

September 25, 2018

U.S. Department of Justice
Office of the Inspector General
Office of the General Counsel
950 Pennsylvania Ave. NW
Room 4726
Washington, DC 20530

Re: Complaint Addressing Conspiracy Against the U.S. Government—18 U.S.C. § 371 by the Democratic Socialists of America

General Counsel Blier:

Upon concluding several “deep state” investigations into the ethics of federal employees, Project Veritas writes to request an investigation into the Democratic Socialists of America (“DSA”). As noted in my correspondence dated September 19, 2018, Project Veritas found several DSA members employed by the federal government, including the Department of Justice, dedicated to impeding and obstructing its very operation. Because these operations stretch across several federal agencies, we ask that your office refer this for criminal investigation with the DOJ in collaboration with other offices of inspector generals.

Project Veritas uncovered four DSA members—one at the Government Accountability Office, one at the Department of Justice¹, one at the Internal Revenue Service, and one at the Department of State—involved in a seemingly interconnected scheme to promote “resistance” of the current administration’s policies in government. While each target acted independently, the common nexus between all of these investigations is an umbrella organization, the DSA. We believe there are sufficient inferences to suggest that the DSA has been coordinating plans among members who are federal employees to impede and obstruct the ordinary business of government.

Just today, Project Veritas released its latest investigation examining the IRS wherein another DSA member was found in its employ. The project demonstrated the bias held by DSA member may have affected his judgment in IRS matters and he may have abused federal leave policy to advance DSA projects. More troubling is the growing web of DSA members employed by the federal government carrying out DSA projects during work hours. Project Veritas will continue to release additional “deep state” publications where evidence of wrongdoing is apparent.

Pursuant to 18 U.S.C. § 371, it is illegal for “two or more persons [to] conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose.” Since its inception, a conspiracy to defraud is defined broadly and includes any act “to interfere with or obstruct one of its lawful governmental functions by deceit, craft or trickery, or at least by means that are dishonest.” *Hammerschmidt v. United States*, 265 U.S. 182, 188 (1924). Thus, any conspiracy that might work

¹ As of the writing of this letter, the Department of Justice removed Allison Hrabar from its employ.

toward the purpose of “impairing, obstructing or defeating the lawful function of any department of Government” is actionable under the law. *Tanner v. United States*, 483 U.S. 107, 128 (1987).

Section 371 offers an important promise to the American people—that programs and policies duly enacted through the democratic process retain their integrity. *United States v. Burgin*, 621 F.2d 1352, 1356 (5th Cir. 1980). Without such protection, outside infiltrators, conmen, and political saboteurs could upend the very basis of democratic government. We ask that this promise be secured for the American people today.

To be certain, federal courts have applied Section 371 in the context of lying to or subverting a federal agency’s mission. In *U.S. v. Hopkins*, the mere agreement for individuals to make strawman, conduit contributions to a political action committee was sufficient to demonstrate a violation of Section 371 against the Federal Election Commission. 916 F.2d 207, 212-13 (5th Cir. 1990). Even without specific knowledge of the controlling regulation, a mere desire to evade regulatory oversight and to impair an agency’s function done knowingly is enough to invoke Section 371.

In Project Veritas’s investigations, it learned that DSA members were spending substantial amounts of time working on DSA projects during federal government work hours while using federal government resources to do so. Put more plainly, public servants entrusted to oversee government integrity, collect taxes, pursue justice, and keep America safe instead spent time busily promoting the cause of international socialism on the back of the American taxpayer. It remains clear from these video investigations that the employees in question knew this violated the law and they did so covertly to evade detection. In at least one instance, vague or misleading statements were given on annual disclosure forms to help evade exposure.

In most of Project Veritas’s investigations, a batch of garden variety Hatch Act and common ethics violations occur. But it is the overarching unification of these members working together toward a common goal—“resistance”—of the current administration that is most troubling. Working together, DSA members employed by the federal government deprive Americans of their duly chosen government through subterfuge and the promotion of an opposing political ideology all with government resources and on government time.

Rather than face a bureaucratic slap on the wrist—such as is found in Hatch Act violations—we write asking that the DOJ conduct a thorough criminal investigation under 18 U.S.C. § 371 and 18 U.S.C. § 1001. Because Project Veritas’s investigations showed a common nexus between members of the DSA carrying out similar activities to slow down administration policies across multiple agencies and to promote socialism during government hours, an investigation under Section 371 is appropriate. Similarly, because at least one member admitted to submitting misleading or vague disclosure forms, an investigation under Section 1001 is warranted. Doing so will bring a properly serious and rigorous investigation into these findings that should disturb Americans of any ideological background. The American government belongs to the American people—not political saboteurs hoping to hijack it.

We ask that you examine the following video reports:

- <https://www.projectveritas.com/2018/09/18/deep-state-unmasked-state-department-on-hidden-cam-resist-everything-i-have-nothing-to-lose/>
- <https://www.projectveritas.com/2018/09/19/breaking-deep-state-unmasked-doj-official-resists-from-inside-cant-get-fired-leaks-at-hhs/>
- <https://www.projectveritas.com/video/the-deep-state-unmasked-federal-employee-admits-to-breaking-rules-every-day/>

- <https://www.projectveritas.com/video/deep-state-unmasked-irs-officials-you-should-give-increased-scrutiny-to-conservative-groups-i-dont-give-a-st-if-that-is-a-crime/>

Project Veritas remains available to assist your office in reviewing this matter. Please contact the undersigned for additional details.

Respectfully,

/s/ Benjamin Barr

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