

Complaint to the State Bar of California

**IN RE: ORLY TAITZ
STATE BAR NO. 223433**

(Submitted anonymously due to potential retaliation,
as described within)

**Office of the Chief Trial Counsel/Intake
The State Bar of California
1149 South Hill Street
Los Angeles, California 90015-2299**

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Preface

A California attorney has decided that President Obama is ineligible to be president, and has taken on the mission of removing him from office -- *by force, if necessary*. On at least two occasions, she has openly called for armed rebellion by the military, to arrest and imprison the elected President.

Her name is Orly Taitz. Using the power of the Internet, including blogs, online radio and television shows, and YouTube, she has become the national leader of a fringe movement. She has literally thousands of followers who think she is waging a lonely battle to uphold the Constitution, in the face of a conspiracy to place a usurper in the White House. Because her cause is so important, she has ignored the laws of the United States, established court procedures, and specifically, the California Rules of Professional Conduct. Specific violations are alleged below.

She has filed three lawsuits in California (two of which have been dismissed), and unsuccessfully attempted to file a fourth in federal court in Washington, D.C. Having been unable to achieve her goal by legal action, *she has begun encouraging her followers nationwide to organize themselves as wholly unlawful "Citizens Grand Juries," and making "presentations" to lead them in indicting President Obama on criminal "charges"*. Already, a group of citizens in Georgia issued an "indictment" of the President, and "served" it on government officials, threatening violence if their "indictment" was ignored. Another such "indictment" is coming in early May, under her direction. In addition:

- 1) She has accused the following federal officials of treason and called for their indictments:
 - a) All the justices of the Supreme Court,
 - b) All the members of the U.S. House of Representatives and Senate,
 - c) Attorney General Eric Holder, Solicitor General Elena Kagan, and other federal officers,
 - d) and, of course, President Obama himself.
- 2) She has personally confronted two Supreme Court justices, when they made public appearances. On both occasions, she improperly tried to engage them in improper *ex parte* discussion of her case before the Court.
- 3) At her confrontation with Chief Justice Roberts, she gave two suitcases full of documents to his security detail, later claiming that she had "filed" a Motion for Reconsideration in one case, and a new lawsuit -- though she paid no filing fee, failed to file with the clerk's office, and showed no proof of service on opposing counsel. When her documents were not placed on the Supreme Court docket, she accused Justice Roberts of further treason and demanded his resignation.
- 4) She has openly encouraged and advised these unlawful "Citizens Grand Juries". In Georgia on March 28, she "presented the case" before a "Citizens Grand Jury" of 25 people, who then issued an indictment of President Obama on charges of fraud. The "indictment" was then "served" on the U.S. Attorney for the Northern District of Georgia, and on the Georgia Attorney General, on Georgia's Speaker of the House, and on Georgia's President of the Senate.
<http://www.riseupforamerica.com/index.html>

She apparently also plans to "do the presentation," as if a prosecutor, at the "Illinois Citizen's Federal Grand Jury" on May 2. <http://americangrandjury.org/grand-jury-updates-from-georgia-and-illinois> She believes she's some sort of "National Prosecutor" at these "Fake Grand Juries," and more will surely follow.

- 5) She has recruited dozens of active and retired military for her crusade, including retired Major General Carroll D. Childers. She published (and thus, endorsed) his statement about President Obama that:

*"He is an interloper, a usurper, a fake, a scam artist, a Chicago crook, a recipient of bribes and gratuitous income for which he paid no tax, a socialist (perhaps only a communist or Marxist), and a grave danger to the future of America ... [Congress and the Supreme Court] are all complicit and should all be severely punished for having failed in their sworn oath to protect and defend the constitution ... [instead of swearing him into office, Justice] **Roberts ... should have immediately had Obama arrested and deported.***

"Other than this, my key short-term complaint is that he has not had a heart attack in office."

<http://defendourfreedoms.us/2009/02/24/major-general-commanding-general-carroll-d-childers-joins-military-suit.aspx>

- 6) On April 4, she attended a "Machine Gun Shoot" in Kentucky, where she actively recruited plaintiffs for her various actions and was at least partially successful. According to her own accounting, she signed up at least 20 new "plaintiffs for my legal actions," presented "a case for fraud" against President Obama in a public appearance with the man who convened the Georgia "Citizens Grand Jury," and collected "at least 300 signed indictments". However, upon information and belief, she is not licensed to practice law in the State of Kentucky.
- 7) She repeatedly instructs her followers to write, call, and otherwise harrass the U.S. Supreme Court, federal courts, U.S. Attorneys, and other governmental officials, demanding that they investigate the President, arrest, and imprison him. On March 14, she wrote:

*[I have been] criss crossing this country talking to Justices of the Supreme court, Representatives, Senators, FBI agents, Attorney Generals, US attorneys, telling all of them, what is wrong with you? Did some evil magician put a spell on the men in this country and they stopped being men? Why are you afraid to speak up, to stand up for you constitution? **Why are you afraid to tell this arrogant jerk from Africa and Indonesia - You need to go home, you cannot be a president and commander in chief because you are not a Natural born Citizen. To be a Natural born Citizen you have to have both parents as citizens. Your father was never a US citizen and you don't qualify and you also spit us in the face by refusing to unseal your vital records. There is no proof that you are even a citizen. For all we know, you need to go back to Kenya and wait for your green card, and that after we try you for all the crimes perpetrated upon American citizens.***

<http://defendourfreedoms.us/2009/03/14/i-did-it.aspx>

By openly advocating armed revolt, accusing virtually the entire federal government of treason, and using poisonous invective against President Obama, *she is making it significantly more likely that someone will attempt to assassinate the President of the United States.*

I recognize that, however distasteful, many of her actions are likely protected by the First Amendment. However, in her capacity as a California attorney, she has violated numerous Rules of Professional Conduct, as detailed below.

A. RESPECT FOR COURTS & JUDGES

The Rule:

Cal. Bus. & Prof. Code § 6068(b) provides: "It is the duty of an attorney to do all of the following: *** (b) To maintain the respect due to the **courts of justice and judicial officers.**"

The Complaint:

Taitz has repeatedly, publicly disrespected courts of justice and individual judicial officers. She has accused judges of "treason," called them "idiots," accused judges of multiple improprieties, and called for the indictment of any judge who refuses to hear her case. She has also shown disrespect for the judicial system by openly seeking volunteers to help her "shop" for a judge politically inclined to hear her case. Her statements and actions disrespecting the courts and individual judges include, but are not limited to the following:¹

1. On **January 21, 2009**, Taitz publicly accused the Supreme Court of integrity/ethics violations merely for meeting with President-Elect Obama and for failing to recuse themselves from swearing him in:

Obama has been in power only one day. Suddenly today my case has disappeared from the docket. The case was not dismissed. It is supposed to be heard on the 23rd of January. Each and every American Citizen needs to call the Supreme court and demand decency from these Justices. They have violated all principles of judicial integrity and ethics by inviting Obama and Biden to the closed door meeting only a few days before the hearing. They have inaugurated him in front of millions of people, when 3 days after the inauguration they are supposed to hear my case, where I state that Obama is not eligible for presidency and never was eligible. They were supposed to recuse themselves from the inauguration. What is going on? Is Chicago mafia influencing the Supreme Court? If we don't have integrity with our elected officials and the whole system is corrupt, then it is time to revolt and change the system.

See "Obama has been in power only one day and they are already playing games with the Supreme Court," posted by Orly Taitz, Dds Esq. at 3:09 PM, available at <http://drorly.blogspot.com/2009/01/obama-has-been-in-power-only-one-day.html>.

2. On **February 27, 2009**, Taitz publicly advocated for volunteers to "shop" for a sympathetic judge, demonstrating a fundamental disrespect by implying that the judiciary is political and not impartial. Taitz posted a response to an email query, in which she stated the following:

*Dear Tommy,
I believe, we have good plaintiffs. (cont'd.)*

¹ These are just a few of *multiple* public statements, oral and in writing, made by Taitz, during recent weeks, that can be found on her current blog, www.defendourfreedoms.us; her prior blog, www.drorly.blogspot.com; her multiple radio/TV interviews published on YouTube; and elsewhere.

What we didn't have so far, is a judge with the guts and a spine to sign a judicial subpoena to demand BO's vital records. ... I suspect, that small town, red state judges are more likely to issue a subpoena. Keep in mind: local judges have to run for office and typically they are closer to real people, who demand answers. Federal judges and the Supreme court were not elected, they are political appointees and more likely to go with the establishment . A local judge in any red state can sign two pieces of paper: a pro hac vice, allowing me, as an out of state attorney to represent a client in his jurisdiction and a subpoena for a production of documents by BO. ...His lawyers will try to appeal, however I believe, that higher state courts will not overturn this decision by the lower state judge, as they know, that the pressure on BO is building and there will be revolt in their state, if they overturn

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In a follow-up response to a reader's comment, Orly stated:

"that is the whole point, I need friendly red states with a judge with some guts to sign the judicial subpoena. Spread the word[.]"

See "question regarding the Barack Obama legal action," posted by Defend Our Freedoms Foundation at 2/27/2009 8:18 PM, available at <http://defendourfreedoms.us/2009/02/27/question-regarding-the-barack-obama-legal-action.aspx>.

3. On **March 7, 2009**, Taitz publicly (a) called a Federal Judge an "idiot," (b) accused the Federal District Judge of improperly failing to recuse himself, (c) called for his removal from the bench; and (d) denigrated the judiciary, generally, contending that a military coup may be necessary to unseat the US President. In a post published on March 7, 2009, Taitz contended as follows:

Please read some background on the judge that decided Hollister v Soetoro. This judge should be removed from the bench. Additionally you will be able to understand why I am skeptical of our judiciary and why I believe, that it ultimately will be up to our military to arrest and prosecute the Usurper in Chief for massive fraud of American citizens and treason.

Here is a little background info on Judge Robertson. It clearly shows he was biased from the beginning and had a definate [sic] conflict of interest and should have recused himself.

This shows that this idiot judge didn't even read the stuff presented to him or doesn't understand the difference between native-born and natural-born.

... Those are outrageous (and if not done in a court opinion - libelous) allegations for a

public official, let alone a judge- to make about a party in a lawsuit. This judge should be removed from the bench for such biasness. In the least, if any other cases come up before him on this issue, he should be immediately challanged [sic] to be removed from the case.

See "Judge James Robertson should be removed from the bench," Posted by Dr. Orly Taitz at 3/7/2009 12:59 AM, available at <http://defendourfreedoms.us/2009/03/07/judge-james-robertson-should-be-removed-from-the-bench.aspx>.

4. On **March 15, 2009**, Taitz openly appealed to her volunteers to "shop" for local judges who would be sympathetic to their cause, demonstrating a fundamental disrespect by implying that the judiciary is political and not impartial.

"We have to move on and continue our research, lobbying politicians and demanding action from our law enforcement and judiciary. Please, let's work together to end this nightmare of illegal and criminal activity, surrounding Obama, as soon as possible:

1. *I need your help in sending by certified mail with my return address letters to Attorney Generals of each state, demanding immediate criminal investigation, Grand Jury and subpoena of records*
2. *Demanding quo warranto proceedings by every US attorney and criminal investigation, Grand Jury and subpoenas*
3. *Demand Judicial hearings and subpoena of records by the State and US Representatives and Senators.*
4. *Looking for decent judges with some guts that would issue subpoenas*
5. *****
****"*

See "Thank you and Lets Keep Working," posted by Dr. Orly Taitz at 3/15/2009 8:28 AM, available at <http://defendourfreedoms.us/2009/03/15/thank-you-and-lets-keep-working.aspx>.

5. On **March 18, 2009**, Taitz publicly stated that if Chief Justice Roberts refuses to hear her case, he is "colluding" and "defacto aiding and abetting commission of massif fraud" and "aiding and abetting treason":

"Please continue follow up with the office of Attorney General Holder and the Supreme Court. Please call, fax, e-mail and mail on the daily basis until we receive an answer and action. The Attorney General and the Chief Justice of the Supreme Court owe an answer to this Nation. They have to address the issue of Obama's illegitimacy for Presidency due to his British Citizenship at birth, his Kenyan citizenship from age 2 and his Indonesian citizenship from around age 5 until now; and they have to respond in regards to all the illegal activity surrounding him and his supporters. The Nation has to see all the proper documents and vital records. If the Attorney General and the Chief Justice of the Supreme Court are silent on this issue and are taking no action, they are de facto colluding with Obama, they are de facto aiding and abetting commission of massive fraud upon the citizens of this country, they are aiding and abetting treason in allowing a Foreign National to usurp the

*White House, the position of the President and Commander in Chief. The phone numbers that I have are as follows: ***"*

See "Follow-Up," posted by Dr. Orly Taitz at 3/18/2009 10:22 AM, available at <http://defendourfreedoms.us/2009/03/18/follow-up.aspx>.

6. On **March 19, 2009**, Taitz posted a blog entry, calling a judge who had dismissed a related case "a disgrace," and calling for Americans to demand his removal from the bench:

"This judge doesn't believe in the rule of law and rule of evidence. Instead of signing subpoenas and getting all of Obama's records, he claims that Obama is eligible because the issue was massaged on the blogs. Since when our judges stopped [sic] reviewing proper documents and relying on some Internet thugs with forged, photo shopped computer image Certificates of Life Birth. Every decent American should demand removing this judge of the bench immediately. He is a disgrace for the legal profession."^{2[2]}

See "Assault on our 1st amendment rights to criticize [sic] idiot judges," posted by Dr. Orly Taitz at 3/19/2009 3:43 AM, available at <http://defendourfreedoms.us/2009/03/19/assault-on-our-1st-amendment-rights-to-critisize-idiot-judges.aspx>.

7. On **March 19, 2009**, Taitz publicly submitted a "dossier" to US legal enforcement agents, stating that the failure of the Supreme Court to hear her case, if not the result of court employee illegal tampering, must be the result of the Supreme Court Justices' "dereliction of duties" and "illegal" activities:

"2. If the signatures were not forged and the docket was not forged, and the justices have actually signed those decisions, then there is a possibility, that the Justices have not actually read the cases but rubber stamp signed the decisions made by their clerks, which would be a dereliction of duties by the Justices of the Supreme Court and illegal as well.

3. Last option is that the justices signed the documents and read the cases. There are a few problems with this scenario as well.

a. The cases have mentioned that not only Obama, but also Roger Calero, admitted citizen of Nicaragua, currently in US on a green card was allowed as a candidate on the ballot in at least five states. Not providing decision on this issue would be a dereliction of duties by the justices and violation of their oath to uphold the Constitution of the United States.

^{2[2]} Taitz was referring to a ruling by Judge James Robertson from the Federal D.C. Circuit Court, in *Hollister v. Soetoro*, --- F.Supp.2d ---, 2009 WL 579477 (D.D.C. Mar. 5, 2009).

b. The cases mentioned above have provided ample evidence, showing that Obama/Soetoro is not eligible for presidency and the refusal to hear the case on the merits is a dereliction of duties and violation of oath by the Justices of the Supreme Court, which is illegal as well."

See "Dossier #3 sent to the Director of FBI, Attorney General and the director of Secret Service," posted by Dr. Orly Taitz at 3/19/2009 6:14 AM, available at <http://defendourfreedoms.us/2009/03/19/dossier-3-sent-to-the-director-of-fbi-attorney-general-and-the-director-of-secret-service.aspx>; See also, e.g., http://www.youtube.com/watch?v=FfA8NmKYM_k&feature=player_embedded and http://www.youtube.com/watch?v=9JRUR9R8Nql&feature=player_embedded for a recording of a March 17, 2009 radio interview in which Taitz repeats and expounds on her accusations against employees and justices of the U.S. Supreme Court.

8. On **March 25, 2009**, Taitz published a blog entry, and established an online petition seeking the indictment of judges who refuse to hear the Obama-eligibility cases:

Redress of grievances - Petition for indictment of Timothy Geithner, Barack Obama, Supreme Court Clerk for stays Danny Bickell, Judges that refuse to uphold Constitution and hear the cases of Obama's ineligibility on the merits and members of Congress and Senate, that refuse to hold Judicial hearings and sign subpoenas for all of Obama's vital records.

Timothy Geithner should be indicted.

Obama should be indicted for massive fraud of American people and treason.

Judges should be indicted for not upholding constitution and not hearing the cases of Obama's lack of eligibility.

Supreme Court Clerk, Danny Bickell, should be indicted for interfering with the justice system.

Attorney General Eric Holder should be indicted for not investigating all of Obama's illegal acts.

The Congressmen and Senators should be indicted for not holding judicial committee hearings on BO's illegitimacy for presidency.

See <http://www.ipetitions.com/petition/RedressofGrievances/>; see also "Indictments- 850 signatures so far," posted by Dr. Orly Taitz at 3/25/2009 5:58 PM, available at <http://defendourfreedoms.us/2009/03/25/indictments.aspx>, in which Taitz solicits petition signatures.

9. On **March 26, 2009**, Taitz issued an "open" letter to US Supreme Court Chief Justice Roberts, stating, among other things, the following:

"This is to remind you that on 03.13.09. I have presented you with the motion for reconsideration in Lightfoot v Bowen, Quo Warranto in Easterling et al v Obama et al and a 164 page dossier of suspected illegal and criminal activity surrounding Mr. Obama and his supporters, that was written on 03.01.09 and sent on Attorney general Holder on 03.03.09. In front of 1200 students and faculty of the University of Moscow, Idaho you agreed to review those documents. This is a matter of National Security and National urgency and as of yet there was no response from you or Attorney General Holder, nor Robert Mueller, Director of FBI, that was copied on this dossier.

On 03.25.09. I arrived to the Washington DC and personally had delivered copies of the above documents to both the Supreme Court and the Department of Justice. I have received a letter from your clerk William K Suter, that relates to the pleadings received on the 23rd and does not mention any documents submitted on the 13th, and I am not sure you are aware of this letter, as you didn't seem to be aware of other matters in the Supreme Court. Mr. Suter stated, that Quo Warranto and Writ of Mandamus don't comply with the rules and I can file a petition for extraordinary writ of MANDAMUS, and I have to file it with the court. He didn't specify what rules he is talking about and this statement seems to be incorrect, since I have filed Quo Warranto as an original jurisdiction case, which doesn't need to be in the form of extraordinary writ of Mandamus. Mr. Suter also stated that the Rules of this Court make no provision for the Motion for Reconsideration of an application, however the rules of this court make no provision for many other out of the ordinary acts, that happened on your watch, including and not limited to:

- 1. Justices of the Supreme Court meeting behind close doors with Obama, who is a person of interest and subject of litigation of my petition, that was scheduled to be heard only a few days later.*
- 2. Any mention of my case, stating that Mr. Obama is ineligible for US presidency, being erased from the External docket of the Supreme Court right after the inauguration and two days before the case was supposed to be heard.*
- 3. Your clerks lying to the citizens and defaming me by claiming that the above events didn't happen, even though hundreds of citizens saw it and are prepared to testify in court in regards to such events.*
- 4. Clerk Danny Bickel on his own accord refusing to file one of two supplemental briefs I've submitted.*
- 5. Your Justices having no clue about any of Obama ineligibility cases, that they supposedly heard in conference five times.*
- 6. Supreme Court Justice getting all of this information and doing nothing about, while under an obligation to act and correct the wrong.*

7. Supreme Court Justices getting information in regarding to criminal activity and not reporting it for further investigation by law enforcement.

8. Supreme Court Justices deciding not to hear on the merits any and all cases in regards to president's ineligibility, while finding more value in a case deling [sic] with the rights of smokers of light cigarettes to sue tobacco. It appears the right of a few trial lawyers to make millions of dollars of such litigation was more important then the right of 305 million Americans to have a legitimate president.

9. Recently I have read the book "Making your Case", that Justice Scalia autographed for me. On page 77 it states "Another factor distinctive to petitions for certiorari is that the judges don't like to spend a lot of time deciding what to decide. Indeed in most courts they won't even read the brief in support of your petition but will rely on summaries (or on selection of particular briefs) by law clerks'. When you have unscrupulous clerks and the issue is National Security this is inconceivable.

One of old maxims in legal practice, is that the substance trumps form. The substance dictates, that under such conditions, it is your obligation to uphold the constitution of the United States and to issue a stay to Mr. Obama's functioning in the capacity of the president and commander in Chief and give him a reasonable time of 24 hours or 48 hours to present all of his vital records or sign a consent for release of such records. If he is not willing to do so, then per the 20th amendment, Mr. Biden becomes a temporary president for two or three months, until a new president and be chosen in a special election.

Justice Roberts, if you are unwilling to do so, it is your constitutional and moral duty to resign and let another Justice uphold the Constitution of the United States of America.

Respectfully submitted.and is being hand delivered on my way to the airport, flying back to California,

Dr. Orly Taitz, ESQ
Counsel for the Petitioners.

See "Letter to Chief Justice Roberts 03.26.09," posted by Dr. Orly Taitz at 3/26/2009 7:38 AM, available at <http://defendourfreedoms.us/2009/03/26/letter-to-chief-justice-roberts-032609.aspx>.

B. HONESTY REQUIREMENT; PROHIBITION ON DECEPTION

The Rule: The State Bar Act provides as follows:

"It is the duty of an attorney to do all of the following: *** (d) To employ, for the purpose of maintaining the causes confided to him or her those means **only as are consistent with truth**, and **never to seek to mislead the judge or any judicial officer by an artifice or false statement of fact or law.**" Cal. Bus. & Prof. Code § 6068(d).

"The commission of any act involving moral turpitude, **dishonesty** or corruption, **whether the act is committed in the course of his relations as an attorney or otherwise**, and whether the act is a felony or misdemeanor or not, constitutes a cause for disbarment or suspension. If the act constitutes a felony or misdemeanor, conviction thereof in a criminal proceeding is not a condition precedent to disbarment or suspension from practice therefor." Cal. Bus. & Prof. Code § 6106.

"Every attorney is guilty of a misdemeanor who either: (a) Is guilty of any **deceit or collusion**, or consents to any deceit or collusion, **with intent to deceive the court or any party.**" Cal. Bus. & Prof. Code § 6128(a).

Complaint re: Taitz's False/Untrue Statements of Fact:

As an initial matter, the list below is limited to statements made in pleadings filed with courts, because to list all the inaccurate/false statements made publicly on her blog and elsewhere would be prohibitively time-consuming. Additionally, the list is limited to very basic/fundamental statements, demonstrably false with even the most cursory review of materials. It is difficult to point out the many other false statements made in her documents without venturing into "argument," which is understood, to be unacceptable in a bar complaint.

1. In the Petition for Extraordinary Writ, filed in *Lightfoot v. Bowen*, No. S16869 (Cal. Sup. Ct., filed Dec. 3, 2008), Taitz, on behalf of her client, asserted the following demonstrably false statements:

- a. *"Box 7C of the [Hawaii] vault Certificate of Live Birth contains a question, whether the birth was in Hawaii or another State or Country. Therefore, the only way to verify the exact location of birth is to review a certified copy or the original vault Certificate of Live Birth and compare the name of the hospital and the name and the signature of the doctor against the birthing records on file at the hospital noted on the Certificate of the Live Birth."*

See Petition, available at <http://goexcelglobal.com/share/c146.pdf>, at ¶ 37.

This is **false**, and should reasonably be known to be false given multiple web-based publications -- not to mention a cursory review of the document itself -- to that effect. Box 7C contains a question regarding the "county, state, or foreign country" that is the "usual residence" of the child's mother. See representative copy of certificate

available at <http://snarkybytes.com/wp-content/uploads/2008/06/hawaii-birth-certificate-1963.jpg>.

To the extent Taitz claims she didn't know of its falsity, she could have conducted a reasonable investigation into the facts before making the assertion, indicating a violation of Cal. R. Prof. Conduct 3-110.

- b. *"Finally, in 1981, Senator Obama traveled to Pakistan, when there was a ban for U.S. citizens to travel to Pakistan. The only logical possibility for him to do so was by using one of his other passports: Indonesian, Kenyan, or British."*

See Petition for Writ of Mandate filed in Lightfoot v. Bowen, No. S16869 (Cal., filed Dec. 3, 2008), available at <http://goexcelglobal.com/share/c146.pdf>, at ¶ 46.

See also Petition for Writ of Mandate, Keyes v. Bowen, No. 34-2008-80000096-CU-WM-GDS (Cal. Superior Ct. Cal, Sacramento, filed Nov. 13, 2008) at ¶ 83 ("Finally, in 1981, Senator Obama traveled to Pakistan, when there was a ban for U.S. citizens to travel to Pakistan."); Amended Petition for Writ of Mandate, Keyes v. Bowen, No. 34-2008-80000096-CU-WM-GDS (Cal. Superior Ct. Cal, Sacramento, filed Feb. 23, 2009) at ¶ 85 (same).

This is **false**, and should reasonably be known to be false given multiple web-based publications – not to mention a US State Department Official Travel Advisory -- to that effect. In 1981, the US State Department issued a Travel Advisory, stating that travel was possible with a visa. See August 17, 1981 Travel Advisory, available at http://dosfan.lib.uic.edu/ERC/travel/cis/southasia/TA_Pakistan1981.pdf; see also a contemporaneous New York Times article discussing travel to Pakistan and passport/visa requirements available at <http://www.nytimes.com/1981/06/14/travel/lahore-a-survivor-with-a-bittersweet-history.html?sec=travel&spon=&pagewanted=5>.

To the extent Taitz claims she didn't know of its falsity, she could have conducted a reasonable investigation into the facts before making the assertion, indicating a violation of Cal. R. Prof. Conduct 3-110.

Note: The California Supreme Court denied this Petition on Dec. __, 2008, without opinion.

2. In the Complaint filed in Keyes v. Obama, No. SACV09- 82 DOC (ANX) (C.D. Cal., filed January 20, 2009),³ Taitz, on behalf of her client, asserted the following demonstrably false statements:

³ This complaint is available on available on PACER (Case No. 8:2009cv00082) and at <http://www.obamaconspiracy.org/wp-content/uploads/2009/02/keyesvobamacomplaint.pdf>.

- a. *"In 1981 it was not legal for a United States citizen, presenting a United States passport to travel to Pakistan." Complaint ¶ 31.*

This allegation is **false** and should reasonably be known to be false given multiple web-based publications to that effect, as discussed above in relation to Taitz' false statements made in her writ petition before the California Supreme Court.

To the extent Taitz claims she didn't know of its falsity, she could have conducted a reasonable investigation into the facts before making the assertion, indicating a violation of Cal. R. Prof. Conduct 3-110.

- b. *"The United States Department of State requires a long form birth certificate as primary evidence of citizenship for issuance of a passport, among other documents which could be presented, none of which is a short form birth certificate form of identification. See <http://travel.state.gov/passport/get/first/first830.html#DS11Instruc> [sic]." Complaint ¶ 39(h).*

This is **demonstrably false** and should reasonably be known to be false given multiple web-based publications to that effect. See http://travel.state.gov/passport/get/first/first_830.html - which directs individuals to <http://www.cdc.gov/nchs/w2w.htm> - which directs Hawaii residents to <http://www.cdc.gov/nchs/howto/w2w/hawaii.htm> - which provides a link for ordering a COLB/short-form certified birth certificate at <http://hawaii.gov/health/vital-records>.

To the extent Taitz claims she didn't know of its falsity, she could have conducted a reasonable investigation into the facts before making the assertion, indicating a violation of Cal. R. Prof. Conduct 3-110.

3. Taitz has, in filings submitted to US officials, referred to a "Ron Polarik" as if that were a person's real name, without disclosing that the "name" is actually a screenname/pseudonym. For example, in a February 27, 2009 Open Letter and Demand for Investigation filed with US Attorney General Eric Holder (and numerous other federal officials), Taitz stated as follows:

Additionally, statements by Ron Polarik and private investigator Jose Barro, showed numerous signs of forgery on the short version COLB posted by Obama/Soetoro, and Forensic Document expert Sandra Line has issued an affidavit that Obama's place of birth cannot be ascertained without seeing the original birth certificate.

See "Dossier of Suspected Criminal Activity and a Demand to Appoint a Special Prosecutor," posted by Defend Our Freedoms Foundation at 3/8/2009 8:41 AM, available at <http://defendourfreedoms.us/2009/03/08/dossier-of-suspected-criminal-activity-and-a-demand-to-appoint-a-special-prosecutor.aspx>, which provides a link to the actual letter (<http://defendourfreedoms.org/letterHolder.htm>).

"Ron Polarik" is a pseudonym/screen name used by a person who has not been publicly-identified. This fact can be confirmed by Philip J. Berg, Esquire,⁴ an attorney who has hired this person. Moreover, in a video interview of "Polarik," Polarik himself states that "I am concealing my identity because I have received threats from people who are loyal to Obama and who don't want the truth to be known." Additionally, the accompanying notes to the video state, "In this video, Molotov Mitchell interviews "Dr. Ron Polarik" "Dr. Polarik" is a pseudonym and his identity is obscured in this video." See <http://www.youtube.com/watch?v=mB346Xzm3oQ> (emphasis added)

C. PROHIBITION AGAINST PRESENTING CLAIM NOT WARRANTED.

The Rule: Cal. R. Prof. Conduct 3-200 provides as follows:

"A member shall not seek, accept, or continue employment if the member knows or should know that the objective of such employment is:

(A) To bring an action, conduct a defense, assert a position in litigation, or take an appeal, without probable cause and for the purpose of harassing or maliciously injuring any person; or

(B) To present a claim or defense in litigation that is not warranted under existing law, unless it can be supported by a good faith argument for an extension, modification, or reversal of such existing law."

The Complaint:

The pleadings and related materials filed by Taitz in various courts over the past two months are replete with legal claims which are not warranted under existing law or supported by a good faith argument (or, in some cases, any argument whatsoever) for a change to existing law.

Because it appears impossible to adequately state this aspect of the complaint without resorting to "argument," I will merely refer the Committee to the materials filed by Taitz, and available court orders regarding her materials, from which the Committee may conduct its investigation into this issue.

Keyes v. Bowen, No. 34-2008-80000096-CU-WM-GDS (Cal. Sacramento Superior Ct., filed Nov. 13, 2008; amended Writ filed Feb. 23, 2009)

Both the original and amended Petition for Writ of Mandate filed in this case was riddled with legal arguments made without citing to any authority, citing to inapposite authority, and/or

⁴ Mr. Berg is in no way involved or even aware of this Complaint. However, given statements made on *his* website, we believe that he can, and will, confirm that "Ron Polarik" is a pseudonym. Mr. Berg's contact information is: Philip J. Berg, Esquire, 555 Andorra Glen Court #12, Lafayette Hill, PA 19444-2531, (610) 662-3005 (cell), (800) 993-PHIL (office), (610) 834-7659 (fax).

citing to legal materials that provided no support for the argument(s). In dismissing this complaint, the Court noted several such instances as follows:

- In the March 23, 2009 order sustaining the Secretary of State's Demurrer, the Court stated as follows:

[Plaintiffs] pray that the Secretary of State be barred "from both certifying to the Governor the names of the California Electors, and from transmitting to each Presidential Elector a Certificate of Election, until such documentary proof is produced and verified showing that any future Presidential candidate is qualified to serve as President of the United States.

Petitioners have not identified any authority requiring the Secretary of State to make an inquiry into or demand detailed proof of citizenship from Presidential candidates. ... Accordingly, there is no basis for mandamus relief. (See *Barnes v. Wong* (1995) 33 Cal.App.4th 390, 395.)

See Order Sustaining the Secretary Of State's Demurrer to the First Amended Petition for Writ of Mandate Without Leave to Amend, *Keyes v. Bowen*, No. 34-2008-80000096-CU-WM-GDS (Cal. Superior Ct. Cal, Sacramento, (J. Kenny), filed March 23, 2009) at pp. 2-3 (emphasis added).

- In the March 23, 2009 order sustaining President Obama's Demurrer, the Court stated as follows:

The Court sustains the demurrer on the ground that the First Amended Petition does not state facts sufficient to constitute a cause of action against any of the named Respondents (Code Civ. Proc. § 430.10(e)). The current pleading does not seek any relief as to either President Obama or Vice President Biden.

* * *

As to claims against the named Electors, the **First Amended Petition does not cite any law** imposing a duty on California Electors to review their candidate's eligibility. In paragraph 72 of the First Amended Petition, petitioners rely on section 8 of title 3 of the United States Code, which provides that the electors shall vote "in the manner directed by the Constitution." The Court concludes that, contrary to petitioners' allegation, this does not provide an affirmative duty on the electors to discover whether the candidate is a natural born citizen. As respondents contend, the language of 3 U.S.C. section 8 is more properly construed as referring to the mechanics of casting votes, found in article II, section 3 of the United States Constitution and the

Twelfth Amendment. And as respondents further contend, the California Electors have no discretion whatsoever, as section 6906 of the California Elections Code requires California's electors to vote for their party's nominee.

The Court further finds that the allegations that Elector Ilene Haber was improperly designated fail to state a cause of action. ... Petitioners' allegation that she was required to be elected pursuant to Elections Code section 6905 because she was replacing a deceased elector is **factually and legally without merit**.

The Court continued:

These respondents also contend that the case is not justiciable—that it is moot in all respects except those that are unripe. The Court finds this argument well taken. The case is clearly moot. The Secretary of State already placed the candidates' names on the ballot, the election has already taken place, the Electors were certified elected by the Secretary of State, met and cast their votes, the governor certified those results and transmitted them to the President of the Senate, and President Obama and Vice President Biden have now been inaugurated and are engaged in the duties of their offices. It is too late for relief against the Secretary of State and the California Electors as to the 2008 General Election. And as to any future election, the claims are not ripe. There is no actual controversy which admits of definitive and conclusive relief, as distinguished from an advisory opinion upon a hypothetical state of facts. (*Selby Realty Co. v. City of San Buenaventura* (1973) 10 Cal.3d 110,117; *Pacific Legal Foundation v. California Coastal Comm'n* (1982) 33 Cal.3d 158.)

See Order Re: Demurrer of President Barack Obama, Vice President Joe Biden, and California Electors to Petitioners' First Amended Petition for Writ of Mandate, *Keyes v. Bowen*, No. 34-2008-80000096-CU-WM-GDS (Cal. Sacramento Superior Ct., (J. Kenny), filed March 23, 2009), at pp. 5-6 (emphasis added).

- In the March 23, 2009 order quashing subpoenas issued by Plaintiffs, the Court stated as follows:

Petitioners contend that respondents waived any objection by failing to object for twenty-seven days. The Court finds this **argument without merit**. The motion to quash was filed within the period provided for by Code of Civil Procedure section 2025.410(b).

The Court further finds that the two categories of documents petitioners seek are **vague, overbroad**, and are **of no relevance to this litigation**. Petitioners demand access to all of President Obama's "academic and housing records." However, the relevance of such records is not established. The issues raised in the First Amended Petition concern the duties, if any, of the respondents to demand proof of natural born citizenship of a candidate for President. Petitioners have not shown that any of the documents sought could assist in answering this question. Petitioners' argument that they could have sought even more documents is not persuasive, nor is their argument that more specific objection was needed pursuant to Code of Civil Procedure section 2031.240(b).

Moreover, this lawsuit is moot as to issues concerning President Obama. The Court on this date is prepared to sustain demurrers to the petition without leave to amend. But

even if the court were to overrule the demurrers, the **First Amended Petition contains no claims as to which the records sought are relevant.**

See Order Re: Motion to Quash of President Barack Obama, Vice President Joe Biden, and 55 California Electors, or in the Alternative, for an Order that the Deposition of the Custodian of Records of Occidental College Not Be Taken *Keyes v. Bowen*, No. 34-2008-80000096-CU-WM-GDS (Cal. Sacramento Superior Ct., (J. Kenny), filed March 23, 2009), at p. 7 (emphasis added)

Lightfoot v. Bowen, No. S16869 (Cal. Supreme Court, filed Dec. 3, 2008)

This Petition for Extraordinary Writ, also filed by Taitz, contained the same basic facts and legal arguments as were propounded in the *Keyes v. Bowen* case in superior court. The California Supreme Court denied the Petition without opinion on Dec. __, 2008.

Lightfoot v. Bowen, No. 08A524 (U.S. Supreme Court, filed Dec. 12, 2008)

Other aspects of this complaint recount what this writer perceives as Taitz's repeated and continual violation of multiple ethics rules in the course of her dealings before the U.S. Supreme Court.

- With respect to legal arguments, rather than seek a writ for certiorari, Taitz opted to file an Application for extraordinary relief in the US Supreme Court. The docket for that application is available at <http://origin.www.supremecourtus.gov/docket/08a524.htm>. While I have not been able to locate a copy of the final version of the Application, Taitz published one version on her website, available at http://defendourfreedoms.org/Scotus_Draft_2_Lightfoot_v_Bowen.doc. A review of this document reveals multiple legal arguments for which no relevant legal authority is cited and for which no reasonable argument for a change in law is offered.
- Taitz filed a "MOTION TO DECLARE THAT BY DEFAULT, THE PRESIDENT ELECT RESPONDENT BARACK OBAMA HAS FAILED TO QUALIFY UNDER US CONSTITUTION ARTICLE II §1, & AMENDMENT 20, PER RULE 21 (2)(B) & (4)," with the Supreme Court on January 15, 2009, according to her post, available at <http://drorly.blogspot.com/2009/01/important-this-motion-was-filed-today.html>.

In that Motion, Taitz cites, as valid authority, "*Scott v. Sanford*, 60 U.S. 393, 476 (1856)." She does not indicate in any way that the *Dred Scott* case was overturned, overruled, or even subsequently criticized/distinguished. *Dred Scott* is listed in the table of authorities, and cited (at p. 10) for the proposition (apparently) that the Supreme Court has recognized the authority of Emmerich de Vattel's view of citizenship:

"The natives, or natural-born citizens, are those born in the country, of parents who are citizens. .." Emmerich de Vattel, *The Law of Nations* (1758), Bk. 1, Ch. 19, Citizens and Nations, p 101 para 212; cited in *Scott v. Sanford*, 60 U.S. 393, 476 (1856).

While not pertinent to the citation to *Scott v. Sanford*, Taitz also fails to disclose to the court that Vattel expressly excepted Great Britain (whose laws the US followed on this

issue) as a country where location of birth, not parents' citizenship, governed a newborn's citizenship.

Note also that Taitz has continued to cite Scott v. Sanford – without disclosing that it is no longer good law – in her various papers filed (or attempted to be filed) with the Supreme Court and other US enforcement officers (seeking to obtain a Quo Warranto action). See, e.g., James v. Obama, proposed Quo Warranto action submitted by Taitz to US AG Eric Holder on XXX, available at <http://defendourfreedoms.us/2009/03/29/pleadings--james-v-obama.aspx>.

- Taitz also filed a "SUGGESTION OF RECUSAL OF HONORABLE CHIEF JUSTICE ROBERTS AND HONORABLE ASSOCIATE JUSTICES FROM SWEARING OF BARACK HUSSEIN OBAMA AS THE PRESIDENT OF THE UNITED STATES ON JANUARY 20TH DUE TO CONFLICT OF INTEREST WITH THE FULL COURT CONFERENCE HEARING ON HE 23RD OF JANUARY OF LIGHTFOOT V BOWEN, SEEKING TO FIND BARACK HUSSEIN OBAMA NOT ELIGIBLE FOR PRESIDENCY" with the Supreme Court on January 13, 2009, as reflected on the official docket and according to her post, available at <http://drorly.blogspot.com/2009/01/very-important-petition-filed-with.html>

In that motion, Taitz disclaims any obligation to cite relevant authority, stating:

APPLICABLE LAW

This is one of those situations where simply recognizing the issue immediately provides the correct answer. No legal citations or discussion is necessary. Elementary ethics and common sense are more than sufficient.

Neither actual bias or pre-judgment is necessary for disqualification. A judge must disqualify himself or herself in any proceeding where impartiality can be reasonably questioned. To avoid being in that position, a judge must avoid any public or private conduct, by words or deeds, regarding the merits of a pending or impending matter.

Unquestionably, if the Chief Justice administers the oath on January 20, it will be unnecessary [sic – "necessary" presumed] for him to disqualify himself in any case that raises Obama's eligibility. The corollary is that disqualification is not an issue if he declines to participate in administering the oath.

- Taitz also filed – or sought to file by personal service to Chief Justice Roberts (March 13, 2009), and then by personal hand service to the Supreme Court (March 23, 2009), an "**Application for Emergency Stay and/or Injunction as to Electoral College Meeting and Alternatively as to California Electors.**" And a "**Motion for Leave to File Writ of Quo Warranto on Barack Hussein Obama II ... and Writs of Mandamus on Hawaii Governor Linda Lingle, to provide evidence, and on Secretary of State Hillary Clinton, to request evidence from United Kingdom, and Republics of Kenya, Indonesia, and Pakistan.**" See file-stamped copies of filings at http://defendourfreedoms.us/files/4/2/6/6/5/166425-156624/7328462875_090323_158483712.pdf.

Keyes v. Obama, No. SACV09- 82 DOC (ANX) (C.D. Cal., filed January 20, 2009)⁵

The basis for this complaint is, clearly, frivolous and not supported by either existing law or a good faith argument for a change in the law. Essentially, Taitz relies upon Executive Order 13488, issued by former President George Bush to seek mandatory disclosure of the same information sought in her other actions outlined above.

The order at issue is Executive Order 13488, "Granting Reciprocity on Excepted Service and Federal Contractor Employee Fitness and Reinvestigating Individuals in Positions of Public Trust," which is available at <http://edocket.access.gpo.gov/2009/pdf/E9-1574.pdf>. The Executive Order states, at Section 4(d):

"This order is intended only to improve the internal management of the executive branch and **is not intended to, and does not**, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its agencies, instrumentalities, or entities, its officers, employees or agents, or any other person."

Therefore, it does not seem reasonable to argue that a complaint filed on the basis of that Executive Order is warranted by existing law or a good faith argument for extending that law.

D. FAILING TO ACT COMPETENTLY

The Rule: Cal. R. Prof. Conduct 3-110 provides as follows:

"(A) A member shall not intentionally, recklessly, or repeatedly fail to perform legal services with competence.

(B) For purposes of this rule, "competence" in any legal service shall mean to apply the 1) diligence, 2) learning and skill, and 3) mental, emotional, and physical ability reasonably necessary for the performance of such service.

(C) If a member does not have sufficient learning and skill when the legal service is undertaken, the member may nonetheless perform such services competently by 1) associating with or, where appropriate, professionally consulting another lawyer reasonably believed to be competent, or 2) by acquiring sufficient learning and skill before performance is required."

The Complaint:

To the extent that the inaccurate factual summarized and referenced above in sections B do not constitute dishonesty/deception, they surely must constitute incompetence inconsistent with the Bar's professional standards. To the extent that the presentation of claims without legal basis or a good faith argument for legal change, and/or to the extent that citation to law that is no longer good does not violate the prohibitions of Cal. R. Prof. Conduct 3-200, they surely must constitute incompetence inconsistent with the Bar's professional standards.

⁵ This complaint is available on available on PACER (Case No. 8:2009cv00082) and at <http://www.obamaconspiracy.org/wp-content/uploads/2009/02/keyesvobamacomplaint.pdf>.

E. NO FACTS PREJUDICIAL TO HONOR OR REPUTATION UNLESS REQUIRED BY JUSTICE

The Rule: Cal. Bus. & Prof. Code § 6068(f) provides: "It is the duty of an attorney to do all of the following: *** (f) To **advance no fact prejudicial to the honor or reputation of a party or witness, unless required by the justice of the cause** with which he or she is charged.

The Complaint:

Taitz's public accusations, in her pleadings, in her letters to Judges and other government officials, and on her crusade-based blog are replete with statements prejudicial to the honor and reputation – of President Barack Obama, of Judges who have refused to hear her case or related cases, of elected officials and of law enforcement agency officials who have not initiated investigations at her request. In addition to her statements quoted and cited elsewhere in this complaint regarding judges and the judiciary, the following is a very brief list of additional examples from pleadings filed with a court and/or official letters filed with law enforcement agencies. Many many more such statements can be found in her publications at www.defendourfreedoms.us and <http://drorly.blogspot.com>.

F. ENCOURAGING LAWSUITS FROM CORRUPT MOTIVE OF PASSION OR INTEREST

The Rule: Cal. Bus. & Prof. Code § 6068(g) provides that "It is the duty of an attorney ... [n]ot to encourage either the commencement or the continuance of an action or proceeding from any corrupt motive of passion or interest."

The Complaint:

It is unclear to me whether Taitz's public, open solicitation of clients to sign on as plaintiffs to support her crusade against the President violates this rule. Therefore, this information is provided not as a complaint *per se*, but as information for the Bar's consideration in connection with other elements of the complaint. Ms. Taitz' website, www.defendourfreedoms.org openly solicits clients for her pending and planned cases. See, e.g.,

- Solicitation of military servicemembers as clients/plaintiffs in her civil actions against the President: See <http://defendourfreedoms.us/2009/02/28/attention-military-personnel.aspx> (solicitation); see also <http://defendourfreedoms.org/ATTENTIONALLMILITARYPERSONNEL.htm> (client consent form); see also <http://drorly.blogspot.com/2009/01/we-are-looking-for-active-members-of.html> (Taitz's blog during the pre-February 2009 period) ("We are looking for active members of the military from Nashville-Fort Campbell area that want to challenge Obama e-mail dr_taitz@yahoo.com").
- Solicitation of federal employees as clients/plaintiffs in her civil actions against the President: See <http://defendourfreedoms.us/2009/03/07/federal-employee-consent-form-for-next-action.aspx>; see also http://defendourfreedoms.org/consent_federal_employee.doc (client consent form);
- Solicitation of parents of military servicemembers as clients/plaintiffs in her planned civil action for damages against the President and Rep. Pelosi: See <http://defendourfreedoms.org/youngUSSoldier.htm> (soliciting clients to bring "legal action

seeking damages from Mr. Obama and Ms. Pelosi for great emotional distress inflicted upon me by their actions....");

- Solicitation for of new clients (and requesting donations) for unidentified new action: See <http://defendourfreedoms.us/2009/02/25/your-voice-in-new-actions.aspx> (soliciting clients and requesting donations for new actions);
- Solicitation of veterans and seamen as plaintiffs in action(s): See <http://defendourfreedoms.us/2009/02/11/for-veterans-and-seaman.aspx>.

G. ACCOUNTING FOR MONIES RECEIVED

The Rule: Cal. Bus. & Prof. Code § 6128(c) provides that "Every attorney is guilty of a misdemeanor who ... [w]illfully receives any money or allowance for or on account of any money which he has not laid out or become answerable for."

The Complaint:

It is unclear to me whether Taitz's establishment of a PayPal fund/foundation to pay for her legal action, while providing no accounting for expenditures of any donations received, complies with § 6128. Therefore, this information is provided not as a complaint *per se*, but as information for the Bar's consideration in connection with other elements of the complaint.

According to Taitz:

"As you know, I have a DefendOurFreedoms foundation, that helps me to pay for legal actions, for traveling to different states and presenting the case to Attorney Generals, US attorneys FBI and legislators, presenting all the information to them, so that Criminal proceedings and Judicial hearings can be conducted on the issue of Obama's illegitimacy for presidency and related illegal activity."

See "Breaking and entering into my PayPal account," Posted by Dr. Orly Taitz at 3/9/2009 7:06 AM, available at <http://defendourfreedoms.us/2009/03/09/breaking-and-entering-into-my-paypal-account.aspx>.

See also "Thank you." posted by Orly Taitz, Dds Esq. on Jan. 17, 2009 at 4:56 AM, available at <http://drorly.blogspot.com/2009/01/thank-you.html> (thanking numerous people for donating \$25 or more and/or \$100 or more); <http://drorly.blogspot.com/2009/01/attn-we-people.html> (January 5, 2009 solicitation of funds to file additional legal actions) .

See also Taitz's client solicitation letters, in which Taitz solicits funds with the following statement:

"As Attorney Orly Taitz is performing this service for her country Pro Bono, any amount that you can contribute will be most helpful."

See Military Personnel Client Consent Form, available at

<http://defendourfreedoms.org/ATTENTIONALLMILITARYPERSONNEL.htm> (actual solicitation of military clients available at <http://defendourfreedoms.us/2009/02/28/attention-military-personnel.aspx>) ; Federal Employee Client Consent Form, available at http://defendourfreedoms.org/consent_federal_employee.doc (actual solicitation of federal employee clients available at <http://defendourfreedoms.us/2009/03/07/federal-employee-consent-form-for-next-action.aspx>).

See also Parents of Military Client Consent Form, available at <http://defendourfreedoms.org/youngUSSoldier.htm> (soliciting clients to bring "legal action seeking damages from Mr. Obama and Ms. Pelosi for great emotional distress inflicted upon me by their actions...."); <http://defendourfreedoms.us/2009/02/25/your-voice-in-new-actions.aspx> (soliciting clients and requesting donations for new actions); <http://defendourfreedoms.us/2009/02/11/for-veterans-and-seaman.aspx> (solicitation of veterans and seamen as plaintiffs in action(s)).

H. PROHIBITION AGAINST ADVISING THE VIOLATION OF LAW

The Rule: Cal. R. Prof. Conduct 3-210 provides that a member "shall not advise the violation of any law, rule, or ruling of a tribunal unless the member believes in good faith that such law, rule, or ruling is invalid. A member may take appropriate steps in good faith to test the validity of any law, rule, or ruling of a tribunal."

The Complaint:

Taitz has repeatedly advocated for the illegal overthrow of the current federal government, including by use of force. A few examples include the following:

1. On **January 17, 2009**, Taitz advocated for the men, particularly of the military, to revolt and install a new government:

what should be done?

*As a follow up to the previous article about Clair McCuskill, Obama "truth" squad and people like Secretary of State of Ohio Jennifer Brunner and all the others that have been collaborating with this Gestapo-SS establishment, they all should and would be tried in Nurenberg style trials for harassing, intimidating, blackmailing and terrorizing fellow citizens, for defrauding the whole country. Patriots of this country didn't fight and defeat Nazi Germany to end up with Obamas, McCuskill, Soros, Brunner and the rest of this squad. **I hope that the men in this country, particularly in our military will finally revolt against this travesty of Justice.** If our government and our elected officials and our judiciary have failed us, then it is time for the new government, new elected officials and a new judiciary.*

See "what should be done?," posted by Orly Taitz, DDS Esq on Jan. 17, 2009 at 4:18 AM, available at <http://drorly.blogspot.com/2009/01/what-should-be-done.html>.

2. On **January 21, 2009**, Taitz publicly accused the Supreme Court of integrity/ethics violations merely for meeting with President-Elect Obama and for failing to recuse themselves from swearing him in:

*Obama has been in power only one day. Suddenly today my case has disappeared from the docket. The case was not dismissed. It is supposed to be heard on the 23rd of January. **Each and every American Citizen needs to call the Supreme court and demand decency from these Justices.** They have violated all principles of judicial integrity and ethics by inviting Obama and Biden to the closed door meeting only a few days before the hearing. They have inaugurated him in front of millions of people, when 3 days after the inauguration they are supposed to hear my case, where I state that Obama is not eligible for presidency and never was eligible. They were supposed to recuse themselves from the inauguration. What is going on? **Is Chicago mafia influencing the Supreme Court? If we don't have integrity with our elected officials and the whole system is corrupt, then it is time to revolt and change the system.***

See "Obama has been in power only one day and they are already playing games with the Supreme Court," posted by Orly Taitz, Dds Esq. at 3:09 PM, available at <http://drorly.blogspot.com/2009/01/obama-has-been-in-power-only-one-day.html>.

3. On **February 3, 2009**, Taitz proclaimed:

*I have reported on thisblog [sic] for quite some time that **we here in the United States are heading toward Civil War.** Many of you told me I was a nut for thinking that.*

*The simple fact is that we are long overdue for another Rebellion in this nation and I heartily endorse the idea of having one again very soon; preferably [sic] starting **THIS year!***

*We must stop our federal government dead in its tracks because it is out of control and very dangerous. **If stopping them means attacking them and destroying them by force, then so be it.***"

See "NH Revolution ~Update~," posted by Dr. Orly Taitz at 2/3/2009 5:34 PM, available at <http://defendourfreedoms.us/2009/02/03/nh-revolution.aspx> (emphasis added).

4. On **March 28, 2009**, Taitz "presented the case" at the wholly unlawful "Georgia Citizens Grand Jury," which was convened in Stockbridge, GA at the business address of Carl Swensson. At the conclusion of the meeting, the "Grand Jury" indicted President Obama on charges of fraud, and later "served" this unlawful "indictment" upon governmental officials in Georgia, including the U.S. Attorney for the Northern District of Georgia, the Georgia Attorney General, and other officials. This so-called "Citizens Grand Jury" was not chosen by any governmental authority, and any actions it took have no force in law. However, the people who participated in it served the unlawful "indictment" of President Obama, and published the following threat of violence, if their demands are not met:

*"If the government does not amend the error within 40 days after being shown the error, then the four members shall refer the matter to the remainder of the grand jury. **The grand jury may distrain and oppress the government in every way in their power, namely, by taking the homes, lands, possessions, and any way else they can until amends shall have been made according to the sole judgment of the grand jury.**"*

Taitz led this "Citizens Grand Jury" by "presenting the case," and subsequently published an account of this wholly unlawful activity, which took place under her guidance. She apparently endorses the implicit threat of violence in the "Grand Jury" pronouncement.

See <http://www.riseupforamerica.com/index.html> (Official website of the unlawful "Georgia Citizens Grand Jury) and <http://defendourfreedoms.us/2009/04/02/from-world-net-daily.aspx>.

I. PROHIBITION AGAINST THREATENING CRIMINAL, ADMINISTRATIVE, OR DISCIPLINARY CHARGES

The Rule: Cal. R. Prof. Conduct 5-100(A) provides that a member "shall not threaten to present criminal, administrative, or disciplinary charges to obtain an advantage in a civil dispute...."

The Complaint: It is unclear to me whether Taitz's practice of threatening legal action against anyone who publicly disagrees with her position violates the above rule. Therefore, this information is provided not as a complaint *per se*, but as information for the Bar's consideration in connection with other elements of the complaint.

1. In response to a person's public statements critical of Taitz's actions in an online forum, Taitz accused the person of intimidation and harassment, and published the person's personally identifiable information, and threatened civil action against the person:

"Here is the info. This person is in AZ. Interesting, that it shows no activity as a lawyer. How does she make a living? Who pays her bills? If you recall, a person that initiated deletion of my wikipedia article had a lawyer referral agency. If you look at previous posts, it shows the link with the names of lawyers in that agency and flashing sign in Arabic. I wonder, if this M_ L. T___ is connected to that agency and that link. By the way, I got a translation of that flashing sign in Arabic. It was a link to a banner advertising a video of hanging od [sic] Saddam Hussein..."

I am busy with the legal action and have no time for this. Can one or two volunteers follow up on that? I want to make sure that we expose each and every incident of intimidation and harassment and report those to proper authorities. We will deal with their defamatory remarks in civil actions later.

****[personally identifiable information]***"*

See "Info on person that intimidated OK rep Dr. Ritze and denigrated me," posted by Dr. Orly Taitz at 2/17/2009 6:48 AM, available at <http://defendourfreedoms.us/2009/02/17/info-on-person-that-intimidated-ok-rep-dr-ritze-and-denigrated-me.aspx>. See also " Info on person that owns the blog, that sent hateful mail to Dr. Ritz and denigrated me and denigrated the whole expose Obama movement," Posted by Dr. Orly Taitz at 2/15/2009 4:17 PM, available at <http://defendourfreedoms.us/2009/02/15/info-on-person-that-owns-the-blog-that-sent-hateful-mail-to-dr-ritz-and-denigrated-me-and-denigrated-the-whole-expose-obama-movement.aspx> (publishing personally identifying information regarding the owner of another blog critical of Taitz's actions).

I have spoken to the attorney who was publicly identified by Taitz, and her law firm received several threatening phone calls. Taitz separately posted a request that her followers send emails to the attorney. She saved screenshots of that post, as well as harassing emails from four of Taitz's followers, and advised that she is willing to share them with the Disciplinary committee upon request. For this reason, I am filing this Complaint anonymously.

2. In response to radio talk show host Michael Medved's critical statements of Taitz's actions, Taitz accused him of, among other things, defamation and slander, and threatened civil action against him. See "ORLY'S RETRACTION REQUEST AGAINST MICHAEL MEDVED," January 23, 2009, available at <http://drorly.blogspot.com/2009/01/orlys-retraction-request-against.html>.
3. See also http://drorly.blogspot.com/2008/12/four-main-cases-one-tough-road_10.html for one of several additional examples of Taitz' response to anyone critical of her actions. Her followers are armed, dangerous and zealous in protecting her interests.

J. PROHIBITION AGAINST EX PARTE CONTACT WITH JUDICIAL OFFICIALS

The Rule: Cal. R. Prof. Conduct 5-300 provides as follows:

(B) A member shall not directly or indirectly communicate with or argue to a judge or judicial officer upon the merits of a contested matter pending before such judge or judicial officer, except: (1) In open court; or (2) With the consent of all other counsel in such matter; or (3) In the presence of all other counsel in such matter; or (4) In writing with a copy thereof furnished to such other counsel; or (5) In ex parte matters.

The Complaint:

By her own accounting, Taitz has contacted two judicial officers – in person – about a case that was pending – and that she seeks reconsideration of – during the month of March 2009.

1. On **March 9, 2009**, Taitz personally confronted US Supreme Court Justice Scalia to discuss a case that had been dismissed and to advocate that he accept a motion for reconsideration. Ms. Taitz's own description of this meeting can be found in multiple posts on her website including. For example, in a recent communication to the FBI, US Attorney General, and Secret Service, Ms. Taitz publicly asserted as follows:

*"On March the 9th I saw Associate Justice of the Supreme Court Antonin Scalia at the book signing ceremony and while he was signing two books that I purchased, I asked him, why my case wasn't forwarded to the next step: oral argument on the merits. Justice Scalia had absolutely no knowledge of this case. I proceeded asking him about other similar cases, all claiming the same thing, that Obama is not eligible for presidency: Wrotnowski, Donofrio, Berg. In presence of several attorneys, law students and secret service agents justice Scalia kept saying that he didn't know anything about those cases, even though all of the plaintiffs have received notification that all of these cases were reviewed by all 9 Justices in the conferenced [sic] and all of their petitions were denied.***"*

See "Dossier #3 sent to the Director of FBI, Attorney General and the director of Secret Service," posted by Dr. Orly Taitz at 3/19/2009 6:14 AM, available at <http://defendourfreedoms.us/2009/03/19/dossier-3-sent-to-the-director-of-fbi-attorney-general-and-the-director-of-secret-service.aspx> (emphasis added); see also, e.g., "Meeting with Scalia and coordinated cyber attack," " Posted by Dr. Orly Taitz at 3/10/2009 6:39 AM, available at <http://defendourfreedoms.us/2009/03/10/meeting-with-scalia-and-coordinated-cyber-attack.aspx>; Motion to Reconsider Lightfoot v. Bowen, posted on 3/12/2009, available at <http://defendourfreedoms.org/motiontoreconsiderLightfootvBowen.htm>.

2. On **March 13, 2009**, Taitz personally confronted US Supreme Court Chief Justice Roberts to discuss a case that had been dismissed, accuse unnamed Supreme Court employees of "illegal activities," and to advocate that he accept a motion for reconsideration. She also submitted "dossiers" of information relating to her case to the Chief Justice. Ms. Taitz's own description of this meeting can be found in multiple posts on her website, on which Taitz recounted the incident as follows:

"After the lecture the audience was told, that they can ask questions, give their name and present a shot question. I was the first to run to the microphone and told Roberts. Are you aware that there is criminal activity going on in the Supreme Court of the United States. I have submitted my case Lightfoot v Bowen to you. You agreed to hear it in the conference of all 9 Justices on January 23. Your clerk, Danny Bickle, [sic] on his own accord refused to forward to you an important supplemental brief, he has hidden it from you and refused to post it on the docket. Additionally, my case was erased from the docket, completely erased one day after the inauguration, only two days before it was supposed to be heard in the conference. Outraged citizens had to call and demand for it to be posted. On Monday I saw Justice Scalia and he had absolutely no knowledge of my case, that was supposedly heard in conference on January 23rd. It is inexplicable, particularly knowing that roughly half a million

American citizens have written to him and to you Justice Roberts demanding that you hear this issue of eligibility of Barack Hussein Obama aka Barry Soetoro to be the President of the United States." At that point I have shown to Roberts a stack of papers, that I held. Those were my pleadings and printouts that I got from WorldNetDaily. It contained your names, names of about 350,000 that signed the petition. (there were others that have written individual letters,) . Roberts stated "I will read your documents, I will review them. Give them to my Secret Service Agent and I will review them". His Secret Service Agent approached me and stated " Give me all the documents, I promise you Justice Roberts will get them". I had a full suitcase of documents. The agent went to look for a box, he found a large box to fit all the documents, he showed me his badge, and introduced himself as Gilbert Shaw, secret Service Agent assigned fto [sic] the security of Chief Justice Roberts."

See, "I Did It," posted by Dr. Orly Taitz at 3/14/2009 5:47 AM, available at <http://defendourfreedoms.us/2009/03/14/i-did-it.aspx>. An audio of the incident (which is not consistent with Taitz's recounting) is available at http://media.spokesman.com/audio_clips/2009/03/robertstaitz.mp3. A video of the incident is available at <http://www.youtube.com/watch?v=6fAEFbgkpWg>.

Taitz followed up on her encounter with a letter to Chief Justice Roberts n March 27, 2009, in which she stated:

*"This is to remind you that on 03.13.09. I have presented you with the motion for reconsideration in Lightfoot v Bowen, Quo Warranto in Easterling et al v Obama et al and a 164 page dossier of suspected illegal and criminal activity surrounding Mr. Obama and his supporters, that was written on 03.01.09 and sent on Attorney general Holder on 03.03.09. In front of 1200 students and faculty of the University of Moscow, Idaho you agreed to review those documents. This is a matter of National Security and National urgency and as of yet there was no response from you or Attorney General Holder, nor Robert Mueller, Director of FBI, that was copied on this dossier. ***"*

See also, "Letter to Chief Justice Roberts 03.26.09," posted by Dr. Orly Taitz at 3/26/2009 7:38 AM, available at <http://defendourfreedoms.us/2009/03/26/letter-to-chief-justice-roberts-032609.aspx>

K. UNAUTHORIZED PRACTICE OF LAW IN ANOTHER JURISDICTION

The Rule:

State Bar Rule of Professional Conduct 1-300(B) states:

A member shall not practice law in a jurisdiction where to do so would be in violation of regulations of the profession in that jurisdiction.

The Complaint:

On **March 28, 2009**, she "presented the case" before a "Citizens Grand Jury" of 25 people in Stockbridge, Georgia, who then issued an indictment of President Obama on charges of fraud. The

"indictment" was then "served" on the U.S. Attorney for the Northern District of Georgia, and on the Georgia Attorney General, on Georgia's Speaker of the House, and on Georgia's President of the Senate. <http://www.riseupforamerica.com/index.html>

She apparently also plans to "do the presentation," as if a prosecutor, at the "Illinois Citizen's Federal Grand Jury" on May 2. <http://americangrandjury.org/grand-jury-updates-from-georgia-and-illinois> She is acting as a sort of "National Prosecutor" at these wholly unlawful "Citizens Grand Juries," and more will surely follow.

On **April 4, 2009**, Taitz appeared at the Knob Creek Machine Gun Shoot, in West Point, Kentucky. Her account of what she did is as follows:

At the show we got a booth and together with the first Citizens Grand Jury Foreman, Mr. Carl Swensson, we presented a case for fraud perpetrated by Obama upon American Citizens. Within a few hours 20 new military plaintiffs signed up for my legal actions. Over 300 have signed indictments. We currently have 25 grand Jurors indictments from KY, OH, TN, GA.

See <http://defendourfreedoms.us/2009/04/05/from-ky.aspx>

Photographs of her at the Machine Gun Shoot and a written news account are available at <http://washingtonindependent.com/37511/at-gun-show-conservatives-panic-about-obama> and <http://washingtonindependent.com/37360/scenes-from-the-real-america>, and a flyer she handed out to the public is available at http://washingtonindependent.com/wp-content/uploads/2009/04/1664_0099.jpg. While the many outright lies contained in this flyer, if produced by a private citizen, would probably be protected by the First Amendment, when promulgated by an attorney, it further violates the duty to employ only those means **only as are consistent with truth**

Moreover, Taitz is not licensed to practice law in the State of Kentucky. If she truly engaged new clients, she violated Kentucky's statute prohibiting unauthorized practice of law.

Conclusion

By her actions, Attorney Taitz is lending apparent legitimacy to the movement to unlawfully unseat the President of the United States, actively encouraging unlawful activity on the part of her followers, expending effort in spreading dishonest claims of law and fact, and specifically, violating the California Rules of Professional Conduct.

Your assistance is requested in investigating these matters.

Case Number(s) of Suit(s)

- Keyes v. Bowen, No. 34-2008-80000096-CU-WM-GDS, Superior Ct. Cal, Sacramento, Petition for Writ of Mandate filed Nov. 13, 2008; Amended Petition for Writ of Mandate filed Feb. 23, 2009. Court order sustaining demurrors and quashing subpoenas filed Mar. 23, 2009 (available online at <https://services.saccourt.com/publicdms2/DefaultDMS.aspx>).
- Lightfoot v. Bowen, No. S16869 (Cal. Supreme Court, filed Dec. 3, 2008)
- Lightfoot v. Bowen, Application 08A524 (U.S. Supreme Court, filed Dec. 12, 2008). (Docket available at <http://origin.www.supremecourtus.gov/docket/08a524.htm>)
- Keyes v. Obama, No. SACV09- 82 DOC (ANX) (C.D. Cal., filed January 20, 2009),⁶

See also

- "Dossiers" submitted by Taitz to the Supreme Court and/or other federal and state law enforcement officials. Dossiers #1, 2, and 4 are available for download at <http://defendourfreedoms.us/2009/03/19/dossiers-and-getting-the-word-out.aspx>.
- Demand for Quo Warranto Actions submitted by Taitz to US Attorney Generals, available at <http://defendourfreedoms.us/2009/03/29/quo-warranto--united-states-attorney-jeffrey-a-taylor.aspx>;

⁶ This complaint is available on available on PACER (Case No. 8:2009cv00082) and at <http://www.obamaconspiracy.org/wp-content/uploads/2009/02/keyesvobamacomplaint.pdf>.