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Via Email Only

Re: Whistleblower Guidance and Document Extraction

Dear James & Russ:

In today's legal conference call, guidance was sought about how to legally extract documents and other information from organizations. This is a written summary of that issue and does not address further legal concerns for this situation. This guidance assumes Project Veritas will investigate sophisticated organizations that employ measures to protect their privacy. Legal counsel is substantially different where groups do not employ such protective measures.

1. **Arm's Length.** Project Veritas enjoys its strongest legal defense when it acts at an arm's length distance from would-be whistleblowers in organizations.
2. **Non-Collaboration.** Project Veritas should act as a publisher of information—not as a collaborator with whistleblowers. Thus, PV should not offer rewards, direct or steer the subject of the investigation, or otherwise participate or have influence over whistleblowers.
3. **Not Really Whistleblowers.** Project Veritas should not promise to confer "whistleblower" status to people wishing to provide it with information. Only permitted government bodies may confer whistleblower status and limited immunity following their own laws.
4. **Hypothetical Examples**
 - a. Permissible: "We're excited you contacted Project Veritas about the Johnson Corporation's pollution scheme. We are always interested in receiving valuable information to air."