



PO 9576
Washington, DC 20016
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Spencer Overton, Esq.
Principal Deputy Assistant Attorney General for the Office of Legal Policy
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Re: Request for Criminal Investigation Into American Crossroads Activities

Dear Mr. Overton:

I am the attorney for Protect Our Elections, a national organization dedicated to fair and transparent elections. Today I sent a letter to the Federal Election Commission requesting an Advisory Opinion on whether the new Karl Rove organization American Crossroads, portrayed as "the Shadow RNC," is bound by the same rules and regulations governing the actual RNC. See attached. I have also published an article today that details many of our concerns about the unregulated, secret funding of American Crossroads and its affiliate(s). See attached

As you are well aware, the FEC has very limited authority to deal with any violations of elections laws. In fact, I recently received a letter from an insider at the Chamber of Commerce who said that organizations such as the Chamber do not fear any action by the FEC. See attached. Therefore, it is incumbent upon the DOJ to immediately take steps to protect the 2010 mid-term elections from being corrupted by hundreds of millions in secret funding at the hands of those who have every incentive to win by hook or crook.

We believe at minimum that the DOJ should do the following:

1. Issue a statement warning and advising all organizations involved in partisan election activities or issue advocacy related to campaigns that they must retain all documents, including emails, donations, expenditures, record keeping, agency filings, and other work product.
2. Announce the formation of a special campaign finance task force whose main objective will be to monitor, investigate and prosecute campaign finance violations. The announcement should advise both organizations and donors that violators will be vigorously pursued with both criminal and civil penalties.
3. Announce a DOJ tip line for people to report violations of campaign finance laws.
4. Impanel an ongoing grand jury to take testimony regarding campaign finance

violations.

5. Launch a specific criminal investigation into American Crossroads/American Crossroads GPS for its coup d'état of the RNC for the purpose of controlling the United States Government. Typically, a coup d'état uses the extant government's power to assume political control of the country. In *Coup d'État: A Practical Handbook*, historian Edward Luttwak says, "A coup consists of the infiltration of a small, but critical, segment of the state apparatus, which is then used to displace the government from its control of the remainder."

In the instant case, Karl Rove, unhappy with the actual RNC, created AC/ACGPS to takeover the duties of the RNC but without the regulation. AC/ACGPS is coordinating with other organizations and candidates to spend as much as a half billion dollars to take control of the House and Senate using secret, unregulated funds. Because the intent of AC/ACGPS is a hostile takeover of the RNC and it is acting in the role of the RNC, its actions are illegal.

We have compiled a great deal of information about the illegal and unethical activities of Karl Rove and Chamber of Commerce CEO Tom Donohue that we can share with your office. Please don't hesitate to contact me.

Sincerely,



Kevin Zeese
Attorney at Law
301-996-6582