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OFFICE OF GENERAL COUNSEL

September 19, 2008

2008 SEP 26 A 11: 28

Thomasenia P. Duncan, General Counsel
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR # 6080

RE: Investigation of The Clarion Fund

Dear Ms. Duncan,

I respectfully request that the Federal Election Commission investigate the actions of the Clarion Fund, Inc., a 501(c)3 tax-deductible organization (Tax ID 205845679).

The Clarion Fund recently financed the distribution of some 28 million DVDs containing the film "Obsession: Islam's Radical War against the West" in what many political analysts describe as "swing" states in the upcoming presidential elections. Those same analysts say the distribution of the "Obsession" DVD was designed to benefit a particular presidential candidate, namely Sen. John McCain. A pro-McCain article was purportedly removed from the website of film's distributor after this controversy came to public attention. The Allentown Pennsylvania Morning Call said the "mailing highlights Clarion's intent to have an impact on the presidential election."

The Patriot News in Harrisburg, Pennsylvania reported: "On Wednesday, though, there was an article on the group's new Web site, www.radicalislam.org, that backed Republican presidential candidate John McCain. The article discusses both candidates and concludes: 'McCain's policies seek to confront radical Islamic extremism and terrorism and roll it back while [Barack] Obama's, although intending to do the same, could in fact make the situation facing the West even worse.'" (9/11/08)

In a recent commentary responding to the distribution of "Obsession," Jeff VanDenBerg, director of Middle East Studies at Drury University, called the film "a blatant piece of anti-Muslim propaganda." He also wrote: "The film 'Obsession' plays to the crudest stereotypes and promotes the simplest solutions. In the end, this kind of thinking will do far more to harm American security than it will to help it." (News-Leader, 9/17/08)

On September 19, 2008, the Orlando Sentinel newspaper reported: "The current distribution effort appears aimed at newspapers in political swing states such as Florida, Pennsylvania, Michigan and Ohio. Because it coincides with a hotly contested presidential election, the effort seems politically motivated, said Greg Sapp, associate professor of religious studies at Stetson University in DeLand."

According to the website for the Secretary of State for New York, Clarion Fund Inc. is incorporated in New York as a Delaware based foreign not-for-profit corporation. According to the Delaware Department of Corporations, Robert (Rabbi Raphael) Shore, Rabbi Henry Harris and Rebecca

Kabat incorporated Clarion Fund. All three of whom are reported to serve as employees of Aish HaTorah International, an organization apparently based in Israel. Also according to the Delaware Department of Corporations, the incorporators of the Clarion Fund used Aish HaTorah's New York City address (150 West 46th Street, New York) to incorporate Clarion Fund in Delaware.

According to "Obsession" website, Rabbi Raphael Shore is the founder and producer of "Obsession". Sources have reported that Rabbi Raphael Shore is an Israeli citizen who lives in Jerusalem and was employed as an executive director with Aish HaTorah International. Gregory Ross has been identified as Clarion Fund's spokesman and communications director. According to the FEC candidate contributions database, Gregory Ross is a fundraiser for Aish HaTorah International. It was reported that distributors of "Obsession" asked viewers to register for a screening of "Obsession" by visiting an Aish HaTorah website.

It appears that the funding for the production, marketing and distribution of "Obsession" may have originated from Israel-based Aish HaTorah International.

I urge you therefore to investigate:

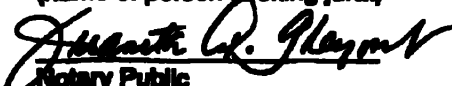
1. Whether or not an incorporated charitable organization made contributions and expenditures in connection with a federal election; and
2. Whether or not the Clarion Fund uses the contributions of foreign nationals in connection with a United States presidential election.

Sincerely,


Nadhira Al-Khalili, Esq.
Legal Counsel

City/County of Arlington
Commonwealth of Virginia
The foregoing instrument was subscribed and sworn
Before me this 19 day of September, 2008, by

Nadhira Al-Khalili
(name of person seeking jurat)


Notary Public

Notary registration number: 940863

My commission expires: June 30, 2012

29044233703

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Individual Contributions Arranged By Type, Giver, Then Recipient

Contributions to Political Committees

ROSS, GREGORY
SANTA FE, NM 87501
SELF/ATTORNEY

GRANGER, KAY
VIA KAY GRANGER CAMPAIGN FUND

03/16/2001

250.00

21990507672

ROSS, GREGORY
SANTA FE, NM 87504
THE ROSS FIRMLLC/ATTORNEY

LOYD, ANNIE
VIA ANNIE LOYD FOR CONGRESS

09/26/2007

250.00

27931298952

ROSS, GREGORY A
ANCHORAGE, AK 99516
SERVICE ONE HEATING COOLING

KNOWLES, TONY
VIA TONY KNOWLES FOR US SENATE

09/03/2004

250.00

24020893220

ROSS, GREGORY A
LEWIS CENTER, OH 43035
WORTHINGTON CITY SD/CLASSROOM TEA

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FEDERAL ELECTION
COMMISSION
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29044233704

07/06/2006 200.00 26930337872

ROSS, GREGORY A
LEWIS CENTER, OH 43035
WORTHINGTON CITY SD/EDUCATOR

NEA FUND FOR CHILDREN AND PUBLIC EDUCATION

07/04/2007 250.00 27931122206

ROSS, GREGORY A MR.
WESTMINSTER, CA 92683
TRANSLOGIC INC./PURCHASING MANAGE

BUSH, GEORGE W
VIA BUSH-CHENEY '04 (PRIMARY) INC

08/13/2004 200.00 24971498835

ROSS, GREGORY MR.
BEVERLY HILLS, CA 90212
AISH HA TORNH INTERNATIONAL/FUNDR

GIULIANI, RUDOLPH W.
VIA RUDY GIULIANI PRESIDENTIAL COMMITTEE INC

06/30/2007 250.00 27930900538

ROSS, GREGORY P
LOS ANGELES, CA 90034

BUSH, GEORGE W
VIA BUSH-CHENEY '04 (PRIMARY) INC

11/09/2004 -25.00 24981496995

ROSS, GREGORY P MR.
PORTSMOUTH, OH 45662
BE IN TOUCH COMMUNICATIONS/OWNER

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE

06/11/2007 250.00 27990334583

07/11/2007 250.00 27990507217

ROSS, GREGORY R
LAGUNA NIGUEL, CA 92677

ERNST & YOUNG LLP**ERNST & YOUNG POLITICAL ACTION COMMITTEE****06/23/1997****500.00****97032163382****ROSSITER, GREGORY
BRENTWOOD, TN 37027
GAYLORD ENTERTAINMENT****CORKER, ROBERT P JR****VIA BOB CORKER FOR SENATE****04/28/2005****250.00****25020262734****ROSSMANN, GREGORY J
SAN FRANCISCO, CA 94109
BROADVIEW INTL****BUSH, GEORGE W****VIA BUSH FOR PRESIDENT INC.****07/07/1999****1000.00****99034852339****ROSSTON, GREGORY
MENLO PARK, CA 94025
STANFORD UNIVERSITY/ECONOMIST****/BIDEN, JOSEPH R., OBAMA, BARACK****VIA OBAMA FOR AMERICA****06/21/2007****250.00****27990262756****ESHOO, ANNA****VIA ANNA ESHOO FOR CONGRESS****11/30/2007****250.00****28930351944****KERRY, JOHN F****VIA JOHN KERRY FOR PRESIDENT INC****04/26/2004****500.00****24961471579****06/09/2004****500.00****24971367386****ROSSTON, GREGORY L
MENLO PARK, CA 94025
STANFORD UNIVERSITY/ECONOMIST**

ALBEN, ALEX
VIA ALBEN2004

07/14/2004

250.00

24962308339

ROSTON, GREGORY L.
MENLO PARK, CA 94025
STANFORD UNIVERSITY/ECONOMIST

GORE, AL
VIA GORE 2000 INC

03/31/1999

1000.00

20990084794

Total Contributions: 6625.00

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NYS Department of State

Division of Corporations

Entity Information

Selected Entity Name: CLARION FUND, INC.

Selected Entity Status Information

Current Entity Name: CLARION FUND, INC.

Initial DOS Filing Date: DECEMBER 28, 2006

County: NEW YORK

Jurisdiction: DELAWARE

Entity Type: FOREIGN NOT-FOR-PROFIT CORPORATION

Current Entity Status: ACTIVE

Selected Entity Address Information

DOS Process (Address to which DOS will mail process if accepted on behalf of the entity)

**FREEMAN & HERZ LLP
ATTN: ELI D. GREENBERG, ESQ.
270 MADISON AVENUE
NEW YORK, NEW YORK, 10016**

Registered Agent

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'Obsession' stokes passions, fears and controversy

By Debra Baran

A documentary produced in Israel and screened widely throughout the U.S. is stirring furious debate over its depiction of Muslims.

The film, "Obsession: Radical Islam's War Against the West," is gaining a quick following among conservative Americans, evangelicals and Jews. U.S. Vice President Dick Cheney is said to have seen the film and though it hasn't technically been released yet, segments have been screened several times on Fox News and shown on nearly 200 university campuses.

But critics of the film dismiss it as "tear-mongering" propaganda aimed at bashing Muslims and inciting bigotry and hate.

"Obsession" is a one-hour look at radical Islam with footage of Arab and Iranian television, interspersed with rallies from Nazi Germany in an attempt to draw parallels between the two. Comprised mostly of news clips from recent years, it includes scenes of thousands of people chanting "Death to America" and children talking about their dream of becoming a martyr. "I hope Bush dies in flames and I want to go to Ariel Sharon and stab him with a sword."

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one little girl in Bahrain tells the camera. The film also features interviews with prominent neo-conservative figures, like Daniel Pipes, who warn about the danger of radical Islam and its growing prominence in some circles.

Supporters of the film, which has been circulating since fall 2006, say it offers an important window into radical trends in the Muslim world.

"Obsession" gives the picture that unfortunately no one else does," says Raphael Shore, the Canadian-Israeli living in Jerusalem who produced the film. "The average viewer tries to understand the conflict. It's difficult to connect all the dots and 'Obsession' does just that. It gives a coherence to a problem that people have been grappling with."

Smear tactics

Critics, however, say the film is demagogic and insist it presents a fringe element as representative of broader religious trends - despite what its creators say are

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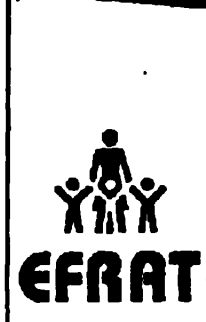
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several disclaimers reminding viewers that "most Muslims do not support terror."

"It's a typical cherry picking of inflammatory images and splicing them together to create fear," Ibrahim Hooper, spokesman for the Council on American-Islamic Relations (CAIR) said in a telephone interview from the group's headquarters in Washington, D.C. "When these smear techniques are used against any other religious or minority group, it is recognized as bigotry. When it's aimed at Islam or Muslims, it has gained unfortunate levels of acceptance within our society." The film, he said, "has an agenda to make Muslims look bad."

Republican and Jewish students groups have sponsored scores of screenings, most of which occurred without incident, the film's creators say. But protests and rising student tensions have begun accompanying the film on many campuses. A screening at Pace University in New York was canceled and rescheduled only months later after administrators pressured Hillel student leaders into calling off their event. And a recent Georgia Tech screening sponsored by the College Republicans required extra security as part of "Islamofascism Awareness Day."

To be sure, "Obsession" has a definite shock value. But Shore denies allegations that it is propaganda.

"Propaganda is a manipulation of facts; it's not showing the whole picture. It seems to me that this does not apply to the film. People say that we picked out the worst stuff, but it's the opposite. There was so much material that it was hard to choose."

Fueling the fire

Aside from the content itself, a number of other factors related to the film have fueled the flames of controversy. For one, it has a largely Jewish and pro-Israel distribution network, though Shore is trying to expand the film's appeal. According to news reports, at a screening earlier this year at New York University, distributors of the film required viewers to register at IsraelActivism.com, the Web site of Aish HaTorah's Hasbara Fellowships.

Shore, incidentally, was the director of both Aish HaTorah International and the Hasbara Fellowships, a pro-Israel advocacy group. But he says the film was an independent project.

He also tries to play down the film's Israel connection, simply because "it isn't helpful," he says. "I don't want it to be only Jewish and Israel-related."

"I don't understand why it's biased if Jews are behind the creation of an objective film," he says. "There's nothing wrong with Jews saying the radical Islamists are coming, just like there's nothing wrong with Jews in Nazi Germany saying the Nazis are coming."

Funders anonymous

The issue is further complicated as funding sources for the film remain hazy. Shore and director Wayne Kopping of South Africa are the only figures associated with the film willing to release their real names and appear in media interviews; the executive producer is listed as Peter Miar, while the production manager is listed as Brett Halperin. But Miar and Halperin are just aliases, Shore says. He describes the real Miar as a Canadian Jewish businessman who wanted to do something significant, but asked to remain anonymous for fear of his safety. According to Shore, about 80 percent of the film's \$400,000 budget was provided by Miar.

"At the recommendation of a number of experts we worked with in making the film, many of the individuals and organizations who helped make this film possible requested anonymity," Shore explained during an online question-and-answer session on Fox.com. "Tragically, we've seen numerous times the response of the radicals to those who openly espouse or disagree with them."

"Radical Muslims are a serious bunch," he later added, "and if they don't like the film, then God forbid..."

Shore also denies early reports that link the film to Honest Reporting, a pro-Israel media watchdog group.

failure

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On the organization's site, "Obsession" is described as "Honest Reporting's newest documentary film," but Shore says it's a mistake and that the film's creators have told Honest Reporting to take it off their site "a dozen times."

"It was a marriage of convenience to associate [my previous film] 'Relentless' with Honest Reporting. At the beginning, I thought I would do the same thing with 'Obsession.' I decided not to, but I considered it and that came out in the press."

This summer, the film will be released officially and will be available in retail outlets like Wal-Mart, Blockbuster and Target. Some 100,000 copies have already been sold through the film's Web site, www.Obsessionthefilm.com, and based on television ratings from Fox and CNN Headline News, which also broadcast segments of the documentary, Shore estimates that some 10 million viewers - including a large number of evangelical Christians - have already seen significant portions of the film.

"Many evangelical Christians are waking up and becoming passionate about this issue," says Shore. "There is a shock factor because people haven't seen this before. Now, they are seeing images of children being brainwashed, they see the passion and ideology of their religious leaders and they say, 'Gosh, that's scary.' But if people were exposed to this already, it wouldn't be so shocking."

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Morning Call (Allentown, Pennsylvania)

September 13, 2008 Saturday
SECOND Edition

Is DVD a wake-up call or propaganda? Timing questioned: Film on Islamic terror draws controversy.

BYLINE: Josh Drobnik Of The Morning Call

SECTION: National; Pg. A1

LENGTH: 527 words

A documentary on the threat of Islamic terrorism is being sent to millions of homes in Pennsylvania and other presidential battleground states through the end of September.

The 60-minute DVD, called "Obsession: Radical Islam's War Against the West," was produced by Raphael Shore, founder of the Clarion Fund, a nonprofit that is paying for its distribution and describes its mission as "educating Americans about national security issues."

Hailed by some observers as a keen glimpse into the threat posed by fundamentalist Islam, the film features scenes of the Sept. 11 terrorist attacks and 2005 London bombings. Critics have panned it and its widespread distribution as a scare tactic in advance of Election Day.

The DVD, originally released in 2005, is being mailed to homes and bundled as an advertising supplement in

newspapers across the country, including in Sunday's Morning Call, as well as The Wall Street Journal, Philadelphia Inquirer, Pittsburgh Post-Gazette, Reading Eagle, Bucks County Courier Times and The New York Times.

The mailing highlights Clarion's intent to have an impact on the presidential election.

"The threat of Radical Islam is the most important issue facing us today," reads a paragraph on the sleeve of the DVD. "But it's a topic that neither the presidential candidates nor the media are discussing openly. It's our responsibility to ensure we can all make an informed vote in November."

A call to Clarion wasn't returned, but the nonprofit's spokesman, Gregory Ross, told the Harrisburg Patriot-News this week that 28 million copies of the DVD are being distributed nationwide throughout September. He said the intent is not to sway voters' opinions about the presidential candidates.

Spokesmen for the presidential campaigns of Republican John McCain and Democrat Barack Obama said the campaigns have no affiliation with Clarion, the DVD or its distribution.

The film kicks off with footage of the Sept. 11 attacks on the World Trade Center and pans around the globe to countries subsequently targeted, including England, Spain and Russia. It includes dramatic footage of ceremonies celebrating suicide bombers and criticizes the news media for failing to adequately explain the threat posed by radical Islam.

Denise Dennis, in an article on the liberal Web site Huffington Post, said the film's distribution "smacks of classic propaganda."

"The point is to frighten viewers and, it seems clear, to frighten American voters across the country in order to raise security concerns ahead of all other issues in the election," she said.

Polls show that voters nationwide think McCain is better prepared than Obama to handle terrorism as commander in chief.

Conservative talk show host Glenn Beck hailed the documentary as "one of the most important films of our time."

Morning Call spokeswoman Vicki Mayk said several people in the newspaper's advertising department viewed the DVD to ensure its suitability and there was no hesitancy to distribute the film.

"It is our policy to accept advertising for legal product and services," Jim Feher, The Morning Call's vice president of advertising, said in a statement.

jdrobnyk@tribune.com

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ORGANIZATION: ISLAM; CONSUMER; EDUCATION; MEDIA; NEWSPAPERS

COMPANY: WALL STREET JOURNAL (56%)

PERSON: BARACK OBAMA (82%); JOHN MCCAIN (53%); ARIANNA HUFFINGTON (51%)

GEOGRAPHIC: HARRISBURG, PA, USA (58%); LONDON, ENGLAND (57%)

PENNSYLVANIA, USA (93%) UNITED STATES (93%); ENGLAND (57%); UNITED KINGDOM (57%)

LOAD-DATE: September 16, 2008

LANGUAGE: ENGLISH

GRAPHIC: THE DVD 'Obsession: Radical Islam's War Against the West' is produced by the Clarion Fund and will be distributed to millions by month's end.;Contributed photo

DOCUMENT-TYPE: Local

PUBLICATION-TYPE: Newspaper

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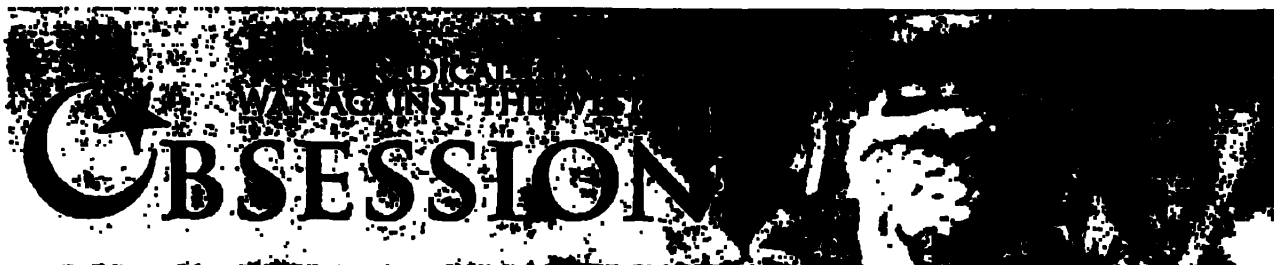
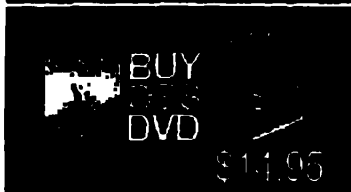
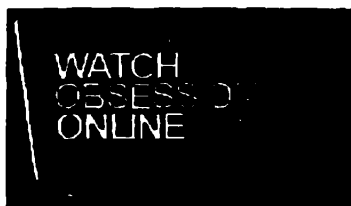
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Wayne Kopping is best known for his film and television work in South Africa, where he is featured both in front of and behind the camera. Kopping has also produced several commercials, music videos, corporate films, and an award-winning short documentary about Nelson Mandela. Wayne previously co-directed & edited the documentary *Relentless: The Struggle for Peace in the Middle East*, a film about the failure of the Oslo Peace Accords.

Raphael Shore, Producer, Co-Writer

Raphael Shore is a documentary producer and founder of Clarion Fund, Inc., a new non-profit organization dedicated to educating the public about national security threats. Shore is currently producing a documentary about radical Islam inside America. He previously produced the critically acclaimed documentary *Obsession: Radical Islam's War Against the West* (2006). He was the producer/co-writer of *Relentless: The Struggle for Peace in the Middle East* (2003). Previously, Shore worked for international organizations as an analyst of Middle East issues. He also has expertise regarding the history of anti-Semitism. Shore has been interviewed by CNN, The New York Times, and other media organizations. A native of Canada, he graduated from the University of Toronto.

Film Crews

Danor Glazer, Itai Newman, Charles Tudor, Rael Wienburg, Nevo ben Cnaan, Misha Speldor, Shuky Zuta

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Entity Name:	CLARION FUND, INC.		
Entity Kind:	CORPORATION	Entity Type:	GENERAL
Residency:	DOMESTIC	State:	DE

REGISTERED AGENT INFORMATION

Name:	CAPITOL SERVICES, INC.		
Address:	815 SOUTH DUPONT HIGHWAY		
City:	DOVER	County:	KENT
State:	DE	Postal Code:	19901
Phone:	(302)735-6718		

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