

IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT
IN AND FOR LEON COUNTY, FLORIDA

MICHAEL C. VOELTZ,
Plaintiff,

Case No.: 2012 CA 003857

vs.

BARACK HUSSEIN OBAMA, et. al.
Defendants.

**PLAINTIFF'S MOTION AND MEMORANDUM IN SUPPORT
THEREOF FOR TEMPORARY INJUNCTION**

Plaintiff Michael Voeltz, by and through his undersigned counsel, pursuant to Rule 1.610, Florida Rules of Civil Procedure, files this Motion for Temporary Injunction and Memorandum in Support Thereof.

INTRODUCTION

On November 6, 2012 the state of Florida held its 2012 General Election. On November 10, 2012 Defendant Barack Hussein Obama was declared the official winner of the Florida General Election. Yet Defendant Obama has never established his eligibility for the presidency of the United States. Indeed, neither Defendant Obama, nor the Democratic Party of Florida has even stated that Defendant Obama is a "natural born citizen." The only evidence of Defendant Obama's alleged birth within the United States has come in the form of a belatedly filed electronic version of a claimed long-form birth certificate posted on the internet. However, there has been evidence to show that this "birth certificate" has either been altered or is entirely fraudulent. No physical, paper copy has ever been presented to establish that Defendant Obama was indeed born within the United States. The only evidence on the record shows that he was

not born within the United States. Thus, the uncontroverted evidence on the record shows that Defendant Obama was not born in the United States and cannot qualify as a "natural born citizen" eligible to be president under any circumstances.

Yet even if his purported "birth certificate" is to be believed, Defendant Obama was born to a mother who was a citizen of the United States, and a father who was a Kenyan citizen. The U.S. Constitution requires that all who serve as President of the United States must be "natural born citizen[s]." The Supreme Court has defined this term to mean a child born to two citizen parents. Since Defendant Obama was not born to both parents who were citizens of the United States, he is not a "natural born citizen" as required by the U.S. Constitution.

Under either scenario, it is clear that Defendant Obama has not established eligibility for the Office of the President of the United States, and it is evident that he may not, under any circumstance, establish his eligibility. Instead, he has defrauded the people of Florida and the nation.

On January 6, 2013 the Presidential Electors for the state of Florida are scheduled to attend a joint session of Congress during which the entirety of the Presidential Electors are set to cast their votes for the President of the United States. If the total number of electoral votes reaches 270 or higher, a candidate is declared the winner of the 2012 Presidential Election and that person will be inaugurated on January 20, 2013 to serve a four year term.

Yet as set forth in Plaintiff's Complaint and his Response in Opposition to Defendants' Motions to Dismiss, Plaintiff has challenged the election of Defendant Barack H. Obama to the Office of President of United States pursuant to the Florida Contest of Elections Statutes, Section 102.168, *et seq*, on the basis that he is ineligible for that office.

Plaintiff now files this Motion For Temporary Injunction in order to prevent the Florida Presidential Electors from casting their votes (or nullify votes that have been cast) for Defendant Barack H. Obama before it can be established that he is indeed a "natural born citizen" as required by the U.S. Constitution for eligibility to the Office of President of the United States.

Plaintiff respectfully requests that this temporary injunction be granted immediately, and that it stay in effect until such a time as Defendant Barack. H. Obama shows his bona fides to be eligible for the Office of President of the United States, and that he has not defrauded the people of Florida and the nation.

THE LAW

A temporary injunction requires: (1) a likelihood of irreparable harm; (2) the unavailability of an adequate remedy at law; (3) a substantial likelihood of success on the merits; and (4) public interest considerations. *Naegele Outdoor Advertising Co. Inc. v. City of Jacksonville*, 659 So.2d 1046, 1047 (Fla. 1995). It is within the discretion of the trial court to grant the injunction. *Precision Tune Auto Care, Inc. v. Radcliff*, 731 So.2d 744, 745 (Fla. 4th DCA 1999). In this case, it is clear that the facts weigh heavily in favor of the granting of a temporary injunction, and are more than compelling especially since voters rights, which are sacrosanct, are involved.

Plaintiffs Will Suffer An Irreparable Injury.

Irreparable injury is an injury which is of a peculiar nature, so that compensation in money cannot atone for it. *Mullinix v. Mullinix*, 182 So. 2d. 268 (Fla. Dist. Ct. App. 4th Dist. 1966). This element is more than clearly met. Plaintiff is not seeking money damages, nor is

money damages the appropriate remedy. Once the President of the United States is inaugurated, no amount of money damages can repair the harm that is done or undue the election. If Defendant Obama is declared ineligible then the United States may fall into a constitutional crisis the likes of which this country has never seen. This court must respectfully act to protect the rights of the voters, both in Florida and in the rest of the United States. The right to vote is the most sacred of rights. Our Founding Fathers pledged their honor, sacred futures, and risked and gave their lives to create a free nation of laws and not of men. To deny Plaintiff, and other voters of this state, the right to challenge a presidential election would be a failure to protect this right and must not happen.

There is No Adequate Remedy at Law to Protect Plaintiff's Interests.

As set forth above, Plaintiff has no adequate remedy at law. Once the Presidential Electors and the Electoral College cast their votes, Plaintiff can never be made whole again. If Defendant Obama is found to be ineligible, which is likely to happen since there is no evidence, either on the record or otherwise that Defendant Obama was born in the United States to U.S. citizen parents, that Plaintiff's vote in the 2012 Presidential Election will be nullified.

Plaintiff Has A Substantial Likelihood Of Success On The Merits.

Incorporated herein, Plaintiff has submitted in his pleadings multiple sworn affidavits that have demonstrated that Defendant Obama's birth certificate and other identifying documents are fraudulent or altered and that Defendant Obama was obviously not born in the United States or its territories. Exhibit 1. Defendants have submitted no contrary affidavits or any other forms of

evidence of the authenticity of Defendant Obama's birth records and his having been born in the United States or its territories.

Even if Defendant Obama's birth records are authentic, which they are not, Defendant Obama still cannot be a "natural born citizen" because he was not born to two U.S. citizen parents. The U.S. Supreme Court has defined "natural born citizen" as one born to two U.S. citizen parents. *Minor v. Happersett*, 88 US 162, 167 (1875). In addition, as set forth in Plaintiff's Response in Opposition to Defendants Motions to Dismiss, this definition of "natural born citizen," being born in the United States with two U.S. citizen parents, was the common definition as used during that era.

"Natural born citizen" is a distinct and separate term of art that cannot be defined by breaking it down into constituent words. *See Sullivan v. Stroop*, 496 U.S. 478, 483 (1990). Thus "born a U.S. citizen" cannot be construed to mean natural born citizen, nor has any U.S. Supreme Court holding ever said as much. The adoption of a "term of art" implies the adoption of the entire body of law from which it came. *See Morissette v. United States*, 342 U.S. 246, 263 (1952). The separate term of art was intended specifically to prevent the danger of foreign influence.

The Founding Fathers and Framers of the U.S. Constitution were very concerned about the danger of foreign influence undermining American society, so much so, that John Jay wrote five Federalist Papers on the dangers of foreign influence (#2-6), and George Washington warned direly about it in his "Farewell Speech" in 1796:

"Against the insidious wiles of foreign influence (I conjure you to believe me, fellow-citizens) the jealousy of a free people ought to be constantly awake, since history and experience prove that foreign influence is one of the most baneful foes of republican government".

In order to protect and safeguard against this foreign influence, the Founding Fathers and Framers placed within the U.S. Constitution the unique requirement that the President of the United States, the highest office in the land, be a "natural born citizen." The term "natural born citizen" was well established at the time the U.S. Constitution was drafted and enacted, coming from the law of nations as compiled and set forth in the historic treatise the "Law of Nations," a treatise crafted by the renowned Emmerich de Vattel, and which the framers consulted and relied upon in crafting and enacting the U.S. Constitution.

In a section titled "Of the Citizens and Natives" the "Law of Nations" confirmed of the difference between citizens and natural born citizens as follows.

“The citizens are the members of the civil society; bound to this society by certain duties, and subject to its authority, they equally participate in its advantages. The natives, or **natural-born citizens, are those born in the country, of parents who are citizens.**”

"Law of Nations," Book 1, Chapter 19, § 212 (emphasis added). Vattel went on to clarify and confirm, the **“country of the father is the country of the son.”** *Id.*

Not coincidentally, the U.S. Supreme Court in *The Venus*, 12 U.S. 253 (1814), Justice John Marshall, in a case entirely decided by the legal concepts of the law of nations, directly quotes the above definition by Vattel almost verbatim. Justice Marshall wrote:

“Vattel, who, though not very full to this point, is more explicit and more satisfactory on it than any other whose work has fallen into my hands, says "The citizens are the members of the civil society; bound to this society by certain duties, and subject to its authority, they equally participate in its advantages. The natives or indigenes are those born in the country of parents who are citizens. Society not being able to subsist and to perpetuate itself but by the children of the citizens, those children naturally follow the condition of their fathers, and succeed to all their rights.”

The Venus, 12 US 253, 289 (1814). Justice Marshall went on to explain:

“The writers upon the law of nations distinguish between a temporary residence in a foreign country for a special purpose and a residence accompanied with an intention to make it a permanent place of abode. The latter is styled by Vattel "domicile," which he defines to be, "a habitation fixed in any place, with an intention of always staying there." Such a person, says this author, becomes a member of the new society, at least as a permanent inhabitant, and is a kind of citizen of an inferior order from the native citizens, but is nevertheless united and subject to the society without participating in all its advantages”.

Id. at 278. Thus, *The Venus* stands for the proposition that allegiance to one's country cannot be established by domicile because it is easily disintegrated when a person moves back to his native country. The Framers wanted a solid bond to one's country. Citizenship through this temporary allegiance cannot be what the Framers were intending when requiring the future president to be a "natural born citizen," for the purpose of the prevention of foreign influence. The Framers desired and mandated that a deep abiding allegiance to the United States for the future president must be had, as this person would be the Commander In Chief of the U.S. Armed Forces. They were looking for allegiance derived from at least naturalized U.S. citizen parents, on the standing of a "Native," who had legally thrown off native allegiances and pledged sole allegiance to their new nation, not the temporary allegiance of inhabitants, simply changed by moving domicile.

The definition that a natural born citizen was one born in the country with two citizen parents, was the prevalent view of the time. In his landmark treatise "A Treatise on Citizenship," following the law of nations codified in Vattel's "Law Of Nations," Alexander Peter Morse definitively set forth and reiterated the accepted law on "natural born citizen," **"A citizen, in the largest sense, is any native or naturalized person who is entitled to full protection in the exercise and enjoyment of the so-called private rights. The natural born, or native is one who is born in the country, of citizen parents."** Morse, Alexander Peter, *A Treatise on Citizenship* pp. xi (1881). **"Under the view of the law of nations, natives, or natural born**

citizens, are those born in the country, of parents who are citizens." *Id.* at §7 (Emphasis added).

Even more, there is clear evidence the Founding Fathers and Framers studied, utilized, and incorporated the law of nations codified in Vattel's "Law of Nations" in the crafting and enacting of the U.S. Constitution, and frequently consulted Vattel's "Law of Nations" thereoften for guidance.

In a letter from Benjamin Franklin to Charles Dumas, editor of the 1775 edition of the Law of Nations, Franklin specifically thanks Dumas for providing him with copies of the "Law of Nations." This founding father and framer wrote:

"I am much obliged by the kind present you have made us of your edition of Vattel. It came to us in good season, when the circumstances of a rising state make it necessary frequently to consult the law of nations. Accordingly that copy, which I kept, (after depositing one in our own public library here, and sending the other to the College of Massachusetts Bay, as you directed,) **has been continually in the hands of the members of our Congress, now sitting, who are much pleased with your notes and preface, and have entertained a high and just esteem for their author.**"

This letter of Benjamin Franklin is a certified copy from the Library of Congress and has been submitted on the record. Franklin, who was instrumental in the drafting and enacting of the Constitution, provides confirmation that those drafting the U.S. Constitution were "frequently consulting" the law of nations codified in "Law of Nations." The Framers then knew of and incorporated the definition of "natural born citizen" which was provided twice within the "Law of Nations."

Not surprisingly, a direct reference to legal incorporation of the law of nations as codified in Vattel's "Law of Nations" also appeared in the U.S. Constitution itself. In Article 1, Section

8, the U.S. Constitution granted enumerated powers for the legislative branch. One of these enumerated powers was "To define and punish Piracies and Felonies committed on the high seas, and **Offenses against the Law of Nations**;" U.S. Constitution, Art. I, s. 8, c. 10 (emphasis added). The Framers took care in incorporating and recognizing the law of nations, and providing Congress with a means of legislating crimes committed against it.

Even after the U.S. Constitution was written, Vattel's "Law of Nations" continued to be consulted and utilized by the leaders of the United States. On October 5, 1789, President George Washington borrowed from the New York Society Library a copy of Vattel's "Law of Nations," as evidenced by his entry in the ledger. An article with the picture of the ledger has been submitted on the record along with a confirmation by the head Librarian of the New York Society Library that the article is accurate.

Issuance of a Temporary Injunction Would Not Be Adverse to the Public Interest.

A temporary injunction would be in the public interest because it would enable the public to, for the first time, determine whether Defendant Obama is eligible for the Office of President of the United States. It is in the public interest of the voters and the people of the United States to have a legitimate president, one who is a natural born citizen and is eligible for the office according the U.S. Constitution, the supreme law of this land. It is in the public interest to have an honest election, with eligible candidates, so that the voters of the United States can decide for themselves based on honest facts about the qualifications and backgrounds of those running for office.

Florida's Challenge of Elections Works in Conjunction With the U.S. Constitution

Defendants disingenuously allege that for Florida to determine eligibility would be contrary to the U.S. Constitution, specifically the Twentieth Amendment and 3 USC §15. This argument is non-meritorious and non-sensical. The Twentieth Amendment simply states the procedure "*if* the President elect shall have failed to qualify." There is no mention about the method of qualification, only that the electors shall meet and vote by ballot.

Nor is Florida law interfering with presidential electors. The Florida law allows challenges to those who are nominated or elected. These actions occur *before* the electors cast their votes, and are simply in place to ensure that the presidential elector votes for an eligible candidate. It would surely be possible for a disqualified candidate to be declared ineligible, leaving the electors with the duty to vote for the remaining candidates. This is precisely the outcome Plaintiff, a registered member of the Democratic Party, and Florida law seek to avoid.

A presidential election is not, ipso facto, an exclusively federal process. In fact, electors, those chosen to ultimately select the President, were to be designated exclusively by the *state* legislatures. Article II, section 1, clause 2. Presidential elections are thus a cooperative and complementary effort of both the state and federal government. The state of Florida, through its legislative branch, is simply ensuring that eligible candidates, for *all* elected offices, are chosen.

CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests that a temporary injunction be granted preventing (or now nullifying any votes that have been cast due to this court's inaction contrary to law) the Presidential Electors for the state of Florida from casting their Electoral Votes for Defendant Obama until and only if Defendant Obama has proven that he is a "natural

born citizen" as required by the U.S. Constitution. Plaintiff has presented a proper challenge pursuant to Section 102.168, Florida Statutes and this court must respectfully determine the eligibility of Defendant Obama for the Office of the President of the United States.

Plaintiffs respectfully reiterate their request for an evidentiary hearing to be held during the week of December 24, 2012 through December 28, 2012 (excluding Christmas Eve, Christmas Day, and New Years) on this Motion For Temporary Injunction. The affiants are also available who have provided to the Court previously their sworn testimony that Defendant Obama's birth certificate and other identifying documents are fraudulent, and they will rightly submit to being cross examined on their serious and scholarly findings that Defendant Obama is ineligible for the Office of the President of the United States, and has defrauded the state of Florida and the nation.

Dated: December 20, 2012

Respectfully submitted,

/s/ Larry Klayman
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Email: leklayman@gmail.com

Counsel for Plaintiff

CERTIFICATION

I HEREBY CERTIFY that a true copy of the foregoing Motion For Temporary Injunction has been filed electronically and served by email this 20th day of December, 2012 upon the following:

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Exhibit 1

State of Arizona)
) ss.
County of Maricopa)

AFFIDAVIT

I, the undersigned, being first duly sworn, do hereby state under oath and under penalty of perjury that the facts are true:


1. I am over the age of 18 and am a resident of Arizona. The information contained in this affidavit is based upon my own personal knowledge and, if called as a witness, could testify competently thereto. I am an investigator with Maricopa County Sheriff's Cold Case Posse.
2. In August 2011, approximately 250 members of the Surprise, Arizona, Tea Party, who are residents of Maricopa County, presented a signed petition asking Sheriff Joe Arpaio to undertake an investigation to address concerns regarding President Barack Obama's long-form birth certificate released by the White House on April 27, 2011.
3. Residents of Maricopa County were concerned that document released was suspected to be a computer-generated forgery, not a scan of an original 1961 paper document, as represented by the White House when the long-form birth certificate was made public.
4. The Tea Party members petitioned under the premise that if a forged birth certificate was utilized to obtain a position for Barack Obama on the 2012 Arizona presidential ballot, their rights as Maricopa County voters could be compromised.
5. In October 2011, Sheriff Arpaio commissioned the Maricopa County Sheriff's Office Cold Case Posse, which is comprised of former law enforcement investigators and practicing attorneys, to investigate President Barack Obama's long-form birth certificate released by the White House on April 27, 2011. The purpose of this investigation was to determine if the document was, in fact, authentic.
6. As lead investigator for the Cold Case Posse, I agreed to Sheriff Arpaio's request to undertake the investigation into President Obama's birth certificate and his eligibility to be president.

7. In February, 2012, Cold Case Posse investigators advised Sheriff Joe Arpaio that the forgers most likely committed two crimes: first, in fraudulently creating a forgery that the White House characterized, knowingly or unknowingly, as an officially produced governmental birth record; and second, in fraudulently presenting to the residents of Maricopa County and to the American public at large, a forgery the White House represented as “proof positive” of President Obama’s authentic 1961 Hawaii long-form birth certificate. These conclusions were based upon, but not limited to, input from numerous experts in the areas of typesetting, computer generated documents, forensic document analysis and Adobe computer programs, as well as, review of Hawaii state law, Hawaii Department of Health policies and procedures, and comparisons with numerous other birth records.
8. The Cold Case investigators further determined that the Hawaii Department of Health has engaged in what Sheriff’s investigators believe is a systematic effort to hide from public inspection whatever original 1961 birth records the Hawaii Department of Health may have in their possession, including changing policies and procedures and denying valid Freedom of Information Act (FOIA) requests for information related to the 1961 birth records (said requests were not for any birth records).
9. Among the evidence released at the March 1, 2012, press conference were five videos the Cold Case Posse produced to demonstrate why the Obama long-form birth certificate is suspected to be a computer-generated forgery.
10. The videos provide a true and correct point-by-point illustration of the investigators’ conclusion that the features and anomalies observed on the Obama long-form birth certificate were inconsistent with features produced when a paper document is scanned, even if the scan of the paper document had been enhanced by Optical Character Recognition (OCR) and optimized.
11. Additionally, the videos demonstrated that the Hawaii Department of Health Registrar’s name stamp and the Registrar’s date stamp were computer-generated images imported into an electronic document, as opposed to actual rubber stamp imprints inked by hand or machine onto a paper document. Based upon this, the document published on the White House website, is, at a minimum, misleading to the public as it has no legal import and cannot be relied on as a legal document verifying the date, place and circumstance of Barack Obama’s birth.

12. The investigators also chronicled a series of inconsistent and misleading representations that various Hawaii government officials have made over the past five years regarding what, if any, original birth records are held by the Hawaii Department of Health.

13. The Cold Case Posse's law enforcement investigation into Barack Obama's birth certificate and his eligibility to be president is continuing, as additional information has been obtained and developed supporting the current findings of the Cold Case Posse. As soon as that information is properly sourced and verified, that additional information will be released to the public at the direction of Maricopa County Sheriff Joe Arpaio.

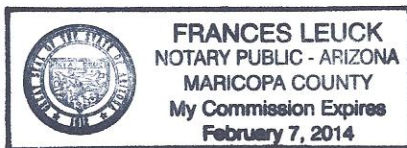
Executed this 11 day of June, 2012, in
Maricopa County, Arizona.



Michael Zullo

Sworn to and subscribed before me this
11th day of June, 2012.





State of Arizona)
) ss.
County of Maricopa)

AFFIDAVIT

I, the undersigned, being first duly sworn, do hereby state under oath and under penalty of perjury that the facts are true:

1. I am over the age of 18 and am a resident of Arizona. The information contained in this affidavit is based upon my own personal knowledge and, if called as a witness, could testify competently thereto. I am the duly elected Sheriff of Maricopa County, Arizona, and I have been a law enforcement officer and official, in both state and federal government, for 51 years.
2. In August of last year, a group of citizens from the Surprise Arizona Tea Party organization met with me in my office and presented a petition signed by approximately 250 residents of Maricopa County, asking if I would investigate the controversy surrounding President Barrack Obama’s birth certificate authenticity and his eligibility to serve as the President of the United States.
3. This group expressed its concern that, up until that point, no law enforcement agency in the country had ever gone on record indicating that they had either looked into this or that they were willing to do so, citing lack of resources and jurisdictional challenges.
4. The Maricopa County Sheriff’s Office is in a rather unique position. Under the Arizona Constitution and Arizona Revised Statutes, as the elected Sheriff of Maricopa County, I have the authority to request the aid of the volunteer posse, located in the county, to assist me in the execution of my duties. Having organized a volunteer posse of approximately 3,000 members, I, as the Sheriff of the Maricopa County Sheriff’s Office, can authorize an investigation go forward to answer these questions at virtually no expense to the tax payer.
5. The Cold Case posse agreed to undertake the investigation requested by the 250 citizens of Maricopa County. This posse consists of former police officers and attorneys who have worked investigating the controversy surrounding Barack Obama. The investigation mainly focused on the electronic document that was

presented as President Obama's long form birth certificate to the American people and to citizens of Maricopa County by the White House on April 27, 2011.

6. The investigation led to a closer examination of the procedures regarding the registration of births at the Hawaii Department of Health and various statements made by Hawaii government officials regarding the Obama birth controversy over the last five years.
7. Upon close examination of the evidence, it is my belief that forgery and fraud was likely committed in key identity documents including President Obama's long-form birth certificate, his Selective Service Registration card, and his Social Security number.
8. My investigators and I believe that President Obama's long-form birth certificate is a computer-generated document, was manufactured electronically, and that it did not originate in a paper format, as claimed by the White House. Most importantly, the "registrar's stamp" in the computer generated document released by the White House and posted on the White House website, may have been imported from another unknown source document. The effect of the stamp not being placed on the document pursuant to state and federal laws means that there is probable cause that the document is a forgery, and therefore, it cannot be used as a verification, legal or otherwise, of the date, place or circumstances of Barack Obama's birth.
9. The Cold Case Posse law enforcement investigation into Barack Obama's birth certificate and his eligibility to be president is on-going. The on-going nature of the investigation is due to additional information that has come to light since we held the press conference in March, 2012. As soon as that information has been properly verified by the Cold Case Posse, I will release that information to the public.

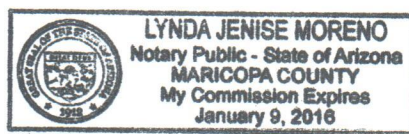
Executed this 12 day of June, 2012, in
Maricopa County, Arizona.



Joseph M. Arpaio, Maricopa County Sheriff

Sworn to and subscribed before me this
12th day of June, 2012.

Lynda Jenise Moreno



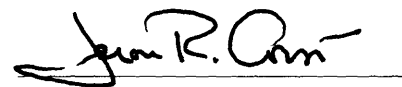
AFFIDAVIT

1. I am currently employed as a Senior Staff Reporter at WND.com.
2. On August 17, 2011, I spoke at a meeting of the Surprise, Arizona, Tea Party, where approximately 250 residents of Maricopa County, signed a petition asking Sheriff Arpaio to undertake an investigation to address concerns regarding President Barack Obama's long-form birth certificate released by the White House on April 27, 2011.
3. The following day, August 18, 2011, I met with members of the Surprise, Arizona, Tea Party with Sheriff Arpaio and his staff in Sheriff Arpaio's Maricopa County Sheriff's Office in downtown Phoenix. The Tea Party group presented the Sheriff with the petition and asked that he undertake the investigation. Sheriff Arpaio suggested he would take the request under consideration, with the possibility he might assign the investigation to the Cold Case Posse.
4. I reported the speech and the meeting with Sheriff Arpaio in an article I published in WND.com, on April 22, 2011, at <http://www.wnd.com/2011/08/336473/>.
5. In September 2011, Sheriff Arpaio agreed to assign the Obama investigation to his Cold Case Posse, headed by lead investigator Mike Zullo. I reported this in WND.com, on September 16, 2011, at <http://www.wnd.com/2011/09/345685/>.
6. At Sheriff Arpaio's request, I agreed to turn over to the Cold Case Posse all the research I conducted to write my book "Where's the Birth Certificate: The Case that Barack Obama is Not Eligible To Be President," published May 17, 2011, as well as all relevant research I conducted subsequently.
7. At Mike Zullo's request, I flew to Phoenix and met with the Cold Case Posse on Friday, October 14, 2011, and Saturday, October 15, 2011, for approximately 8 hours each day, to present the research requested.
8. My research, published and/or provided to date, reveals and shows a likelihood that key identity papers for President Obama have been forged,

including his long-form birth certificate released by the White House on April 27, 2011, and his Social Security Number.

9. Based as well on extensive research and investigation, I have written and published a book on the subject of Barack Obama's eligibility to be president of the United States and found that, at a minimum, there are significant issues of fact that are in dispute as to where he was born, Hawaii as he claims, or outside of the United States and its territories. I am incorporating into this affidavit the contents of my book: "Where's the Birth Certificate?: The Case that Barack Obama is Not Eligible to be President" which sets forth my findings, as Exhibit 1. I attest to the accuracy of my book.

Sworn to and executed under oath this 12th day of June, 2012 in Morris Plains, NJ



Jerome Corsi, Ph.D.

Sworn to and subscribed before me this
12 day of JUNE, 2012

