

July 6, 2019

Third Judicial Department Attorney Grievance Committee
286 Washington Avenue Extension
Suite 200
Albany, New York 12203

RE: Stephen R. Coffey, Michael P. McDermott & Pamela A. Nichols

Dear Committee Members:

I am writing in order to request that you undertake a comprehensive investigation concerning the three above-named attorneys – and their individual and joint involvement in aiding and abetting various criminal activities of the NXIVM criminal enterprise. Based upon information and belief, their involvement in those activities includes, but is not necessarily limited to, the following:

- Aiding and abetting NXIVM's attempt to obtain copies of bank records and other personal information concerning some/all of the following individuals:
 - NDNY Senior U.S. District Court Judge Gary L. Sharpe;
 - NDNY Senior U.S. District Court Judge Thomas J. McAvoy;
 - NDNY U.S. District Court Magistrate Randolph F. Treece (Retired);
 - NJ U.S. District Court Judge Dennis M. Cavanaugh;
 - NJ U.S. District Court Magistrate Mark Falk;
 - NDNY U.S. Bankruptcy Court Judge Robert E. Littlefield, Jr.;
 - Albany County Court Judge Thomas A. Breslin;
 - U.S. Senator Chuck Schumer;
 - Edgar Bronfman, Sr. (Deceased);
 - Toni Foley AKA Toni Natalie;
 - Steve Forbes;
 - George R. Hearst III;
 - Stephen E. Herbits;
 - James M. Odat;
 - Joseph J. O'Hara;
 - Rick Ross;
 - Rabbi Israel Singer;
 - Peter L. Skolnik; and
 - Rex Smith.

- Aiding and abetting NXIVM's attempt to get the following individuals indicted in various jurisdictions within the United States:
 - Barbara J. Bouchey;
 - Toni Foley AKA Toni Natalie;

- Joseph J. O'Hara;
 - Frank R. Parlato, Jr.;
 - Rick Ross; and
 - John J. Tighe.
- Aiding and abetting NXIVM's attempt to get the following individuals indicted in Canada:
 - Sarah Edmondson;
 - Jen Kobelt; and
 - Mark Vicente.
 - Aiding and abetting NXIVM's attempt to get the following individuals indicted in Mexico:
 - Barbara J. Bouchey;
 - Susan Dones;
 - Toni Foley AKA Toni Natalie;
 - Joseph J. O'Hara;
 - Frank R. Parlato, Jr.;
 - Rick Ross;
 - Kim Woolhouse; and
 - Tony Zarattini.
 - Aiding and abetting the filing of false affidavits – and/or the provision of perjured testimony – in various civil and criminal lawsuits. These lawsuits include, but are not limited to, the following:
 - People v. Joseph J. O'Hara (Albany County – 2005);
 - People v. Joseph J. O'Hara Et Al (Albany County – Index: DA-172-15);
 - NXIVM v. The Ross Institute Et Al (Index No. 2:06-cv-01051);
 - NXIVM v. Toni Natalie Et Al (Case 6:13-cv-06577);
 - U.S. v. John J. Tighe (Case 1:14-cr-00464); and
 - U.S. v. Joseph J. O'Hara (Case No. 10-cr-2842).

The federal investigators who were involved in the recently-concluded criminal trial of Keith A. Raniere AKA The Vanguard are in possession of evidence that will corroborate some of my allegations concerning Mr. Coffey, Mr. McDermott and Ms. Nichols. In this regard, I suggest that you contact FBI Special Agent Michael Weginer at (212) 354-2000 to discuss how you might obtain access to – and/or copies of – some of that evidence.

In addition to the above, Mr. Coffey, Mr. McDermott and Ms. Nichols were instrumental in getting criminal computer trespass charges filed against me, Toni Foley AKA Toni Natalie, and John J. Tighe in Albany County in February 2014. They did this even though they were well aware that there was no jurisdictional basis for those charges to be filed in Albany County because the server that housed the website that was allegedly accessed illegally was actually situated in Saratoga County at the time of the alleged incidents. Mr. Coffey, Mr. McDermott and Ms. Nichols utilized their contacts within the Office of the Albany County District Attorney to get criminal charges brought against me, Ms. Foley/Natalie and Mr. Tighe after the Office of the Saratoga

County District Attorney and the Office of the New York State Attorney General refused to bring any such charges. In addition, they also conspired to get Holly A. Trexler, a former colleague of Mr. McDermott at the Office of the Albany County District Attorney, appointed as a Special District Attorney in Albany County so that she could oversee the prosecution of the bogus charges. Finally, as documented in the attached "Incident Report", Mr. Coffey, Mr. Dermott and Ms. Nichols had more than two dozen meetings and telephone conversations with Rodger Kirsopp, the NYS Police Senior Investigator who oversaw the investigation of this matter in their attempt to convince him to find that criminal charges were warranted – and interfered with that investigation by taking control of one of the computers that was supposedly used to illegally access the NXIVM website.

Finally, Mr. Coffey recently unleashed an unprovoked, expletive-filled attack on Marc Agnifilo, who served as the lead counsel for Mr. Raniere in his recently-concluded criminal case – and on the jury that rendered a verdict in that case. In doing so, Mr. Coffey made the following statements:

- ***"I thought it was embarrassing, that [Agnifilo's] remarks were embarrassing and I was ashamed that an attorney for any client would stand out after a verdict and put his own self-interests – what he perceives to be his own self-interests – before the client";***
- ***"You're gonna speak to Barbara Bouchey? You're going over to her and say, 'I hope that you can heal?' Are you fucking kidding me? Really?";***
- ***"The jury took five fucking hours! You know what, on a six-week trial, I'll tell you something – I don't think that jury was into this case";*** and
- ***"And I'm very disappointed in this jury. I'm not going to stand here and tell you that I thought the jury did a good job. You know what, I don't think they did a great job. It's not a question of respect. I don't believe it."***

If you are intent on upholding the integrity of the New York State Bar, then you must conduct a thorough investigation of my allegations regarding Mr. Coffey, Mr. McDermott, and Ms. Nichols. Thereafter, if you confirm that some/all of those allegations are accurate, you must immediately suspend or disbar all three individuals.

I will be happy to supply you with more information and documents concerning my various allegations with respect to Mr. Coffey, Mr. McDermott and Ms. Nichols. In addition, I will be happy to testify under oath – and/or to submit a sworn affidavit – regarding each allegation that is set forth in this letter.

I understand that you may be reluctant to investigate attorneys who have such stature and local influence as these three individuals. What I would suggest is that unless you are willing to investigate attorneys like this, you are failing to uphold your duties and obligations as members of the Third Judicial Department Attorney Grievance Committee.

Sincerely,

Joseph J. O'Hara

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PS/Rumors have persisted for years that Mr. Coffey and/or his law firm have an undisclosed ownership interest in the WGDJ/Talk 1300 radio station in Albany, NY. In conjunction with the requested investigation, you may also want to question him about that matter.