

Congress of the United States
House of Representatives

COMMITTEE ON OVERSIGHT AND REFORM

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May 26, 2021

The Honorable Alejandro N. Mayorkas
Secretary
Department of Homeland Security
3801 Nebraska Avenue, N.W.
Washington, D.C. 20016

Dear Secretary Mayorkas:

The Subcommittee on Civil Rights and Civil Liberties is writing to request information about how the Department of Homeland Security (DHS) evaluated the dangers associated with militia violent extremists (MVEs) prior to militia groups' involvement in the January 6, 2021, insurrection at the U.S. Capitol.¹

The Subcommittee is concerned that under the Trump Administration, DHS did not give sufficient attention to the unique and evolving threat posed by MVEs. Last year, nationwide militia networks mobilized their members to engage in vigilante activity at racial justice protests, armed demonstrations against COVID-19 public health measures, and other street protests advancing conspiracy theories about voter fraud and a stolen election.² As you know, militias were also implicated in serious efforts to overturn the election, culminating in the insurrection.³

After the insurrection, DHS finally issued a public warning that mentioned MVEs as a major component of the domestic terrorism threat landscape.⁴ Prior to that point, however, DHS

¹ *Prosecutors Allege "Alliance" Between Proud Boys and Oath Keepers on Jan. 6*, Washington Post (Mar. 24, 2021) (online at www.washingtonpost.com/local/legal-issues/oathkeepers-proudboys-alliance-capitol-riot/2021/03/24/81e93b48-8cb0-11eb-9423-04079921c915_story.html).

² Anti-Defamation League, *The Militia Movement* (online at www.adl.org/resources/backgrounders/the-militia-movement-2020); *Faced with Defeat, Armed Protesters in Arizona Insist Election Stolen*, Reuters (Nov. 7, 2020) (online at www.reuters.com/article/us-usa-election-lawsuit-arizona/faced-with-defeat-armed-protesters-in-arizona-insist-election-stolen-idUSKBN27N10U).

³ *Who Are the Oath Keepers? Militia Group, Founder Scrutinized in Capitol Riot Probe*, National Public Radio (Apr. 10, 2021) (online at www.npr.org/2021/04/10/985428402/who-are-the-oath-keepers-militia-group-founder-scrutinized-in-capitol-riot-probe).

⁴ Office of the Director of National Intelligence, *Domestic Violent Extremism Poses Heightened Threat in 2021* (Mar. 1, 2020) (online at www.dhs.gov/sites/default/files/publications/21_0301_odni_unclass-summary-of-dve-assessment-17_march-final_508.pdf); see also Joint Intelligence Bulletin, *Domestic Violent Extremists Emboldened in Aftermath of Capitol Breach, Elevated Domestic Terrorism Threat of Violence Likely Amid Political Transitions and Beyond* (Jan. 13, 2021) (online at <https://info.publicintelligence.net/DHS-FBI-NCTC->

guidance documents failed to highlight the threat of MVEs. For instance, the October 2020 Homeland Threat Assessment and the September 2019 Strategic Framework for Countering Terrorism and Targeted Violence did not explicitly mention MVEs.⁵

Given this curious silence, the Subcommittee would like to know more about DHS's strategy to counter MVEs *before* the attack on the U.S. Capitol. Illegal paramilitary activity by these groups has been on the rise for many years as militias have mobilized against local, state, and federal governments; civil rights protesters; left-wing activists; and immigrants.⁶

Militia groups have also increasingly aligned their efforts explicitly with white supremacists and similar extremist groups. Joint mobilization around recent flash points related to COVID-19 and the 2020 election "created opportunities for crossover" between militias and other far-right extremists that led to "alliances [that] continued throughout the year."⁷ These alliances were on full display during last summer's racial justice protests and continued through the January insurrection, when the Oath Keepers, for example, allegedly coordinated with the Proud Boys in preparation for the attack.⁸

DHS must provide greater transparency into its analysis of militia extremism prior to the time it ballooned into a serious threat to our democratic institutions.

Militia Groups Played a Critical Role in Recent Extremist Activity

Last year, armed militia members stormed state capitols across the nation in opposition to public health measures related to the COVID-19 pandemic. In Idaho and Oregon, militias helped to forcibly disrupt sessions of the state legislatures.⁹ In Michigan, an armed occupation of the

CapitolBreachViolence.pdf).

⁵ Department of Homeland Security, *Homeland Threat Assessment* (Oct. 2020) (online at www.dhs.gov/sites/default/files/publications/2020_10_06_homeland-threat-assessment.pdf); Department of Homeland Security, *Strategic Framework for Countering Terrorism and Targeted Violence* (Sept. 2019) (online at www.dhs.gov/sites/default/files/publications/19_0920_plcy_strategic-framework-countering-terrorism-targeted-violence.pdf).

⁶ Mary McCord, *Armed Militias Are Taking Trump's Civil War Tweets Seriously*, Lawfare (Oct. 2, 2019) (online at www.lawfareblog.com/armed-militias-are-taking-trumps-civil-war-tweets-seriously); *An Expert on Right-Wing Extremist Groups Warns "The Threat Is Escalating"*, Esquire (Oct. 19, 2020) (online at www.esquire.com/news-politics/a34413038/interview-kathleen-belew-white-supremacist-groups-expert/); *How Trump and COVID-19 Have Reshaped the Modern Militia Movement*, FiveThirtyEight (Sept. 4, 2020) (online at <https://fivethirtyeight.com/features/how-trump-and-covid-19-have-reshaped-the-modern-militia-movement/>); *Veterans Fortify the Ranks of Militias Aligned with Trump's Views*, New York Times (Sept. 11, 2020) (online at www.nytimes.com/2020/09/11/us/politics/veterans-trump-protests-militias.html).

⁷ Southern Poverty Law Center, *Antigovernment Movement* (online at www.splcenter.org/fighting-hate/extremist-files/ideology/antigovernment).

⁸ *Portland Police Stand by as Proud Boys and Far-Right Militias Flash Guns and Brawl with Antifa Counter-Protesters*, Washington Post (Aug. 22, 2020) (online at www.washingtonpost.com/nation/2020/08/22/portland-police-far-right-protest/); *Justice Dept. Links Oath Keepers and Proud Boys Ahead of Capitol Riot* (Mar. 24, 2021) (online at www.nytimes.com/2021/03/24/us/politics/oath-keepers-proud-boys-capitol-riot.html).

⁹ *Unmasked Protesters Push Past Police into Idaho Lawmakers' Session*, National Public Radio (Aug. 25,

state capitol was followed by a narrowly foiled plot by members of a local militia to kidnap Governor Gretchen Whitmer.¹⁰

Militia groups also mobilized in opposition to last summer's racial justice protests.¹¹ In cities across the country, militias plotted to interfere with peaceful protests with violent vigilante activity.¹² In August 2020, militia member Kyle Rittenhouse shot and killed two protesters in Kenosha, Wisconsin, following the death of a Black man in police custody.¹³

As militias became more active, they also cast themselves as patriots who would answer the call to defend then President Trump against forces allegedly working to steal the election.¹⁴ The percentage of demonstrations that involved far-right militias and similar groups nearly doubled in the weeks following the election, rising from approximately 5% before the election to approximately 10% by the end of November.¹⁵ Militia groups were also at the center of some of the most aggressive "Stop the Steal" actions protesting the election results, including on-the-ground intimidation of election officials in Georgia.¹⁶

Ultimately, militia groups organized their members to converge on Washington, D.C., to prevent the certification of the votes of the Electoral College on January 6, 2021.¹⁷ Prosecutors have already charged several militia members for plotting the ensuing attack on the Capitol.¹⁸

2020) (online at www.npr.org/2020/08/25/905785548/unmasked-protesters-push-past-police-into-idaho-lawmakers-session); *Heavily Armed Far-Right Mob Floods Oregon Capitol*, Daily Beast (Dec. 22, 2020) (online at www.thedailybeast.com/heavily-armed-far-right-mob-descends-on-oregon-capitol).

¹⁰ *In Michigan, a Dress Rehearsal for the Chaos at the Capitol on Wednesday*, New York Times (Jan. 9, 2021) (online at www.nytimes.com/2021/01/09/us/politics/michigan-state-capitol.html); *Member of Extremist Group Pleads Guilty in Michigan Governor Kidnapping Plot*, New York Times (Jan. 27, 2021) (online at www.nytimes.com/2021/01/27/us/ty-garbin-whitmer-kidnapping-plot.html).

¹¹ Armed Conflict Location & Event Data Project, *Standing By: Right-Wing Militias & the U.S. Election* (Oct. 2020) (online at <https://acleddata.com/blog/2020/10/21/standing-by-militias-election/>).

¹² *Militia at Violent New Mexico Protest Linked to White Supremacy, Domestic Terror: Mayor*, Reuters (Jun. 16, 2020) (online at www.reuters.com/article/us-new-mexico-protest/militia-at-violent-new-mexico-protest-linked-to-white-supremacy-domestic-terror-mayor-idUSKBN23N2RL).

¹³ *Kyle Rittenhouse and His Militia Defense Ignores that Private Paramilitaries Are Illegal*, NBC News (Sept. 5, 2020) (online at www.nbcnews.com/think/opinion/kyle-rittenhouse-his-militia-defense-ignores-private-paramilitaries-are-illegal-ncna1239397).

¹⁴ *A Pro-Trump Militant Group Has Recruited Thousands of Police, Soldiers, and Veterans*, The Atlantic (Nov. 2020) (online at www.theatlantic.com/magazine/archive/2020/11/right-wing-militias-civil-war/616473/).

¹⁵ *Capitol Riots: Are U.S. Militia Groups Becoming More Active?*, BBC (Jan. 21, 2021) (online at www.bbc.com/news/world-us-canada-55638579).

¹⁶ *"It's Surreal": U.S. Officials Facing Violent Threats as Trump Claims Voter Fraud*, The Guardian (Dec. 10, 2020) (online at www.theguardian.com/us-news/2020/dec/09/trump-voter-fraud-threats-violence-militia).

¹⁷ *"Oath Keepers" Militia Was Ready on Jan. 6 to Act on Trump's Orders, Prosecutors Say*, Reuters (Feb. 11, 2021) (online at www.reuters.com/article/usa-trump-capitol-arrests/oath-keepers-militia-was-ready-on-jan-6-to-act-on-trumps-orders-prosecutors-say-idINKBN2AB24T).

¹⁸ *Prosecutors Allege "Substantial Evidence" of Oath Keepers Conspiracy to Storm Capitol*, National Public Radio (Mar. 25, 2021) (online at www.npr.org/2021/03/25/981210089/prosecutors-allege-substantial).

DHS Did Not Adequately Warn the Public of Growing Militia Threats

Despite the clear signs that militia groups were a growing threat to public safety, MVEs were not singled out in public DHS counterterrorism reports until *after* January 6. As mentioned above, the department finally used the term “MVE” to describe a distinct category of domestic extremists in a late January 2021 joint assessment of threats to the Capitol region and in its March 2021 public threat assessment.

However, neither the term “MVE” nor the word “militia” appeared in the October 2020 Homeland Threat Assessment, which was issued just two days before federal agents announced arrests in an attempted militia plot to kidnap and possibly assassinate Governor Whitmer. The report spoke of “anti-government/anti-authority” violent extremists that may be spurred to action by public health restrictions, without addressing the role that militia networks have played in radicalizing and connecting these extremists.¹⁹ Similarly, militia groups were not mentioned in the September 2019 Strategic Framework for Countering Terrorism and Targeted Violence.²⁰

In addition, the department reportedly did not issue a threat assessment ahead of January 6, despite clear signals from militia groups that they planned to attack the Capitol.²¹ For days before the attack, online forums frequented by far-right militias and other extremist groups were filled with references to potential violence and calls to bring weapons to the planned protests against the certification of the Electoral College vote.²² This included posts about Capitol Hill on MyMilitia, a forum popular with MVEs, that called for users to “take the hill or die trying.”²³

The failure to properly warn the public about this evolving threat may have undermined law enforcement strategies to combat militia extremism on and before January 6. During racial justice protests last summer, local law enforcement’s acquiescence to militia activity occurred in the absence of clear federal guidance on how to handle and contextualize the threat of MVEs.²⁴

evidence-of-oath-keeper-conspiracy-to-storm-capitol).

¹⁹ Department of Homeland Security, *Homeland Threat Assessment* (Oct. 2020) (online at www.dhs.gov/sites/default/files/publications/2020_10_06_homeland-threat-assessment.pdf).

²⁰ Department of Homeland Security, *Strategic Framework for Countering Terrorism and Targeted Violence* (Sept. 2019) (online at www.dhs.gov/sites/default/files/publications/19_0920_plcy_strategic-framework-countering-terrorism-targeted-violence.pdf).

²¹ *Why Didn't the FBI and DHS Produce a Threat Report Ahead of the Capitol Insurrection?*, National Public Radio (Jan. 13, 2021) (online at www.npr.org/2021/01/13/956359496/why-didnt-the-fbi-and-dhs-produce-a-threat-report-ahead-of-the-capitol-insurrect).

²² *Pro-Trump Forums Erupt with Violent Threats Ahead of Wednesday's Rally Against the 2020 Election*, Washington Post (Jan. 5, 2021) (online at www.washingtonpost.com/technology/2021/01/05/parler-telegram-violence-dc-protests/).

²³ *Capitol Rioters Planned for Weeks in Plain Sight. The Police Weren't Ready*, ProPublica (Jan. 7, 2021) (online at www.propublica.org/article/capitol-rioters-planned-for-weeks-in-plain-sight-the-police-werent-ready); *Proud Boys and Hardcore Trump Supporters Are Turning Their Backs on Cops*, Vice (Jan. 5, 2021) (online at www.vice.com/en/article/88avmx/proud-boys-and-hardcore-trump-supporters-are-turning-their-backs-on-cops).

²⁴ *Armed Vigilantes Antagonizing Protesters Have Received Warm Reception from Police*, The Intercept

Because most states already have laws prohibiting illegal paramilitary activities, clear federal guidance could have helped state and local law enforcement leverage the tools already at their disposal to counter this increasingly prevalent strand of extremism.²⁵

Since the January insurrection, militia groups have celebrated what they consider to be a victory on that day. The assault on our Capitol not only emboldened militia groups to think big about overthrowing constitutional government but also provided them an unprecedented opportunity to collaborate and coordinate violent action among diverse extremist elements.²⁶ Militia groups are already planning their next wave of activities, including lawless and criminal confrontations with the Biden Administration.²⁷ In March 2021, Capitol Police uncovered another potential plot by militia groups to breach the Capitol.²⁸

Despite this, MVEs were not mentioned in the National Terrorism Advisory System bulletins DHS published on January 27 and May 14, 2021, indicating that the department's failure to publicly engage with this threat is an ongoing problem.²⁹

The American people deserve a complete, transparent analysis of whether DHS failed to assess appropriately the security threat posed by MVEs. Given the dangerous evolution of the militia movement into a core component of right-wing violent extremism, the federal government must learn from past mistakes and improve its analytical and reporting functions so it can clearly communicate to the public the nature of this urgent problem.

For the above reasons, we request that you provide the Subcommittee with the following documents and information no later than June 15, 2021:

1. All guidance documents provided to state and federal law enforcement since January 2020 about the threat of militia groups and MVEs, including any

(June 19, 2020) (online at <https://theintercept.com/2020/06/19/militia-vigilantes-police-brutality-protests/>).

²⁵ Vanda Felbab-Brown, *How to Counter Right-Wing Armed Groups in the United States*, Brookings Institution (Jan. 21, 2021) (online at www.brookings.edu/blog/order-from-chaos/2021/01/21/how-to-counter-right-wing-armed-groups-in-the-united-states/).

²⁶ “*This Was Really Big*”: *Far-Right Extremist Groups Use Capitol Attack to Recruit New Members*, USA Today (Jan. 7, 2021) (online at www.usatoday.com/story/news/nation/2021/01/07/us-capitol-riots-used-extremists-recruit-new-pro-gun-members/6588908002/).

²⁷ *Militia Alliance in Georgia Signals New Phase for Extremist Paramilitaries*, Atlanta Journal Constitution (Feb. 4, 2021) (online at www.ajc.com/news/militia-alliance-in-georgia-signals-new-phase-for-extremist-paramilitaries/UD2JMQV5A5EABHHAKBQZBK2IVY/); *Right-Wing Militias Are Already Organizing to Take on the Biden Administration*, Slate (Mar. 9, 2021) (online at <https://slate.com/news-and-politics/2021/03/militia-armed-uprising-biden-bundy-haaland-interior.html>).

²⁸ *Police Uncover “Possible Plot” by Militia to Breach Capitol*, Associated Press (Mar. 3, 2021) (online at <https://apnews.com/article/police-uncover-possible-plot-militia-breach-capitol-c470dc642d9b568238f80b5822787159>).

²⁹ Department of Homeland Security, *National Terrorism Advisory System Bulletin* (Jan. 27, 2021) (online at www.dhs.gov/sites/default/files/ntas/alerts/21_0127_ntas-bulletin.pdf); Department of Homeland Security, *National Terrorism Advisory System Bulletin* (May 14, 2021) (online at www.dhs.gov/sites/default/files/ntas/alerts/21_0514_ntas_bulletin_all-sectors.pdf).

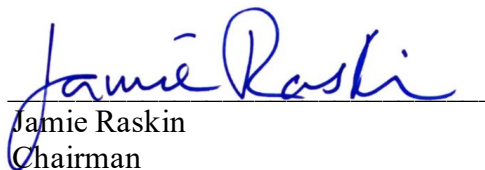
documents about the crossover between militia mobilization and white supremacist activity;

2. An explanation of how the department's understanding of the militia movement has changed since the publication of the October 2020 Homeland Threat Assessment;
3. A discussion of the ways the department has refocused its domestic terrorism strategy to emphasize the threat posed by militia groups in the wake of the January 6, 2021, attack on the U.S. Capitol;
4. An assessment of whether the growth of nationwide militia networks—as opposed to isolated extremists—has changed the nature of the MVE threat;
5. A plan to apply the MVE label in future public communications, including when extremists also appear to be motivated by white supremacist beliefs; and
6. An assessment of the relationship between militia extremists and white supremacist extremists, including recent joint mobilization by these extremist groups.

The Committee on Oversight and Reform is the principal oversight committee of the House of Representatives and has broad authority to investigate “any matter” at “any time” under House Rule X. An attachment to this letter provides additional instructions for responding to the Subcommittee’s request. If you have any questions regarding this request, please contact Subcommittee staff at (202) 225-5051.

Thank you for your attention to this matter.

Sincerely,



Handwritten signature of Jamie Raskin in blue ink, written over a horizontal line.

Jamie Raskin
Chairman

Subcommittee on Civil Rights and Civil Liberties

Enclosure

cc: The Honorable Pete Sessions, Ranking Member
Subcommittee on Civil Rights and Civil Liberties

Responding to Oversight Committee Document Requests

1. In complying with this request, produce all responsive documents that are in your possession, custody, or control, whether held by you or your past or present agents, employees, and representatives acting on your behalf. Produce all documents that you have a legal right to obtain, that you have a right to copy, or to which you have access, as well as documents that you have placed in the temporary possession, custody, or control of any third party.
2. Requested documents, and all documents reasonably related to the requested documents, should not be destroyed, altered, removed, transferred, or otherwise made inaccessible to the Committee.
3. In the event that any entity, organization, or individual denoted in this request is or has been known by any name other than that herein denoted, the request shall be read also to include that alternative identification.
4. The Committee's preference is to receive documents in electronic form (i.e., CD, memory stick, thumb drive, or secure file transfer) in lieu of paper productions.
5. Documents produced in electronic format should be organized, identified, and indexed electronically.
6. Electronic document productions should be prepared according to the following standards:
 - a. The production should consist of single page Tagged Image File ("TIF"), files accompanied by a Concordance-format load file, an Opticon reference file, and a file defining the fields and character lengths of the load file.
 - b. Document numbers in the load file should match document Bates numbers and TIF file names.
 - c. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
 - d. All electronic documents produced to the Committee should include the following fields of metadata specific to each document, and no modifications should be made to the original metadata:

BEGDOC, ENDDOC, TEXT, BEGATTACH, ENDATTACH, PAGECOUNT, CUSTODIAN, RECORDTYPE, DATE, TIME, SENTDATE, SENTTIME, BEGINDATE, BEGINTIME, ENDDATE, ENDTIME, AUTHOR, FROM, CC, TO, BCC, SUBJECT, TITLE, FILENAME, FILEEXT, FILESIZE, DATECREATED, TIMECREATED, DATELASTMOD, TIMELASTMOD,

INTMSGID, INTMSGHEADER, NATIVELINK, INTFILPATH, EXCEPTION,
BEGATTACH.

7. Documents produced to the Committee should include an index describing the contents of the production. To the extent more than one CD, hard drive, memory stick, thumb drive, zip file, box, or folder is produced, each should contain an index describing its contents.
8. Documents produced in response to this request shall be produced together with copies of file labels, dividers, or identifying markers with which they were associated when the request was served.
9. When you produce documents, you should identify the paragraph(s) or request(s) in the Committee's letter to which the documents respond.
10. The fact that any other person or entity also possesses non-identical or identical copies of the same documents shall not be a basis to withhold any information.
11. The pendency of or potential for litigation shall not be a basis to withhold any information.
12. In accordance with 5 U.S.C. § 552(d), the Freedom of Information Act (FOIA) and any statutory exemptions to FOIA shall not be a basis for withholding any information.
13. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.
14. If compliance with the request cannot be made in full by the specified return date, compliance shall be made to the extent possible by that date. An explanation of why full compliance is not possible shall be provided along with any partial production.
15. In the event that a document is withheld on the basis of privilege, provide a privilege log containing the following information concerning any such document: (a) every privilege asserted; (b) the type of document; (c) the general subject matter; (d) the date, author, addressee, and any other recipient(s); (e) the relationship of the author and addressee to each other; and (f) the basis for the privilege(s) asserted.
16. If any document responsive to this request was, but no longer is, in your possession, custody, or control, identify the document (by date, author, subject, and recipients), and explain the circumstances under which the document ceased to be in your possession, custody, or control.
17. If a date or other descriptive detail set forth in this request referring to a document is inaccurate, but the actual date or other descriptive detail is known to you or is otherwise apparent from the context of the request, produce all documents that would be responsive as if the date or other descriptive detail were correct.

18. This request is continuing in nature and applies to any newly-discovered information. Any record, document, compilation of data, or information not produced because it has not been located or discovered by the return date shall be produced immediately upon subsequent location or discovery.
19. All documents shall be Bates-stamped sequentially and produced sequentially.
20. Two sets of each production shall be delivered, one set to the Majority Staff and one set to the Minority Staff. When documents are produced to the Committee, production sets shall be delivered to the Majority Staff in Room 2157 of the Rayburn House Office Building and the Minority Staff in Room 2105 of the Rayburn House Office Building.
21. Upon completion of the production, submit a written certification, signed by you or your counsel, stating that: (1) a diligent search has been completed of all documents in your possession, custody, or control that reasonably could contain responsive documents; and (2) all documents located during the search that are responsive have been produced to the Committee.

Definitions

1. The term “document” means any written, recorded, or graphic matter of any nature whatsoever, regardless of how recorded, and whether original or copy, including, but not limited to, the following: memoranda, reports, expense reports, books, manuals, instructions, financial reports, data, working papers, records, notes, letters, notices, confirmations, telegrams, receipts, appraisals, pamphlets, magazines, newspapers, prospectuses, communications, electronic mail (email), contracts, cables, notations of any type of conversation, telephone call, meeting or other inter-office or intra-office communication, bulletins, printed matter, computer printouts, teletypes, invoices, transcripts, diaries, analyses, returns, summaries, minutes, bills, accounts, estimates, projections, comparisons, messages, correspondence, press releases, circulars, financial statements, reviews, opinions, offers, studies and investigations, questionnaires and surveys, and work sheets (and all drafts, preliminary versions, alterations, modifications, revisions, changes, and amendments of any of the foregoing, as well as any attachments or appendices thereto), and graphic or oral records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings and motion pictures), and electronic, mechanical, and electric records or representations of any kind (including, without limitation, tapes, cassettes, disks, and recordings) and other written, printed, typed, or other graphic or recorded matter of any kind or nature, however produced or reproduced, and whether preserved in writing, film, tape, disk, videotape, or otherwise. A document bearing any notation not a part of the original text is to be considered a separate document. A draft or non-identical copy is a separate document within the meaning of this term.
2. The term “communication” means each manner or means of disclosure or exchange of information, regardless of means utilized, whether oral, electronic, by document or otherwise, and whether in a meeting, by telephone, facsimile, mail, releases, electronic

message including email (desktop or mobile device), text message, instant message, MMS or SMS message, message application, or otherwise.

3. The terms “and” and “or” shall be construed broadly and either conjunctively or disjunctively to bring within the scope of this request any information that might otherwise be construed to be outside its scope. The singular includes plural number, and vice versa. The masculine includes the feminine and neutral genders.
4. The term “including” shall be construed broadly to mean “including, but not limited to.”
5. The term “Company” means the named legal entity as well as any units, firms, partnerships, associations, corporations, limited liability companies, trusts, subsidiaries, affiliates, divisions, departments, branches, joint ventures, proprietorships, syndicates, or other legal, business or government entities over which the named legal entity exercises control or in which the named entity has any ownership whatsoever.
6. The term “identify,” when used in a question about individuals, means to provide the following information: (a) the individual’s complete name and title; (b) the individual’s business or personal address and phone number; and (c) any and all known aliases.
7. The term “related to” or “referring or relating to,” with respect to any given subject, means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is pertinent to that subject in any manner whatsoever.
8. The term “employee” means any past or present agent, borrowed employee, casual employee, consultant, contractor, de facto employee, detailee, fellow, independent contractor, intern, joint adventurer, loaned employee, officer, part-time employee, permanent employee, provisional employee, special government employee, subcontractor, or any other type of service provider.
9. The term “individual” means all natural persons and all persons or entities acting on their behalf.