Filed in District Court
State of Minnesota
10/28/2026

State of Minnesota
County of Hennepin

District Court
4th Judicial District

Prosecutor File No. 26A12402
Court File No. 27-CR-26-28438

State of Minnesota,

Plaintiff,

vs.

JAMES O'KEEFE DOB: 06/28/1984

205 DATURA ST
#320
WEST PALM BEACH, FL 33401

Defendant.

COMPLAINT

Summons

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I

Charge: Identity Theft-Transfers/Possesses/Uses Identity of Other Person
Minnesota Statute: 609.527.2, with reference to: 609.05.1, 609.05.2, 609.527.3(3)
Maximum Sentence: 5 YEARS AND/OR $10,000
Offense Level: Felony

Offense Date (on or about): 08/11/2026

Control #(ICR#): 26228835

Charge Description: That on or about 8/11/2026, in Minneapolis, Hennepin County, Minnesota, JAMES O'KEEFE, acting alone or intentionally aiding, advising, hiring, counseling or conspiring with another or otherwise procures the other to commit the crime, knowingly misrepresented his identity in applying for a ballot, depositing a ballot in a ballot box or attempted to vote by means of a voting machine or electronic voting system.

COUNT II

Charge: Election Day Act - Unlawful Voting - Misrepresent identity; Apply for/deposit ballot or attempt vote
Minnesota Statute: 204C.14.1(a), with reference to: 609.05.1, 609.05.2, 204C.14.1
Maximum Sentence: 5 YEARS AND/OR $10,000
Offense Level: Felony

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ballot, depositing a ballot in a ballot box or attempted to vote by means of a voting machine or electronic voting system.

MINNESOTA JUDICIAL BRANCH

STATEMENT OF PROBABLE CAUSE

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Complainant has investigated the facts and circumstances of this offense and believes the following establishes probable cause:

On August 11, 2026, the State of Minnesota held a primary election involving races for federal, state, and county positions. The polling places for these elections were staffed by election judges who have the responsibility to oversee the administration of voting at each location.

During this primary election a group of individuals, who were not registered voters or eligible to vote in Minnesota elections, entered numerous polling places under false pretenses. These individuals included and appeared to be led by:

- JAMES EDWARD O'KEEFE (Defendant O'Keefe)
- CAMERON HIGBY (Defendant Higby)

The named defendants ("the Defendants" collectively) and other unnamed individuals working with them or at their direction, visited multiple Minneapolis polling places with hidden video camera devices while donning costumes and modifying their voices to obscure their identities. Videos from these visits were posted online. This complaint focuses specifically on the following locations and incidents within Hennepin County, Minnesota:

Ward 1, Precinct 1:
At this location, Defendant Higby entered the polling place with an unidentified female. The polling place is located at 416 35th Ave NE, Minneapolis, Hennepin County, Minnesota.

Video depicts Defendant Higby, dressed in clothing to disguise his identity, entering the polling place and repeatedly falsely identifying himself to the elections judges as Identity Theft Victim 1, a registered voter in that precinct. Had Defendant Higby truthfully identified himself as a non-resident present at the polls to explore Minnesota's voting laws, he would not have been allowed in the polling location. Election judges allowed Defendant Higby to apply for a ballot because he used the stolen identity of a pre-registered Minnesota voter. Defendant Higby, however, was prevented from falsely voting by election judges, when he refused to sign the appropriate paperwork.

As depicted in the video, and confirmed by statements from the election officials, Defendant Higby approached an election judge staffing the table where one applies for a ballot. Defendant Higby then proceeded to apply for a ballot by providing the name of Identity Theft Victim 1 as well as the address of that same person to the election judge. The name and address that Defendant Higby used matched a registered voter in the precinct. In the edited video that Defendant Higby posted online, he stated in a voice over: "I walked into this polling station with a random name of a random person who is registered to vote in this precinct. I am not that person."

Defendant Higby told staff that he was there to vote and also to vouch for the unidentified female who was with him. The video shows the election judge turning the iPad towards Defendant Higby as part of the process. While continuing to claim to be Identity Theft Victim 1, Defendant Higby asked various questions about the vouching process before faking a telephone call and leaving the polling place.

Ward 1, Precinct 5:
At this location, Defendant Higby entered the polling place located at the Waite Park Recreation Center, 1810 34th Ave NE, Minneapolis, Hennepin County, Minnesota. He arrived at about 1:15 pm and again

entered the polling location with no authorized purpose. Defendant Higby was again disguised in clothing and face coverings to conceal his identity. He was also with an unidentified male and an unidentified female.

Before going to the registration table, Defendant Higby indicated to an election official that he was there to vouch for someone, not vote. However, at another point, Defendant Higby was asked by an election judge "are you here to vote today" and he stated "yes." This judge also asked if Defendant Higby lived in the precinct, and he lied, stating that they do live in the precinct. Defendant Higby was then brought to the table where registered voters apply for ballots. The election judge staffing that table asked Defendant Higby for his name and address. Defendant then proceeded to apply for a ballot by providing the name of Identity Theft Victim 2[SD2.1] to the election judge. The name and address that Defendant Higby used matched Identity Theft Victim 2, a registered voter in the precinct. This voter was not present and did not give Defendant Higby permission to use their identity.

Defendant Higby then proceeded to commence the vouching process for the unidentified female who was with him, only stopping at the point where an oath must be sworn. Election Judge 1 reported that the interaction was "quite peculiar" because Defendant Higby asked the same sorts of questions about whether an ID was needed to vote about 10 times. Election Judge 2 reported similarly odd behavior. Election Judge 2 also stated that he had not experienced another voter get to the point in the process that Defendant Higby did but not sign the voter oath.

Defendant Higby left but claimed he would return with eight more people.

Afterwards, the incident log notes that neither Defendant Higby nor the person with him ultimately voted. This is corroborated in Defendant Higby's video of the interaction. The incident log also noted that the individuals left after one of the election workers asked for an ID.

Upon leaving this polling location, Defendant made a recording outside. In the video, he said "so we just went into this polling station. I was dressed just like this. I gave a name that is not me. I said the name is [name beeped out], and they said, "okay you are in the system you can vote today."

In the video, Defendant Higby is critical of Minnesota's election system because it does not require the showing of IDs. He asserts that his actions on this day exposed how someone could use an ID of a registered voter and falsely vote.

Ward 2, Precinct 5:
The Pratt Community School, in Hennepin County, Minnesota, is the site of Ward 2, Precinct 5. Defendant O'Keefe and Defendant Higby entered this polling location with other individuals. Defendant O'Keefe went to the table where registered voters apply for ballots by giving their name. The election judge staffing that table asked Defendant O'Keefe for his name. Defendant then proceeded to apply for a ballot by providing the name of Identity Theft Victim 3, a person registered to vote in that precinct, to the election judge. Further claiming to be Identity Theft Victim 3, Defendant O'Keefe confirmed Identity Theft Victim 3's date of birth with the election judge before asking questions about the vouching process. In an interview with investigators, Identity Theft Victim 3 said that he did not give permission for Defendant O'Keefe to use his identify.

Ward 3, Precinct 5:
The Twin Cities International School, in Hennepin County, Minnesota is the site of the Ward 3, Precinct 5 polling location. Defendant O'Keefe and Defendant Higby entered the polling location with other individuals and went to the table where registered voters apply for a ballot by giving their names. Defendant O'Keefe then proceeded to apply for a ballot by providing the name of Identity Theft Victim 4, a registered voter in

that precinct. The election judge, believing that Defendant O'Keefe was who he identified himself as, confirmed that the individual is registered to vote. Defendant O'Keefe then asked questions about the vouching system. This interaction is recorded on both Defendant Higby's video and Defendant O'Keefe's video.

MSA 204C.14 subd. 1(a) – Election Day Activities, Polling Place Activities, Unlawful Voting:
Minnesota law states: "No individual shall intentionally misrepresent the individual's identity in applying for a ballot, depositing a ballot in a ballot box or attempting to vote by means of a voting machine or electronic voting system." (emphasis added).

The steps required for a pre-registered voter to apply for and receive a ballot are detailed in the election manual published by the Minnesota Secretary of State. During the August 11, 2026 primary election, the relevant election manual outlined, among other things, a multistep process for a pre-registered voter to apply for a ballot and vote. For a pre-registered voter, providing their name and address to the Roster Judge is the first step. The Minnesota Secretary of State's Office confirmed with investigators that an individual begins the process of applying for a ballot when they approach a Roster Judge in a polling place, engage with the Roster Judge and respond to questions about who they are and where they live.

Defendant O'Keefe entered a polling place without legitimate purpose and intentionally misrepresented his identity to election judges on at least two occasions on August 11, 2026. One occurred at Ward 2, Precinct 5 where he used the name of a voter registered in that precinct, Identity Theft Victim 3, in applying for a ballot. The other occurred at Ward 3, Precinct 5 where he falsely gave the name of a voter registered in that precinct, Identity Theft Victim 4, in applying for a ballot. He also intentionally aided and abetted Defendant Higby in the incidents at Ward 1, Precinct 1 and Ward 1, Precinct 5.

MSA 609.527 – Identity Theft:

Defendant O'Keefe used multiple identities that are not his own with the intent to commit and aid in the commission of unlawful activity. This unlawful activity includes repeatedly giving false information to public officials and misrepresenting their identity in applying for a ballot. He also intentionally aided and abetted Defendant Higby in the incidents at Ward 1, Precinct 1 and Ward 1, Precinct 5.

Defendant is not in custody.

JUDICIAL BRANCH

SIGNATURES AND APPROVALS

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Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant

David M Hansen
Police Sergeant
350 S 5th St
Minneapolis, MN 55415-1389
Badge: 2680

Electronically Signed:
10/27/2026 12:16 PM
Hennepin County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney

Morgan D Kunz
Senior Assistant Hennepin County Attorney
300 S 6th St
Minneapolis, MN 55487
(612) 348-5550

Electronically Signed:
10/27/2026 11:03 AM

MINNESOTA JUDICIAL BRANCH

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FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

[X] SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear as directed in the Notice of Hearing before the above-named court to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

[ ] WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

[ ] ***Execute in MN Only*** [ ] ***Execute Nationwide*** [ ] ***Execute in Border States***

[ ] ORDER OF DETENTION

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: $0.00
Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: October 27, 2026.

Judicial Officer Thomas J Conley
Judge

Electronically Signed: 10/27/2026 04:33 PM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

COUNTY OF HENNEPIN
STATE OF MINNESOTA

State of Minnesota

Plaintiff

vs.

JAMES O'KEEFE

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Summons upon the Defendant herein named.

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

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Name:	JAMES O'KEEFE
DOB:	06/28/1984
Address:	205 DATURA ST #320 WEST PALM BEACH, FL 33401
Alias Names/DOB:	
SID:	
Height:	
Weight:	
Eye Color:	
Hair Color:	
Gender:	MALE
Race:	White
Fingerprints Required per Statute:	Yes
Fingerprint match to Criminal History Record:	No
Driver's License #:	
SILS Person ID #:	983552
SILS Tracking No.	3558252
Alcohol Concentration:	

MINNESOTA JUDICIAL BRANCH

STATUTE AND OFFENSE GRID

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Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	8/11/2026	609.527.2 Identity Theft-Transfers/Possesses/Uses Identity of Other Person	Felony	U1730	X	MN0271100	26228835
	Modifier	8/11/2026	609.05.1 Liability for Crimes of Another-Intentional	No-Level	U1730	X	MN0271100	26228835
	Modifier	8/11/2026	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	U1730	X	MN0271100	26228835
	Penalty	8/11/2026	609.527.3(3) Identity Theft-Penalties-2 or 3 Direct Victims/Value to Direct and Indirect Victims $501-$2,500	Felony	U1730	X	MN0271100	26228835
2	Charge	8/11/2026	204C.14.1(a) Election Day Act - Unlawful Voting - Misrepresent identity; Apply for/deposit ballot or attempt vote	Felony	Y1190	X	MN0271100	26228835
	Modifier	8/11/2026	609.05.1 Liability for Crimes of Another-Intentional	No-Level	Y1190	X	MN0271100	26228835
	Modifier	8/11/2026	609.05.2 Liability for Crimes of Another-Reasonably Forseeable	No-Level	Y1190	X	MN0271100	26228835
	Penalty	8/11/2026	204C.14.1 Election Day Act - Unlawful voting; Felony penalty.	Felony	Y1190	X	MN0271100	26228835

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