

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

PHILIP J. BERG, ESQUIRE,	:	
<i>Plaintiff</i>	:	
vs.	:	CIVIL ACTION NO. 2:08-cv-04083-RBS
	:	
BARACK HUSSEIN OBAMA, a/k/a	:	
BARRY SOETORO, a/k/a	:	
BARRY OBAMA, a/k/a	:	JURY TRIAL DEMANDED
BARACK DUNHAM, a/k/a	:	
BARRY DUNHAM, THE	:	
DEMOCRATIC NATIONAL	:	
COMMITTEE, THE FEDERAL	:	
ELECTION COMMISSION AND	:	
DOES 1-50 INCLUSIVE,	:	
<i>Defendants</i>	:	

ORDER DEEMING REQUESTS FOR ADMISSIONS – ADMITTED
as to DEFENDANTS, BARACK HUSSEIN OBAMA and
THE DEMOCRATIC NATIONAL COMMITTEE

THIS CAUSE came before the United States District Court Judge, Honorable R. Barclay Surrick on Plaintiff’s Motion Requesting an Order of this Court deeming Request for Admissions served upon Defendants, Barack Hussein Obama and The Democratic National Committee Admitted. Having reviewed Plaintiff’s Motion and any response thereto and for good cause shown, it is hereby

ORDERED that Plaintiff’s Motion is **GRANTED** and Plaintiff’s First Request for Admissions upon Defendant Barack Hussein Obama numbered 1-56 and to Defendant The Democratic National Committee numbered 1-27 are hereby deemed Admitted.

BY THE COURT

Dated: October _____, 2008

Hon. R. Barclay Surrick
United States District Court Judge
For the Eastern District of PA

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vs.	:	CIVIL ACTION NO. 2:08-cv-04083-RBS
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BARRY OBAMA, a/k/a	:	JURY TRIAL DEMANDED
BARACK DUNHAM, a/k/a	:	
BARRY DUNHAM, THE	:	
DEMOCRATIC NATIONAL	:	
COMMITTEE, THE FEDERAL	:	
ELECTION COMMISSION AND	:	
DOES 1-50 INCLUSIVE,	:	
<i>Defendants</i>	:	

**PLAINTIFF’S MOTION REQUESTING AN IMMEDIATE ORDER DEEMING
PLAINTIFF’S REQUEST FOR ADMISSIONS TO DEFENDANTS, BARACK
HUSSEIN OBAMA and THE DEMOCRATIC NATIONAL COMMITTEE,
ADMITTED**

NOW COMES the Plaintiff, Philip J. Berg, Esquire [hereinafter “Plaintiff”] and respectfully requests this Honorable Court to grant Plaintiff’s Motion and issue an immediate Order deeming Plaintiff’s Requests for Admissions, served upon Defendants, Barack Hussein Obama [hereinafter “Obama”] and The Democratic National Committee [hereinafter “DNC”] on September 15, 2008 “Admitted” on the following Grounds:

1. Plaintiff filed this action on August 21, 2008 requesting Declaratory and Injunctive Relief, as Obama does not meet the qualifications or eligibility to run for and/or serve as the President of the United States.
2. On or about September 9, 2008, Plaintiff filed a Motion for Expedited Discovery, Extensive Discovery and Depositions of Obama and Howard Dean,

Chairman of the DNC and the appointment of a Special Master. Defendants never Responded to or Opposed said Motion. This Motion is still pending.

3. On September 15, 2008, Defendants, Obama and the DNC, were served with discovery by Plaintiff for Request for Admissions and Request for Production of Documents. Defendants' responses were due within thirty [30] days. Plaintiff's Request for Admissions served upon Obama are attached hereto as **Exhibit "1"** and Plaintiff's Requests for Admissions served upon the DNC are attached hereto as **Exhibit "2"**
4. Defendants, Obama and the DNC did not Answer the Complaint, failed to turn over proof of Obama's citizenship status and instead filed a Motion to Dismiss on September 24, 2008. Defendants claimed Plaintiff did not have standing to bring this action and failed to state a claim which relief could be granted.
5. This Honorable Court requested Plaintiff to file any Responses in Opposition to Defendants Motion within five [5] days, that being on or before September 29, 2008 and Plaintiff complied by filing a Response in Opposition to Defendants Motion to Dismiss.
6. On or about Monday, October 6, 2008, Defendants Obama and the DNC's Attorney called Plaintiff requesting Plaintiff to agree to Staying discovery pending a decision on their Motion to Dismiss. Plaintiff declined as Obama's citizenship status is of National security as he is running for President of the United States.

7. In the afternoon of October 6, 2008, Defendants, Obama and DNC, filed a Motion for Protective Order staying all discovery pending the Court's decision on their Motion to Dismiss. In their Motion Defendants acknowledged receipt of the Requests for Admissions.
8. On or about October 9, 2008, Plaintiff filed his Response in Opposition to Defendants Motion for Protective Order.
9. Defendants have failed to timely Answer Plaintiff's requests for Admissions, which were served on September 15, 2008 and Defendants Answers were due thirty [30] days thereafter. Therefore, these matters are automatically deemed admitted in accordance with Federal Rules of Civil Procedure 36(a). *McNeil v. AT&T Universal Card*, 192 F.R.D. 492, 494 (E.D. Pa. 2000), *Goodman v. Mead Johnson & Co.*, 534 F.2d 566, 573 (3d Cir. 1976), cert. denied, 429 U.S. 1038, 97 S. Ct. 732 (1977); *Siss v. County of Passaic*, 75 F. Supp. 2d 325, 331 (D.N.J. 1999).
10. No order staying discovery has been entered in this forum. Because the proceedings in this matter have not been stayed, and because the Defendants, Obama and DNC, failed to timely Answer Plaintiff's Request for Admissions, they have been deemed admitted in accordance with Federal Rules of Civil Procedure, Rule 36(a).

11. Plaintiff has diligently prosecuted his case. Accordingly, Plaintiff requests an Order deeming Plaintiff's First Request for Admissions to Defendant Obama numbered 1-56 and to Defendant DNC numbered 1-27 Admitted.

Respectfully submitted,

Dated: October 21, 2008

s/ Philip J. Berg
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 Motion Deeming Plaintiff's Requests for the First Set of Admissions, served upon Defendants, Barack Hussein Obama [hereinafter "Obama"] and The Democratic National Committee [hereinafter "DNC"] via electronic filing on the ECF System, this 21st day of October 2008 upon the following:

John P. Lavelle, Jr.
Attorney I.D. PA 54279
**BALLARD SPAHR ANDREWS &
INGERSOLL, LLP**
1735 Market Street, 51st Floor
Philadelphia, PA 19103
(215) 864-8603
(215) 864-9125 (Fax)
lavellej@ballardspahr.com

Joseph E. Sandler
SANDLER REIFF & YOUNG PC
300 M Street, S.E. Suite 1102
Washington, D.C. 20003
Telephone: (202) 479-1111
Fax: (202) 479-1115
sandler@sandlerreiff.com

Robert F. Bauer
General Counsel, Obama for America
PERKINS COIE
607 Fourteenth Street N.W.
Washington, D.C. 20005-2003
Telephone: 202.628.6600
Facsimile: 202.434.1690
RBauer@perkinscoie.com

Attorney's for Defendant's
Barack Hussein Obama and
The Democratic National Committee

Benjamin A. Streeter, III, Esquire
The Federal Election Commission (FEC)
999 E. Street, NW
Washington, D.C. 20463
bstreeter@fec.gov

In pro se

/s Philip J. Berg

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

1.

EXHIBIT "1"

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PHILIP J. BERG, ESQUIRE,	:	
	:	
<i>Plaintiff</i>	:	
vs.	:	CIVIL ACTION NO. 08-cv-04083
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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>	:	

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 15th, 2008

s/ Philip J. Berg
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 Barrack Hussein Obama were served by United States Postal Service, with postage fully prepaid this 15th 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

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

EXHIBIT "2"

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. Admit you have not vetted Barrack Hussein Obama.

Response:

Admission, Request No. 3. Admit you have not had a background check performed on Barrack Hussein Obama.

Response:

Admissions, Request No. 4. Admit you have not verified Barrack Hussein Obama's eligibility to serve as President of the United States.

Response:

Admissions, Request No. 5. Admit Barrack Hussein Obama was born in Kenya.

Response:

Admissions, Request No. 6. Admit Barrack Hussein Obama is not a "natural born" United States citizen.

Response:

Admissions, Request No. 7. Admit Barrack Hussein Obama was not born in Hawaii.

Response:

Admissions, Request No. 8: Admit you have not inquired into Barrack Hussein Obama's citizenship status.

Response:

Admissions, Request No. 9. Admit you have a duty to properly vet the Democratic Nominee for Presidency.

Response:

Admissions, Request No. 10.

Admit Lolo Soetoro, M.A., an Indonesian citizen adopted Barrack 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 15th, 2008

s/Philip J. Berg
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 15th 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

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