

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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PHILIP J. BERG, ESQUIRE,	:	
	:	
<i>Plaintiff</i>	:	
	:	
vs.	:	CIVIL ACTION NO. 08-cv-04083
	:	
BARACK HUSSEIN OBAMA, a/k/a	:	
BARRY SOETORO, a/k/a	:	
BARRY OBAMA, a/k/a	:	
BARACK DUNHAM, a/k/a	:	
BARRY DUNHAM; THE	:	
DEMOCRATIC NATIONAL	:	
COMMITTEE, THE FEDERAL	:	
ELECTION COMMISSION AND	:	
DOES 1-50, INCLUSIVE,	:	
	:	
<i>Defendants</i>	:	

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**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS**

Plaintiff Philip J. Berg, Esquire [hereinafter "Plaintiff"] submits the following Requests for Admissions to Defendant Barack Hussein Obama a/k/a Barrack Hussein Obama a/k/a Barry Obama a/k/a Barrack Dunham a/k/a Barack Dunham a/k/a Barry Dunham a/k/a Barrack Soetoro a/k/a Barack Soetoro a/k/a Barry Soetoro [hereinafter "Obama"] pursuant to Federal Rules of Civil Procedure Rule 36.

**INSTRUCTIONS**

If Obama fails to respond or object to any request within thirty (30) days of the service of the Requests, the matter shall be deemed admitted under Rule 36. As you are aware, Plaintiff has filed a Motion for Expedited Discovery requesting Admission

Responses to be filed within ten (10) days of service. If granted, the thirty (30) days herein will not apply.

As is more fully set out in Rule 36(a), the Defendant must admit or deny each Request, and, where necessary, specify the parts of each request to which it objects or cannot in good faith admit or deny. If the Defendant objects to only part of a Request, it must admit or deny the remainder of the Request. In the event that Defendant objects to or denies any Request or portion of a Request, the Defendant must state the reason for its objection or denial.

These Requests shall be deemed continuing and supplemental answers shall be required if you directly or indirectly obtain further information after your initial response as provided by Federal Rules of Civil Procedure, Rule 26(e).

Each Request solicits all information obtainable by Defendant Obama from Defendant's attorney's, investigators, agents, employees and representatives. If you answer a Request on the basis that you lack sufficient information to respond, describe any and all efforts you made to inform yourself of the facts and circumstances necessary to answer or respond.

### **DEFINITIONS**

1. The word "or" is used herein in its inclusive sense unless the context clearly requires otherwise.

2. The term "document" means and includes without limitation all correspondence, memoranda, certificates, notes, books, manuals, pamphlets, brochures, advertisements, books of account, balance sheets, financial statements, profit and loss statements, working papers, schedules, diaries, calendars, logs, time records, equipment

records, microfilms, transcripts, recordings, tapes, telexes, telegrams, files, proposals, bids, offers, contracts, agreements, change orders, worksheets, drawings, blue prints, designs, specifications, time cards, compilations, graphs, charts, bills, statements, invoices, receipts, bills of lading, shipping records, confirmations, applications, purchase orders, checks, checkbooks and other checking records, photographs, formulae, prescriptions, studies, projections, reports, computer programs, information contained in computer banks, tapes, cards, printouts and drafts to the extent they differ from the originals, and all other records and papers of any nature whatsoever.

3. Any reference to a specifically named person, corporation, Governmental Agency, State Agency or other entity and any reference generally to “person” shall include the employees, agents, representatives and other persons acting on behalf thereof or through whom the referenced person acts. The term “person” means and includes natural persons, corporations, partnerships, joint ventures, sole proprietorships, associations, trust, estates, firms and any other entity.

4. As used herein, “Plaintiff” means, unless otherwise indicated, Philip J. Berg, Esquire, as well as their agents, attorneys, representatives or any other person acting on their behalf or on behalf of any one of them.

5. As used herein, “Defendant” and “Obama”, shall be deemed to include Defendant Barack Hussein Obama a/k/a Barrack Hussein Obama a/k/a Barry Obama a/k/a Barrack Dunham a/k/a Barack Dunham a/k/a Barry Dunham a/k/a Barrack Soetoro a/k/a Barack Soetoro a/k/a Barry Soetoro, as well as his agents, attorneys, representatives or any other person acting on his behalf or on behalf of any one of them.

**FIRST SET OF ADMISSIONS**

**Admissions, Request No. 1.**            Admit you were born in Kenya.

**Response:**

**Admissions, Request No. 2.**            Admit you are a Kenya “natural born” citizen.

**Response:**

**Admission, Request No. 3.**            Admit your foreign birth was registered in the State  
of Hawaii.

**Response:**

**Admissions, Request No. 4.**            Admit your father, Barrack Hussein Obama, Sr.  
admitted Paternity of you.

**Response:**

**Admissions, Request No. 5.**

Admit your mother gave birth to you in Mombosa, Kenya.

**Response:**

**Admissions, Request No. 6.**

Admit your mother's maiden name is Stanley Ann Dunham a/k/a Ann Dunham.

**Response:**

**Admissions, Request No. 7.**

Admit the COLB [Certification of Live Birth] posted on the website "Fightthesmears.com" is a forgery.

**Response:**

**Admissions, Request No. 8:**

Admit you were adopted by a Foreign Citizen.

**Response:**

**Admissions, Request No. 9.**

Admit you were adopted by Lolo Soetoro, M.A. a citizen of Indonesia.

**Response:**

**Admissions, Request No. 10.**

Admit you were not born in Hawaii.

**Response:**

**Admissions, Request No. 11.**

Admit you were not born at the Queens Medical Center in Hawaii.

**Response:**

**Admissions, Request No. 12.**

Admit you were not born at Kapi'olani Medical Center for Women and Children in Hawaii.

**Response:**

**Admissions, Request No. 13.**

Admit you were not born in a Hospital in Hawaii.

**Response:**

**Admissions, Request No. 14.**

Admit you are a citizen of Indonesia.

**Response:**

**Admissions, Request No. 15.**

Admit you never took the "Oath of Allegiance" to regain your U.S. Citizenship status.

**Response:**

**Admissions, Request No. 16.**

Admit you are not a "natural born" United States citizen.

**Response:**

**Admissions, Request No. 17.**

Admit your date of birth is August 4, 1961.

**Response:**

**Admissions, Request No. 18.**

Admit you traveled to Pakistan in 1981 with your Pakistan friends.

**Response:**

**Admissions, Request No. 19.**

Admit in 1981 you went to Indonesia on your way to Pakistan.

**Response:**

**Admissions, Request No. 20.**

Admit Pakistan was a no travel zone in 1981 for American Citizens.

**Response:**

**Admissions, Request No. 21.**

Admit in 1981 Pakistan was not allowing American Citizens to enter their Country.

**Response:**

**Admissions, Request No. 22.**

Admit you traveled on your Indonesian Passport to Pakistan.

**Response:**

**Admissions, Request No. 23.**

Admit you renewed your Indonesian Passport on your way to Pakistan.

**Response:**

**Admissions, Request No. 24.**

Admit your senior campaign staff is aware you are not a “natural born” United States Citizen.

**Response:**

**Admissions, Request No. 25.**

Admit you are proud of your Kenya Heritage.

**Response:**

**Admissions, Request No. 26.**

Admit your relatives have requested changes to the portion of your birth certificate that identifies your first name.

**Response:**

**Admissions, Request No. 27.**

Admit your relatives have requested changes to the portion of your birth certificate that identifies your last name.

**Response:**

**Admissions, Request No. 28.**

Admit your relatives have requested changes to the portion of your birth certificate that identifies your place of birth.

**Response:**

**Admissions, Request No. 29.**

Admit you have requested changes to the portion of your birth certificate that identifies your first name.

**Response:**

**Admissions, Request No. 30.**

Admit you have requested changes to the portion of your birth certificate that identifies your last name.

**Response:**

**Admissions, Request No. 31.**

Admit you have requested changes to the portion of your birth certificate that identifies your place of birth.

**Response:**

**Admissions, Request No. 32.**

Admit that the document identified as your Indonesian School record from Fransiskus Assisi School in Jakarta, Indonesia, attached hereto as Exhibit "A", is genuine.

**Response:**

**Admissions, Request No. 33.**

Admit you went to a Judge in Hawaii to have your name changed.

**Response:**

**Admissions, Request No. 34.**

Admit you went to a Senator and/or Congressman or other public official in Hawaii to have your name changed.

**Response:**

**Admissions, Request No. 35.**

Admit you have had a passport issued to you from the Government of Indonesia.

**Response:**

**Admissions, Request No. 36.**

Admit the United States Constitution does not allow for a Person to hold the office of President of the United States unless that person is a “natural born” United States citizen.

**Response:**

**Admissions, Request No. 37.**

Admit you are ineligible pursuant to the United States Constitution to serve as President and/or Vice President of the United States.

**Response:**

**Admissions, Request No. 38.**

Admit you have never renounced your citizenship as it relates to your citizenship to the country of Indonesia.

**Response:**

**Admissions, Request No. 39.**

Admit you have never renounced your citizenship as it relates to your citizenship to the country of Kenya.

**Response:**

**Admissions, Request No. 40.**

Admit you are an Attorney who specializes in Constitutional Law.

**Response:**

**Admissions, Request No. 41.**

Admit Kenya was a part of the British Colonies at the time of your birth.

**Response:**

**Admissions, Request No. 42.**

Admit Kenya did not become its own Republic until 1963.

**Response:**

**Admissions, Request No. 43.**

Admit you are not a “Naturalized” United States Citizen.

**Response:**

**Admissions, Request No. 44.**

Admit you have obtained \$200 Million dollars in campaign funds by fraudulent means.

**Response:**

**Admissions, Request No. 45.**

Admit you cannot produce a “vault” (original) long version of a birth certificate showing your birth in Hawaii.

**Response:**

**Admissions, Request No. 46.**

Admit your “vault” (original) long version birth certificate shows your birth in Kenya.

**Response:**

**Admissions, Request No. 47.**

Admit the only time you have been to a Hospital in Hawaii was for check-ups or medical treatments for illnesses.

**Response:**

**Admissions, Request No. 48.**

Admit Queens Medical Center in Honolulu, Hawaii do not have any record of your mother, Stanley Ann Dunham (Obama) giving birth to you.

**Response:**

**Admissions, Request No. 49.**

Admit Kapi'olani Medical Center for Women and Children in Honolulu, Hawaii do not have any record of your mother, Stanley Ann Dunham (Obama) giving birth to you.

**Response:**

**Admissions, Request No. 50.**

Admit you were born in the Coast Province Hospital in Mombasa, Kenya.

**Response:**

**Admissions, Request No. 51.**

Admit you represented on your State Bar application in Illinois you have never used any other name other than Barack Hussein Obama.

**Response:**

**Admissions, Request No. 52.**

Admit you went by the name Barry Soetoro in Indonesia.

**Response:**

**Admissions, Request No. 53.**

Admit your Indonesian school records are under the name of Barry Soetoro.

**Response:**

**Admissions, Request No. 54.**

Admit you took an Oath to uphold the United States Constitution when admitted to the State Bar of Illinois to practice Law.

**Response:**

**Admissions, Request No. 55.**

Admit you took an Oath to uphold the United States Constitution when you were Sworn into your United States Senate Office.

**Response:**

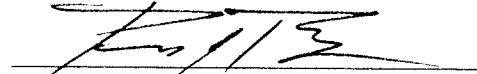
**Admissions, Request No. 56.**

Admit you hold dual citizenship with at least one other Country besides the United States of America.

**Response:**

Respectfully submitted,

Dated: September 15<sup>th</sup>, 2008



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

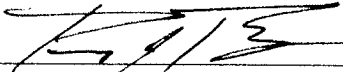
**CERTIFICATE OF SERVICE**

I, hereby certify that Plaintiff's First Set of Admissions addressed to Defendant Barack Hussein Obama were served by United States Postal Service, with postage fully prepaid this 15<sup>th</sup> day of September 2008 upon the following:

Barrack H. Obama  
713 Hart Senate Office Building  
Washington, D.C. 20510  
Fax: (202) 228-4260

Democratic National Committee (DNC)  
430 S. Capitol St. SE,  
Washington DC 20003  
Fax: (202) 863-8063

Federal Election Commission (FEC)  
999 E. Street, NW,  
Washington, DC 20463

  
\_\_\_\_\_  
PHILIP J. BERG, ESQUIRE  
*Attorney for Plaintiff*  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
(610) 825-3134

**EXHIBIT "A"**

REGISTRATION OF GRADEBOOK

No. 203.

1. The name of the pupil: Barry Soetoro
2. The place and date of birth: Honolulu 4-8-1961
3. The nation
  - a. of citizenship: Indonesia
  - b. The foreign descendants:
  - c. The ethnic group:
4. The religion: Islam
5. Address of the pupil: Menteng Dalam R001 R003
6. From which school (moved from) and what class: ???
7.
  - a. Date accepted: 1-1-1968 (January 1, 1968)
  - b. Grade: I (First grade)
8.
  - a. The name of the parents Mr. Ms.: L. Soetoro M A (Lolo Soetoro)
  - b. Occupation Job: (??? Geography ????)  
(name of the mother will only be used if father is deceased)
  - c. Address: Menteng Dalam R001 R003
9. the name of the guardian:  
(??? was filled up, ??? parents of the pupil were not available, already ????)  
because another thing )
  - b. Occupation Job:
  - c. the address: Menteng Dalam R001 R003
10. left this school:
  - a. ?? was finished, outside from the class:           The date:
  - b. ?? recieved ?? the date:           No.
  - c. ?? the school to:
11. Other information:

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

1. Nama lengkap : H. Satrio Purno L  
P

2. Tempat dan tanggal lahir : Demak 4-9-41

3. Bangsa a. Warga negara : Indonesia

b. Pendidikan : \_\_\_\_\_

c. Sekolah : \_\_\_\_\_

4. Agama : Islam

5. Alamat rumah : Blumbang Dalam 2007/Rw.02

6. Nama sekolah (jika pernah) dan kelas tempat : Taman Kanak-kanak Firdaus Demak

7. a. Ditunjuk sebagai ketua : 1-1-1964

b. Durasi di kelas : 1

8. a. Nama : H. Satrio Purno

b. Pendidikan : Peg. Dinas Geografi Div. Topo D.D.  
(tamat dan, hanya jika telah lulus menngal)

c. Alamat : Blumbang Dalam 2007/Rw.02

9. a. b. c. d. e.

(Nama dan d. ke orang tua murid tak ada, sudah meninggal atau karena hal lain)

10. a. b. c. d. e. \_\_\_\_\_

11. a. b. c. d. e. \_\_\_\_\_

A. Dalam surat : Kelas dan kelas tanggal  
Sebab Pindah

Keterangan \_\_\_\_\_

B. Tanggal, nama dan alamat tanggal No

C. Melindungi sekolah ke \_\_\_\_\_

11. Keterangan lain:

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

---

PHILIP J. BERG, ESQUIRE,	:	
	:	
<i>Plaintiff</i>	:	
vs.	:	CIVIL ACTION NO. 08-cv-04083
	:	
BARACK HUSSEIN OBAMA, a/k/a	:	
BARRY SOETORO, a/k/a	:	
BARRY OBAMA, a/k/a	:	
BARACK DUNHAM, a/k/a	:	
BARRY DUNHAM; THE	:	
DEMOCRATIC NATIONAL	:	
COMMITTEE, THE FEDERAL	:	
ELECTION COMMISSION AND	:	
DOES 1-50, INCLUSIVE,	:	
	:	
<i>Defendants</i>	:	

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**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
TO DEFENDANT BARACK H. OBAMA**

Pursuant to Federal Rule of Civil Procedure, Rule 34, Plaintiff Philip J. Berg, Esquire [hereinafter "Plaintiff"] requests Defendant Barack Hussein Obama a/k/a Barack Hussein Obama a/k/a Barry Obama a/k/a Barack Dunham a/k/a Barack Dunham a/k/a Barry Dunham a/k/a Barack Soetoro a/k/a Barack Soetoro a/k/a Barry Soetoro [hereinafter "Obama"] to produce the originals or clear, readable copies of the below listed documents and/or items. The below listed documents and/or items are to be produced at Plaintiff's office on or before thirty (30) days after the date on the Certificate of Service. As you are aware, Plaintiff has filed a Motion for Expedited Discovery requesting various dates for Production of Documents to be filed. If granted, the thirty (30) days herein will not apply. Such request is continuing up to and at the time of trial.

## DEFINITIONS

A. "You" or "your" refers to Defendant herein and to all other persons acting or purporting to act on behalf of Defendant, including agents and employees.

B. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, correspondence, notes, telegrams, telexes, advertisements, facsimiles, e-mail, or other forms of verbal and/or communicative intercourse.

C. "Documents" shall mean all written or graphic matter of every kind or description, however, produced or reproduced, whether draft or final, original or reproduction signed or unsigned, and regardless of whether approved, signed, sent, received redrafted, or executed, including but not limited to: written communications, letters, correspondence, facsimile, e-mail, memoranda, minutes, notes, films, recordings, of any type, transcripts, contracts, agreements, purchase or sales orders, memoranda of telephone conversations of personal conversations, diaries, desk calendars, interoffice communications, reports, studies, bills, receipts, checks, checkbooks, invoices, requisitions or material similar to any of the foregoing however denominated, by whomever prepared, and to whoever addressed, which are in your possession, custody or control or to which you have had or can obtain access.

D. "Persons" means an individual, corporation, partnership, trust, governmental agency, state agency, associations, company, organization, or any form of a business or commercial entity.

E. “Identify” when used with respect to an individual, means to state: (1) their name; (2) business affiliation and official title and/or position; and (3) their last known residential and business address.

F. “Identify” when used with respect to a document, means to state: (1) the type of document (e.g. letter, memorandum, hand-written note, facsimile, e-mail, certificate); (2) its date of origin or creation; (3) its author and addressee; (4) its last known custodian or locations; and (5) a brief description of its subject matter and size. In lieu of identifying any document(s), you may attach a copy of it to your answer, indicating the question to which it is responsive.

G. “Identify” when used with respect to a company or other business entity, means to state: (1) the company’s legal name, any former names, and the name under which it trades or does business; (2) the address of its principal place of business; and (3) the identity of its chief executive officer.

H. “Relate to” means: consist of, refer to, reflect or be in any way logically connected with the matter discussed.

I. The period of time encompassed by these requests shall be from the date of Obama’s birth to the date of answering, unless otherwise indicated. Note, this request is continuing up to and at the time of trial.

J. For purposes of the Rule, a statement includes:

- (1) A written statement, signed or otherwise adopted or approved by the person making it, or
- (2) A stenographic, mechanical, electronic, video-graphic or other recording, or a transcript thereof, which is a substantially verbatim

recital of an oral statement by the person making it and contemporaneously recorded.

K. “And “, “or”, and “and/or” shall be construed as broadly as possible so that information otherwise within the scope of the request is not excluded.

**CLAIMS OF PRIVILEGE:**

If an objection to a request is based upon a claim of privilege or attorney work product, identify each document so withheld. With regard to all documents or portions of documents withheld on this basis, identify its creator, provide a brief description of the documents, and state with particularity the basis of the claim of privilege, work product, or other ground of nondisclosure.

**LOST OR DESTROYED DOCUMENTS:**

If any document requested has been lost, discarded, or destroyed, identify such document. State the type of document, its date, the approximate date it was lost, discarded, or destroyed, the reason it was lost, discarded or destroyed, a summary of its substance, and the identity of each person having knowledge of the contents thereof. If a Governmental or State Document, state the Governmental Agency and/or State Agency, including address and telephone number, who has the control, custody and care of the original document(s).

**CONTINUING OBLIGATION:**

This demand is deemed to be continuing in nature, and in the event you become aware of or acquire in your possession, custody, or control additional responsive documents, you are requested promptly to produce such additional documents for inspection and copying.

**DOCUMENTS REQUESTED:**

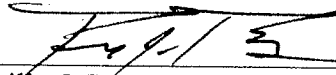
1. A genuine certified copy of your “vault” (original long version) birth certificate, from Kenya, Indonesia and/or Hawaii;
2. Any and all Registrations of your Birth, including but not limited to Canada, Kenya, the British Colonies and the United States
3. A Certified copy of the U.S. Oath of Allegiance you were required to take to regain any U.S. citizenship status;
4. Any and all passport records and/or files, including but not limited to applications and travel logs to your Indonesian passport, Kenya passport, British Colonies passport, Pakistan passport and U.S. Passport;
5. Any and all adoption records, including but not limited to your adoption by Lolo Soetoro, M.A. and your grandparents, Stanley Dunham and Madelyn Dunham;

6. A Certified copy of any and all documents pertaining to a request to change your name, including but not limited to Court filings, Applications, Certifications, Court Orders, etc.
7. A Certified copy of any and all applications for a social security number to be issued to you and requests for duplicate social security cards;
8. A Certified copy of any background checks conducted by the Federal Bureau of Investigations (FBI), Central Intelligence Agency (CIA) and/or any federal/state/local law enforcement personnel or security companies;
9. A copy of your entire presidential file pertaining to being vetted;
10. Certified copies of any and all records and applications filled out and submitted to Occidental College, Harvard College, Harvard Law School, University of Chicago, Columbia and any other colleges which you applied at and attended and taught;
11. Certified copies of all applications, requests, financial statements, etc. for student loans, grants and scholarships to cover school and living expenses;
12. A copy of all college thesis papers from Occidental College, Harvard College, Harvard Law School, Columbia, University of Hawaii and any other colleges which you applied and/or were registered with;

13. Any and all essays pertaining to your life, background, heritage and childhood;
14. Any and all Baptismal records and/or certificates;
15. A detailed list and copies of membership of all clubs, organizations, fraternities, groups and affiliations;
16. A copy of your Selective Service Registration; and
17. Any and all Harvard Law Review articles which you wrote.

Respectfully submitted,

Dated: September 15, 2008

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

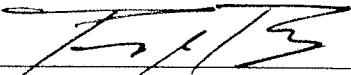
**CERTIFICATE OF SERVICE**

I, hereby certify that Plaintiff's First Request for Production of Documents addressed to Defendant Barrack Hussein Obama, et al were served by United States Postal Service, with postage fully prepaid this 15<sup>th</sup> day of September 2008 upon the following:

Barrack H. Obama  
713 Hart Senate Office Building  
Washington, D.C. 20510  
Fax: (202) 228-4260

Democratic National Committee (DNC)  
430 S. Capitol St. SE,  
Washington DC 20003  
Fax: (202) 863-8063

Federal Election Commission (FEC)  
999 E. Street, NW,  
Washington, DC 20463

  
\_\_\_\_\_  
PHILIP J. BERG, ESQUIRE  
*Attorney for Plaintiff*  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
(610) 825-3134

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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PHILIP J. BERG, ESQUIRE,	:	
	:	
<i>Plaintiff</i>	:	
vs.	:	CIVIL ACTION NO. 08-cv-04083
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ELECTION COMMISSION AND	:	
DOES 1-50, INCLUSIVE,	:	
	:	
<i>Defendants</i>	:	

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**PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS  
TO DEFENDANT DEMOCRATIC NATIONAL COMMITTEE [DNC]**

Plaintiff Philip J. Berg, Esquire [hereinafter "Plaintiff"] submits the following Requests for Admissions to Defendant the Democratic National Committee [hereinafter "DNC"] pursuant to Federal Rules of Civil Procedure Rule 36.

**INSTRUCTIONS**

If the DNC fails to respond or object to any request within thirty (30) days of the service of the Requests, the matter shall be deemed admitted under Rule 36. As you are aware, Plaintiff has filed a Motion for Expedited Discovery requesting Admission Responses to be filed within ten (10) days of service. If granted, the thirty (30) days herein will not apply.

As is more fully set out in Rule 36(a), the DNC must admit or deny each Request, and, where necessary, specify the parts of each request to which it objects or cannot in good faith admit or deny. If the DNC objects to only part of a Request, it must admit or deny the remainder of the Request. In the event that DNC objects to or denies any Request or portion of a Request, the DNC must state the reason for its objection or denial.

These Requests shall be deemed continuing and supplemental answers shall be required if you directly or indirectly obtain further information after your initial response as provided by *Federal Rules of Civil Procedure, Rule 26(e)*.

Each Request solicits all information obtainable by the DNC from the DNC's attorney's, investigators, agents, employees and representatives. If you answer a Request on the basis that you lack sufficient information to respond, describe any and all efforts you made to inform yourself of the facts and circumstances necessary to answer or respond.

#### **DEFINITIONS**

1. The word "or" is used herein in its inclusive sense unless the context clearly requires otherwise.

2. The term "document" means and includes without limitation all correspondence, memoranda, certificates, notes, books, manuals, pamphlets, brochures, advertisements, books of account, balance sheets, financial statements, profit and loss statements, working papers, schedules, diaries, calendars, logs, time records, equipment records, microfilms, transcripts, recordings, tapes, telexes, telegrams, files, proposals, bids, offers, contracts, agreements, change orders, worksheets, drawings, blue prints, designs, specifications, time cards, compilations, graphs, charts, bills, statements,

invoices, receipts, bills of lading, shipping records, confirmations, applications, purchase orders, checks, checkbooks and other checking records, photographs, formulae, prescriptions, studies, projections, reports, computer programs, information contained in computer banks, tapes, cards, printouts and drafts to the extent they differ from the originals, and all other records and papers of any nature whatsoever.

3. Any reference to a specifically named person, corporation, Governmental Agency, State Agency or other entity and any reference generally to "person" shall include the employees, agents, representatives and other persons acting on behalf thereof or through whom the referenced person acts. The term "person" means and includes natural persons, corporations, partnerships, joint ventures, sole proprietorships, associations, trust, estates, firms and any other entity.

4. As used herein, "Plaintiff" means, unless otherwise indicated, Philip J. Berg, Esquire, as well as his agents, attorneys, representatives or any other person acting on his behalf or on behalf of any one of them.

5. As used herein, "Defendant" and "DNC", shall be deemed to include Defendant The Democratic National Committee (DNC), as well as its agents, attorneys, representatives or any other person acting on their behalf or on behalf of any one of them.

### **FIRST SET OF ADMISSIONS**

**Admissions, Request No. 1.**

Admit you nominated Barrack Hussein Obama as the Democratic Nominee for President.

**Response:**

**Admissions, Request No. 2.  
Response:**

Admit you have not vetted Barrack Hussein Obama.

**Admission, Request No. 3.  
Response:**

Admit you have not had a background check performed on Barrack Hussein Obama.

**Admissions, Request No. 4.  
Response:**

Admit you have not verified Barrack Hussein Obama's eligibility to serve as President of the United States.

**Admissions, Request No. 5.  
Response:**

Admit Barrack Hussein Obama was born in Kenya.

**Admissions, Request No. 6.  
Response:**

Admit Barrack Hussein Obama is not a "natural born" United States citizen.

**Admissions, Request No. 7.  
Response:**

Admit Barrack Hussein Obama was not born in Hawaii.

**Admissions, Request No. 8:  
Response:**

Admit you have not inquired into Barrack Hussein Obama's citizenship status.

**Admissions, Request No. 9.  
Response:**

Admit you have a duty to properly vette the Democratic Nominee for Presidency.

**Admissions, Request No. 10.**

Admit Lolo Soetoro, M.A., an Indonesian citizen adopted Barack Hussein Obama.

**Response:**

**Admissions, Request No. 11.**

Admit your Credentials Committee has been aware of this lawsuit since August 22, 2008 as the lawsuit was faxed to your Washington D.C. Office on August 22, 2008.

**Response:**

**Admissions, Request No. 12.**

Admit your Credentials Committee failed to verify and/or inquire into the credentials of Barack Hussein Obama to serve as the President of the United States.

**Response:**

**Admissions, Request No. 13.**

Admit your Credential Committee's Report failed to address the issues of Barack Hussein Obama's ineligibility to serve as President of the United States.

**Response:**

**Admissions, Request No. 14.**

Admit Howard Dean, Chair Person has and had knowledge Barack Hussein Obama was born in Kenya and ineligible to serve as the President of the United States.

**Response:**

**Admissions, Request No. 15.**

Admit Plaintiff and all democratic citizens of the United States have been personally injured as a result of not having a qualified Democratic Presidential Nominee to cast their votes upon.

**Response:**

**Admissions, Request No. 16.**

Admit Plaintiff and all citizens of the United States have a Constitutional Right to vote for the President of the United States and to have two (2) qualified candidates of which to choose from.

**Response:**

**Admissions, Request No. 17.**

Admit Plaintiff and all citizens of the United States have a Constitutional right to have a properly vetted Democratic Presidential Nominee of which to cast their vote.

**Response:**

**Admissions, Request No. 18.**

Admit an FBI background check is not performed on the Presidential or Vice Presidential Candidates.

**Response:**

**Admissions, Request No. 19.**

Admit the United States Constitution does not allow for a Person to hold the office of President of the United States unless that person is a "natural born" United States citizen.

**Response:**

**Admissions, Request No. 20.**

Admit you collected donations on behalf of Barack Hussein Obama for his Presidential campaign.

**Response:**

**Admissions, Request No. 21.**

Admit Plaintiff and Democratic citizens donated money based on false representations that Barack Hussein Obama was qualified to serve as the President of the United States.

**Response:**

**Admissions, Request No. 22.**

Admit if Barack Hussein Obama is elected as President and allowed to serve as President of

the United States in violation of our Constitution, it will create a Constitutional crisis.

**Response:**

**Admissions, Request No. 23.**

Admit Barack Hussein Obama took an Oath to uphold the United States Constitution.

**Response:**

**Admissions, Request No. 24.**

Admit allowing a person who is not a “natural born” citizen to serve as President of the United States violates Plaintiff’s rights to due process of law in violation of the United States Constitution.

**Response:**

**Admissions, Request No. 25.**

Admit allowing a person who is not a “natural born” citizen to serve as President of the United States violates Plaintiff’s rights to Equal Protection of the laws in violation of the United States Constitution.

**Response:**

**Admissions, Request No. 26.**

Admit the function of the DNC is to secure a Democratic Presidential Candidate who will protect Democratic citizen’s interests, fight for their equal opportunities and fight for justice for all Americans

**Response:**

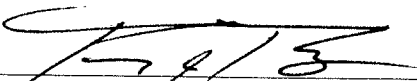
**Admissions, Request No. 27.**

Admit the Democratic National Committee has been promoting Barack Hussein Obama’s Presidential election knowing he was ineligible to serve as President of the United States.

**Response:**

Respectfully submitted,

Dated: September 15, 2008

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

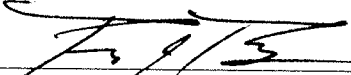
**CERTIFICATE OF SERVICE**

I, Philip J. Berg, Esquire, hereby certify that Plaintiff's First Set of Admissions addressed to Defendant The Democratic National Committee [DNC] were served by United States Postal Service, with postage fully prepaid this 15<sup>th</sup> day of September 2008 upon the following:

Barrack H. Obama  
713 Hart Senate Office Building  
Washington, D.C. 20510  
Fax: (202) 228-4260

Democratic National Committee (DNC)  
430 S. Capitol St. SE,  
Washington DC 20003  
Fax: (202) 863-8063

Federal Election Commission (FEC)  
999 E. Street, NW,  
Washington, DC 20463

  
\_\_\_\_\_  
PHILIP J. BERG, ESQUIRE  
*Attorney for Plaintiff*  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
(610) 825-3134

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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PHILIP J. BERG, ESQUIRE,	:	
	:	
<i>Plaintiff</i>	:	
vs.	:	CIVIL ACTION NO. 08-cv-04083
	:	
BARACK HUSSEIN OBAMA, a/k/a	:	
BARRY SOETORO, a/k/a	:	
BARRY OBAMA, a/k/a	:	
BARACK DUNHAM, a/k/a	:	
BARRY DUNHAM; THE	:	
DEMOCRATIC NATIONAL	:	
COMMITTEE, THE FEDERAL	:	
ELECTION COMMISSION AND	:	
DOES 1-50, INCLUSIVE,	:	
	:	
<i>Defendants</i>	:	

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**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
TO DEFENDANT THE DEMOCRATIC NATIONAL COMMITTEE**

Pursuant to *Federal Rule of Civil Procedure, Rule 34*, Plaintiff Philip J. Berg, Esquire [hereinafter "Plaintiff"] requests Defendant the Democratic National Committee [hereinafter "DNC"] to produce the originals or clear, readable copies of the below listed documents and/or items. The below listed documents and/or items are to be produced at Plaintiff's office on or before thirty (30) days after the date on the Certificate of Service. As you are aware, Plaintiff has filed a Motion for Expedited Discovery requesting various dates for Production of Documents to be filed. If granted, the thirty (30) days herein will not apply. Such request is continuing up to and at the time of trial.

## DEFINITIONS

A. "You" or "your" refers to Defendant herein and to all other persons acting or purporting to act on behalf of Defendant, including agents and employees.

B. "Communications" shall mean all inquiries, discussions, conversations, negotiations, agreements, understandings, meetings, telephone conversations, letters, correspondence, notes, telegrams, telexes, advertisements, facsimiles, e-mail, or other forms of verbal and/or communicative intercourse.

C. "Documents" shall mean all written or graphic matter of every kind or description, however, produced or reproduced, whether draft or final, original or reproduction signed or unsigned, and regardless of whether approved, signed, sent, received redrafted, or executed, including but not limited to: written communications, letters, correspondence, facsimile, e-mail, memoranda, minutes, notes, films, recordings, of any type, transcripts, contracts, agreements, purchase or sales orders, memoranda of telephone conversations of personal conversations, diaries, desk calendars, interoffice communications, reports, studies, bills, receipts, checks, checkbooks, invoices, requisitions or material similar to any of the foregoing however denominated, by whomever prepared, and to whoever addressed, which are in your possession, custody or control or to which you have had or can obtain access.

D. "Persons" means an individual, corporation, partnership, trust, governmental agency, state agency, associations, company, organization, or any form of a business or commercial entity.

E. “Identify” when used with respect to an individual, means to state: (1) their name; (2) business affiliation and official title and/or position; and (3) their last known residential and business address.

F. “Identify” when used with respect to a document, means to state: (1) the type of document (e.g. letter, memorandum, hand-written note, facsimile, e-mail, certificate); (2) its date of origin or creation; (3) its author and addressee; (4) its last known custodian or locations; and (5) a brief description of its subject matter and size. In lieu of identifying any document(s), you may attach a copy of it to your answer, indicating the question to which it is responsive.

G. “Identify” when used with respect to a company or other business entity, means to state: (1) the company’s legal name, any former names, and the name under which it trades or does business; (2) the address of its principal place of business; and (3) the identity of its chief executive officer.

H. “Relate to” means: consist of, refer to, reflect or be in any way logically connected with the matter discussed.

I. The period of time encompassed by these requests shall be from the date of Obama’s announcement to run for United States President to the date of answering, unless otherwise indicated. Note, this request is continuing up to and at the time of trial.

J. For purposes of the Rule, a statement includes:

- (1) A written statement, signed or otherwise adopted or approved by the person making it, or
- (2) A stenographic, mechanical, electronic, video-graphic or other recording, or a transcript thereof, which is a substantially verbatim

recital of an oral statement by the person making it and contemporaneously recorded.

K. “And “, “or”, and “and/or” shall be construed as broadly as possible so that information otherwise within the scope of the request is not excluded.

**CLAIMS OF PRIVILEGE:**

If an objection to a request is based upon a claim of privilege or attorney work product, identify each document so withheld. With regard to all documents or portions of documents withheld on this basis, identify its creator, provide a brief description of the documents, and state with particularity the basis of the claim of privilege, work product, or other ground of nondisclosure.

**LOST OR DESTROYED DOCUMENTS:**

If any document requested has been lost, discarded, or destroyed, identify such document. State the type of document, its date, the approximate date it was lost, discarded, or destroyed, the reason it was lost, discarded or destroyed, a summary of its substance, and the identity of each person having knowledge of the contents thereof. If a Governmental or State Document, state the Governmental Agency and/or State Agency, including address and telephone number, who has the control, custody and care of the original document(s).

**CONTINUING OBLIGATION:**

This demand is deemed to be continuing in nature, and in the event you become aware of or acquire in your possession, custody, or control additional responsive documents, you are requested promptly to produce such additional documents for inspection and copying.

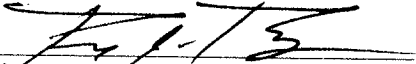
**DOCUMENTS REQUESTED:**

1. A Certified copy of any file or folder, with all contents, on Presidential Candidate Barack Hussein Obama;
2. A Certified copy of Barack Hussein Obama's Presidential candidacy file;
3. A Certified copy of the background check performed on Presidential Candidate Barack Hussein Obama;
4. A Certified copy of all documents and/or records of Presidential Candidate Barack Hussein Obama, including but not limited to his birth certificate, social security verification, college transcripts, background checks, investigation reports, citizenship verifications, secret clearance, passport records and any other documents not mentioned herein bearing his name; and

5. Certified copies of all documents and records used in vetting Presidential Candidate Barack Hussein Obama.

Respectfully submitted,

Dated: September 15, 2008

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

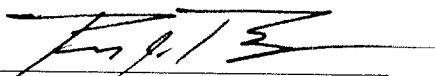
**CERTIFICATE OF SERVICE**

I, Philip J. Berg, Esquire, hereby certify that Plaintiff's First Request for Production of Documents addressed to Defendant the Democratic National Committee (DNC) were served by United States Postal Service, with postage fully prepaid this 15<sup>th</sup> day of September 2008 upon the following:

Barrack H. Obama  
713 Hart Senate Office Building  
Washington, D.C. 20510  
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430 S. Capitol St. SE,  
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Fax: (202) 863-8063

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999 E. Street, NW,  
Washington, DC 20463

  
PHILIP J. BERG, ESQUIRE  
*Attorney for Plaintiff*  
555 Andorra Glen Court, Suite 12  
Lafayette Hill, PA 19444-2531  
(610) 825-3134