

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF LOUISIANA

UNITED STATES OF AMERICA

v.

JOSEPH BASEL  
STAN DAI  
ROBERT FLANAGAN  
JAMES O'KEEFE

Criminal Action No. 10-00081

Magistrate 1  
Magistrate Judge Daniel E. Knowles, III

**MOTION TO PERMIT TRAVEL OUTSIDE THE STATE OF NEW JERSEY**

Undersigned represents James O'Keefe in connection with the above entitled matter where he is currently serving a probationary sentence imposed by the Honorable Magistrate Judge Knowles on May 26, 2010. Mr. O'Keefe has been advised by the Probation Department in New Jersey that all travel must be approved by the Sentencing Magistrate Judge.

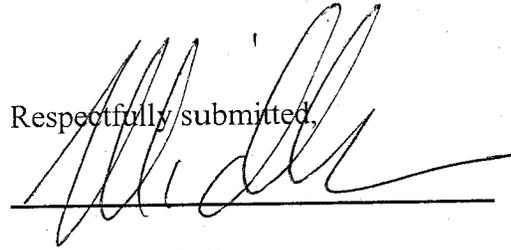
Mr. O'Keefe requests permission for the following travel:

- From Westwood, New Jersey to Solomons, Maryland, from May 20, 2011 to May 22, 2011 for a personal trip;
- From Westwood, New Jersey to Solomons, Maryland, from May 27, 2011 to May 30, 2011 for a personal trip;
- From Westwood, New Jersey to Washington, D.C., from June 1, 2011 to June 5, 2011 to attend the Faith and Freedom Conference;
- From Washington, D.C. to Charleston, South Carolina, from June 6, 2011 to June 7, 2011 to speak at a paid speaking engagement;
- From Westwood, New Jersey to Baltimore, Maryland, from June 14, 2011 to June 16, 2011 for a paid speaking engagement at the Harbor League;

- From Westwood, New Jersey to Saint George Island, Maryland, from June 22, 2011 to June 26, 2011 to attend a Project Veritas Board of Directors' meeting;
- From Westwood, New Jersey to Solomons, Maryland, from June 27, 2011 to July 5, 2011 for a personal trip.

We have conferred with Mr. O'Keefe's Probation Officer, Patrick Hattersley, and Assistant United States Attorney Jordan Ginsberg, who advise that they have no objection to the requested travel.

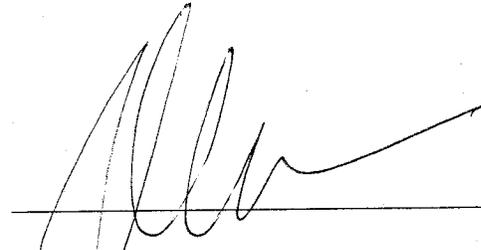
Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael J. Madigan", written over a solid horizontal line.

Michael J. Madigan  
*Attorney for James O'Keefe*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19 day of May, 2011, I mailed, faxed, or e-mailed the foregoing document and notice of electronic filing to Assistant United States Attorney Jordan Ginsberg.

A handwritten signature in black ink, appearing to read "Michael J. Madigan", is written over a horizontal line. The signature is stylized and cursive.

Michael J. Madigan  
Orrick, Herrington & Sutcliffe LLP