



May 14, 2007

Via Certified Mail

Ms. Lila [REDACTED] Rose
[REDACTED]
[REDACTED]

Re: Surreptitious Recording of PPLA Employees Without Consent


Dear Ms. Rose:

Planned Parenthood Los Angeles (PPLA) recently became aware of two videos, entitled "Planned Parenthood Part 1" and "Planned Parenthood Part 2," that you posted on YouTube.com. These videos contain excerpts of conversations you had with PPLA employees that you and your cohort James O'Keefe apparently obtained through false pretenses and unlawfully, as these conversations were surreptitiously recorded without the knowledge and consent of the PPLA employees.

These surreptitious recordings violate the California Invasion of Privacy Act, specifically Cal. Penal Code § 632. Given the seriousness of this matter, we demand that 1) you immediately cease and desist from any recording of any communication with any PPLA employee without his/her consent; 2) you immediately remove from YouTube.com the portions of the videos containing the illegal surreptitious recordings; and 3) you immediately relinquish to PPLA the original and any copies of all communications with PPLA employees you have recorded without their consent. If you do not agree to take these three steps, PPLA will seek all appropriate legal remedies, including the remedies available to PPLA set out in the California Invasion of Privacy Act. Section 637.2 of the Penal Code provides that, in addition to being enjoined and restrained from any violation, you are subject to \$5,000 or three times actual damages, which is greater, for each incident of illegal recording.

Please confirm in writing, by May 18, 2007 your agreement to comply with these demands. If you do not confirm by this date that you will comply with these demands and cease your unlawful practices, PPLA will seek the full range of civil sanctions and remedies against you without any additional warning to you.

Sincerely,


Mary-Jane Wagle
President and CEO

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