

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

AMERICA FIRST LEGAL
FOUNDATION,

Plaintiff,

v.

CYBERSECURITY AND
INFRASTRUCTURE SECURITY
AGENCY,

Defendant.

Civil Action No.: 1:22-cv-1255

COMPLAINT

1. Plaintiff America First Legal Foundation (“AFL”) brings this action against Defendant Cybersecurity and Infrastructure Security Agency (“CISA” or “Defendant”) to compel compliance with the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552.

2. Since July 2021, AFL has investigated the federal government’s censorship of First Amendment protected speech in collusion with legacy and social media companies. *See e.g., AFL, Following Disturbing Admission By Biden White House, AFL FOIAS The Biden Administration About Its Directions To Social Media Companies To Censor Americans* (July 16, 2021), <https://tinyurl.com/2p8tmb24>.

3. On February 7, 2022, the Department of Homeland Security (“DHS”) issued a bulletin titled “Summary of Terrorism Threat to the U.S. Homeland” identifying “the proliferation of false and misleading narratives” as a major threat

facing the United States. DEPT' OF HOMELAND SEC., *Summary of Terrorism Threat to the U.S. Homeland* (Feb. 7, 2022), <https://tinyurl.com/mr3udu6r> (last visited Nov. 2, 2022).

4. On April 4, 2022, AFL submitted a FOIA request to CISA, a component within DHS, to uncover how its “Mis-, Dis-, and Malinformation” (MDM) team, formerly known as the Countering Foreign Influence Task Force (CFITF), causes content to be removed from social media—potentially in violation of the Constitution. The FOIA sought information on how this may have happened leading up to the 2020 election and how it occurs on an ongoing basis to this day on an evolving list of topics. *See AFL, AFL Targets Another Biden Administration Effort to Collaborate with Establishment Media and Social Media Companies* (Apr. 7, 2022), <https://tinyurl.com/zyknkbdn>.

5. On July 27, 2022, AFL made public documents proving at least one federal agency, the Centers for Disease Control and Prevention, was actively colluding with social media companies to remove or suppress political speech on the platforms of Twitter, Facebook, and Instagram. *See AFL, AFL Lawsuit Reveals Damning CDC Documents Proving Government Collusion with Big Tech to Censor Free Speech and Promote Biden Administration Propaganda* (July 27, 2022), <https://tinyurl.com/2p9d8asz>.

6. Records obtained by Missouri Attorney General Eric Schmitt reportedly confirm that, during the period leading up to November 2020, CISA officials frequently engaged with social media companies and expected them to “process

reports and provide timely responses, to include the removal of reported misinformation from the platform where possible.” Ken Klippenstein & Lee Fang, *Truth Cops: Leaked Documents Outline DHS’s Plans to Police Disinformation*, INTERCEPT (Oct. 31, 2022), <https://tinyurl.com/54u6vb8c>.

7. “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances.” U.S. CONST. amend. I.

8. As the American Civil Liberties Union recently put it: “The First Amendment bars the government from deciding for us what is true or false, online or anywhere. Our government can’t use private pressure to get around our constitutional rights.” @ACLU, TWITTER (Oct. 31, 2022, 5:43 PM), <https://tinyurl.com/3ejdfapu> (citing INTERCEPT, supra).

9. More than 200 days after AFL filed its FOIA request, CISA continues to suppress information of great public interest and stonewall AFL’s request for records relating to their unconstitutional collaboration with social media companies to censor politically controversial speech.

PARTIES

10. Plaintiff AFL is a nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, ensure due process and equal protection for all Americans, and encourage public knowledge and understanding of

the law and individual rights guaranteed under the United States Constitution and the laws of the United States.

11. AFL's mission includes promoting government transparency and accountability by gathering official information, analyzing it, and disseminating it through reports, press releases, and/or other media, including social media platforms, all to educate the public. All the records AFL receives will be made publicly available on AFL's website for citizens, journalists, and scholars to review and use.

12. Defendant CISA is an agency of the federal government within the meaning of 5 U.S.C. § 552(f) and has possession and control of the records AFL seeks.

13. CISA is headquartered, and has its principal place of business, in Arlington, Virginia.

14. Although CISA's public-facing address is a mail stop in Washington, D.C., its chief officers are primarily and principally stationed at its headquarters in Arlington, Virginia.

15. CISA keeps the records that AFL seeks in Arlington, Virginia or maintains them on a system of records there.

JURISDICTION AND VENUE

16. This Court has jurisdiction over this action pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1331. Additionally, it may grant declaratory relief pursuant to 28 U.S.C. § 2201, *et seq.*

17. Venue is proper in this District pursuant to 5 U.S.C. § 552(a)(4)(B) and 28 U.S.C. § 1391(e).

AFL'S FOIA REQUEST

18. On April 4, 2022, AFL sent a FOIA request to CISA seeking records relating to CISA's CFITF, MDM team, certain policies and directives, certain communications relating to the 2020 election, and communications between certain CISA employees and specific private entities. Exhibit A.

19. On May 2, 2022, CISA sent a letter to AFL acknowledging receipt of the request and assigning it Case Number 2022-NPFO-00105. Exhibit B.

20. That letter stated, “[u]pon review of the subject matter of your request, and an evaluation of the six factors identified above, CISA has determined that it will conditionally grant your request for a fee waiver.” However, “[i]f upon review of these documents, CISA determines that the disclosure of the information contained in those documents does not meet the factors permitting CISA to waive the fees, then CISA will at that time either deny your request for a fee waiver entirely, or [reduce] fees corresponding to the amount of relevant material found.” *Id.* at 2–3.

21. On May 9, 2022, CISA FOIA Officer Charles Schnepfe emailed AFL, offering to discuss AFL's FOIA request. AFL agreed and discussed the FOIA request with CISA over the phone later that afternoon. Exhibit C at 7–10.

22. On May 13, 2022, CISA sent an e-mail to AFL, attaching CISA's proposed search terms for narrowing AFL's FOIA request. *See Ex. C* at 6–7. The attachment is included to this Complaint as Exhibit D.

23. On May 13, 2022, AFL replied to CISA, agreeing to most, but amending part, of CISA's proposed narrowing. *See Ex. C* at 5–6.

24. On June 13, 2022, after a few e-mails exchanged between CISA and AFL to confirm the narrowed scope of the request to which AFL agreed, CISA confirmed that it has “sent this request out for search and will work the records as we get them.” *See id.* at 3–5.

25. On August 2, 2022, AFL sent an e-mail to CISA, requesting an update on the status of the FOIA request. *Id.* at 3.

26. On August 3, 2022, CISA replied, stating that the “request is in the search queue and we will be tasking our OCIO shortly.” *Id.* at 2.

27. On August 31, 2022, AFL sent another e-mail to CISA, requesting an update on the status of the FOIA request. *Id.*

28. On August 31, 2022, CISA replied, stating that “[t]he search is ongoing.” *Id.* at 1.

29. As of the date of this Complaint, AFL has received no further response from the Defendant about its FOIA request.

CLAIM FOR RELIEF
Violation of FOIA, 5 U.S.C. § 552

30. AFL incorporates by reference paragraphs 1–29.

31. AFL properly requested records within the possession, custody, and control of the Defendant.

32. The Defendant failed to conduct a reasonable search for responsive records, and the requested records are not exempt from disclosure pursuant to any FOIA exemption. *See* 5 U.S.C. § 552(b).

33. Moreover, the Defendant failed to disclose any segregable, non-exempt portions of responsive records. *See id.*

34. The Defendant failed to respond to AFL's request within the statutory time-period. 5 U.S.C. § 552(a)(6).

35. Accordingly, AFL has exhausted its administrative remedies. 5 U.S.C. § 552(a)(6)(C).

36. The Defendant has violated FOIA by failing to, within the statutorily prescribed time limit, (i) reasonably search for records responsive to AFL's FOIA request; (ii) provide a lawful reason for the withholding of any responsive records; (iii) grant AFL a fee waiver; and (iv) segregate exempt information in otherwise non-exempt responsive records.

PRAYER FOR RELIEF

WHEREFORE, AFL respectfully requests that this Court:

- i. Declare that the records sought by AFL's April 4, 2022, request must be disclosed pursuant to 5 U.S.C. § 552;
- ii. Order the Defendant to search immediately, demonstrating search methods reasonably likely to lead to the discovery of responsive records;
- iii. Order the Defendant to produce by a date certain all non-exempt records responsive to AFL's FOIA request, accompanied by a Vaughn index of any responsive records or portions of responsive records being withheld under claim of exemption;
- iv. Order the Defendant to grant AFL's request for a fee waiver;

v. Award AFL attorneys' fees and costs incurred in this action pursuant to 5 U.S.C. § 552(a)(4)(E); and

vi. Grant AFL such other and further relief as this Court deems proper.

November 4, 2022

Respectfully submitted,



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**Pro Hac Vice application forthcoming*

*Counsel for Plaintiff America First
Legal Foundation*

JS 44 (Rev. 04/21)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

America First Legal Foundation

(b) County of Residence of First Listed Plaintiff Washington, D.C.
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) 202-836-7958
Andrew Block, America First Legal Foundation,
611 Pennsylvania Ave., S.E. #231, Washington DC 20003

DEFENDANTS

Cybersecurity and Infrastructure Security Agency

County of Residence of First Listed Defendant Arlington
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from Another District (specify)
- 6 Multidistrict Litigation - Transfer
- 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
5 USC 552

Brief description of cause:
Civil action to enforce FOIA request, to force agency to conduct search and provide responsive documents

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. **DEMAND \$** _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____

DOCKET NUMBER 22-cv-01255

DATE

11-4-2022

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____



April 4, 2022

VIA DHS PAL

Cybersecurity and Infrastructure Security Agency
Department of Homeland Security
Mail Stop 0380
2707 Martin Luther King Jr. AVE SE
Washington, DC 20528

Freedom of Information Act Request: CISA's Mis-, Dis-, and Malinformation (MDM) Team

Dear FOIA Officer:

America First Legal Foundation is a national, nonprofit organization working to promote the rule of law in the United States, prevent executive overreach, and ensure due process and equal protection for all Americans, all to promote public knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. To that end, we file Freedom of Information Act (FOIA) requests on issues of pressing public concern, then disseminate the information we obtain, making documents broadly available to the public, scholars, and the media. Using our editorial skills to turn raw materials into distinct work, we distribute that work to a national audience through traditional and social media platforms. AFL's email list contains over 30,000 unique addresses, our Facebook page has over 18,000 followers, our Twitter page has over 11,000 followers, the Twitter page of our Founder and President has over 118,000 followers, and we have another 28,000 followers on GETTR.

I. Introduction

On February 7, 2022, the U.S. Department of Homeland Security (DHS) issued a bulletin entitled "Summary of Terrorism Threat to the U.S. Homeland" in which it lists "the proliferation of false or misleading narratives, which sow discord or undermine public trust in U.S. government institutions" as a major threat facing the United States.¹ To combat this threat, the "Mis-, Dis-, and Malinformation" (MDM)

¹ Dep't of Homeland Sec., *Summary of Terrorism Threat to the U.S. Homeland*, Feb. 7, 2022, <https://www.dhs.gov/ntas/advisory/national-terrorism-advisory-system-bulletin-february-07-2022>.

team in the Cybersecurity and Infrastructure Security Agency (CISA) within DHS, formerly known as the Countering Foreign Influence Task Force (CFITF) prior to 2021, works “in close coordination with interagency and private sector partners, social media companies, academia, and international partners on a variety of projects to build resilience against malicious information activities.”² The MDM team highlights its “close collaboration with the FBI’s Foreign Influence Task Force, the U.S. Department of State, the U.S. Department of Defense, and other agencies across the federal government.”³ Particular areas of concern highlighted on its website include election disinformation and “COVID-19-related MDM activities [which] seek to undermine public confidence and sow confusion.”⁴

While DHS has characterized the “proliferation” of MDM as a major homeland security threat, and CISA’s MDM team has leveraged its partners in the national security apparatus and its relationships with social media companies to combat this threat, the results of this presumably legitimate government activity appear to many Americans as Orwellian political censorship that violates the Constitution.

On March 17, 2022, the New York Times revealed that “[Hunter] Biden’s laptop was indeed authentic, more than a year after ... much of the media dismissed the New York Post’s reporting as Russian disinformation.”⁵ When the story was first accused of being disinformation, Twitter suspended the New York Post’s account for seven days,⁶ and Facebook “reduc[ed]’ the story’s distribution on its platform while waiting for third-party fact checkers to verify it.”⁷ This was just one of many instances where social media companies censored politically controversial information under the pretext of combatting MDM even when the information later became verified.⁸

The American people have a right to know how the national security apparatus, including CISA’s MDM team, is being used to censor politically controversial content on social media platforms under the pretext of combatting MDM. It is not clear that such efforts by the government to cause content to be removed from social media are constitutional, even if the content itself is actually false.⁹

² Cybersecurity and Infrastructure Sec. Agency, *Mis, Dis, Malinformation*, <https://www.cisa.gov/mdm> (last visited Apr. 4, 2022).

³ *Id.*

⁴ *Id.*

⁵ Anders Hagstrom, “*He Doesn’t Work for the United States*”: *Psaki Deflects When Asked if She Stands by Calling Hunter’s Laptop Disinformation*, DAILY CALLER (Mar. 17, 2022), <https://dailycaller.com/2022/03/17/hunter-biden-laptop-new-york-post-psaki-ukraine-business/>.

⁶ *Id.*

⁷ Associated Press, *Twitter CEO Says It Was Wrong to Block Links to Hunter Biden Story*, L.A. TIMES (Oct. 16, 2020), <https://www.latimes.com/world-nation/story/2020-10-16/twitter-changes-hacked-content-rules-hunter-biden-story-furor>.

⁸ Jacob Siegel, *Invasion of the Fact-Checkers*, TABLET (Mar. 21, 2022), <https://www.tabletmag.com/sections/news/articles/invasion-fact-checkers>.

⁹ See *United States v. Alvarez*, 567 U.S. 709, 723 (2012) (“Our constitutional tradition stands against the idea that we need Oceania’s Ministry of Truth ... The mere potential for the exercise of that

Therefore, AFL requests the following records under the Freedom of Information Act (FOIA), 5 U.S.C. § 552:

II. Requested Records

Please note that AFL's requests do not include "daily clips" emails and press releases.

- A. All records containing the terms "misinformation," "disinformation," or "malinformation". The time frame for this item is January 20, 2021, to the date this request is processed.
- B. All records sufficient to identify the person(s) responsible for identifying or designating what is or is not "misinformation", "disinformation", or "malinformation." The time frame for this item is January 20, 2021, to the date this request is processed.
- C. All records of Directives, Instructions, policy statements, policies, guidelines, and memoranda that authorize, delegate authority, or otherwise govern CISA's activities relating to misinformation, disinformation, or malinformation.
- D. All records of Directives, Instructions, policy statements, policies, guidelines, and memoranda that authorize, delegate authority, or otherwise govern CISA's communications and interactions with social media companies.
- E. All records of communications, including emails and Microsoft Teams chats, to or from any CISA CFITF employee or contractor, between October 1, 2020 and January 20, 2021, referring to "Hunter", "laptop", "Devon", "Archer", "Burisma", "Bohai", "Rosemont Seneca", or "Ukraine".
- F. All records of communications, including emails and Microsoft Teams chats, to or from any CISA CFITF employee or contractor, between October 1, 2020 and January 20, 2021, referring to "election fraud", "voting irregularities", "alternate electors", "electoral college", or "stop the steal".
- G. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: "@facebook.com", "@google.com", "@instagram.com", "@linkedin.com", "@meta.com", "@reddit.com", "@twitter.com", "@tiktok.com", or "@youtube.com".

power casts a chill, a chill the First Amendment cannot permit if free speech, thought, and discourse are to remain a foundation of our freedom.”).

- H. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: “@factcheck.org”, “@fullfact.org”, or “@snopes.com”.
- I. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: “@ap.org”, “@cnn.com”, “@latimes.com”, “@msnbc.com”, “@nypost.com”, “@nytimes.com”, “@reuters.com”, “@usatoday.com”, “@washpost.com”, or “@wsj.com”.

III. Processing

DHS must comply with the processing guidance in the Attorney General’s Memorandum on Freedom of Information Act Guidelines.¹⁰ This means, among other things, the following.

- The Department may withhold responsive records only if: (1) the agency reasonably foresees that disclosure would harm an interest protected by one of the nine exemptions that FOIA enumerates; or (2) disclosure is prohibited by law.
- Information that might technically fall within an exemption should not be withheld from AFL unless the Department can identify a foreseeable harm or legal bar to disclosure. In case of doubt, openness should prevail.
- If the Department determines that it cannot make full disclosure of a requested record, then the FOIA requires that it consider whether partial disclosure of information is possible and take reasonable steps necessary to segregate and release nonexempt information.
- The Department must properly apply the foreseeable harm standard. That means it must confirm and demonstrate to AFL that it has considered the foreseeable harm standard when reviewing records and applying FOIA exemptions.
- Redactions are disfavored as the FOIA’s exemptions are exclusive and must be narrowly construed. If a record contains information responsive to a FOIA request, then the Department must disclose the entire record, as a single record cannot be split into responsive and non-responsive bits. Our request includes any attachments to those records or other materials enclosed with a record when transmitted. If an email is responsive to our request, then our

¹⁰ U.S. Dep’t Just. (Mar. 15, 2022), <https://www.justice.gov/ag/page/file/1483516/download>.

request includes all prior messages sent or received in that email chain, as well as any attachments.

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. In conducting your search, please give full effect to all applicable authorities and broadly construe our Item and your obligations to provide responsive records.
- Please search all relevant records or systems containing records regarding agency business. Do not exclude records regarding agency business contained in files, email accounts, or devices in the personal custody of your officials, such as personal email accounts or text messages. Records of official business conducted using unofficial systems or stored outside of official files are subject to the Federal Records Act and FOIA. It is not adequate to rely on policies and procedures that require officials to move records to official systems within a certain time. AFL has a right to records in those files even if material has not yet been moved to official systems or if officials have, by intent or through negligence, failed to meet their obligations.
- Please use all available tools to conduct a complete and efficient search for potentially responsive records. Many agencies have adopted the National Archives and Records Administration (“NARA”) Capstone program or similar policies. These provide options for searching emails and other electronic records in a manner reasonably likely to be more complete than just searching individual custodian files. For example, a custodian may have deleted a responsive email from his or her email program, but your agency’s archiving tools may capture that email under Capstone. At the same time, custodian searches are still necessary; you may not have direct access to files stored in .PST files, outside of network drives, in paper format, or in personal email accounts.
- If some portions of the requested records are properly exempt from disclosure, then please disclose any reasonably segregable non-exempt portions of the requested records. If a request is denied in whole, please state specifically why it is not reasonable to segregate portions of the record for release.
- Please take appropriate steps to ensure that records responsive to this request are not deleted before our Items are processed. If potentially responsive records are subject to potential deletion, including on a scheduled basis, please prevent deletion by instituting a litigation hold or other appropriate measures.

IV. Fee Waiver Request

Per 5 U.S.C. § 552(a)(4)(A)(iii), AFL requests a waiver of all search and duplication fees. These authorities provide for fee waivers when, as here, “disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” AFL’s request concerns identifiable operations or activities of the government, and the information requested is likely to contribute significantly to the public understanding of how the federal government acts to suppress or not suppress information, often in coordination with the private sector, with which the administration disagrees. Knowing the reasoning, justification, and policy considerations behind such actions is in the public interest.

Also, AFL is a qualified non-commercial public education and news media requester. AFL is a new organization, but it has already demonstrated its commitment to the public disclosure of documents and creation of editorial content. We distribute our work widely, posting government records for the benefit of the public, Congress, policymakers, and scholars, and creating and disseminating distinct work on media outlets of all sorts through the exercise of our editorial skills.

As a nonprofit organization primarily engaged in the dissemination of information to educate the public, AFL does not have a commercial purpose and the release of the information requested is not primarily in AFL’s financial interest. Our status as a qualified non-commercial public education and news media requester has been recognized by the Departments of Defense, Education, Energy, Interior, Health and Human Services, and Homeland Security, and the Office of the Director of National Intelligence.

V. Production

To accelerate release of responsive records, AFL welcomes production on an agreed rolling basis. If possible, please provide responsive records in an electronic format by email. Alternatively, please provide responsive records in native format or in PDF format on a USB drive. Please send any responsive records being transmitted by mail to America First Legal Foundation, 611 Pennsylvania Avenue SE #231, Washington, D.C. 20003.

VI. Conclusion

If you have any questions about this request or believe further discussions regarding search and processing will speed the efficient production of records of interest to AFL, then please contact me at FOIA@aflegal.org. Finally, please contact us immediately if AFL’s request for a fee waiver is not granted in full. Thank you in advance for your cooperation.

Thank you,

/s/ Reed D. Rubinstein

Reed D. Rubinstein

America First Legal Foundation

U.S. Department of Homeland Security
Cybersecurity & Infrastructure Security Agency
Office of the Director
Washington, DC 20528



CISA
CYBER+INFRASTRUCTURE

May 2, 2022

SENT VIA EMAIL TO: info@aflegal.org

Reed Rubinstein
611 Pennsylvania Ave SE #231
Washington, DC 20003

RE: CISA Case Number 2022-NPFO-00105

Dear Mr. Rubinstein:

This acknowledges receipt of your April 4, 2022, Freedom of Information Act (FOIA) request to U.S. Department of Homeland Security (DHS), Cybersecurity & Infrastructure Security Agency (CISA), for:

“ A. All records containing the terms “misinformation,” “disinformation,” or “malinformation”. The time frame for this item is January 20, 2021, to the date this request is processed.

B. All records sufficient to identify the person(s) responsible for identifying or designating what is or is not “misinformation”, “disinformation”, or “malinformation.” The time frame for this item is January 20, 2021, to the date this request is processed.

C. All records of Directives, Instructions, policy statements, policies, guidelines, and memoranda that authorize, delegate authority, or otherwise govern CISA’s activities relating to misinformation, disinformation, or malinformation.

D. All records of Directives, Instructions, policy statements, policies, guidelines, and memoranda that authorize, delegate authority, or otherwise govern CISA’s communications and interactions with social media companies.

E. All records of communications, including emails and Microsoft Teams chats, to or from any CISA CFITF employee or contractor, between October 1, 2020 and January 20, 2021, referring to “Hunter”, “laptop”, “Devon”, “Archer”, “Burisma”, “Bohai”, “Rosemont Seneca”, or “Ukraine”.

F. All records of communications, including emails and Microsoft Teams chats, to or from any CISA CFITF employee or contractor, between October 1, 2020 and January 20, 2021, referring to “election fraud”, “voting irregularities”, “alternate electors”, “electoral college”, or “stop the steal”.

G. All records of communications, including emails, to or from any CISA CFITF or MDM

employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: “@facebook.com”, “@google.com”, “@instagram.com”, “@linkedin.com”, “@meta.com”, “@reddit.com”, “@twitter.com”, “@tiktok.com”, or “@youtube.com”.

H. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: “@factcheck.org”, “@fullfact.org”, or “@snopes.com”.

I. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: “@ap.org”, “@cnn.com”, “@latimes.com”, “@msnbc.com”, “@nypost.com”, “@nytimes.com”, “@reuters.com”, “@usatoday.com”, “@washpost.com”, or “@wsj.com”., and to your request for a waiver of all assessable FOIA fees.”

Your request was received in this office on April 05, 2022.

Due to the increasing number of FOIA requests received by this office, we may encounter some delay in processing your request. Per Section 5.5(a) of the DHS FOIA regulations, 6 C.F.R. Part 5, CISA processes FOIA requests according to their order of receipt. Although CISA’s goal is to respond within 20 business days of receipt of your request, the FOIA does permit a 10- day extension of this time period. As your request seeks numerous documents that will necessitate a thorough and wide-ranging search, CISA will invoke a 10-day extension for your request, as allowed by 6 C.F.R. Part 5 § 5.5(c). If you care to narrow the scope of your request, please contact our office. We will make every effort to comply with your request in a timely manner.

You have requested a fee waiver. The DHS FOIA Regulations at 6 CFR § 5.11(k) set forth six factors CISA must evaluate to determine whether the applicable legal standard for a fee waiver has been met: (1) Whether the subject of the requested records concerns “the operations or activities of the government,” (2) Whether the disclosure is “likely to contribute” to an understanding of government operations or activities, (3) Whether disclosure of the requested information will contribute to the understanding of the public at large, as opposed to the individual understanding of the requester or a narrow segment of interested persons, (4) Whether the contribution to public understanding of government operations or activities will be “significant,” (5) Whether the requester has a commercial interest that would be furthered by the requested disclosure, and (6) Whether the magnitude of any identified commercial interest to the requester is sufficiently large in comparison with the public interest in disclosure, that disclosure is primarily in the commercial interest of the requester.

Upon review of the subject matter of your request, and an evaluation of the six factors identified above, CISA has determined that it will conditionally grant your request for a fee waiver. The fee waiver determination will be based upon a sampling of the responsive documents received from the various CISA program offices as a result of the searches conducted in response to your FOIA request. CISA will, pursuant to DHS regulations applicable to media requesters, process the first 100 pages. If upon review of these documents, CISA determines that the disclosure of the information contained in those documents does not meet the factors permitting CISA to

waive the fees, then CISA will at that time either deny your request for a fee waiver entirely, or will allow for a percentage reduction in the amount of the fees corresponding to the amount of relevant material found that meets the factors allowing for a fee waiver. In either case, CISA will promptly notify you of its final decision regarding your request for a fee waiver and provide you with the responsive records as required by applicable law.

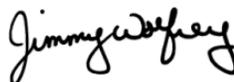
In the event that your fee waiver is denied, and you determine that you still want the records, provisions of the FOIA allow us to recover part of the cost of complying with your request. We shall charge you for records in accordance with the DHS FOIA regulations as they apply to media requestors. As a media requester you will be charged 10 cents per page for duplication; the first 100 pages are free. In the event that your fee waiver is denied, we will construe the submission of your request as an agreement to pay up to \$25.00. This office will contact you before accruing any additional fees.

We have queried the appropriate program offices within CISA for responsive records. If any responsive records are located, they will be reviewed for determination of releasability. Please be assured that one of the processors in our office will respond to your request as expeditiously as possible. We appreciate your patience as we proceed with your request.

If you have any questions or wish to discuss reformulation or an alternative time frame for the processing of your request, please contact FOIA office. You may send an e-mail to FOIA@HQ.DHS.GOV, call free 703-235-2211, or you may contact our FOIA Public Liaison in the same manner. Additionally, you have a right to seek dispute resolution services from the Office of Government Information Services (OGIS) which mediates disputes between FOIA requestors and Federal agencies as a non-exclusive alternative to litigation. If you are requesting access to your own records (which is considered a Privacy Act request), you should know that OGIS does not have the authority to handle requests made under the Privacy Act of 1974. You may contact OGIS as follows: Office of Government Information Services, National Archives and Records Administration, 8601 Adelphi Road-OGIS, College Park, Maryland 20740-6001, e-mail at ogis@nara.gov; telephone at 202-741-5770; toll free at 1-877-684-6448; or facsimile at 202-741-5769.

Your request has been assigned reference number **2022-NPFO-00105**. Please refer to this identifier in any future correspondence. To check the status of a CISA FOIA request, please visit <https://foiarequest.dhs.gov/app/CheckStatus.aspx>. Please note that to check the status of a request, you must enter the 2022-NPFO-00105 tracking number.

Sincerely,



Jimmy Wolfrey
Senior Director, FOIA Operations and Management
(Acting)



AFL FOIA <foia@aflegal.org>

DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

AFL FOIA <foia@aflegal.org>

Wed, Aug 31, 2022 at 10:32 AM

To: "Schnepfe, Charles" <Charles.Schnepfe@cisa.dhs.gov>

Cc: Michael Ding <michael.ding@aflegal.org>

Thanks, Charles

On Wed, Aug 31, 2022 at 10:29 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

Michael,

The search is ongoing. No substantial change from our last communication.

Chuck

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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From: AFL FOIA <foia@aflegal.org>
Sent: Wednesday, August 31, 2022 9:21 AM
To: Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov>
Cc: Michael Ding <michael.ding@aflegal.org>
Subject: Re: DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

Good morning Charles,

Hope you've been well. How is the search coming along?

Thanks,

Michael

On Wed, Aug 3, 2022 at 7:22 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

Good morning Michael,

Your request is in the search queue and we will be tasking our OCIO shortly. Given the extensive and broad criteria, I assume that the search will take a considerable amount of time and effort and will take some time to sort through any records returned. If your office deems it expeditious to narrow the search criteria in order to shorten the search time and processing, please feel free to give me a call.

Chuck

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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From: AFL FOIA <foia@aflegal.org>
Sent: Tuesday, August 2, 2022 4:56 PM
To: Michael Ding <michael.ding@aflegal.org>
Cc: Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov>
Subject: Re: DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

Good afternoon,

Would you please provide us with an update of our request?

Thanks!

Michael

On Mon, Jun 13, 2022 at 1:00 PM Michael Ding <michael.ding@aflegal.org> wrote:

Thanks, Charles.

On Mon, Jun 13, 2022 at 8:16 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

Michael,

We have sent this request out for search and will work the records as we get them. Please keep in mind that we work FOIA's in the order in which they were received, FIFO.

[REDACTED] asked me to say hi.

Chuck

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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From: AFL FOIA <foia@aflegal.org>
Sent: Friday, June 10, 2022 2:43 PM
To: Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov>
Cc: Michael Ding <michael.ding@aflegal.org>
Subject: Re: DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

Hi Charles,

For E, the criteria I sent was intended to be the narrowed search terms we agree to. I don't believe it is reasonable to add "hunter" to a search for the term "Burisma", for example. What would the MDM team be communicating about in an email with the term "Burisma"?

May we please receive an update on the status of this request?

Thank you,
Michael Ding
America First Legal Foundation

On Tue, May 17, 2022 at 8:51 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

Michael,

To be sure, you concur with all of the criteria sent with the addition of the term "hunter" under section E?

Chuck

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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From: AFL FOIA <foia@aflegal.org>
Sent: Friday, May 13, 2022 5:06 PM
To: Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov>
Subject: Re: DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

Chuck,

I appreciate you following up on our previous call.

I concur with your proposals with the following caveats for Item E:

Search Terms for item E, plus the items marked in blue:

"hunter"

"biden"AND"laptop"

"hunter"AND"laptop"

"devon"AND"archer"

"hunter"AND"ukraine"

"biden"AND"ukraine"

"hunter"AND"biden"AND"laptop"

Burisma

Bohai

"Rosemont"AND"Seneca"

"Rosemont"AND"Seneca"AND"ukraine"

While I understand your reasoning for "hunter"AND"biden" instead of just "hunter", I don't foresee there being that many instances of "hunter" in contexts other than in reference to Hunter Biden, given the mission of this task force.

Please confirm that you can process this search.

Thank you and have a great weekend!

Michael

On Fri, May 13, 2022 at 10:08 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

Mr. Ding,

Good morning. As discussed on our call I am getting back to you with some suggested search criteria/methodology to aid in the search for records responsive to your request. Would you kindly take a look at the attached and let CISA know if these terms are acceptable or if your organization has any modifications, concerns, etc.

Please advise and have a good weekend.

Chuck

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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From: AFL FOIA <foia@aflegal.org>
Sent: Monday, May 9, 2022 11:38 AM
To: Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov>
Subject: Re: DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

thanks! I'll call you at [REDACTED]

On Mon, May 9, 2022 at 11:37 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

See you then.

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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From: AFL FOIA <foia@aflegal.org>
Sent: Monday, May 9, 2022 11:30 AM
To: Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov>
Subject: Re: DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

great, how about 2pm EST?

On Mon, May 9, 2022 at 11:25 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

Sure, what time?

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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From: AFL FOIA <foia@aflegal.org>
Sent: Monday, May 9, 2022 11:23 AM
To: Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov>
Subject: Re: DHS FOIA 2022-NPFO-00105 - Rubinstein to AF Legal

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Contact your component SOC with questions or concerns.

Hi Charles,

Are you available to discuss later this afternoon?

Thank you,

Michael Ding

America First Legal Foundation

On Mon, May 9, 2022 at 11:19 AM Schnepfe, Charles <Charles.Schnepfe@cisa.dhs.gov> wrote:

Mr. Rubinstein,

Good morning. I am Charles Schnepfe, the CISA FOIA Officer, and would like to discuss the attached request in the hopes of helping your office get the records you seek. Would you be able to discuss for a few minutes?

I am available at [REDACTED] all week between 8:00 AM and 3:00 PM EST.

V/r

Charles H. Schnepfe, MPA

CISA FOIA Officer

Cybersecurity and Infrastructure Security Agency

Cell: [REDACTED] E-mail: charles.schnepfe@cisa.dhs.gov



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Search Terms for 2022-NPFO-00105 to AFL

A. All records containing the terms “misinformation,” “disinformation,” or “malinformation”. The time frame for this item is January 20, 2021, to the date this request is processed.

As discussed with AFL, we can get back to this one. CISA feels that these terms are too broad and will yield records that are not relevant to the intent of the requester.

B. All records sufficient to identify the person(s) responsible for identifying or designating what is or is not “misinformation”, “disinformation”, or “malinformation.” The time frame for this item is January 20, 2021, to the date this request is processed.

TBD

C. All records of Directives, Instructions, policy statements, policies, guidelines, and memoranda that authorize, delegate authority, or otherwise govern CISA’s activities relating to misinformation, disinformation, or malinformation.

OK

D. All records of Directives, Instructions, policy statements, policies, guidelines, and memoranda that authorize, delegate authority, or otherwise govern CISA’s communications and interactions with social media companies.

OK

E. All records of communications, including emails and Microsoft Teams chats, to or from any CISA CFITF employee or contractor, between October 1, 2020 and January 20, 2021, referring to “Hunter”, “laptop”, “Devon”, “Archer”, **“Burisma”, “Bohai”, “Rosemont Seneca”,** or “Ukraine”.

CISA would like to use the terms below to search for the records requested. We feel that these terms anded together will yield records in a more productive fashion than the single word terms. Items marked in blue above are ok.

**“hunter”*”biden”; “biden”*”laptop”; “devon”*”archer”; “hunter”*”biden”*”ukraine”;
“hunter”*”biden”*”laptop”; Burisma; Bohai; “Rosemont”*”Seneca”; “Rosemont”*”Seneca”*”ukraine”**

F. All records of communications, including emails and Microsoft Teams chats, to or from any CISA CFITF employee or contractor, between October 1, 2020 and January 20, 2021, referring to “election fraud”, “voting irregularities”, “alternate electors”, “electoral college”, or “stop the steal”.

CISA has identified the employees that were involved with the CFTIF (closed out in 2021) and the follow-on MDM team. Those persons records will be searched for responsive records.

G. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: “@facebook.com”, “@google.com”, “@instagram.com”, “@linkedin.com”, “@meta.com”, “@reddit.com”, “@twitter.com”, “@tiktok.com”, or “@youtube.com”.

CISA has identified the employees that were involved with the CFTIF (closed out in 2021) and the follow-on MDM team. Those persons records will be searched for responsive records.

H. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: “@factcheck.org”, “@fullfact.org”, or “@snopes.com”.

CISA has identified the employees that were involved with the CFTIF (closed out in 2021) and the follow-on MDM team. Those persons records will be searched for responsive records.

I. All records of communications, including emails, to or from any CISA CFITF or MDM employee or contractor, from October 1, 2020 to the date this request is processed, with any email domain ending in: "@ap.org", "@cnn.com", "@latimes.com", "@msnbc.com", "@nypost.com", "@nytimes.com", "@reuters.com", "@usatoday.com", "@washpost.com", or "@wsj.com".

CISA has identified the employees that were involved with the CFTIF (closed out in 2021) and the follow-on MDM team. Those persons records will be searched for responsive records.

Search Terms for item E, plus the items marked in blue:

"hunter"AND"biden"

"biden"AND"laptop"

"devon"AND"archer"

"hunter"AND"biden"AND"ukraine"

"hunter"AND"biden"AND"laptop"

Burisma

Bohai

"Rosemont"AND"Seneca"

"Rosemont"AND"Seneca"AND"ukraine"