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September 19, 2011

Magistrate Judge Daniel Knowles III
United States District Court
Eastern District of Louisiana
500 Poydras Street
New Orleans, LA 70130

Re: Application for Probation Revocation
United States v. James O'Keefe, 10-81 "K" 3

Dear Magistrate Judge Knowles:

My name is Kevin Zeese and I am an attorney and spokesperson for several national non-profit organizations in the Washington, DC area. Enclosed please find an Application to Revoke James O'Keefe's Probation based on his violation of several conditions of probation and as well as numerous federal criminal statutes. As you will see, the number of violations is staggering, and the harm he has caused to innocent people and legitimate organizations, government agencies and media is really mind boggling, all while on probation and right under the nose of his probation officer.

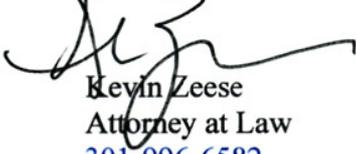
Mr. O'Keefe's Project Veritas is a criminal enterprise, which has engaged in fraud, impersonation, identity theft, conspiracy and even possibly hate crimes.

The enclosed application includes documents and links to support each violation. Because Mr. O'Keefe is currently engaged in continuing criminal behavior that constitutes an ongoing threat to the community, we urge you to immediately remand him into custody pending a probation revocation hearing. Moreover, because of the profound harm he caused to dozens of people, organizations, government agencies and media operations by his criminal activity, we believe that he should also be prosecuted by the Department of Justice and we urge you to make that criminal referral.

I have mailed copies of the enclosed Application to Assistant US Attorney Jordan Ginsburg, Louisiana Chief Probation Officer Kito Bess, and New Jersey Supervising Probation Officer Thomas Larson so they are aware of Mr. O'Keefe's criminal conduct. I have also sent copies to both the IRS in Dallas and FBI Field Office in Washington, DC.

Please let me know if I can be of further assistance.

Sincerely,



Kevin Zeese
Attorney at Law
[301-996-6582](tel:301-996-6582)

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Re: Application for Probation Revocation
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Dear Magistrate Judge Knowles:

I am writing to bring to your attention various activities of James O'Keefe that appear to be clear violations of his conditions of probation as well as federal and state law. I believe that these violations warrant the issuance of an Order to Show Cause as to why his probation should not be revoked, and a judicial referral for criminal prosecution.

Mr. O'Keefe was sentenced to a three-year period of probation on May 26, 2010 with the order that he comply with a list of 13 standard conditions of probation. See Exhibit A. However, as set forth below, he has repeatedly violated several of those conditions by engaging in fraudulent and illegal conduct that caused significant harm to a number of innocent, law-abiding individuals, non-profits, government agencies and even Muslims.

I

MR. O'KEEFE'S EMPLOYMENT IS NOT LEGITIMATE

1. Mr. O'Keefe Is Misleading The IRS and Public

Mr. O'Keefe is required to "work regularly at a lawful occupation." See Standard Condition #5. Mr. O'Keefe's occupation, working at Project Veritas, is not "lawful" for probation purposes. Indeed, as set forth below, it is both unlawful and criminal.

According to press reports and filings in this Court, Mr. O'Keefe purports to work as founder of Project Veritas, an organization that has applied for and been granted preliminary 501c3 status with the IRS. According to an article in *The Chronicle of Philanthropy*, Mr. O'Keefe's chances of getting *final* 501c3 status will depend upon whether or not the IRS learns of his criminal history. See Exhibit B, "Videographer Behind Secret NPR Videos Makes Push For Non Profit Status," <http://philanthropy.com/article/Videographer-Behind-NPR-Videos/126745/>

"The real concern, they say, is that Mr. O'Keefe pleaded guilty to a misdemeanor crime after he and three others entered the office of Sen. Mary Landrieu, Democrat of Louisiana, last year pretending to be telephone repairmen. The fact that Mr. O'Keefe has stated in public that he would do it again, albeit

‘differently,’ would probably be the biggest stumbling block to gaining charity status, said Marc Owens, a Washington tax lawyer who formerly oversaw the IRS division that monitors tax-exempt groups.

‘If he is proposing to do something that is, in fact, illegal, can the IRS believe, with any degree of credibility, what he is saying?’ Mr. Owens said. ‘Is he going to continue to enter government offices illegally? He pled guilty to it once and said he would do it again. It’s reasonable to conclude that the organization may be engaged in criminal activity in the future.’

But Mr. Owens added that while the IRS does conduct Internet searches of applicant organizations, it does not usually conduct criminal checks of applicants for charity status.”

Another of Mr. O’Keefe’s conditions of probation is listed under Standard Condition #13, which states:

“as directed by the probation officer, the defendant shall notify third parties of risks that may be occasioned by the defendant’s criminal conduct or personal history and characteristics and shall permit the probation officer to make such notifications and to confirm the defendant’s compliance with such notification requirements.”

It appears, however, that the IRS has not been notified by either Mr. O’Keefe or his probation officer that Mr. O’Keefe has committed several serious criminal offenses or that he is currently on probation. In fact, according to the 61 pages of documents released by the IRS regarding Project Veritas, there is only a single mention of Mr. O’Keefe anywhere in those documents. Exhibit C, page 6. And that has Mr. O’Keefe as “founder,” residing at 1922 Quincy Street, Arlington, VA 22207, making a proposed salary of \$120,000 per year. As noted above, if the IRS were notified that Mr. O’Keefe, a criminal on probation, is not simply the founder of Project Veritas, but the person who controls and directs it, and conceives of fraudulent schemes against innocent persons, the IRS would be inclined to deny final 501c3 status because of its concern that he would engage in criminal activity through Project Veritas. It appears that such concerns would be warranted in light of Mr. O’Keefe’s activities as founder of Project Veritas, as set forth below.

Mr. O’Keefe has also misled the IRS by stating various addresses for himself and Project Veritas on different IRS documents -- one in Texas and another in Virginia. And according to one document released by the IRS, an advisor to Project Veritas advised the person filing the documents not to list the Washington, DC address from the Project Veritas website because it could “distract” the IRS. See Exhibit C, page 52, email from Peter Samuelson. Moreover, as the Chronicle reported, Project Veritas is misleading people who visit the Project Veritas website by stating that Project Veritas has offices in Washington, DC:

“An attempt to visit Mr. O’Keefe at Project Veritas’s official address in Washington—2100 M Street N.W., Suite 170-241—was also unsuccessful. Suite 170 is a UPS store and No. 241 is a small mailbox that rents for \$35 a month.”

As the Court knows, Mr. O’Keefe resides in New Jersey.

2. Project Veritas Is Not Legitimate Employment For Probation Purposes

According to the IRS documents, Project Veritas did not have any funding or capitalization in 2010 during the time he has been on probation. Exhibit C, page 50. And, according to Mr. O’Keefe himself, in a March 19, 2011 fundraising email, he had run up \$50,000 in credit card debt on behalf of Project Veritas by the first quarter of 2011. Exhibit D. Also, according to Project Veritas spokesman Shane Cory, as of May 2011, Mr. O’Keefe “has still not drawn a salary to date.” Exhibit E. “Videographer Who Took Aim At NPR Gets IRS Approval For New Charity,” <http://philanthropy.com/article/article-content/127637>

Legitimate employment for probation purposes means working for a company that is capitalized enough to pay the probationer’s salary plus required taxes and withholdings. It does not mean creating a shell company and running up tens of thousands of dollars in credit card debt and then sending out emails begging for funds to pay off the credit cards used to cover the activities of the company.

Legitimate employment for probation purposes in cases of defendants such as Mr. O’Keefe who commit crimes involving deception, means having a supervising employer with whom the probation officer can verify the probationer’s employment, activities and hours on the job. In the case of Mr. O’Keefe, he has no supervisor, he sets his own schedule and he controls how money is spent. This allows Mr. O’Keefe to tell his probation officer whatever he wants about his so called employment and, as set forth below, to engage in fraud, deception and other unethical and criminal conduct.

Project Veritas does not constitute lawful employment. Indeed, it is a criminal enterprise, engaged in fraud, impersonation, identity theft, and various other federal and state crimes, all conceived of and directed by James O’Keefe.

II JAMES O’KEEFE, THROUGH PROJECT VERITAS, HAS ENGAGED IN A PATTERN OF FRAUDULENT, DECEPTIVE, AND CRIMINAL CONDUCT THAT HAS CAUSED SIGNIFICANT PERSONAL AND FINANCIAL HARM TO INNOCENT INDIVIDUALS AND OTHERS

The harm committed by Mr. O’Keefe since he was placed on probation less than 16 months ago is staggering. He is a serial offender who has destroyed many innocent people’s reputations, jobs, careers, security, and pursuit of happiness, as well as the

stellar reputations of established non-profit and media organizations, dedicated government agencies and the Muslim faith. He has done this by engaging in fraudulent, deceptive, unethical and criminal conduct. The descriptions of this conduct as set forth below come from the public domain.

1. Mr. O'Keefe Attempted To Lure A Female CNN Reporter On To A Boat In Maryland In Order To Ruin Her Reputation And Cause Her Employer Harm

In August 2010, Mr. O'Keefe conceived of a scheme on behalf of Project Veritas, to lure award winning CNN Investigative Correspondent Abbie Boudreau on to a boat in Maryland for purposes of destroying her career and harming the reputation of CNN. Mr. O'Keefe conceived of his scheme in order to retaliate against CNN for doing an unflattering story about his illegal conduct involving the secret taping of ACORN offices. The scheme was so dangerous and sickening that one of Mr. O'Keefe's own associates, Izzy Santa, tipped off Ms. Boudreau just minutes before she was set to meet Mr. O'Keefe. Exhibit F, "Woman Who Stopped CNN 'Punk' Plan Says O'Keefe Claims Untrue." http://articles.cnn.com/2010-10-05/us/okeefe.prank.cnn_1_okeefe-james-o-keefe-cnn-reporter?s=PM:US

In short, Mr. O'Keefe contacted Ms. Boudreau and falsely said that he had a story for her and that he wanted to meet her at his Maryland "office" alone to discuss the story. She flew into Maryland, rented a car and proceeded to the supposed office. When she arrived, she was approached by a visibly distraught Ms. Santa who told her that there was no office but that Mr. O'Keefe wanted to lure her on to a boat that was decked out with hidden cameras, sex toys, champagne, strawberries and pornography. Once she would get on the boat, he would hit on her for sex and record the entire episode for later public release. Ms. Santa begged her not to get on the boat and then later gave her the 13-page plan for the operation. Exhibit G. A few days later, Mr. O'Keefe retaliated against Ms. Santa by removing her from any further participation in Project Veritas activities.

Ms. Santa saved Ms. Boudreau from a very dangerous and sexist setup by Mr. O'Keefe, which could have resulted in physical, emotional and financial harm to Ms. Boudreau. Indeed, CNN lost thousands of dollars by sending a top reporter to talk with Mr. O'Keefe based on his false representations.

Protection of the community is a primary consideration of probation. Defendants on probation cannot be allowed to engage in deception and misrepresentations that cause harm to innocent people and companies, and defendants cannot be allowed to place people, especially women, in dangerous and compromising positions in order to destroy their reputations. Standard Condition 13 requires notification to persons who could be harmed by a probationer's conduct, but neither Ms. Boudreau nor CNN were ever advised in advance that Mr. O'Keefe intended to harm them with a bizarre sex plot. Clearly, Mr. O'Keefe's conduct with regard to CNN and Ms. Boudreau constitutes a violation of the terms and goals of probation.

2. Mr. O’Keefe Is Currently Committing Fraud With Regard To A Fake Website He Created, Falsely Purporting To Support Muslims, Which Includes False Information Requesting Tax Exempt Donations Scamming Muslims And Others, And Illegal Impersonation

The Fake MeacTrust.org Website

On January 15, 2011, James O’Keefe, using the email address greatsoutherner17@hotmail.com registered the website domain name, MeacTrust.org with an address of 2100 M. Street, NW, Suite 170, Washington, DC 20037. Exhibit F. “MEAC” is an acronym for Muslim Education Action Center. The address for MeacTrust is the same address Mr. O’Keefe lists for Project Veritas on its website.

Shortly after registering this domain, Mr. O’Keefe created a public website tied to the www.MeacTrust.org called “MEAC of America.” Exhibit H. This website purports to serve the Muslim community but is in fact a fraud and a scam, and constitutes a direct attack on Islam and profound disrespect for Muslims everywhere. Everything on the website is a lie, made up to deceive the reader.

On the home page of the website, Mr. O’Keefe states in the left sidebar: “Welcome to MEAC. We are a charitable organization dedicated to promoting a proper understanding of Islam.” In the center section, he continues his lies:

“Welcome to the Muslim Education Action Center.
Assalamu Alaikum Wa Rahmatullahi Wa Barakatuhu,

Islam in America is at a crossroads. One path is continued confusion, hatred, intolerance and discrimination, and the other is the truth and beauty of the Quran. America has been struggling with which road to choose primarily because it does not know or understand the beauty of our holy teachings.

Amidst these perilous times for Islam in America, MEAC has come a long way in recent years thanks to the tremendous leadership and generosity (sic) of Chairman Bin Talal, his associates, and his family. MEAC Trust holdings have nearly tripled under his tenure and continue to grow, ensuring that as the Islamic way of life is increasingly threatened in America, MEAC will have the means to respond and continue to protect the vision of our founders.

MEAC continues to bring religious education and truth to students across the country and to serve the growing Islamic schools and university departments with resources, support and guidance. We also assist educational institutions in lobbying state and national government for the autonomy and resources necessary for effective teaching of Islam.

In this current time of conflict we see opportunity - opportunity to spread truth to the public, an opportunity for enlightenment. MEAC is a leader in Islamic education and we assist those who take the action necessary to effect change, to bring America into the light and away from the forces of division, intolerance and injustice.

MEAC is a servant of Islam, and may peace be upon us all.

Omar Kasaam
Vice Chairman”

At the bottom of the page, Mr. O’Keefe falsely states that the MeacTrust website was copyrighted and created in 2008:

“© 2008 Muslim Education Action Center | Educating Against Ignorance”

On the “About Us” page, Mr. O’Keefe continues his lies and scam:

“Muslim Education Action Center (MEAC) is a waqf, the historical Islamic equivalent of an American trust or endowment, serving Muslims in the United States and their institutions. MEAC facilitates the realization of American Muslims' desire for a virtuous and happy life in a Shari'ah-compliant way.

MEAC is a not-for-profit entity that qualifies as a tax-exempt organization under Section 501(c) (3) of the Internal Revenue Code. MEAC began as a small local organization in 1986 in New Jersey (MEACNJ). In 1988, the MEAC trust was established to support Islamic educational centers and institutions across the country.

This web site is dedicated to Brother Mohammad Sharif Mahdavi, who passed away to the Hereafter on Friday December 1, 2006. He had been a trustee of MEAC since March 1993.”

“What We Do.”

“ After recent dramatic expansions, MEAC has donated annually between 9 and 27 million in each of the last five years. MEAC contributes to organizations that we believe advance tolerance and understanding of Islam in the American community. We especially look for organizations that share our philosophical (sic) approach to the spread of Islam and the establishment of Sharia worldwide (see Philosophy). Our board meets formally once a year, but members do converse individually throughout the year to consider new recipients.”

On the “Philosophy” page, Mr. O’Keefe falsely states that MEAC promotes tolerance and education of Islam.

On the “Contributions” page, Mr. O’Keefe falsely states that MEAC is a 501c3 charitable organization that can accept donations and that such donations are tax-exempt.

“While MEAC depends heavily on large donors, both individual and institutional, and for that we are blessed, we could not sustain ourselves without the support of individuals like you. Because MEAC qualifies as a tax-exempt organization under Section 501(c) (3) of the Internal Revenue Code, all donations are tax exempt.

Rest assured that all MEAC Trust holdings are invested in Shariah compliant stocks, domestic and foreign securities, and portfolios based on Islamic principles. All donations that are not immediately put to use will be held in Shariah compliant fashion, putting principle before profit.

Please send contributions to:

Muslim Education Action Center
2100 M St NW Ste 170
Washington, D.C. 20037

For further questions, please contact donate@meactrust.org.”

Under “Solicitations,” Mr. O’Keefe falsely states that Muslim organizations can apply for grants from MEAC.

“A majority of MEAC contributions go to organizations we have sought and contacted ourselves, and as such, we do not maintain an extensive staff to evaluate unsolicited proposals, though we certainly do consider applications. Organizations that apply for financial assistance should have strong references, especially from organizations that have current or past relationships with MEAC. The fastest path to consideration is to contact us through those references. Otherwise, please contact us at solicitations@meactrust.org.”

On the “Contact” page, Mr. O’Keefe lists a host of fake names to make it appear that respected Muslims operate MEAC, and that it has a board of directors. The phone number listed directs to a Google Voice answering machine.

“Contact, contact@meactrust.org
Donate, donate@meactrust.org
Solicitations, solicitations@meactrust.org

Chairman

Hisham bin Talal

Vice Chairman

Omar Kasaam, okasaam@meactrust.org

Board of Trustees

Dr. Ayman al-Mansoor, PhD., mansoor@meactrust.org

Dr. Huda Khan, M.D. hkhan@meactrust.org

Qusay Sharif, qsharif@meactrust.org

Dr. Samir Siddiqi, M.D., ssiddiqi@meactrust.org

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Noha Khalid, nkhalid@meactrust.org

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Mohammed Haseeb, mhaseeb@meactrust.org

Mailing Address

Muslim Education Action Center

2100 M St NW Ste 170

Washington, D.C. 20037

Phone

(202) 579-9431

Please understand, the person you wish to reach may be overseas and may take time to respond.”

MeacTrust.org is a fraud

Neither the Internal Revenue Service nor Guidestar have any record for MeacTrust. Exhibits I and J. MeacTrust is not a charitable organization and the IRS has not approved it under section 501c3. MeacTrust has not been incorporated in any state. Donations to MeacTrust are not tax-deductible.

MeacTrust does not have employees or a board, and it has not provided any money to any Muslim organization for any purpose. MeacTrust does not do any of the things it purports to do on its website.

MeacTrust is a complete fraud created by James O’Keefe in order to mislead, deceive and defraud.

Mr. O'Keefe shows profound disrespect for the Muslim faith by using MeacTrust to perpetrate a fraud in the name of Islam. The website is populated with pictures of Muslim mosques and other Islamic religious graphics in order to mislead the reader. Mr. O'Keefe has used MeacTrust to hijack the Muslim religion for his own sick and fraudulent purposes. In doing so, he has harmed the Muslim community and undermined its religious tenets.

Mr. O'Keefe has violated and continues to violate numerous federal crimes through his MeacTrust website, including mail, wire, and IRS fraud, impersonation, identity theft, conspiracy, and racketeering. His sinister attack on the Muslim faith could also be considered a hate crime.

3. Mr. O'Keefe Is Committing Fraud, Engaging In Deception And Harming The Muslim Faith With Another Website, MeacNJ.org

On July 6, 2010, less than two months after he was placed on probation, Mr. O'Keefe registered a web domain called MeacNJ.org, and created a website called Muslim Education Action Center Of New Jersey, presently available at <http://meacnj.dreamonllc.com/>. It is a one-page website, attached as Exhibit K, based entirely on lies and deception.

“Islam in America is at a crossroads. One path is continued confusion, hatred, intolerance and discrimination, and the other is the truth and beauty of the Quran. America has been struggling with which road to choose primarily because it does not know, believe and trust in the beauty of the Quran, in the truth of Islam.

MEAC-NJ was founded in 1988 by Islamic visionaries inspired by Allah to bring religious education and truth to students in New Jersey, as well as to serve the growing Islamic schools in the state with resources, support, advice, and guidance in lobbying the state government for the autonomy and resources necessary for effective teaching of Islam.

Like never before, there is an opportunity to spread the truth of the Quran to the Garden State. MEAC-NJ a force in Islamic education and action necessary to effect change, to bring the people of this region closer to Allah and away from the forces of division, intolerance and injustice.

MEAC-NJ is a servant of Islam, and is always ready and available to help serve you.”

After a photo of a mosque, it lists its address and prayer times.

- **“Prayer Times**
 - Fajr: 3:50 AM

- Dhuhr: 1:00 PM
- 'Asr: 5:00 PM
- Maghreb: 8:22 PM
- 'Isha: 10:10 PM
- Jum'ah: 1:00 PM

Contact Us

MEAC-NJ
576 Valley Road Suite 152
Wayne, NJ 07470

contact@meacnj.org

(973) 910-0631

© 2008 Muslim Education Action Center of New Jersey | Educating Against Ignorance”

MeacNJ is a fraud: it was not founded in 1988, its website was not copyrighted in 2008, it does not have a mosque, it does not serve Islam, it does not have prayer services, it does not have a Quran Institute, and it is not legitimate in any way.

MeacNJ’s address is actually a UPS store and its phone number is a Google Voice answering machine.

Mr. O’Keefe, as a probationer, has violated the goal of probation, by creating a fraudulent website to convey a false impression and by asserting support for the Muslim faith when in fact the reason for the website is to harm and discredit that faith. He has used MeacNJ to establish the bonafides of MeacTrust so it could defraud others.

4. Mr. O’Keefe Has Used The Deceptive MeacTrust and MeacNJ to Cause Profound Harm To National Public Radio And Its Employees In Retaliation For Its Supposed Liberal Media Coverage

Mr. O’Keefe is in the business of destroying the reputation and financial support of any person, organization, or media outlet he disagrees with politically. On February 12, 2011, he chose to scandalize National Public Radio through a deceptive scheme using the fraudulent MeacTrust.

In short, Mr. O’Keefe directed others associated with Project Veritas to contact NPR pretending to be Muslim executives from MeacTrust Board of Trustees who wanted to donate \$5 million to NPR. Those impersonators falsely said they were Muslims and introduced themselves using the false names Ibrahim Kassan and Amir Malik. They had phone conversations with NPR employees and sent them emails with false information regarding MeacTrust and its supposed 501c3 status. They sent a stretch limousine to pick up two NPR fundraisers, Ron Shiller and Betsy Liley, from NPR, and they all met at a Washington DC restaurant for lunch.

At the lunch, the impersonators had set up a hidden camera focused on the NPR staffers, which recorded an approximately two-hour meeting.

The impersonators falsely told the NPR staff that MeacTrust funds a number of Muslims schools “across the US,” including “some universities,” and falsely said MeacTrust was “originally founded by members of the Muslim Brotherhood.” They said that there are “not enough Muslim voices in schools and on the air,” and they repeatedly disparaged, “Jews, Jewish money, Jewish influence, Israel and Zionism.” They falsely said that their “funding comes from the Muslim Brotherhood.”

The NPR staffers refused to accept any donation from MeacTrust.

Mr. O’Keefe took the two-hour tape and edited it down to approximately ten minutes, making it appear that the NPR staffers said things that they did not. Project Veritas then released that tape on YouTube and sent it out to the media with the spin that NPR staff disparaged Republicans, the Tea Party, and said that NPR would be better off without federal funding. <http://www.youtube.com/watch?v=xd9OYJMX9t4>

The edited tape was widely picked up by the media, and NPR immediately fired Mr. Schiller and NPR CEO Vivian Schiller, and suspended Ms. Liley as a result of the firestorm it caused. Not until days later did experts review the entire two-hour tape and find that Mr. O’Keefe intentionally edited it to harm NPR and its staff by taking statements out of context:

Tompkins said O’Keefe’s editing is repeatedly and blatantly unfair.

"Except for a couple of unfortunate forays for political opinion, I think that Ron Schiller actually did a fairly remarkably good job of explaining how NPR works and what you can and cannot expect if you contribute money to the NPR Foundation," Tompkins said.

Blaze editor Baker said he emerged from analyzing the tapes with a surprising degree of respect for the professionalism of the two NPR executives, Ron Schiller and Betsy Liley.

"I think if you look at two hours in total, you largely get an impression that these are pretty — they seem to be fairly balanced people, trying to do a fairly good job," Baker said.

In recent days, several influential journalists have written that they regret giving O’Keefe’s NPR videos wider circulation without scrutinizing them for themselves, given his past record and some of the objections that the Blaze first raised. They include Ben Smith of Politico, James Poniewozik of Time magazine and Dave Weigel of Slate.

"The speed at which the media operates when a video comes out is a problem," Weigel said Sunday. "I mean, the rush to be the first to report on a video — and, let’s be brutally honest, the rush is to get traffic and to get people booked on [cable TV] shows to talk about it — and that nature leads you to not do the rigor and fact-checking that you would do in other situations."

An Accelerated Departure

Late Sunday night, NPR Senior Vice President Dana Davis Rehm wrote in an e-mail that the videos unfairly present several innocent comments by Ron Schiller and Liley as inappropriate.

"No one should be surprised based on O'Keefe's record that the video was heavily edited with the intention of discrediting NPR Rehm said." Exhibit L, "Elements of NPR Gotcha Video Taken Out Of Context,"

<http://www.npr.org/2011/03/14/134525412/Segments-Of-NPR-Gotcha-Video-Taken-Out-Of-Context>, See also Exhibit M, "Hatchet Job: The Video Hit Piece That Made NPR And Its Critics Look Bad,"

<http://www.time.com/time/magazine/article/0,9171,2059608,00.html>

NPR later released the emails to and from MeacTrust showing that its impersonators lied to NPR. Exhibit N, "NPR Publishes E-Mails From Top Staff Stating Problems With 'Muslim Group's' Offer Of \$5 Million"

http://www.slate.com/content/slate/blogs/weigel/2011/03/10/npr_publishes_e_mails_from_top_staff_stating_problems_with_muslim_group_s_donations.html

In conclusion, Mr. O'Keefe violated his probation by (1) invading the privacy of Ron Shiller and Betsy Liley, (2) directing and conspiring with people to impersonate Muslims in order to harm the reputation of NPR and its staff, (3) creating and using a fraudulent website to deceive innocent people who were doing their job, and (4) failing to warn innocent people that he was out to harm them. NPR suffered grievous harm, attacks on its reputation, calls for removal of federal funding, and loss of its CEO chief fundraiser, and fundraising assistant, all of whom were also harmed by O'Keefe's attack on their reputations and loss of income and future employment. Both the Jewish faith and the Muslim faith were harmed by Mr. O'Keefe's scam—first, the impersonators portrayed everything about Jews and Israel in disparaging terms; second, in acting as stereotypes of anti Jewish Muslims, they misrepresented the Muslim faith and undermined those who genuinely work to bridge differences between Muslims and other faiths.

5. James O'Keefe Stalked And Secretly Recorded New Jersey Teacher Alissa Ploshnick In Order To Destroy Her Reputation And That Of The Teachers Union To Which She Belonged

In November 2010, James O'Keefe stalked New Jersey special education teacher Alissa Ploshnick at her home and sat beside her in a bar while she took a break from a teacher conference on how she could better serve "her kids." He secretly tape-recorded her while she talked and then edited her comments to make it appear that she said and meant things that she did not. After Mr. O'Keefe released the edited tape, Ms. Ploshnick was suspended without pay for nine days and became the target of right wing media. She said that she felt as though she had "been raped" by Mr. O'Keefe. Exhibit O, "Heroic N.J. Teacher Sacrificed For Political Cause In Hidden Video,"

http://blog.nj.com/njv_bob_braun/2010/11/braun_heroic_nj_teacher_was_sa.html

As stated best by New Jersey Star Ledger Bob Braun,

“[In 1997, Ms. Ploshnick] risked her life to save the lives of a dozen Passaic schoolchildren. She threw herself in front of a careening van to protect her students and landed in the hospital with broken ribs, a fractured wrist, a badly bruised pelvis and glass cuts in her eyes. She could have died.

The president of the United States, Bill Clinton then, sent her a letter. It read:

"I recently heard about your act of heroism and wanted to commend you for your selflessness. True heroes are rare in today's world. And, all too often, those who are really making a difference in our communities go unnoticed and unrewarded. I am delighted to be able to give you the recognition you deserve. You are an example for all of us, and I applaud you for your sense of duty." ...

"I felt like I was raped," says Ploshnick referring to the moment she learned that what she thought was a private, even flirtatious, talk with a "nice" young man who bought her drinks was really part of a political scam to discredit her union in an web videotape called "Teachers Gone Wild."

Saving children's lives, risking death for them, wasn't enough to earn a pass from political incivility.

Nor was a solid record over a nearly 20-year career during which she was cited by William Paterson University for training student teachers and by Fairleigh Dickinson University's dyslexia program for her "fine record of experience," "strong interpersonal skills" and "dedication to learning." She says she spent \$9,000 of her own money on school supplies for her students, made sure a child in her class made his dental appointments by bringing him there and was just asked to be a godparent to the child of another student.

"Give me a smile and say hello and I'll do anything for you," says Ploshnick.

"I've always done it. It's hard to reteach your heart and your brain."

Ploshnick, 38 and single, was unlucky enough to be hit on in an East Brunswick bar in August by a young guy working for pretend journalist and admitted criminal James O'Keefe, the conservative attack dog who pleaded guilty to federal charges of entering a U.S. senator's office under false pretenses. He is on probation. He also tried to embarrass CNN recently by setting up a planned, taped attempt to seduce reporter Abbie Boudreau. It failed when one of his operatives tipped Boudreau off.

O'Keefe's operative bought drinks for Ploshnick and began asking about tenure. Ploshnick talked about how difficult it was to fire a tenured teacher. She said some things she shouldn't have said. She quoted someone *else* as having used a racial obscenity, the so-called "n-word."

But the phony Lothario sitting with her — plying her with drinks and laughing and egging her on — taped her every word. Including that word.

O'Keefe made Ploshnick, a teacher who saved the lives of children, an unwitting star in a web-based movie, a phony exposé of nothing but the cynicism of ideologically driven pseudo-journalists. All O'Keefe managed to do was ruin the reputation of a woman who should be honored as a hero — and was, not only by Clinton but also by Montel Williams and Oprah Winfrey, a fan of Gov. Chris Christie's. ...

"I think it's so unfair that I should be in the middle of this," says Ploshnick. "I'm not the monster I've been made out to be."

They should watch it and wonder about political correctness. That is, after all, why she was suspended by the Passaic superintendent.

"Politically correct is the theme of the day," says Robert Holster, the superintendent, to explain why she was punished despite her courage and sacrifice — and the knowledge she did not use the slur to describe anyone but to report what someone else said.

"We're getting hammered," Holster says about local reaction.

Alan Zegas, the Chatham lawyer representing Ploshnick, said he was investigating the "circumstances leading to the harm suffered by Alissa to determine whether legal action should be taken" against O'Keefe and his crew. Zegas, one of the state's best-known trial lawyers, said the actions of the crew members in surreptitiously taping her were "deeply disturbing."

Zegas said O'Keefe and others showed up at her apartment in Lincoln Park twice after she was secretly taped. He said he is investigating the possibility of bringing stalking and harassment charges. A violation of probation could put O'Keefe in jail.

Ploshnick says she will not contest the administrative penalties against her.

"The comments were made," says Ploshnick, who returned to work Friday. "The district is protecting the district. I'm not proud of what I said." Then she adds, "I just wanted to get back to my kids."

O'Keefe was asked for comment via e-mail and phone. He did not respond. He has argued the videotape represents "investigative journalism" to expose racism among teachers union leaders — which by the way, she is not. Ploshnick was attending a conference of the New Jersey Education Association to learn more about special-education law when she was secretly taped.

Ploshnick, who still suffers pain from the injuries she sustained saving those children, says her life will never be the same because of the secret taping. She has stopped dating and taken herself off dating sites. She won't go to a bar and she is afraid of meeting strangers.

"I just want to make sure what happened to me won't happen to anyone else. No one should have to live with what I've lived with," she says.

And let's face it: Alissa Ploshnick wasn't punished, her reputation wasn't destroyed, her professionalism and heroism disregarded, because she repeated a word someone else said.

She was sacrificed to a political cause."

James O'Keefe violated his terms of probation by stalking and setting up Ms. Ploshnick, an innocent, hard working teacher who educates special needs children and saves their lives when they are in danger. Mr. O'Keefe harmed her, her employer and the teachers union to which she belongs by use of underhanded and illicit means, combined with fraud, alcohol, lies and an edited tape. Mr. O'Keefe did not notify Ms. Ploshnick of

"risks that may be occasioned by the defendant's criminal conduct or personal history and characteristics and shall permit the probation officer to make such

notifications and to confirm the defendant's compliance with such notification requirements."

6. James O'Keefe Directed People To Impersonate Russian Drug Dealers, Irish Fishermen And IRA Terrorists And Lie To Innocent Medicaid Workers To Ruin Their Reputations And Harm Their Employers

In June of 2011, Mr. O'Keefe as founder of Project Veritas, directed people associated with Project Veritas to go to the Medicaid offices in Ohio, Maine and North Carolina while impersonating Russian mafia drug dealers (Ohio), Irish fishermen (Maine) and Irish Republican Army terrorists (North Carolina). These impersonators lied to the Medicaid employees, secretly video recorded their conversations, and then released edited versions of the tapes to make it appear that the employees did or said something wrong. Here is what happened in North Carolina according to reporter Ryan Reilly:

"A man goes into a public assistance office in Charleston, South Carolina in a kilt, tells them he's a member of the Irish Republican Army and asks for help for 25 fellow Irishmen in a hospital who need Medicaid.

A government employee follows the rules and explains the process for filling out a Medicaid paperwork and the qualifications they'd need to meet. She informs them that a federal law intended to protect patient privacy requires her not to divulge any information he's told her.

So what happens next? James O'Keefe's Project Veritas releases a deceptively edited video that makes the woman look like a terrorist sympathizer, though it isn't even clear if she knows the background of the IRA." Exhibit P, "James O'Keefe's Latest 'Terrorist' Medicaid Sting Goes After Woman For Following Law,"

http://tpmmuckraker.talkingpointsmemo.com/2011/07/james_okeefes_latest_terrorist_medicaid_sting_goes_after_woman_for_following_law.php

Similar fraudulent conduct directed by Mr. O'Keefe took place in Maine and Ohio. See Exhibit Q, "Medicaid Sting Is Still a Fraud."

<http://mediamatters.org/blog/201108110028>

Mr. O'Keefe's fraud was intended to and did harm the reputations of the Medicaid offices and employees targeted by him. In fact, at least two of them were "suspended" from their jobs. Exhibit R, "Ohio Workers Caught in James O'Keefe's 'Sting' Suspended," <http://thepoliticalcarnival.net/2011/07/27/ohio-workers-caught-in-james-okeefes-sting-suspended/>

Again, Mr. O'Keefe engaged in the crimes of impersonation and fraud, and unethically edited secretly recorded tapes to harm well-meaning government employees because he

wanted to scandalize and harm the reputation of Medicaid. At no time were these innocent government employees informed of the risks associated with being targeted by a criminal defendant, on probation, who destroys lives and reputations because he does not agree with their politics.

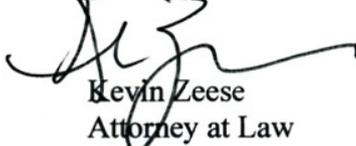
CONCLUSION

James O'Keefe has repeatedly violated his probation by engaging in criminal and unethical behavior that has caused grievous harm to many people, organizations, government agencies, and religions. He has engaged in this staggering crime spree right under the nose of his probation officer by withholding information from him and having others commit acts that Mr. O'Keefe directs. Mr. O'Keefe has violated numerous conditions of his probation by working for Project Veritas, a criminal enterprise engaged in fraudulent behavior, and by failing to inform persons he comes in contact with that he is a convict who will set them up and ruin their reputations.

We ask not only that Mr. O'Keefe's probation be revoked, but that this Court make a criminal referral to the FBI and IRS for possible prosecution of Mr. O'Keefe and those associated with him for fraud, impersonation, identity theft, stalking, conspiracy and other criminal violations.

Please don't hesitate to contact me if I can be of further assistance.

Sincerely,



Kevin Zeese
Attorney at Law
301-996-6582

cc:

Jordan Ginsburg, Assistant US Attorney
E.D. Louisiana
650 Poydras Street, Suite 1600
New Orleans, Louisiana 70130

Thomas Larson, Supervising Probation Officer
Paterson NJ United States Probation Office
200 Federal Plaza, Room 130
Post Office Box 2097
Paterson, NJ 07509-2097

Kito Bess, Chief Probation Officer
United States Probation Office LA
500 Poydras Street
Room B505
New Orleans, LA 70130

Internal Revenue Service
Exempt Organizations Classification
1100 Commerce Street
MC 4900 DAL
Dallas, TX 75242

James W. McJunkin, Assistant Director in Charge
Federal Bureau Of Investigation, Washington, DC Field Office
601 4th St
Washington, DC 20535

Kevin Zeese
Attorney at Law
POB 9576
Washington, DC 20016

September 19, 2011

Jordan Ginsburg, Assistant US Attorney
E.D. Louisiana
650 Poydras Street, Suite 1600
New Orleans, Louisiana 70130

Re: James O'Keefe Probation Revocation Application

Dear Mr. Ginsburg:

My name is Kevin Zeese and I am an attorney and spokesperson for several national non profit organizations in the Washington, DC area. Enclosed please find an Application for Revocation of James O'Keefe's Probation.

After you review the material, please join in our call for Mr. O'Keefe's probation revocation. He has not only repeatedly violated his conditions of probation, but he has violated numerous federal and state criminal statutes, including fraud, impersonation, identity theft, conspiracy and even possibly hate crimes. We have included documents and links to support each violation.

We urge you to act quickly in this matter in order to stop Mr. O'Keefe's crime spree.

Please let me know if I can be of further assistance.

Sincerely,

Kevin Zeese
Attorney at Law
301-996-6582

**Kevin Zeese
Attorney at Law
POB 9576
Washington, DC 20016**

September 19, 2011

Thomas Larson, Supervising Probation Officer
Paterson NJ United States Probation Office
200 Federal Plaza, Room 130
Post Office Box 2097
Paterson, NJ 07509-2097

Re: James O'Keefe Probation Revocation Application

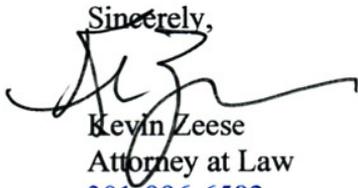
Dear Mr. Larson:

My name is Kevin Zeese and I am an attorney and spokesperson for several national non-profit organizations in the Washington, DC area. Enclosed please find an Application for Revocation of James O'Keefe's Probation.

After you review the material, please join in our call for Mr. O'Keefe's probation revocation. He has not only repeatedly violated his conditions of probation, but he has violated numerous federal and state criminal statutes, including fraud, impersonation, identity theft, conspiracy and even possibly hate crimes. We have included documents and links to support each violation.

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Please let me know if I can be of further assistance.

Sincerely,

Kevin Zeese
Attorney at Law
301-996-6582

**Kevin Zeese
Attorney at Law
POB 9576
Washington, DC 20016**

September 19, 2011

Internal Revenue Service
Exempt Organizations Classification
1100 Commerce Street
MC 4900 DAL
Dallas, TX 75242

Re: Project Veritas, EIN 27-2894856

Dear Exempt Organizations Chief:

My name is Kevin Zeese and I am an attorney and spokesperson for several national non-profit organizations in the Washington, DC area. I am writing to ask that the IRS conduct a prompt review of a recent approval of 501c3 status for Project Veritas, EIN 27-2894856 in light of that organization's misleading the IRS in its application process and its unethical, partisan and criminal activities since its inception.

I am enclosing an Application for Revocation of James O'Keefe's Probation, which sets out the facts relative to Project Veritas' criminal activities, and Mr. O'Keefe's criminal and fraudulent conduct.

Mr. O'Keefe has not only repeatedly violated his conditions of probation, but he has violated numerous federal and state criminal statutes, including fraud, impersonation, identity theft, conspiracy and even possibly hate crimes. We have included documents and links to support each violation.

Since Mr. O'Keefe is using Project Veritas to conduct criminal activity, we urge you to act quickly in this matter in order to stop Mr. O'Keefe's crime spree.

Please let me know if I can be of further assistance.

Sincerely,



Kevin Zeese
Attorney at Law
301-996-6582

**Kevin Zeese
Attorney at Law
POB 9576
Washington, DC 20016**

September 19, 2011

James W. McJunkin, Assistant Director in Charge
Federal Bureau Of Investigation, Washington, DC Field Office
601 4th St
Washington, DC 20535

Re: James O'Keefe and Project Veritas, EIN 27-2894856
Located in Washington, DC

Dear Mr. McJunkin:

My name is Kevin Zeese and I am an attorney and spokesperson for several national non-profit organizations in the Washington, DC area. I am writing to ask that the FBI launch a criminal investigation into Project Veritas and its founder James O'Keefe for violating a host of federal criminal statutes, including fraud, impersonation, identity theft, conspiracy and even possibly hate crimes. Project Veritas uses an address of 2100 M. Street, Suite 170-241, Washington, DC 20037.

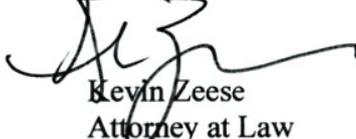
Mr. O'Keefe is on federal probation for attempting to break into Louisiana Senator Mary Landrieu's office in 2010.

I am enclosing an Application for Revocation of James O'Keefe's Probation, which sets out the facts relative to Project Veritas' criminal activities, and Mr. O'Keefe's criminal and fraudulent conduct. We have included documents and links to support each violation. We have asked that his probation be revoked. However, because of the harm he caused to dozens of people, organizations, government agencies and media operations, by his criminal activity, we believe that he should also be prosecuted by the Department of Justice.

Since Mr. O'Keefe is using Project Veritas to conduct criminal activity, we urge you to act quickly in this matter in order to stop Mr. O'Keefe's crime spree.

Please let me know if I can be of further assistance.

Sincerely,



Kevin Zeese
Attorney at Law
301-996-6582

