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U.S. House of Representatives
Washington, DC 20515

january6th.house.gov
(202) 225-7800

One Hundred Seventeenth Congress

Select Committee to Investigate the January 6th Attack on the United States Capitol

August 25, 2021

The Honorable David S. Ferriero
Archivist of the United States
U.S. National Archives and Records Administration
700 Pennsylvania Avenue, NW
Washington, DC 20408

Dear Mr. Ferriero:

The Select Committee to Investigate the January 6th Attack on the United States Capitol is examining the facts, circumstances, and causes of the January 6th attack. Our Constitution provides for a peaceful transfer of power, and this investigation seeks to evaluate threats to that process, identify lessons learned, and recommend laws, policies, procedures, rules, or regulations necessary to protect our Republic in the future. Pursuant to the Presidential Records Act (44 U.S.C. § 2205(2)(C)), and House Resolution 503, the Select Committee requests that you produce the documents described in the attached schedule from the Executive Office of the President (EOP) and the Office of the Vice President (OVP) in your custody, control, or possession.

Given the urgent nature of our request, we ask that you expedite your consultation and processing times pursuant to your authority under 36 C.F.R. § 1270.44(g). We have some concern about the delay in producing documents requested this past March, and we want to assist your prompt production of materials. We look forward to discussing ways in which we can do that. Toward that end, we request that NARA meet expeditiously with Select Committee investigative staff to discuss production priorities.

This is our first request for materials, and we anticipate additional requests as our investigation continues. Please produce this information to the Select Committee no later than September 9, 2021. An attachment to this letter provides additional instructions for responding to the Select Committee's request.

If you have questions, please contact Select Committee investigative staff at 202-225-7800.

Sincerely,

A handwritten signature in blue ink that reads "Bennie G. Thompson".

Bennie G. Thompson
Chairman

DOCUMENT SCHEDULE

Pending Requests

The Select Committee reiterates the requests made in the March 25, 2021,¹ correspondence from multiple committees of the House of Representatives, which the Select Committee subsequently joined, for documents and communications received, prepared, or sent between December 1, 2020, and January 20, 2021, relating to the counting of the electoral college vote on January 6, 2021, the potential for demonstrations, violence, or attacks in the National Capital Region on or around January 6, 2021, and the events or aftermath of January 6, 2021.

Those March 25, 2021, requests include but are not limited to:

1. All documents and communications relating in any way to remarks made by Donald Trump or any other persons on January 6, including Donald Trump's and other speakers' public remarks at the rally on the morning of January 6, and Donald Trump's Twitter messages throughout the day.
2. All calendars, schedules, and movement logs regarding meetings or events attended by President Trump, including the identity of any individuals in attendance, whether virtual or in-person, on January 6, 2021.
3. All documents and communications regarding the movements and protection of Vice President Pence on January 6, 2021.
4. All video communications recorded of the President speaking on January 6, 2021, and all documents and communications related thereto, including communications involving the President or any other officials or employees in the Executive Office of the President or the Office of the Vice President. This request specifically includes videos of communications released to the public and communications recorded but not released to the public, any documents or other communications identifying or discussing the content of those videos.
5. All photographs, videos, or other media, including any digital time stamps for such media, taken or recorded within the White House on January 6, 2021, or taken of the crowd assembled for the rally on the morning of January 6, and all communications or other documents related to that media.

¹ Letter from Chairwoman Carolyn B. Maloney, House Committee on Oversight and Reform, et al., to David Ferriero, Archivist, National Archives (March 25, 2021) (online at <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2021-03-25.House%20Committees%20to%20Agencies%20re%20Jan%206%20Attack.pdf>).

6. All photographs, videos, or other media, including any digital time stamps for such media, taken or recorded of Vice President Mike Pence or any individuals accompanying him, on January 6, 2021.
7. All documents and communications within the White House on January 6, 2021, relating in any way to the following:
 - the January 6, 2021, rally;
 - the January 6, 2021, march to the Capitol;
 - the January 6, 2021, violence at the Capitol;
 - any aspect of the Joint Session where Congress was counting electoral votes;
 - any legal, political, or other strategy regarding the counting of electoral votes;
 - Donald J. Trump;
 - Vice President Pence;
 - the President's tweets, speech, any other public communications on that date;
 - the President's recording of video for release on that date and any outtakes;
 - reactions, summaries, or characterizations of any public speeches or other communications by Donald Trump or other public speakers on that date;
 - efforts to persuade the President to deliver any particular message to people at or near the Capitol;
 - Sarah Matthews;
 - Hope Hicks;
 - Mark Meadows;
 - Dan Scavino;
 - Pat Cipollone;
 - Marc Short;
 - Patrick Philbin;
 - Eric Herschmann;
 - Stephan Miller;
 - Greg Jacob;
 - Matthew Pottinger;
 - Keith Kellogg;
 - Robert O'Brien;
 - Peter Navarro;
 - Ben Williamson;
 - Cassidy Hutchinson;
 - Molly Michael;
 - Nicholas "Nick" Luna;
 - Judd Deere;
 - Kayleigh McEnany;

- Ivanka Trump;
 - Eric Trump;
 - Lara Trump;
 - Donald Trump, Jr.;
 - Jared Kushner;
 - Melania Trump;
 - Kimberly Guilfoyle;
 - Steve Bannon;
 - Michael Flynn;
 - Rudolph “Rudy” Giuliani;
 - Roger Stone;
 - any Member of Congress or congressional staff; or
 - the Department of Defense, the Department of Justice, the Department of Homeland Security, the Department of the Interior, or any element of the National Guard.
8. All White House visitor records on January 6, 2021.
 9. All documents and communications regarding the movement of the President on January 6, 2021.
 10. All call logs and telephone records identifying calls placed to or from any individuals identified in (7) above.
 11. All schedules for any individuals identified in (7) above on January 6, 2021, and all documents relating to such meetings, including memoranda, read-aheads, and summaries of such meetings.
 12. All documents and communications received, prepared, or sent by any official within the White House Situation Room and the White House Operations Center on January 6, 2021, including but not limited to any communication logs, situation reports, and watch officer notes.

Additional Requests

In addition, to the extent not included in the scope of the March 25, 2021, request, and as a supplement to the requests previously made on March 25, 2021, we hereby make the following additional requests.

- (a) *Planning by the White House and Others for Legal or Other Strategies to Delay, Halt, or Otherwise Impede the Electoral Count*

1. From April 1, 2020, through January 20, 2021, all documents and communications related to efforts, plans, or proposals to contest the 2020 Presidential election results.
2. From April 1, 2020, through January 20, 2021, all documents and communications related to plans, efforts, or discussions regarding the electoral count (including plans, efforts, or discussions regarding delaying or impeding the electoral count).
3. All documents and communications concerning the role of the Vice President as the Presiding Officer in the certification of the votes of the electoral college.
4. From November 3, 2020, through January 20, 2021, all documents and communications referring or relating to the 2020 election results between White House officials and officials of State Governments. This includes, but is not limited to, communications with the following individuals and their staff and subordinates:
 - Doug Ducey,
 - Brian Kemp,
 - Brad Raffensperger,
 - Ken Paxton,
 - Frances Watson,
 - Mike Shirkey,
 - Lee Chatfield, or
 - Monica Palmer.
5. From April 1, 2020, through January 20, 2021, all documents and communications related to the 2020 election results, to or from one or more of the following individuals: Rudolph “Rudy” Giuliani, Justin Clark, Matt Morgan, Sidney Powell, Kurt Olsen, or Cleta Mitchell.
6. From April 1, 2020, through January 20, 2021, all documents and communications related to the 2020 Presidential election, including forecasting, polling, or results, and which are authored, presented by, or related in any way to the following individuals: Anthony “Tony” Fabrizio, Brad Parscale, Bill Stepien, Corey Lewandowski, or Jason Miller.
7. All documents and communications to or from David Bossie relating to questioning the validity of the 2020 election results.
8. All documents and communications referring or relating to court decisions, deliberations, or processes involving challenges to the 2020 Presidential election.

9. From November 3, 2020, through January 20, 2021, all documents and communications relating to the State of Texas and litigation concerning the 2020 Presidential election.
10. From November 3, 2020, through December 31, 2020, all documents and communications relating to an amicus brief concerning litigation involving the State of Texas.
11. All documents and communications relating to decisions of the United States Supreme Court issued on December 8, 2020, and December 11, 2020.
12. From November 3, 2020, through January 20, 2021, all documents and communications relating to Justin Riemer and the electoral count or litigation concerning the 2020 Presidential election.
13. All documents and communications referring or relating to QAnon, the Proud Boys, Stop the Steal, Oath Keepers, or Three Percenters concerning the 2020 election results, or the counting of the electoral college vote on January 6, 2021.
14. Any documents and communications relating to election machinery or software used in the 2020 election, including but not limited to communications relating to Dominion Voting Systems Corporation.
15. From November 3, 2020, through January 19, 2021, all documents and communications concerning the resignation of any White House personnel or any politically appointed personnel of any Federal department or agency (including the resignation of any member of the President's Cabinet) and mentioning the 2020 Presidential election or the events of January 6, 2021.
16. All documents and communications concerning prepared remarks for a speech by Donald Trump on November 3, 2020, or November 4, 2020.
17. All documents and communications to or from John Eastman from November 3, 2020, through January 20, 2021.
18. All documents and communications relating to allegations of election fraud or to challenging, overturning, or questioning the validity of the 2020 Presidential election, and involving personnel of the Department of Justice, including any one or more of the following individuals: Jeffrey Rosen, Richard Donoghue, Steven Engel, Jeffrey Wall, Patrick Hovakimian, Byung J. "BJay" Pak, Bobby Christine, or Jeffrey Clark.

19. All documents and communications relating to allegations of election fraud or to challenging, overturning, or questioning the validity of the 2020 Presidential election and Chris Christie.
20. All documents and communications relating to the results of the 2020 Presidential election and Peter Navarro.
21. All documents and communications relating to challenging, overturning, or questioning the validity of the 2020 Presidential election and William Barr.

(b) Recruitment, Planning, Coordination, and Other Preparations for the Rallies Leading up to and Including January 6th and the Violence on January 6th

1. All documents and communications relating to planned protests, marches, public assemblies, rallies, or speeches in Washington, DC, on November 14, 2020, December 12, 2020, January 5, 2021, and January 6, 2021.
2. All documents and communications related to security of the Capitol or other Federal facilities on January 5, 2021, and January 6, 2021.
3. All documents and communications concerning Donald Trump's statement on September 29, 2020, for the Proud Boys to "stand back and stand by."
4. From December 1, 2020, through January 20, 2021, any documents and communications involving White House personnel and any Member of Congress, referring or relating to (a) civil unrest, violence, or attacks at the Capitol; (b) challenging, overturning, or questioning the validity of the 2020 election results; (c) the counting of the electoral college vote on January 6, 2021; or (d) appealing the decisions of courts related to the 2020 Presidential election.
5. All documents and communications related to social media information monitored, gathered, reviewed, shared, or analyzed by White House personnel on January 6, 2021.
6. All documents and communications related to any plan for the President to march or walk to the Capitol on January 6, 2021. This request includes any such documents or communications related to a decision not to march or walk to the Capitol on January 6, 2021.
7. From April 1, 2020, through January 20, 2021, all documents and communications concerning the 2020 election and relating to the following individuals:
 - Cindy Chafian,

- Greg Locke,
- Robert Patrick Lewis,
- Chris Lippe,
- Tracy Diaz,
- Alex Phillips,
- Bianca Gracia,
- Ali Alexander,
- Brandon Straka,
- Rose Tennet,
- Ed Martin,
- Vernon Jones,
- Cordie Williams,
- Michael Flynn,
- Alex Jones,
- Owen Schroyer,
- Karyn Turk,
- Scott Presler,
- Rogan O'Handley,
- Christie Hutcherson,
- Gina Loudon,
- Jack Posobiec,
- Bryson Grey,
- Angela Stanton King,
- Brian Gibson,
- George Papadopoulos,
- Julio Gonzalez,
- Bernard Kerik,
- Mark Burns,
- Roger Stone,
- George Flynn,
- Tom Van Flein,
- Doug Logan,
- Katrina Pierson,
- Amy Kremer,
- Dustin Stockton,
- Enrique Tarrío,
- Kenneth Harrelson,
- Caroline Wren, or
- Michael Coudrey.

(c) Information Donald Trump Received Following the Election Regarding the Election Outcome, and What He Told the American People About the Election

1. From November 3, 2020, to January 20, 2021, all documents and communications reporting, summarizing, or detailing the voting returns and election results of the 2020 Presidential election.
2. All documents and communications related to Donald Trump's response to the election results of the 2020 Presidential election, including but not limited to any planned public remarks.
3. All documents and communications regarding a November 9, 2020, memorandum from Attorney General William Barr concerning investigation of voter fraud allegations.
4. All documents and communications relating to voting machines or software used in the 2020 election and their control or manipulation through thermostats.
5. From April 1, 2020, through January 20, 2021, all documents and communications relating to challenging the validity of the 2020 election, to, from, or mentioning Mike Lindell.
6. From April 1, 2020, through January 20, 2021, all documents and communications relating to challenging the validity of the 2020 election, to, from, or mentioning Doug Logan.
7. From November 3, 2020, through January 20, 2021, all documents and communications related to prepared public remarks and actual public remarks of Donald Trump.

(d) What the President Knew About the Election's Likely Outcome Before the Election Results and How He Characterized the Validity of the Nation's Election System

1. From April 1, 2020, through November 3, 2021, all documents and communications provided to Donald Trump or Mark Meadows containing information predicting that Donald Trump would or might lose the 2020 Presidential election.
2. From April 1, 2020, through January 20, 2021, all documents and communications provided to Donald Trump or Mark Meadows relating to mail-in ballots and their effect or predicted effect on results of the election or the timing of election-related news or decisions.
3. From November 3, 2020, through November 5, 2020, all documents and communications provided to Donald Trump or Mark Meadows relating to projected election results of the 2020 Presidential election.

4. From April 1, 2020, through January 20, 2021, all documents provided to Donald Trump or Mark Meadows reviewing, assessing, or reporting on the security of election systems in the United States.
5. From April 1, 2020, through January 20, 2021, all documents and communications provided to Donald Trump or Mark Meadows regarding purported election irregularities, election-related fraud, or other election-related malfeasance.
6. From April 1, 2020, through January 20, 2021, all documents and communications provided to Donald Trump or Mark Meadows referring to a stolen election, stealing the election, or a “rigged” election.

(e) Responsibilities in the Transfer of Power and the Obligation to Follow the Rule of Law

1. All documents and communications relating to legal advice or legal analysis of, or compliance with, the constitutional process for certifying the electoral vote. This includes, but is not limited to, communications with and from the following individuals:
 - Pat Cipollone,
 - Patrick Philbin,
 - Eric Herschmann,
 - John Eastman, or
 - Greg Jacobs.
2. All documents and communications on January 6, 2021, related to Mark Milley, Christopher Miller, Kashyap “Kash” Patel, or Ryan McCarthy.
3. From January 6, 2021, through January 20, 2021, all documents and communications related to the events of January 6, 2021, and Mark Milley, Christopher Miller, Kashyap “Kash” Patel, or Ryan McCarthy.
4. From November 3, 2020, through January 20, 2021, all documents and communications concerning the potential or actual changes in personnel at the following departments and agencies:
 - The Department of Defense, within the Office of the Secretary and the Joint Chiefs of Staff. This should include, but is not limited to, such documents and communications concerning the following individuals:
 - Mark Esper,
 - Mark Milley,
 - Christopher Miller,

- Kashyap “Kash” Patel,
 - James Anderson,
 - Anthony Tata,
 - Ezra Cohen-Watnick,
 - Joseph Kernan, or
 - John McEntee
 - The Department of Justice. This should include, but is not limited to, such documents and communications concerning the following individuals:
 - Jeffrey Rosen,
 - Richard Donoghue,
 - Jeffrey Clark, or
 - John McEntee
 - The Federal Bureau of Investigation. This should include, but is not limited to, such documents and communications concerning the following individuals:
 - Kashyap “Kash” Patel,
 - Christopher Wray, or
 - John McEntee.
 - The Central Intelligence Agency. This should include, but is not limited to, such documents and communications concerning the following individuals:
 - Kashyap “Kash” Patel,
 - Gina Haspel,
 - Vaughn Bishop, or
 - John McEntee.
 - The Department of Homeland Security (including the United States Secret Service). This should include, but is not limited to, such documents and communications concerning the following individuals:
 - Chad Wolf, or
 - John McEntee.
5. From November 3, 2020, through January 20, 2021, all documents and communications relating to Jeffrey Clark.
 6. From November 3, 2020, through January 20, 2021, all documents and communications related to the Twenty-Fifth Amendment to the U.S. Constitution.

7. From January 6, 2021, through January 20, 2021, all documents and communications related to the mental stability of Donald Trump or his fitness for office.
8. Any documents and communications relating to instructions to stop or delay preparation for the transition of administrations.
9. All communications between White House personnel and General Services Administration (GSA) Administrator Emily Murphy or other GSA officials relating to “ascertainment” under the Presidential Transition Act. This includes but is not limited to communications discussing the recognition of Joseph Biden as the winner of the 2020 Presidential election.
10. All documents and communications concerning the potential invocation of the Insurrection Act.
11. From November 3, 2020, through January 20, 2021, all documents and communications related to martial law.
12. All documents and communications concerning the use of Federal law enforcement or military personnel during voting in the 2020 Presidential election.
13. From November 3, 2020, through January 20, 2021, all documents and communications related to Kashyap “Kash” Patel.
14. From November 3, 2020, through January 20, 2021, all documents and communications related to John McEntee.

(f) Other Materials Relevant to the Challenges to a Peaceful Transfer of Power

1. Any documents and communications relating to foreign influence in the United States 2020 Presidential election through social media narratives and disinformation.
2. All documents and communications related to the January 3, 2021, letter from 10 former Defense Secretaries warning of use of the military in election disputes.

Responding to the Select Committee to Investigate the January 6th Attack on the United States Capitol's Document Requests

1. In complying with this request, produce all responsive documents, regardless of classification level, 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 Select Committee to Investigate the January 6th Attack on the United States Capitol ("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 a protected electronic form (i.e., password protected CD, memory stick, thumb drive, or secure file transfer) in lieu of paper productions. With specific reference to classified material, you will coordinate with the Committee's Security Officer to arrange for the appropriate transfer of such information to the Committee. This includes but is not necessarily limited to: a) identifying the classification level of the responsive document(s); and b) coordinating for the appropriate transfer of any classified responsive document(s).
5. Electronic document productions should be prepared according to the following standards:
 - a. If the production is completed through a series of multiple partial productions, field names and file order in all load files should match.
 - b. 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.

6. 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.
7. 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.
8. When you produce documents, you should identify the paragraph(s) or request(s) in the Committee's letter to which the documents respond.
9. 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.
10. The pendency of or potential for litigation shall not be a basis to withhold any information.
11. 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.
12. Pursuant to 5 U.S.C. § 552a(b)(9), the Privacy Act shall not be a basis for withholding information.
13. 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, as well as a date certain as to when full production will be satisfied.
14. In the event that a document is withheld on any basis, provide a log containing the following information concerning any such document: (a) the reason it is being withheld, including, if applicable, the 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 withholding.
15. 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. Additionally, identify where the responsive document can now be found including name, location, and contact information of the entity or entities now in possession of the responsive document(s).

16. 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.
17. 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.
18. All documents shall be Bates-stamped sequentially and produced sequentially.
19. 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 classification level, how recorded, or how stored/displayed (e.g. on a social media platform) 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, computer or mobile device screenshots/screen captures, 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, through a social media or online platform, 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, assignee, 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.