

SCHEDULE

In accordance with the attached Definitions and Instructions, the U.S. Department of Homeland Security (“DHS” or “Department”), including its Office of Intelligence and Analysis (“I&A”), is required to preserve and produce copies of all documents, communications, or other materials in its possession, custody, or control, from **March 1, 2018 to the present** (unless otherwise noted below), regardless of classification or form, and whether draft or final, **referring or relating to the following topics:**

I. **Foreign Efforts to Influence or Interfere in United States Elections and Related Matters**

- a. All drafts and final versions of I&A intelligence products and reports regarding efforts by Russia, China, and Iran to influence, interfere in, or undermine U.S. elections—including products and reports used only within I&A, as well as those disseminated outside of I&A and/or the Department; as well as products and reports authored solely by I&A, or jointly with other DHS components or other Federal departments and agencies.
- b. All “raw” intelligence and other information underlying the products and reports described in paragraph (a).
- c. All documents and communications containing, referring, or related to efforts to block, delay, pause, or otherwise withhold production or dissemination of intelligence products or reports regarding such election-related influence or interference, including but not limited to:
 - i. Communications involving or referencing senior DHS or White House officials referring or relating to such production or dissemination, to include an e-mail dated on or about July 7, 2020, from Acting DHS Chief of Staff Gountanis to I&A Acting Undersecretary Brian Murphy regarding the production and dissemination of I&A’s products and reports regarding Russian disinformation and related matters.
 - ii. A meeting on or about July 8, 2020, between Mr. Murphy and Mr. Chad Wolf regarding such matters.
 - iii. Efforts by Mr. Wolf or other senior DHS or White House officials, following the July 8, 2020 meeting, to exclude Mr. Murphy from future meetings regarding such matters.
- d. All documents and communications containing, referring, or related to efforts to change or modify intelligence products or reports regarding election-related influence or interference threats posed by Russia, China, and/or Iran; including any directions, requests, or suggestions by senior officials within DHS or the White House that such products or reports be withheld, manipulated, censored, or otherwise changed in any way.

- e. All documents and communications referring or related to the appearance of I&A Undersecretary David Glawe before the House Permanent Select Committee on Intelligence on or about September 12, 2018, including any references to Glawe’s remarks about Russian interference in the 2016 U.S. election or to the 2016 Intelligence Community Assessment, and any subsequent request or direction by President Trump that Mr. Glawe be fired because of remarks Glawe made during that appearance.
- f. All documents and communications referring or related to meetings convened by the National Security Council (“NSC”)—to include any meeting of the NSC’s Principals Committee, Deputies Committee, or Policy Coordinating or Sub Policy Coordinating Committees, whether restricted or non-restricted—regarding such election-related influence or interference and related matters, including but not limited to preparatory material, written readouts or summaries, or other records regarding a meeting of the Deputies Committee in approximately May 2020 on the subject of election security, influence, and interference.
- g. All documents and communications containing, referring, or related to disclosures by Mr. Murphy relaying his concerns about the administration of U.S. intelligence programs or other activities related to foreign efforts to influence or interfere in United States elections, to include disclosures to or communications with:
 - i. Former Secretary of Homeland Security Kirstjen Nielsen.
 - ii. Mr. Wolf, including on or about April 15, 2020, and in May 2020.
 - iii. Mr. Cuccinelli, including on or about April 15, 2020, and late May 2020.
 - iv. Mr. Patel, including on March 3, 7, 23, and 24, 2020, as well as April 10 and 14, 2020.
 - v. Mr. Miles Taylor.
 - vi. Mr. David Glawe.
 - vii. Then-Principal Deputy Director for National Intelligence Sue Gordon, including on or about October 16, 2018.
 - viii. Assistant Deputy National Security Advisor Sarah Tinsley, including on or about May 28, 2019.

II. Documents Identified by Brian Murphy

- a. All documents and communications identified or submitted by or on behalf of Brian Murphy in 2020 to DHS in connection with its prepublication review process, and relating to allegations advanced in complaints Murphy submitted to the DHS Inspector General in 2018, 2019, or 2020.

III. Nationwide Domestic Protests and Related Events

- a. All documents and communications referring or related to the collection, production, and dissemination of intelligence regarding the activities of U.S. journalists and their reporting on the nationwide domestic protests.
- b. All documents and communications referring or related to the deployment of I&A personnel to Portland and other U.S. cities in response to the nationwide domestic protests.
- c. All documents and communications referring or related to the apprehension, arrest, and detention of protestors and others in Portland, including any I&A participation in custodial debriefings.
- d. All documents and communications referring or related to efforts to analyze or otherwise exploit data from electronic devices, including cellular telephones, belonging to protestors.
- e. Any and all policies and guidance issued regarding activities I&A could and could not lawfully conduct under applicable authorities in response to the nationwide domestic protests.
- f. All documents and communications referring to President Trump's Executive Order (E.O.) 13933 on Protecting American Monuments, Memorials, and Statues and Combating Recent Criminal Violence, including any communications between DHS, the Department of Justice (DOJ), the Executive Office of the President (EOP), or the White House.
- g. Any and all I&A "Job Aids" relating to the nationwide domestic protests, including that regarding Monuments, Memorials, and Statues; and those regarding the Portland Surge Operation (dated on or about July 9, 2020).
- h. All documents and communications containing, referring, or related to the attribution of violent activity to a particular group or groups, including the creation and use of the terms "violent opportunist" and "Violent ANTIFA Anarchist Inspired."
- i. All I&A intelligence products and reports relating to the nationwide domestic protests, including those in Portland, Oregon, including products or reports that have been recalled or withdrawn for any reason.

IV. ANTIFA and "anarchist" groups operating in the United States

- a. All documents and communications containing, referring, or related to directions, requests, or suggestions that I&A intelligence assessments or reports should be changed so as to conform to or support public claims by President Trump, the

White House, or senior Trump Administration officials concerning ANTIFA and “anarchist” groups.

- b. All I&A intelligence products and reports, whether internal to DHS or disseminated externally, regarding ANTIFA, “anarchist” groups, violent opportunists, and “Violent ANTIFA Anarchist Inspired” groups operating in the United States.

V. The provision of statistics and other information to Congress and the public regarding the number of Known or Suspected Terrorists (“KSTs”) and Special Interest Aliens (“SIAs”) entering the United States

- a. All documents and communications containing, referring, or related to the provision of statistics and other information to Congress regarding the number of KSTs and/or SIAs entering the United States through its southwest border, including but not limited to:
 - i. Preparation for Secretary Nielsen’s testimony before the House Judiciary Committee on December 20, 2018.
 - ii. Preparation for Secretary Nielsen’s testimony before the House Homeland Security Committee on March 6, 2019.
 - iii. A PowerPoint presentation made public by the White House in or about January 2019, regarding the southwest border wall and KSTs.
- b. All documents and communications containing, referring, or related to directions, requests, or suggestions that I&A intelligence assessments support a claim by White House officials that large numbers of KSTs were entering the United States through its southwest border.

VI. The preparation of any “reference aids” or other products for use by Department officials during the adjudication of claims for asylum in the United States

- a. All documents and communications containing, referring, or related to directions, requests, or suggestions that “reference aids” regarding the socioeconomic and security conditions in South or Central American countries, including Guatemala, Honduras, and El Salvador—or any of I&A’s intelligence products, reports or other information regarding conditions in those countries—should be changed so as to conform to or support public claims by President Trump, the White House, or senior Trump Administration officials.
- b. All documents and communications referring or related to any meeting among senior DHS officials at which conditions in Guatemala, Honduras, and El Salvador and asylum claims were discussed, to include a meeting in approximately December 2019 between Mr. Murphy, Mr. Glawe, and Mr. Cuccinelli.

- c. All documents and communications containing, referring, or related to directions, requests, or suggestions, including by Mr. Cuccinelli, that “deep state” individuals who compiled intelligence reports regarding conditions in Guatemala, Honduras, and El Salvador, should be identified and/or fired or reassigned.
- d. All I&A intelligence products and reports, including reference aids, regarding conditions in Guatemala, Honduras, and El Salvador produced in the period September 2019 through March 2020.

VII. The preparation of an intelligence assessment of the threats to the U.S. Homeland (the “Homeland Threat Assessment” or “HTA”), as well any related policy documents related to such assessment and intended for public release:

- a. All documents and communications containing, referring, or related to directions, requests, or suggestions that discussion of domestic terrorism threats within the HTA and/or related policy documents should be changed so as to minimize the relative severity or nature of the threat from white supremacist extremist groups, and/or to emphasize the severity or nature of the threat from left-wing groups.
- b. All documents and communications containing, referring, or related to delays in the review, approval, dissemination, or publication of the HTA and/or related policy documents, and the reasons for such delays.
- c. All documents and communications containing, referring, or related to concerns that the HTA and/or related policy documents would reflect negatively on President Trump or the Trump Administration, including concerns raised by Mr. Wolf, Mr. Cuccinelli, and Deputy Chief of Staff Scott Erickson.
- d. All documents and communications containing, referring, or related to directions, requests, or suggestions by DHS senior officials that the HTA’s analytic line or conclusions be changed.
- e. All documents and communications containing, referring, or related to the review of the HTA and/or related policy documents by the Department’s policy or operating components, to include any review by its Office of Strategy, Policy and Plans and U.S. Customs and Border Protection, and any direction, request, or suggestion by Department components that analysis and/or assessments in the HTA or related policy documents should be changed.
- f. All HTA and related policy documents in draft or final form, including redlines, track changes, or comments to any drafts.