing number of violent psychopaths who seem to be drawn to this issue, I am not going to use or supply any details that can be used to identify the owners of the COLBS used in the analysis except for those which have already been publicly disclosed. If the owners want to come forward on their own that is entirely their decision. Now let's get to the summarized report.

In questioned document analysis there are several methods for detecting forgeries – the most basic of which is to conduct a side by side evaluation of known good samples to compare against

the questioned one and to use an alternate light source to highlight the changes in the color and density of the inks and paper. In the case at hand there are no questioned physical documents to examine so I used the same basic techniques modified for the digital age for use in computer forensic analysis.

The following analysis was conducted using various Hawaiian COLBS issued over a multi-year time frame ranging from 2001 through 2008 but this report will focus only on the results from the March 2007 through June 2008 certificates for accurately comparing against the KOS image purportedly printed by the Health Department of Hawaii in June 2007. I am only interested in comparing apples to apples as they say but I will touch on some of the other years for a brief comparative and observational analysis.

Since the image presented is a graphical image and not a physical certificate I made the concerted effort to track down known good certificates and certificate images to use for the analysis. Thanks to several individuals I managed to collect and review multiple images of certificates issued between 2001 through 2003 all of which bore an identical layout to the previous Decosta image which was issued during the same time frame. Several more certificate images and physical certificates were also sent to me of certificates issued between 2006 through 2008 directly by their respective owners. All of the 2006 through 2008 certificates bore an identical layout to one another. Several copies of the images were created to allow digital modifications to be made without altering the original images. MD5 and SHA1 signatures were generated for each of the images and their duplicates. The signatures of the duplicates matched against their originals and the original images were then moved to a separate protected directory on the server.

By separating the certificate issue dates into groups the pre-2006 certificates show a clearly different security border design than the more recent 2006 through 2008 design. There were no other visually detectible modifications to the layout of the certificates between all time frames aside from the additional change from the DATE ACCEPTED to DATE FILED headings.

**Image 1. 2001 – 2008 border patterns**

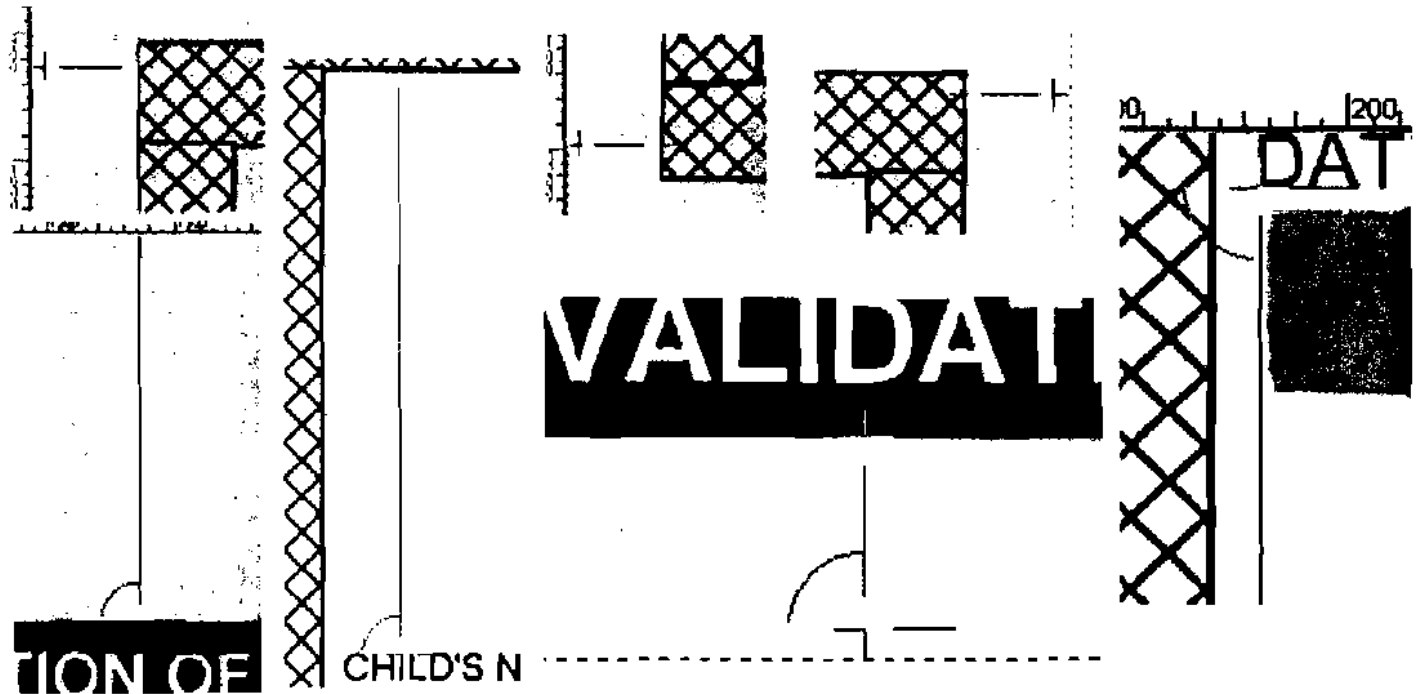


All known good certificate images from all time frames examined shared an apparent identical layout and font. Each of the available un-cropped full certificate images, from all time frames, showed the security borders to be almost perfectly centered from left to right within the lower

---

2/3 rd portion of the 8 1/2 x 11 inch page with all deviations off center being within 15 pixels. Measurements were taken from the top left, top right, bottom left, bottom right, center top, and center bottom of each images security border to the edges of the visible paper which appeared as hard edges with the top cover of the scanners creating whitespace.

Image 2. Measurements



The embossed seals and ink stamps in all of the pre-2006 images are clearly visible in the scans however none of the post-2006 seals or ink stamps are visible without extensive manipulation to the digital images. Even when scanning the physical post-2006 certificate in my possession using multiple resolutions and using multiple scanners I was also unable to produce an image which would allow the seal to show though the image. The ink stamps on the rear side were also not visible in the front side scans without digital modifications to the scanned images. My scans of the physical certificate also produced the same results using multiple resolutions and using multiple scanners.

The post-2006 COLBs were then compared against one another for a direct 1:1 comparison. Using copies of the images I digitally enhanced and modified the scans by removing only the hatch pattern background and then removing the merged information fields leaving just the raw document templates and saving them as a series of digital overlay templates. When the 2006 overlay was placed on top of the 2007 image they matched from corner to corner with some minor variations on the minute angle of the images. The fonts were observed to be in the same

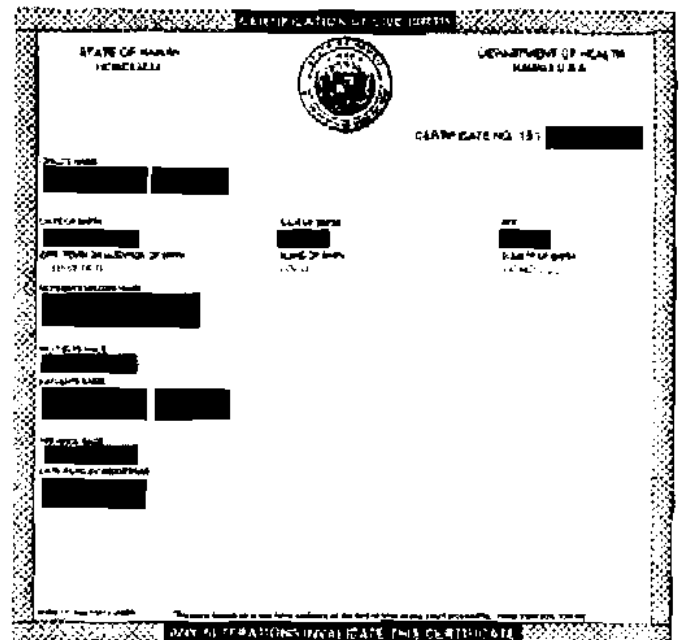
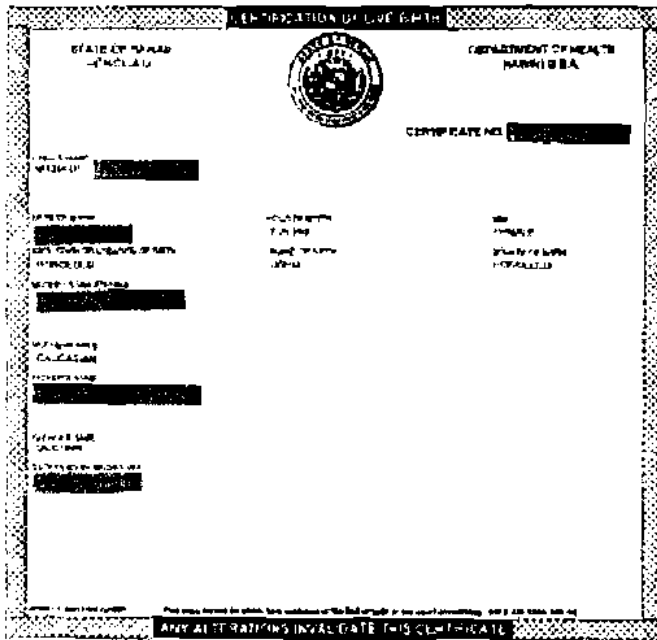


locations and of the same size and kerning. The procedure was then used with the 2006 overlay on top of the 2008 image. Once again, they matched from corner to corner with some minor variations on the minute angle of the images. The fonts were observed to be in the same locations and of the same size, style, and kerning. The 2007 overlay was then applied on top of the 2008 image. The 2007 and 2008 also matched from corner to corner with some minor variations on the minute angle of the images. The fonts were observed to be in the same locations and of the same size, style, and kerning. Having verified that all of the examined post-2006 certificates were identical in form and substance I then focused the rest of the analysis using the 2007 and 2008 COLB KOS image to pin the document into the middle of the known time frame.

### Image 3. Overlays

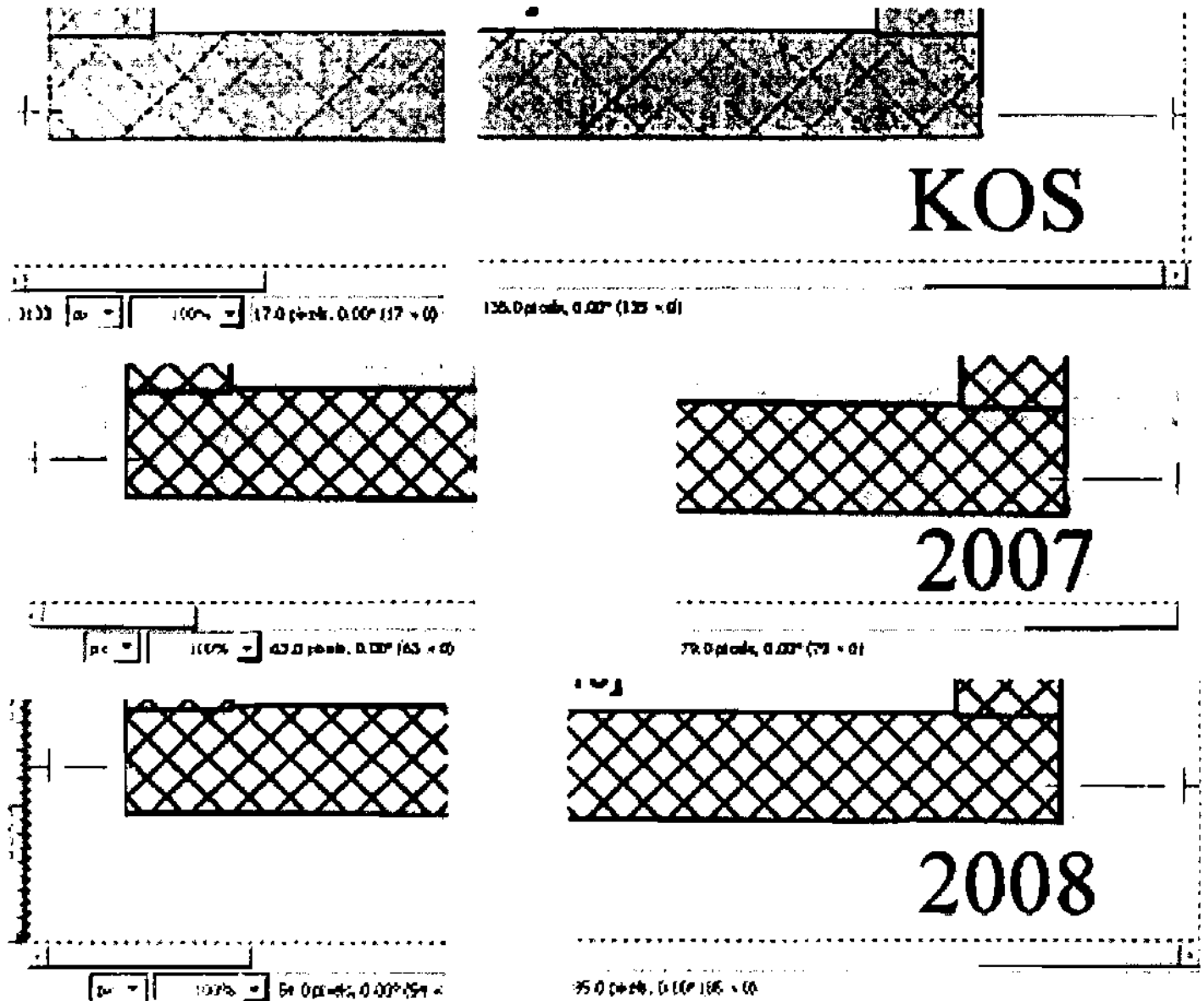
2007 overlay on 2008

2008 overlay on 2007



The same measurement methodology was used against the full un-cropped KOS image and showed the security borders to be uncentered from left to right within the lower 2/3 rd portion of the 8 1/2 x 11 inch page with a deviation from the other measurements off center being the average of 75 pixels – a 60 pixel greater deviation. Measurements were taken from the top left, top right, bottom left, bottom right, center top, and center bottom of each images security border to the edges of the visible paper which appeared as hard edges with the top cover of the scanners creating whitespace. The differences are also detectible visually without the use of digital enhancements.

Image 4. measurement comparisons

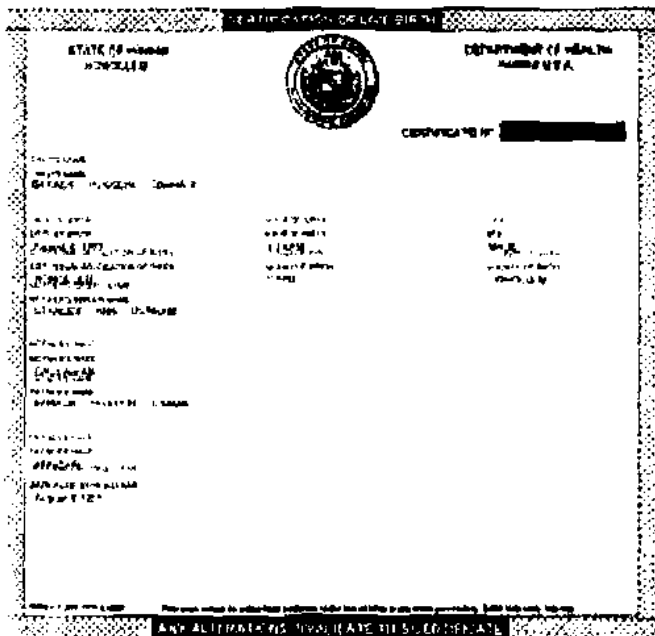


The previously created overlays were placed on top of the image. When the 2007 overlay was placed on top of the image they did not immediately line up. After being matched from security border corner to security border corner with some minor variations on the minute angle of the images the security border pattern obviously did not match in pattern or in color. The fonts were observed to not be in the same locations and they also did not share same kerning. The procedure was then used with the 2008 overlay on top of the KOS image. Once again when the 2008 overlay was placed on top of the image they did not immediately line up. After being matched

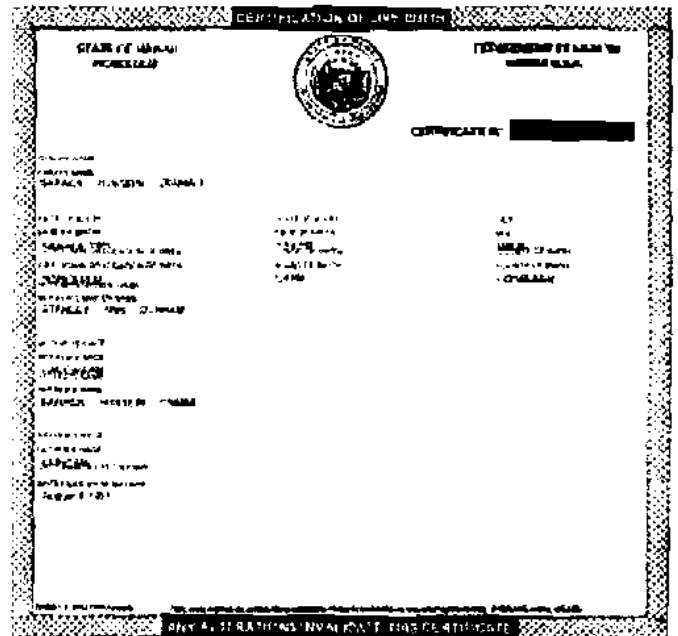
from corner to corner like the 2007 overlay again with some minor variations on the minute angle of the images the security border pattern obviously did not match in pattern or in color. The fonts were observed to not be in the same locations on the page and they also did not share same kerning.

**Image 5. with 2007 and 2008 overlays**

**2007 overlay over KOS**

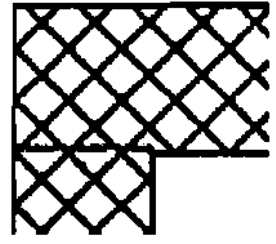
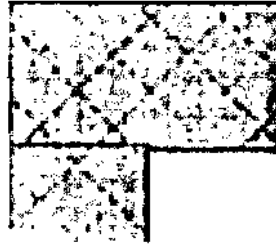
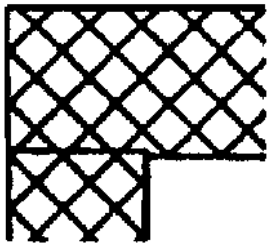


**2008 overlay over KOS**



A direct relative comparison using unmodified copies of the original images were made in regards to the security border pattern and color. Several distinctions were noted from the 2007 / 2008 certificate security border versus the security border used in the KOS image.

**Image 6. Border comparisons**



2007

KOS 2007

2008

Direct relative measurements using unmodified copies of the original images were made in regards to the font size and kerning. Several letters were distinctly different in width and kerning from the 2007 / 2008 certificate font versus the font used in the KOS image such as O, H, N, R, and C.

**Images 7 – 9. Animated GIFs showing kerning differences**



X  
X  
X  
X  
X  
X  
X  
X  
X  
X

DATE OF BIRTH



CITY, TOWN OR LOCALITY

HONOLULU

MOTHER'S MAIDEN NAME

**DATE OF BIRTH**

**August 4, 1961**

**CITY, TOWN OR LOCALITY**

**HONOLULU**

**MOTHER'S MAIDEN NAME**

The metadata and EXIF information was then extracted from the 2007, 2008, and the two images. The metadata extracted from the JPG files consisted of the quantization tables used for compressing the image and the EXIF data if it was present.

The 2007 image's rate of compression was calculated to an approximated 75% quality factor at 300 dpi with an image size of 2550 x 3300 pixels in a portrait orientation and contained no EXIF data.

The 2008 image's rate of compression was calculated to an approximated 80% quality factor at 300 dpi with an image size of 2550 x 3300 pixels in a portrait orientation and also contained no EXIF data.

The un-cropped image's rate of compression was calculated to an approximated 90% quality factor at 300 dpi with an image size of 2550 x 3300 pixels in a portrait orientation and also contained the following relevant EXIF data:

[Software ] = Adobe Photoshop CS3 Macintosh

[DateTime ] = 2008:

06:12

08:42:36

[ColorSpace ] = 65535

[ExifImageWidth ] = 2550

[ExifImageHeight] = 3300

Raw Image Orientation = Portrait

Photoshop Save As Quality = [8]

Photoshop Save Format = [Progressive]

The cropped image's rate of compression was calculated to an approximated 50% quality factor at 300 dpi with an image size of 2427 x 2369 pixels in a landscape orientation and also contained the following relevant EXIF data:

[Software ] = Adobe Photoshop CS3 Macintosh

[DateTime ] = 2008:

06:12

08:42:36

[ColorSpace ] = 65535

[ExifImageWidth ] = 2427

[ExifImageHeight] = 2369

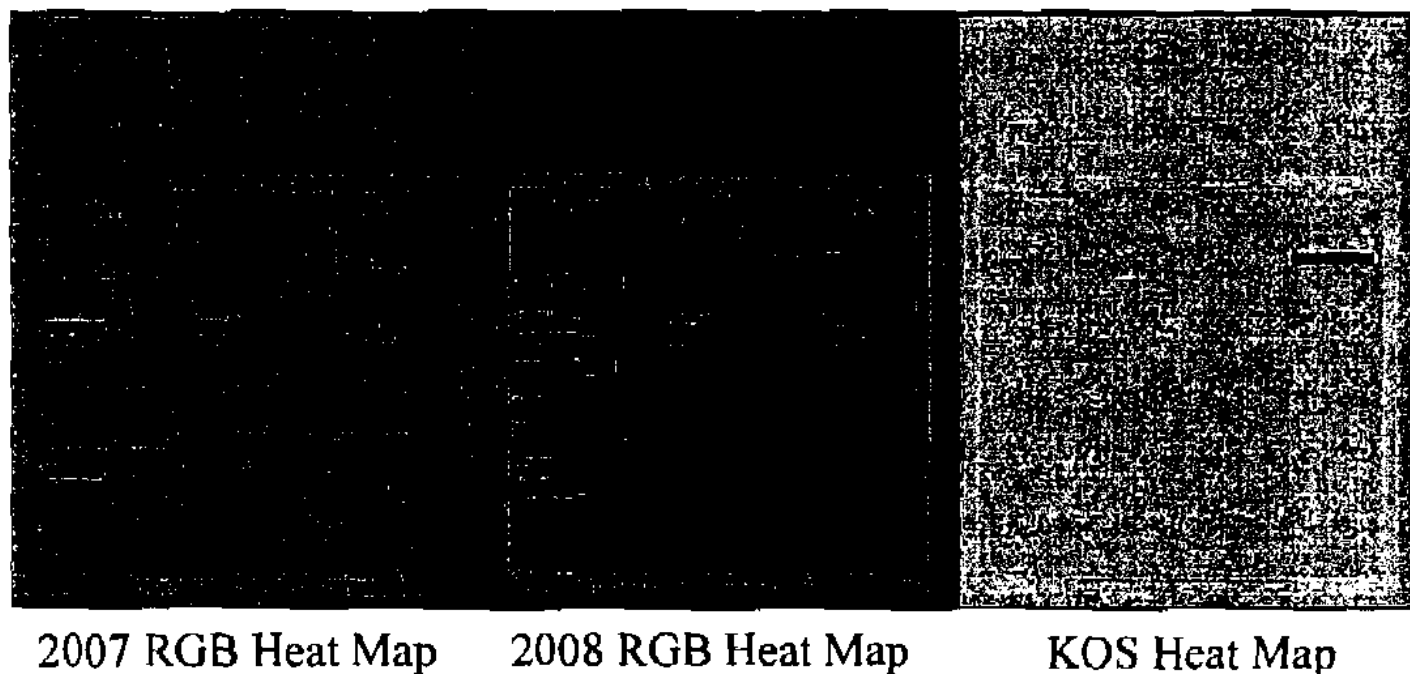
Raw Image Orientation = Landscape

The 2007, 2008, and the two KOS images were then analyzed by creating a heat map showing where each pixel changes as jpeg quality decreases from 100 to 0. A change was considered relevant once the sum of the changes to the red, green, and blue values exceeded 10%. The heat map created from the 2007 and 2008 images showed the fonts, seal image, and security border are all identical consistent values. To eliminate any subjective presumptions and to increase the number of comparative tests the same analysis was then conducted on the 2006 and prior certificate images which all found the fonts, seal images, and security borders to also be saved



with identical consistent values. The same analysis on the KOS images showed the security border having a substantially different RGB quality value than the fonts and the seal image.

**Image 10. RGB value heat maps**



**Image 11. Detailed images of RGB value heat maps**



The 2007, 2008, and the two KOS images were also analyzed for jpeg compression variations by creating a heat map showing where the difference for a particular compression level is indicated. A change was considered relevant once the sum of the changes to the error level values exceeded 10% of the previously calculated compression error rates. The heat map created from the 2007

and 2008 images showed the fonts, seal image, and security border are all identical consistent values. To eliminate any subjective presumptions and to increase the number of comparative tests the same analysis was then conducted on the 2006 and prior certifieate images which all found the fonts, seal images, and security borders to also be compressed with identical consistent values. The same analysis on the KOS image indicated that the security border has a different error value than the fonts and the seal image.

**Image 12. Error level analysis heat maps**

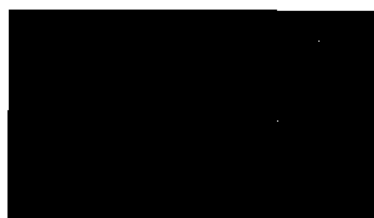


**2007 Error Heat Map**

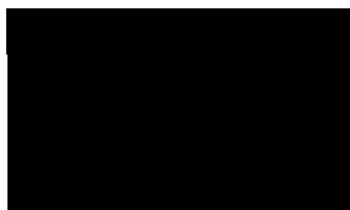
**2008 Error Heat Map**

**KOS Heat Map**

**Image 13. Detailed images of error level analysis heat map**



**2007 Error Heat Map  
Detail**



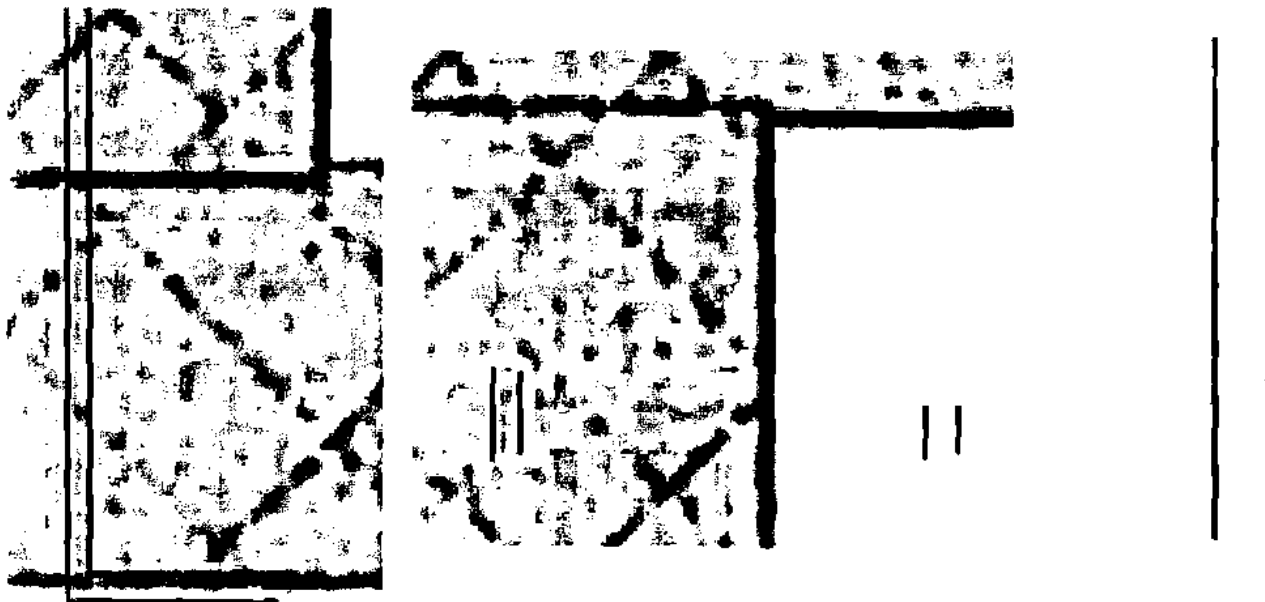
**2008 Error Heat Map  
Detail**



**KOS Heat Map  
Detail**

The image contains numerous visible artifacts located at various points throughout the image. These artifacts are not found on any other known good image from any examined time frame. I began creating a pixel level map of these errors by using a copy of the full un-cropped version and simply highlighting the areas by drawing a pixel wide line to the left and to the right of each visible flaw. The left side of the image towards the inside edge of the security border contained stray vertical lines that did not match up to any of the jpeg compression artifacts so they were highlighted. The right side of the image contained visual pixel level inconsistencies in the background hatch pattern. The right side pattern is visually consistent with the artifacts left after digitally erasing an area from an image and attempting to rebuild the background.

**Image 14. Some random flaws highlighted**



By connecting the points together the original placement of what appears to be part of the original security border becomes apparent. The placement of the lines matches the expected location of a good security border based on the known placement from the known good certificates. The width and spacing of the highlighted areas also match a 1:1 scale overlay from a section of a known good security border.

**Image 15. Connected lines**

**CERTIFICATE OF LIVE BIRTH**

STATE OF HAWAII  
HONOLULU



DEPARTMENT OF HEALTH  
HAWAII, U.S.A.

CERTIFICATE NO. [REDACTED]

CHILD'S NAME  
DUSTIN RUSSELL DEAN

DATE OF BIRTH  
August 4, 1981

TIME OF BIRTH  
1:30 PM

SEX  
MALE

CITY/TOWN OR LOCATION OF BIRTH  
HONOLULU

NAME OF BIRTH  
CLINIC

COUNTY OF BIRTH  
HONOLULU

QUALIFYING PHYSICIAN  
STANLEY JOHN DEAN

MOTHER'S NAME  
CAROL ANN

FATHER'S NAME  
BARBARA RUSSELL DEAN

PHYSICIAN'S NAME  
A. J. CAN

DATE FILED BY PHYSICIAN  
August 1981

ANY ALTERATIONS INVALIDATE THIS CERTIFICATE

A close examination of the security border itself reveals several repeating inconsistencies. Among them is a “weak line” which repeats once after every second bold line and a slightly downward curving end point where a straight line should end. This pattern continues around the entire perimeter of the security border. Upon very close inspection portions of the security border also repeat every 240 pixels. By mapping this repeating pattern it becomes apparent that the pattern is laid out as a 240 x 240 pixel square that can be accurately extrapolated to the next position by simply counting 240 pixels. This type of tiling effect is commonly seen when an image has been modified by filling an area using an image editing application’s tile or pattern fill function.

**Image 16. Mapped border pattern**

STATE OF HAWAII HONOLULU			DEPARTMENT OF HEALTH HAWAII U.S.A		
<p>NAME OF PATIENT BARRY, MISSION, CEANAH</p> <p>DATE OF BIRTH AUGUST, 1961</p> <p>CITY, TOWN OR DISTRICT OF BIRTH HONOLULU</p> <p>HOSPITAL, CLINIC OR HOME STANLEY ANN DUNHAM</p> <p>MOBILITY CAUCASIAN</p> <p>FATHER'S NAME BARBAR, MISSION, CANAHA</p> <p>PATIENT'S RACE WHITE</p> <p>DATE FILED BY REGISTRAR APRIL 1, 1981</p>			<p>SEX OF BIRTH MALE</p> <p>PLACE OF BIRTH CANHA</p>		<p>CERTIFICATE NO. [REDACTED]</p> <p>SEX MALE</p> <p>CITY OF BIRTH HONOLULU</p>
			<p>THE COPY HEREON IS THE SOLE EVIDENCE OF THE FACT OF BIRTH IN ANY COURT PROCEEDING. (HRS 208, Chap. 117, 1978)</p> <p><b>ANY ALTERATIONS INVALIDATE THIS CERTIFICATE</b></p>		

During the course of my analysis several calls were made to various departments in the Hawaiian State Government in an attempt to better understand the process and procedures used to create, print, and distribute copies of the COLB form. While I was brushed off or hung up upon by almost all of the people I contacted I did manage to talk with a computer technician who was familiar with the computers and printers used by the Department of Health and the clerk's offices. He was unwilling to give any specific details but did provide enough information to work with. The COLB certificates are printed directly in the clerk's office at the time they are

requested. The system uses a standard laser printer and the border is printed at the same time as the text and other images on top of preprinted security paper. He stated the border is a vector image and would appear crisp and defined. When asked if a COLB can be printed off center he said it was not possible and any misfeed would simply jam in the printer. When asked if he had seen the images on-line he replied that he had – and that there is “no way” they had printed something that looked like that which further backed up my conclusions. Now let’s start to put the pieces of the puzzle together. The KOS image security border pattern does not match any known specimen from any known year. It does not match the pre-2006 nor does it match the post-2006 certificate patterns. The placement of the text in all of the pre-2006 and post-2006 certificates are almost identical pixel location matches while the image’s text placement does not match any known specimen from any known year. The shape and kerning of the fonts used in the 2006 through 2008 certificates are identical while the shape and kerning of the fonts used in the image does not match any known specimen. The KOS image shows clear signs of tampering such as the mismatch in RGB and error levels, visible indications of the previous location of the erased security border, easily detectable patterns of repeating flaws around the new security border, EXIF data that says the image was last saved with Photoshop CS3 for Macintosh, and finally a technician from Hawaii who confirms it just looks wrong.

There are two obvious scenarios used to create the image that can be ascertained from evidence. Either a real COLB was scanned into Photoshop and digitally edited or a real COLB was first scanned to obtain the graphic layout then blanked by soaking the document in solvent to remove the toner. After rescanning the blank page to a separate image the graphics from the previously obtained scan could then be easily applied to the blank scan after some editing and rebuilding. It would also explain why date stamp bleeds through the paper and the various bits of toner located around the image as well as the remnants of the previous location of a security border.

So as I have been saying repeatedly since I first compared the KOS images to the Decosta image using the same tests and measurements – the image is a horrible forgery.

Previously at Atlas: FORENSIC EXPERT: "the [birth] certificate is still a horrible forgery"

Mystery, Clarification and Obfuscation of Obama's Birth Certificate Forgery

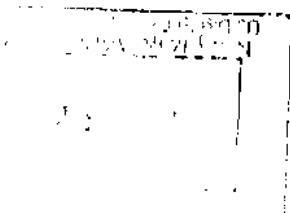
Atlas Tech Expert Declares Obama Birth Certificate ...

Who died and made him the final word on Obama's ...

The "Missing" Obama Birth Certificate Seal 6/29/08

SUCH A LIAR: OBAMA'S FAKE BIRTH CERTIFICATE 6/26/08

RELEASE OBAMA'S BIRTH CERTIFICATE! 6/10/08



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

Case No. \_\_\_\_\_

JANE DOE, a pseudonym to protect the innocent

Plaintiff

v.

Barack Hussein Obama, Jr. aka Barry Soetoro, a citizen of Indonesia

Democratic National Committee

Defendants

\_\_\_\_\_ /

PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE  
WITH MOTION TO DIRECT AGENCIES  
OF THE UNITED STATES FOR INJUNCTIVE RELIEF

Plaintiff, Jane Doe, hereby requests this Court take Judicial Notice and states:

1. Plaintiff is a Forensic Psychologist who works for the Criminal Justice System and the Courts providing psychological examinations, including competency to stand trial for defendants in the criminal justice system charged with crimes,, including First Degree Homicide.
  2. Plaintiff initiated this action before the US District Court of the District of Columbia based upon significant reading of the books written by the
-



- Defendant where he voluntarily states that he has engaged in criminal conduct, including drug and substance abuse, including the use of cocaine.
3. Plaintiff initiated this action before the US District Court upon significant reading of all of the books written by others concerning the Defendant. Plaintiff was alarmed to read that immediate family members of the Defendant on his biological father's side have stated to third parties that Defendant was actually born in Kenya, Africa and that later upon his mother's return to Hawaii she effectuated a "late registration" birth certificate in Hawaii, which Hawaii allows.
  4. Further, the Plaintiff became further alarmed to read that the Defendant's mother voluntarily renounced and relinquished the Defendant's US nationality, if any, in 1968 when she married Lolo Soetoro, a citizen of Jakarta, Indoneisa, and registered her son in legal public and educational records as "Barry Soetoro, a citizen of Indoneisa."
  5. Further, "Barry Soetoro" has remained a citizen of Indonesia and allegedly travelled on his Indonesian passport after the age of 18 while travelling in his early twenty's.
  6. Unbeknownst to the Plaintiff, a third party, Phillip Berg, Esq. a Licensed Attorney, had previously filed a similar complaint with additional facts and a statement of the violations of the numerous laws by both the Defendants named in this case. Exhibit A herein.
  7. The Plaintiff requests that the Court read Exhibit A in its entirety as the matters pending before the United States District Courts of both PA and DC are of great magnitude by a person who has confessed in his own autobiography to engaging in criminal conduct in the United States.
  8. This person is running for the highest Office of this Nation, the Office of the President of the United States.

9. Further, there are reports that the Defendant is emotionally unstable and that he has evidence psychopathic tendencies, including being diagnosed by other respected Psychiatrists as having a "Narcissistic Personality Disorder."
10. The combined Complaints from Phillip Berg and Jane Doe with facts are sufficient for this Court to direct the agencies of the United States, including the Office of the FBI, the Office of the United States Attorney, the Office of the Consular General for the Dept. of State, the Office of the CIA, and other US agencies to immediately open an investigation into the facts and allegations in order to protect the Plaintiff and the innocent American voter.


WHEREFORE, Plaintiff, Jane Doe, respectfully requests this Court take Judicial Notice of Phillip Berg, Esq. v. Barack Hussein Obama, Jr. aka Barry Soetoro, and other aliases filed at the US District Court for the District of PA, and to enter its orders as follows:

1. Immediate temporary and permanent injunction to prohibit the Defendant from accepting the nomination by the Democratic National Committee for the Office of the President of the US; temporary and permanent injunction to prohibit the Defendant's name from being placed on the ballots of all States of the United States; temporary and permanent injunction to prohibit the Defendant from being sworn into and holding the Office of the President of the United States.
2. Orders directed to the agencies of the US Federal Government directing these agencies to open investigation into the criminal conduct of the Defendant, who has confessed to engaging in drug and substance abuse, including the use of cocaine while located in the United States.
3. Orders directed to the agencies of the US Federal Government to open an investigation into the facts stated by Defendant's biological family members,

including the Defendant's own paternal grandmother that the Defendant was actually born in Kenya, Africa.

4. Orders directed to the agencies of the US Federal Government to open full investigation into the Defendant's self-renunciation of his US Citizenship, if any, by declaring himself to be a citizen of either or both Kenya Africa and Indonesia, including his failure to obtain an oath of allegiance to the US after the age of 18 and to travel on an Indonesian passport after the age of 18.
5. Orders directed to the agencies of the US Federal Government to open a full investigation into the travel outside of the US by any all parties related to the Defendant at any time, including the Defendant's biological mother, the Defendant's biological father, the Defendant's step-father, the Defendant.
6. Plaintiff requests this Court take any and all immediate temporary injunctive and permanent relief in order to protect the Plaintiff, an American Voter from the bizarre and criminal conduct of the Defendant and other illegal conduct of the Defendant set forth herein and the Complaint Phillip Berg v. Barack Hussein Obama, Jr, aka Barry Soetoro, citizen of Indoneisa, et al Exhibit A herein.

Respectfully submitted this 28<sup>th</sup> day of August 2008,

  
Jane Doe

P.O. Box 8542 Columbus, GA 31908

# EXHIBIT A

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PHILIP J. BERG, ESQUIRE

CIVIL ACTION NO.

V.S.

BARACK HUSSEIN OBAMA, a/k/a

BARRY SOETORO, a/k/a

BARRY OBAMA, a/k/a JURY TRIAL DEMANDED

BARACK DUNHAM, a/k/a

BARRY DUNHAM, THE

DEMOCRATIC NATIONAL

COMMITTEE, THE FEDERAL

ELECTION COMMISSION AND

DOES 1-50 INCLUSIVE

*Defendants*

**COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**  
**PRELIMINARY STATEMENT**

1. Article II, Section I of the United States Constitution, states in particular part, "No Person except a natural born Citizen, or a Citizen of the United States at the time of the Adoption of this Constitution, shall be eligible to the Office of

President; neither shall any Person be eligible to that Office who shall not have attained to the Age of thirty five Years, and been Fourteen Years a Resident within the United States." Furthermore, all Presidents since and including Martin Van Buren were born in the United States subsequent to the Declaration of Independence.

2. "The general doctrine of our Constitution is, that the executive power of the nation is vested in the President; subject only to the exceptions and qualifications, which are expressed in the instrument." 7 Works of Alexander Hamilton, J. C. Hamilton ed. (New York: 1851), 76, 80-81 (emphasis in original), U.S. Constitution, Article II (Hamilton and Madison.)
1. Obama is a representative of the Democratic People. However, the Obama must meet the Qualifications specified for the United States Office of the President, which is he must be a "natural born" citizen. Unfortunately, Obama is not a "natural born" citizen. Just to name one of the problems, Obama lost his U.S. citizenship when his mother married an Indonesian citizen and relocated herself and Obama to Indonesia wherein Obama's mother naturalized in Indonesia and Obama followed her naturalization, as he was a minor and in the custody of his mother. Obama failed to take the oath of allegiance when he turned eighteen (18) years to regain his United States Citizenship status.
2. The Democratic National Committee is for Plaintiff and "We the People" who believe in the Democratic Vision. The Democratic National Party is supposed to represent the Democratic Americans in seeking honest leadership, Open Government, Real Security, Energy Independence, Economic Prosperity, Educational Excellence, a Healthcare System that works for Everyone and Retirement Security. The Democratic Party is supposed to represent and protect the interests of working Americans and guaranteeing personal liberties for all. Of which includes securing a Democratic Nominee on the Presidential Election ballot who represents the Democratic vision and who is qualified and eligible to run for Office of the President under the qualifications of the United States Constitution.
3. The actions of Obama, a U.S. Senator, in running for President of the United States, knowing he is not eligible, have been taken entirely without authorization under the

United States Constitution, completely ignoring the qualification and procedures created by the United States Constitution he is purporting to enforce.

6. Should Obama become the Nominee of the Democratic Party and then be discovered by virtue of malfeasance, or negligence, on his part not to have revealed material evidence showing him to be Ineligible for the Office of President of the United States of America and thereby his Nomination be declared void by the appropriate Authorities Acting under the Law, Plaintiff as well as other Democratic Americans will suffer Irreparable Harm including but not limited to:

A) Functional, or Actual, Disenfranchisement of large numbers of Citizens, being members of the Democratic Party, who would have been deprived of the ability to choose a Nominee of their liking;

B) Irreparable Harm to the structure and integrity of the Democratic Party and the Democratic National Committee. In turn, this too would lead to Disenfranchisement; and

C) A severe and genuine likelihood of Civil Disturbance by virtue of reaction to said Disenfranchisement.

### **JURISDICTION AND VENUE**

1. This case arises under the Constitution and laws of the United States and presents a federal question within this Court's jurisdiction under Article III of the Constitution and 28 U.S.C. § 1331.
2. This Court has authority to grant declaratory relief pursuant to the Declaratory Judgment Act, 28 U.S. C. § 2201.
3. Venue is proper in this Court under 28 U.S.c. § 1391(b).

### **PARTIES**

1. Plaintiff, Plaintiff, Philip J. Berg, Esquire [hereinafter "Plaintiff"], is an adult individual with a business address of 555 Andorra Glen Court, Suite 12, Lafayette Hill, PA 19444-2531.
2. Defendant, Barack Hussein Obama, aka/a Barry Soetoro, aka/a Barry Obama, aka/a Barack Dunham, aka/a Barry Dunham [hereinafter "Obama" is an adult individual with an office address of 713 Hatch, Senate Office Building, Washington D.C.
3. Obama, The Democratic National Committee (hereinafter referred to as "DNC") is a Corporation with a principal address of 430 S. Capitol Street SE, Washington, DC 20003.
4. Defendant, The Federal Election Commission (FEC) was created in 1975 by Congress to administer and enforce the Federal Election Campaign Act (FECA). The FEC is a Governmental Agency with a principal address of 999 E Street, NW, Washington, DC 20463.

### **FACTUAL ALLEGATIONS**

1. Since the beginning of the U.S. Constitution, in order to run for Office of the President, you must be a "natural born citizen" and you may not hold dual citizenship or multiple citizenships with foreign Countries. U.S. Constitution, Article II, Section 1.
2. There are questions as to where Obama was actually born, in the United States or abroad and then registered his birth. There are further questions regarding Obama's United States Citizenship, if he ever held such, being expatriated and his failure to regain his citizenship by taking the oath of allegiance once he turned eighteen (18) years of age. There are additional questions regarding Obama's multi citizenships with foreign countries, which he still maintains. To

date, Obama has refused to prove he is qualified under the U.S. Constitution and his eligibility to run as President of the United States.

3. The facts are undisputed by Obama that his mother, Stanley Ann Dunham, was a U.S. Citizen however, his father, Barack Obama, Sr., was a Citizen of Kenya. Obama's parents, according to divorce records, were married on or about February 2, 1961.
4. Obama claims he was born in Honolulu, Hawaii on August 4, 1961; however, has never given the name of the hospital he was born in; whereas Obama's grandmother on his father's side, half brother and half sister claim Obama was born in Kenya. Reports reflect Obama's mother went to Kenya during her pregnancy; however, she was prevented from boarding a flight from Kenya to Hawaii at her late stage of pregnancy, which apparently was a normal restriction to avoid births during a flight. Stanley Ann Dunham (Obama) gave birth to Obama in Kenya, after which she flew to Hawaii and registered Obama's birth. There are records of a "registry of birth" for Obama, on or about August 8, 1961 in the public records office in Hawaii.
5. Upon investigation into the birth of Barack Hussein Obama in Honolulu, Hawaii, Obama's birth is reported as occurring at two (2) separate hospitals, Kapiolani Hospital and Queens Hospital. Wikipedia English Version under the subject "Barack Obama" states Obama was born at Kapiolani Hospital. Wikipedia Italian Version under the subject "Queens Hospital" states Barack Obama was born in Queens Hospital.

1. There are further references circulating on the internet claiming examination of the hospital's records in Hawaii show no birthing records for Stanley Ann Dunham (Obama), Obama's mother. However, there are records of a "registry of birth" for Obama, on or about August 8, 1961 in the public records office in Hawaii.
2. Wayne Madsen, Journalist with Online Journal was a contributing writer and published an article on June 9, 2008 stating the GOP sent a research team to Mombasa, Kenya and located a Certificate Registering the birth of Barack Obama, Jr. at a Maternity Hospital, to his father, a Kenyan Citizen and his mother, a U.S. Citizen.
3. At the time of Obama's birth in 1961, Kenya was a British Colony.
4. There is a Canadian Birth Certificate posted on the Internet in the name of Barack Hussein Obama, Jr.; however, the date of birth shows to be August 23, 1961.
5. Under the Independence Constitution of Kenya, Obama became a Kenyan citizen on December 12, 1963. Chicago-based Internet journalist, broadcaster and critic Andy Martin states Obama has never renounced his Kenyan citizenship. Andy Martin further states on Obama's Senate web site, Obama tap dances around his own dual nationality when discussing his father. Obama obviously knows, because his father told the Obama, that he (Obama) also held/bolds Kenyan nationality.
6. If in fact Obama was born in Kenya, the laws on the books at the time of his birth stated if a child is born abroad and one parent was a U.S. Citizen, which would have been his mother, Stanley Ann Dunham, Obama's mother would have had to live ten (10) years in the United States, five (5) of which were after the age of fourteen (14). At the time of

Obama's birth, his mother was only eighteen (18) and therefore did not meet the residency requirements under the law to give her son (Obama) U.S. Citizenship. The laws in effect at the time of Obama's birth prevented U.S. Citizenship at birth of children born abroad to

a U.S. Citizen parent and a non-citizen parent, if the citizen parent was under the age of nineteen (19) at the time of the birth of the child. Obama's mother did not qualify under the law on the books to register Obama as a "natural born" citizen. Section 301(a)(7) of the Immigration and Nationality Act of June 27, 1952, 66 Stat. 163, 235, 8 U.S.C. §1401(b), Matter of S-F-and G-, 2 I & N Dec. 182 (B.I.A.) approved (Att'y Gen. 1944). Obama would have only been Naturalized and a Naturalized citizen is not qualified and/or eligible to run for Office of the President. U.S. Constitution, Article II, Section Clause 4.

1. Furthermore, if Obama had been born in Kenya, his birth father Barack Obama, Sr. was a citizen of Kenya; therefore, Obama would have automatically become a citizen of Kenya.
2. In or about 1967, when Obama was approximately six (6) years old, his mother, Stanley Ann Dunham married Lolo Soetoro, a citizen of Indonesia and moved to Indonesia with Obama. At this time, if Obama was Registered as a "natural born" citizen, which he did not qualify to be registered as, he would have lost his U.S. Citizenship when his mother married Lolo Soetoro and took up residency in Indonesia. The first requirement is that naturalization must be achieved through "application." Such type of naturalization occurs, for example, when a person acquires a foreign nationality by marriage to a national of that country. Nationality Act of 1940, Section

Z:\FORMS\Obama Complaint.doc

>317(b). Additionally, there is rumor circulating on the Internet that his Indonesian stepfather, Lolo Soetoro, adopted Obama.

1. The Nationality Act of 1940 provided for the loss of citizenship when the person became naturalized upon the naturalization of his or her parent having custody of such person. Obama's mother expatriated her U.S. Citizenship when she married Lolo Soetoro, a citizen of Indonesia and relocated her and her son (Obama) to Indonesia.
2. Obama was enrolled by his parents in a public school, Fransiskus Assisi School in Jakarta, Indonesia. Plaintiff has received copies of the school registration where it clearly states Obama's name as Barry Soetoro and lists his citizenship as Indonesian, Obama's father is listed as Lolo Soetoro, Obama's date of birth and place of birth are listed as August 4, 1961 in Honolulu and Obama's Religion is listed as Islam. This document was verified by television show *Inside Edition*, whose reporter, Matt Meagher took the actual footage of the school record.
3. In or about 1971, Obama's mother sent Obama back to Hawaii. Obama was ten (10) years of age upon his return to Hawaii.
4. Sometime after the return of Obama to Hawaii, Obama's mother, Stanley Ann Dunham returned to Hawaii and divorced her husband, Lolo Soetoro. At the time of Divorce, Obama's mother, Stanley Ann Dunham could have regained her U.S. Citizenship. In order to regain her citizenship, Obama's mother would have had to take the oath of allegiance required. Such oath of allegiance may be taken abroad before a diplomatic or consular of the United States, or in the United States before the Attorney General or the judge or clerk of a Court. Such Oath of allegiance would have been entered in the records of the appropriate embassy, legation, consulate, court or the



Attorney General and upon demand, a certified copy of the proceedings, including a copy of the oath administered, under the seal of the embassy, legation, consulate, court or the Attorney General shall be delivered. The certified copy shall be evidence of the facts stated therein before any court of record or judicial tribunal and in any department or agency of the Government of the United States. 8U.S.c. §1435.

31. As stated above, The Nationality Act of 1940 provided for the loss of citizenship when the person became naturalized upon the naturalization of his or her parent having custody of such person. Obama's mother expatriated her U.S. Citizenship when she married Lolo Soetoro, a citizen of Indonesia and relocated her and her son (Obama) to Indonesia.

Obama's mother failed to take the oath in order to regain her U.S. Citizenship. Therefore, Obama would not have been able to regain his U.S. Citizenship until he turned eighteen (18) years after he took the oath of allegiance before a diplomatic or consular officer of the United States, or in the U.S. before the Attorney General or the judge or clerk of court. Plaintiff is informed, believes and thereon alleges Obama failed to regain his citizenship by taking the oath of allegiance. Since the oath of allegiance would have been entered in the records of the appropriate embassy, legation, consulate, court or the Attorney General, if Plaintiff is incorrect, then Obama should be able to produce in Court a certified copy of the proceedings, including a copy of the oath administered.

Investigation further showed in 1981, Obama traveled to Pakistan using his Indonesian passport. At the time of travels to Indonesia, Obama was twenty (20) years old. He was well aware he maintained his Indonesia citizenship, and failed to regain his United States citizenship. Indonesia does not allow dual citizenship. Had Obama regained his United States citizenship, he would have been traveling on a United States Passport.

Obama and his Campaign office have been asked to produce Obama's Certificate of Birth in order to prove he is a "natural born" citizen as required by the U.S. Constitution.

1. After many attempts of the public to obtain Obama's Certificate of Birth, a Hawaiian Certificate of Live Birth (COLB) was placed on Obama's campaign website. However, as posted all over the internet, three (3) independent Document Forensic Experts performed extensive Forensic testing on the Certificate of Live Birth posted on Obama's campaign website. The Forensic Expert findings were the Certificate of Live Birth (COLB) was in fact a forgery. It was further discovered that this original Certificate of Live Birth which had been altered and forged was issued to Maya Kasandra Soetoro, born in 1970. Maya Kasandra Soetoro is Obama's half sister who was born in Indonesia and her birth was later registered in Hawaii. The altered and forged COLB is still on Obama's website located at <http://my.barackobama.com/page/invite/birthcert>
2. Further investigation led to Obama's State Bar Registration and Public Disciplinary Record. On the Illinois State Bar Registration and Public Disciplinary Record it

specifically asks for "Full former name(s). Obama put "None," when in fact he went by the name Barry Soetoro, and Barry Obama. It is further believed Obama has used the name Barry Dunham. Obama lied on the State government form that he signed under the penalty of perjury.

3. Even if Obama maintained his United States Citizenship, which he failed to do, he also carries citizenships in Kenya and Indonesia. Obama has divided loyalties with foreign countries. Thus, Obama carries multiple citizenships and is ineligible to run for President of the United States. United States Constitution, Article II, Section 1.
1. All the efforts of supporters of legitimate citizens were for nothing because the Obama cheated his way into a fraudulent candidacy and cheated legitimately eligible natural born citizens from competing in a fair process and the supporters of their citizen choice for the nomination.
2. Voters donated money, goods and services to select a nominee, and were defrauded by Obama's obfuscations. Obama clearly shows consciousness of guilt by his actions by posting a forged birth certificate on his website, and by and the falsifications he told to cover his loss of citizenship.
3. Obama proclaims himself a Constitutional scholar and lecturer, but did not learn he had no eligibility to become President except by means of obfuscations and deceptions.
4. The injunctive relief must be granted because failing to do so, this inaction defrauds everyone who voted in the Democratic Primary for a nominee that is a fair representation of the voters. Failure to grant injunctive relief would allow a corrupted, fraudulent nomination process to continue.
5. It not only allows, but promotes an overwhelming degree of disrespect and creates such a lack of confidence in voters of the primary process itself, so that it would cement a prevailing belief that no potential candidate has to obey the laws of this country, respect our election process, follow the Constitution, or even suffer any consequence for lying and defrauding voters to get onto the ballot when they have no chance of serving if they fraudulently manage to get elected.
6. If declaratory and injunctive relief is not given, it would be extremely unfair to the country for candidates of either party to become the nominee when there is any question as to the nominee's eligibility to serve if elected.
7. As stated above, Plaintiff as well as Democratic American Citizens will suffer Irreparable Harm if Declaratory and Injunctive relief is not granted. Plaintiff does not have any other way of redress regarding these very significant and important issues.
8. The DNC has failed Plaintiff and the Democratic American Citizens by their failure to perform due diligence and inquire into Obama's eligibility to run for Office of the President.

## COUNT ONE

>

### **VIOLATION OF THE UNITED STATES CONSTITUTION, ARTICLE II, SECTION I**

1. Plaintiff hereby incorporates Paragraphs 1 through 45 as if fully set forth herein.
  2. The United States Constitution, Article II, Section I, Clause 4, Qualifications, Office of President, states: "No person except a natural born citizen, or a citizen of the United States, at the time of the Adoption of this Constitution, shall be eligible to the Office of President; neither shall any Person be eligible to that Office who shall not have attained to the Age of thirty-five Years, and been fourteen Years a Resident within the United States."
  3. Obama's failure to maintain his United States Citizenship makes him ineligible to run for Office of the President.
  4. Obama, if born in Kenya would have made him a citizen of Kenya. Furthermore, because of the 1940 Naturalization Act, June 1952, Obama's mother would have had to be nineteen (19) in order for Obama to be a "natural born" United States citizenship upon registration of his birth. Obama's mother was only eighteen (18) when she birthed Obama and therefore was not old enough to meet the residency requirements under our laws at the time of Obama's birth and be able to register her son's birth as a "natural born" citizen.
  5. Even if Obama would have been able to be registered as a "natural born" citizen in Hawaii, he lost his citizenship in the United States when his mother married Lolo Soetoro, a citizen of Indonesia and then took Obama to Indonesia and set up residency with her new husband.
  6. Obama's mother could have regained her and Obama's United States Citizenship status when she divorced her husband, Lolo Soetoro and moved back to Hawaii. However, in order to regain her citizenship in the United States she would have had to take the oath of allegiance, which would have been recorded. Obama's mother never did take the oath of allegiance to regain her citizenship in the United States.
  7. Moreover, Obama could have regained his citizenship in the United States when he turned eighteen (18), again by taking the oath of allegiance that would have been recorded. However, Obama failed to do so.
  8. The Democratic National Committee (DNC) is supposed to represent and protect the interests of working Americans, which includes securing a Democratic Nominee on the Presidential Election ballot who represents the Democratic vision and who is qualified and eligible to run for Office of the President under the qualifications of the United States Constitution. The DNC has failed to inquire into Obama's eligibility status.
-

54. For the above aforementioned reasons, Obama needs to immediately supply a certified copy of his oath of allegiance proving he regained his United States Citizenship. In addition, Obama needs to furnish a certified copy of his Certificate of Live Birth to further prove he was born in Hawaii as he claims. However, if Obama is unable to supply a certified record of his oath of allegiance, he needs to immediately step down and withdrawal his candidacy for President.

*WHEREFORE*, Plaintiff respectfully prays that this Court:

A. Declare that Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham is ineligible to run for United States Office of the President under the United States Constitution, Article II, Section I;

B. Preliminary and permanently enjoin Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham from running for United States Office of the President;

C. Preliminary and permanently enjoin Defendant, The Democratic Committee from nominating Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham as the Democratic Nominee;

D. Award Plaintiff such costs and fees pursuant to 42 U.S.c. § 1988 and other applicable by law; and E. Grant Plaintiff such other and further relief as the Court deems just and proper.

## **COUNT TWO DUAL CITIZENSHIP**

1. Plaintiff hereby incorporates Paragraphs 1 through 54 as if fully set forth herein.
  2. From the beginning of our Constitution, our forefathers inferred a person running for Office of the President could not have divided loyalties. This was a result of people coming from England to the United States who owed loyalties to both England and the United States. Our forefather's did not want a person with dual loyalties to be able to secure the position as President of the United States.
  3. This inference is taken from Article II, Section I, which plainly states qualifications for Office of the President must be a "natural born" citizen.
  4. The United States President cannot run our Country and have responsibilities and obligations owed to other countries.
  5. Obama is not eligible to run for Office of the United States President as his mother failed to regain her citizenship after her divorce to Lolo Soetoro, a citizen of Indonesia, when Obama was a minor and Obama himself failed to regain his
-

United States Citizenship when he turned eighteen (18). Therefore, Obama is not a "natural born" citizen.

1. Furthermore, Obama is well aware he is not a United States Citizen and does not qualify as a "natural born" citizen. Obama traveled to Pakistan in 1981, at which time he was twenty (20) years old and used his Indonesian Passport, not a United States Passport.
2. The Democratic National Committee (DNC) is supposed to represent and protect the interests of working Americans, which includes securing a Democratic Nominee on the Presidential Election ballot who represents the Democratic vision and who is qualified and eligible to run for Office of the President under the qualifications of the United States Constitution. The DNC has failed to inquire into Obama's eligibility status.
3. For the above aforementioned reasons, Obama needs to immediately step down and withdrawal his candidacy for Presidency.

**WHEREFORE**, Plaintiff respectfully prays that this Court:

A. Declare that Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham is ineligible to run for United States Office of the President under the United States Constitution, Article II, Section I;

B. Preliminary and permanently enjoin Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham from running for United States Office of the President;

C. Preliminary and permanently enjoin Defendant, The Democratic Committee from nominating Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham as the Democratic Nominee;

D. Award Plaintiff such costs and fees pursuant to 42 U.S.C. § 1988 and other applicable by law; and

E. Grant Plaintiff such other and further relief as the Court deems just and proper.

### **COUNT THREE FRAUD**

1. Plaintiff hereby incorporates Paragraphs 1 through 62 as if fully set forth herein.
2. Obama committed Fraud upon Plaintiff and the American Citizens by running for President claiming to be eligible knowing he was not eligible as a result of his failure to regain his United States Citizenship and by maintaining multi citizenships with Kenya and Indonesia.
3. Obama further committed Fraud upon Plaintiff and the American people by falsifying information on his Illinois State Bar Registration and Public Disciplinary Record. Obama stated on his Application to the State Bar of Illinois, as proven by the Illinois State Bar Registration and Disciplinary Record, stating he never used any other names. Obama

signed his application/registration for the Illinois State Bar under the penalty of perjury >knowing the information to be false. The fact of the matter is Obama used the >name Barry Soetoro in Indonesia and was registered as a citizen of Indonesia on >his school records. Obama further used the name Barry Obama and it is further >believed Obama used the name Barack and/or Barry Dunham.

1. Obama attempted to defraud Plaintiff and the American people by allowing an altered and forged Hawaii Certificate of Live Birth (COLB) to be placed on his campaign website. Obama was well aware the Government issued COLB was altered and forged as the original document was in the name of Maya Kasandra Soetoro born in 1970. Maya Kasandra Soetoro Obama's half sister who was born in Indonesia and her birth was later registered in Hawaii. The altered and forged COLB IS still on Obama's website located at [11 ttV://my.barackobama.com/page/invite/birthcert](http://www.mv://my.barackobama.com/page/invite/birthcert)
2. Obama further attempted to defraud Plaintiff and the American People by claiming to be a United States Citizen, knowing this information to be false. Obama is well aware when his mother married Lolo Soetoro, a citizen of Indonesia and took up residency in Indonesia with Obama, they both naturalized in Indonesia expatriating their United States Citizenship. Obama's mother failed to regain her citizenship after her divorce to Lolo Soetoro, when Obama was a minor and Obama himself failed to regain his United States Citizenship by taking the oath of allegiance, which is recorded when he turned eighteen (18) years.
3. Furthermore, Obama is well aware he is not a United States Citizen and does not qualify as a "natural born" citizen. Obama traveled to Pakistan in 1981, at which time he was twenty (20) years old and used his Indonesian Passport, not a United States passport.
4. Moreover, as stated above, Obama was registered in School in Jakarta, Indonesia as Barry Soetoro, a citizen of Indonesia, born in 1961 in Hawaii and his religion was registered as Islam.
5. The Democratic National Committee (DNC) is supposed to represent and protect the interests of working Americans, which includes securing a Democratic Nominee on the Presidential Election ballot who represents the Democratic vision and who is qualified and eligible to run for Office of the President under the qualifications of the United States Constitution. The DNC has failed to inquire into Obama's eligibility status.
6. For the above aforementioned reasons, Obama needs to immediately step down and withdrawal his candidacy for Presidency.

**WHEREFORE**, Plaintiff respectfully prays that this Court:

A. Declare that Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham is ineligible to run for United States Office of the President under the United States Constitution, Article II, Section I;

B. Preliminary and permanently enjoin Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham from running for United States Office of the President;

C. Preliminary and permanently enjoin Defendant, The Democratic Committee from nominating Defendant Barack Hussein Obama, a/k/a Barry Obama, a/k/a Barry Soetoro, a/k/a Barack Soetoro, a/k/a Barry Dunham, a/k/a Barack Dunham as the Democratic Nomincc;

D. Award Plaintiff such costs and fees pursuant to 42 U.S.C. § 1988 and other applicable by law; and

E. Grant Plaintiff such other and further relief as the Court deems just and proper.

Respectfully submitted,

Attorney in *Pro Se* 555 Andorra Glen Court, Suite 12 Lafayette Hill, PA 19444-2531  
Identification No. 09867 >(610) 825-3134

### **VERIFICATION**

I, PHILIP J. BERG, hereby state that I am the Plaintiff in this action and verify that the statements made in the foregoing Complaint for Declaratory and Injunctive Relief are true and correct to the best of my knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S. Section 4904 relating to unsworn falsification to authorities.