

SUBPOENA

**BY AUTHORITY OF THE HOUSE OF REPRESENTATIVES OF THE
CONGRESS OF THE UNITED STATES OF AMERICA**

To Proud Boys International, L.L.C.

You are hereby commanded to be and appear before the
Select Committee to Investigate the January 6th Attack on the United States Capitol

of the House of Representatives of the United States at the place, date, and time specified below.

- to produce the things identified on the attached schedule** touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of production: 1540A Longworth House Office Building, Washington, DC 20515

Date: December 7, 2021

Time: 10:00 AM

- to testify at a deposition** touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony: _____

Date: _____

Time: _____

- to testify at a hearing** touching matters of inquiry committed to said committee or subcommittee; and you are not to depart without leave of said committee or subcommittee.

Place of testimony: _____

Date: _____

Time: _____

To any authorized staff member or the United States Marshals Service

_____ to serve and make return.

Witness my hand and the seal of the House of Representatives of the United States, at

the city of Washington, D.C. this 22nd day of November, 2021.

Attest:

Kevin McAuliffe

Clerk

Bonnie Thompson

Chairman or Authorized Member

PROOF OF SERVICE

Subpoena for

Proud Boys International, L.L.C.

Address c/o Jason Lee Van Dyke, 1417 E McKinney Street, Suite 110

Denton, TX 76209-2502

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

*U.S. House of Representatives
117th Congress*

Served by (print name) _____

Title _____

Manner of service _____

Date _____

Signature of Server _____

Address _____

BENNIE G. THOMPSON, MISSISSIPPI
CHAIRMAN

ZOE LOFGREN, CALIFORNIA
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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

November 23, 2021

Proud Boys International, L.L.C.
c/o Mr. Jason Lee Van Dyke
1417 E McKinney Street, Suite 110
Denton, TX 76209-2502

Dear Mr. Van Dyke:

Pursuant to the authorities set forth in House Resolution 503 and the rules of the House of Representatives, the Select Committee to Investigate the January 6th Attack on the United States Capitol (“Select Committee”) hereby transmits a subpoena that compels you to produce the documents set forth in the accompanying schedule by December 7, 2021.

The Select Committee is investigating the facts, circumstances, and causes of the January 6th attack and issues relating to the peaceful transfer of power, in order to identify and evaluate lessons learned and to recommend to the House and its relevant committees corrective laws, politics, procedures, rules, or regulations. The inquiry includes examination of how various individuals and entities coordinated their activities leading up to the events of January 6, 2021, as well as the influencing factors that fomented such an attack on American representative democracy while engaged in a constitutional process.

The investigation and public reports have revealed credible evidence of the involvement of the Proud Boys in the events within the scope of the Select Committee’s inquiry. You have been identified in reporting as the Proud Boys’ attorney;¹ you also reportedly served as Chairman of the Proud Boys in 2018.² You have also been identified in reporting as the former owner of the “Proud Boys” trademark, which you surrendered in February 2021.³ JLVD Holdings, L.L.C.—which corresponds to your initials—is listed as the last director of Proud Boys International, L.L.C., before its dissolution on February 10, 2021.⁴ As you appear to be the last record-holder of Proud Boys International, L.L.C., the Select Committee seeks relevant records in your possession, custody, or control.

¹ *A Proud Boys Lawyer Wanted to Be a Nazi Terrorist*, VICE, Dec. 8, 2020, <https://www.vice.com/en/article/wx8xp4/a-proud-boys-lawyer-wanted-to-be-a-nazi-terrorist>.

² *Gavin McInnes: founder of far-right Proud Boys denied Australian visa – report*, THE GUARDIAN, Nov. 30, 2018, <https://www.theguardian.com/world/2018/nov/30/gavin-mcinnis-proud-boys-australia-visa>.

³ *PROUD BOYS trademark owner surrenders registration weeks after Capitol riot*, WORLD TRADEMARK REVIEW, Feb. 15, 2021, <https://www.worldtrademarkreview.com/governmentpolicy/proud-boys-trademark-owner-surrenders-registration-weeks-after-capitol-riot>.

⁴ *Proud Boys International L.L.C.*, OPENCORPORATES, https://opencorporates.com/companies/us_tx/0803172528.

Indictments returned by a federal grand jury in Washington, D.C., indicate that Proud Boys engaged in extensive calls for violence leading up to January 6, 2021. On November 5, 2020, Joe Biggs, a Proud Boys member indicted by the Department of Justice (“DOJ”), posted on social media, “It’s time for f***ing war if they steal this s***,” referring to the 2020 election results.⁵ Mr. Biggs also claimed, on a Proud Boys livestreamed show called *WarBoys*, that government officials are “evil scum, and they all deserve to die a traitor’s death.” Ethan Nordean, a Proud Boys leader also indicted by the DOJ, responded, “Yup, Day of the Rope,”⁶ referring to a day of mass lynching of “race traitors” in the white supremacist novel *The Turner Diaries*. Shortly before January 6, Mr. Nordean said on his podcast, “When police officers or government officials are breaking the law, what are we supposed to do as the people? Discourse? What are we supposed to debate? No, you have to use force.”⁷

According to allegations of District of Columbia officials, on December 12, 2020, Proud Boys incited violence and vandalism in the streets of Washington, D.C., while rallying in support of then-President Trump’s attempts to overturn the election results.⁸ During these events, Proud Boys Chairman Henry “Enrique” Tarrío burned a “Black Lives Matter” banner stolen from the Asbury United Methodist Church.⁹

On December 19, 2020, a Stop the Steal protest event was announced for January 6, 2021.¹⁰ On December 29, Mr. Tarrío posted the following message on Parler: “We will not be wearing our traditional Black and Yellow. We will be incognito and will spread across downtown DC in smaller teams ... who knows...we might dress in all BLACK for the occasion.”¹¹

On January 4, 2021, Mr. Tarrío was arrested for the December 12, 2020, burning of a “Black Lives Matter” banner and barred from entering the District of Columbia on the following days. Though Mr. Tarrío was prevented from participating in the events at the United States Capitol on January 6th, to date, at least 34 individuals affiliated with the Proud Boys have been indicted by the Department of Justice (“DOJ”) in relation to the attack at the United States Capitol. Certain indictments returned against Proud Boys members describe prior planning and coordination, including efforts to fundraise for “[p]rotective gear and communications.”¹² Furthermore, video evidence plainly demonstrates that Proud Boys members are involved in the January 6th attack.¹³

⁵ *Conspiracy Charges Bring Proud Boys' History Of Violence Into Spotlight*, NPR, Apr. 9, 2021, <https://www.npr.org/2021/04/09/985104612/conspiracy-charges-bring-proud-boys-history-of-violence-into-spotlight>.

⁶ *Id.*

⁷ *Id.*

⁸ *Proud Boys sparked clashes during pro-Trump rally, D.C. officials say*, WASHINGTON POST, Dec. 14, 2020, https://www.washingtonpost.com/local/public-safety/trump-rally-violence-proud-boys/2020/12/14/bf2f5826-3e26-11eb-8bc0-ae155bee4aff_story.html.

⁹ *A Proud Boys Leader Who Burned a Black Lives Matter Flag Gets 5 Months in Jail*, NPR, Aug. 23, 2021, <https://www.npr.org/2021/08/23/1030430809/proud-boys-enrique-tarrio-sentence>.

¹⁰ *United States v. Nordean et al.*, First Superseding Indictment, D.D.C., Criminal No. 21-cr-175 (TJK), Mar. 10, 2021, available at <https://www.justice.gov/usao-dc/case-multi-defendant/file/1377586/download>.

¹¹ *Proud Boys Say They'll "Be Incognito" During January 6 Trump Rallies in DC*, WASHINGTONIAN, Dec. 31, 2020, <https://www.washingtonian.com/2020/12/31/proud-boys-say-theyll-be-incognito-during-january-6-trump-rallies-in-dc/>.

¹² *United States v. Nordean et al.*, First Superseding Indictment, D.D.C., Criminal No. 21-cr-175 (TJK), Mar. 10, 2021, available at <https://www.justice.gov/usao-dc/case-multi-defendant/file/1377586/download>.

¹³ *DOJ releases Capitol riot videos from case involving Proud Boys*, CNN (YouTube), June 22, 2021, <https://www.youtube.com/watch?v=ecwqRIUrYzI>.

Accordingly, the Select Committee seeks documents regarding these and other matters that are within the scope of the Select Committee's inquiry.

A copy of the rules governing Select Committee depositions, and document production definitions and instructions are attached. Please contact staff for the Select Committee at 202-225-7800 to arrange for the production of documents.

Sincerely,

A handwritten signature in blue ink that reads "Bennie G. Thompson". The signature is written in a cursive style with a large, stylized initial "B".

Bennie G. Thompson
Chairman

SCHEDULE

In accordance with the attached definitions and instructions, you, Jason Lee Van Dyke, in your capacity as agent for Proud Boys International, L.L.C. (the "Entity"), are hereby required to produce all documents and communications in the possession, custody, or control of the Entity—including any such documents or communications stored or located on Entity devices (e.g., personal computers, cellular phones, tablets, etc.), in Entity accounts, and/or on Entity applications (e.g., email accounts, contact lists, calendar entries, etc.)—referring or relating to the following items. If no date range is specified below, the applicable dates are for the time period August 1, 2020, to present.

1. Documents sufficient to identify all employees, officers, and board members of Proud Boys International, L.L.C. ("PBI LLC"), as well as members of the Elders Chapter, and documents regarding organizational structure, rules, bylaws, policies, and procedures of PBI LLC.
2. The Certificate of Formation for PBI LLC and any other documents submitted on behalf of PBI LLC to the Texas Secretary of State.
3. All agendas, minutes, notes, or other records related to meetings of PBI LLC or any incorporated or unincorporated chapter of the Proud Boys, including meetings of the Elders Chapter, and any newsletters, blogs, posts, or similar records issued to Proud Boys membership or the public, relating to efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021.
4. All documents and communications referring to, or containing, non-public intelligence or work product originating in any federal, state, local, territorial, or tribal government entity, and documents sufficient to identify the source of such intelligence or work product, relating to efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021.
5. All documents and communications concerning the participation of individuals affiliated with PBI LLC or any incorporated or unincorporated Proud Boys chapter in the November 14, 2020, "Million MAGA March" or associated rallies in Washington, D.C., including all documents and communications related to preparation for such events.
6. All documents and communications concerning the participation of individuals affiliated with PBI LLC or any incorporated or unincorporated Proud Boys chapter in the December 12, 2020, "Stop the Steal" rally or associated rallies in Washington, D.C., including all documents and communications related to preparation for such events.
7. All documents and communications regarding training, planning, organizing, coordination, fundraising, traveling, means of communication, or transporting equipment or weapons to Washington, D.C., in preparation for events on January 5 and 6, 2021.

8. All documents and communications to or from email accounts hosted on .gov and .mil domains related to recruitment of new members, dissemination of government intelligence products, use of official government resources in support of Proud Boys activities, or planning for the following events in Washington, D.C.: the November 14, 2020 and December 12, 2020 rallies at Freedom Plaza, and rallies and events at the United States Capitol on January 5 and 6, 2021.
9. All documents and communications regarding lodging and transportation for any individual affiliated with PBI LLC or any incorporated or unincorporated Proud Boys chapter, including documents and communications related to funding for such lodging and transportation, in relation to events in Washington, D.C. on January 5 and 6, 2021.
10. All communications with members of the following groups, relating to efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021: Oath Keepers, Three Percenters, 1st Amendment Praetorian, Nationalist Socialist Club, America First, Groyper Army, New Jersey European Heritage Association, Latinos for Trump, and Vets4Trump.
11. All communications with or directly concerning Donald J. Trump, his family members, advisors, White House staff, or staff with Donald J. Trump for President, Inc., relating to efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021.
12. All communications with any security official for rallies held at Freedom Plaza, the Ellipse, or the Capitol Grounds, or any of the following individuals, relating to efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021: Amy Kremer, Kylie Kremer, Cynthia Chafian, Scott Chafian, Caroline Wren, Maggie Mulvaney, Justin Caporale, Tim Unes, Hannah Salem (also known as Hannah Stone), Lyndon Brentnall, Katrina Pierson, Ali Akbar (also known as Ali Alexander), Nathan Martin, Stephen Brown, Alex Jones, Roger Stone, Kimberly Fletcher, Debbie Kraulidis, Bryan Lewis, Marsha Lessard, Christina Staggs, Andrea Lafferty, Belton Platt, Mashandia Platt, Jo Reitkopp, Chris Steinbrunn, James Epley, and Peter Boykin.
13. All documents and communications regarding event security or individual protective services provided by PBI LLC or any incorporated or unincorporated Proud Boys chapter, or any member thereof, to any individual or event in Washington, D.C., on November 14, 2020, December 12, 2020, January 5, 2021, or January 6, 2021.
14. All communications sent or received on January 5 and 6, 2021 related to events in Washington, D.C., or efforts to interfere in government processes.
15. All communications sent or received by any of the following individuals, relating to efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election;

efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021: Ethan Nordean, Joseph Randall Biggs, Zachary Rehl, Charles Donohoe, Dominic Pezzola, William Pepe, Matthew Greene, Christopher Kuehne, Louis Enrique Colon, Felicia Konold, Cory Konold, William Chrestman, Ryan Ashlock, Nicholas Ochs, Jonathanpeter Allen Klein, Matthew Leland Klein, Paul Rae, Edward George Jr., Joshua Pruitt, Nathaniel A. Tuck, Arthur Jackman, Matthew Bledsoe, Edward Jacob Lang, Daniel Goodwyn, Ricky Willden, Kevin A. Tuck, Joshua James, Christopher Joseph Quaglin, Daniel Lyons Scott, Barton Wade Shively, Gabriel Augustin Garcia, Christopher Worrell, Marc Anthony Bru, and Robert Gieswein.

16. All communications sent or received by individuals affiliated with any incorporated or unincorporated Proud Boys chapters in the following states, relating to efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021: California, Florida, Missouri, New York, North Carolina, Washington, Oregon, Hawaii, and Pennsylvania.
17. All documents and communications regarding participation by PBI LLC or any incorporated or unincorporated Proud Boys chapter, or any member thereof, in events outside of Washington, D.C., challenging the legitimacy of the election of President Joseph R. Biden, Jr.
18. All documents and communications regarding the certification of the votes cast by the Electoral College in connection with the November 3, 2020, presidential election.
19. All documents and communications regarding the Presidential Inauguration of Joseph R. Biden, Jr., on January 20, 2021.
20. For the time period of January 6, 2021, to present, all documents and communications concerning the facts and circumstances of the attack on the U.S. Capitol in Washington, D.C. that occurred on January 6, 2021 (the "Capitol Attack").
21. All documents and communications related to attempts to interfere with voting or the operation of polling sites on Election Day or during early voting for the November 3, 2020, election.
22. Documents sufficient to identify all email accounts, social media accounts, messaging services, or websites used, whether directly or indirectly, to communicate regarding efforts to challenge the legitimacy of, interfere with, or disrupt the 2020 presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021.
23. Documents sufficient to identify all telephone numbers used to conduct or communicate about the affairs of PBI LLC or any incorporated or unincorporated Proud Boys chapter regarding efforts to challenge the legitimacy of, interfere with, or disrupt the 2020

presidential election; efforts to interfere in government processes; or events in Washington, D.C., on January 5 and 6, 2021.

24. Documents sufficient to identify all accounts held at financial institutions¹⁴ (“Financial Accounts”) for which PBI LLC was the direct or indirect beneficial owner, or over which PBI LLC exercised control, and into or through which funding for the November 14, 2020, December 12, 2020, and January 5 and 6, 2021, events in Washington, D.C., was deposited or transferred, whether from sponsors, donors, or any other funding source, or from which funds were transferred or withdrawn for any purpose in connection with such events.
25. For each Financial Account identified in response to the Requests above, documents sufficient to identify the institution at which the account is held, the individual(s) or entity in whose name the account is held, and all account transactions, including, but not limited to, deposits, withdrawals, transfers, and exchanges, in connection with the November 14, 2020, December 12, 2020, and January 5 and 6, 2021, events in Washington, D.C.
26. To the extent not covered by the above requests, for the time period of January 6, 2021, to present, all documents and communications whenever dated provided to any law enforcement agency, including but not limited to the U.S. Department of Justice and the Federal Bureau of Investigation, concerning the facts and circumstances of the January 5 and 6, 2021, events in Washington, D.C.

¹⁴ For the purposes of this request, the term “financial institution” shall have the definition provided in 31 U.S.C. § 05312(a)(2), which includes, but is not limited to, FDIC insured banks, commercial bank or trust companies, private bankers, an agency or branch of a foreign bank in the United States, credit unions, registered brokers and dealers, investment bankers or investment companies, currency exchanges, cryptocurrency exchanges, insurance companies, pawnbrokers, travel agencies, businesses engaged in vehicle/automobile/airplane/boat sales, persons involved in real estate closings and settlements, and casinos.

DOCUMENT PRODUCTION DEFINITIONS AND INSTRUCTIONS

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.