



January 18, 2022

VIA EMAIL

Susan Clarke Schaar
Clerk of the Senate of Virginia
P.O. Box 396
Richmond, Virginia 23218
sschaar@senate.virginia.gov

Re: Virginia Freedom of Information Act Request

Dear FOIA Officer:

Pursuant to the Virginia Freedom of Information Act, Va. Code Ann. § 2.2-3700, I, Austin Evers, a resident of Virginia, make the following request for records.

Virginia State Senator Amanda Chase has repeatedly denied the validity of the November 2020 election and in 2020 called for former President Trump to declare martial law to prevent its certification.¹ In the following year, Sen. Chase participated in further efforts to cast doubt on the election, including visiting the site of the Arizona Senate's widely discredited "audit" of Maricopa County's election results² and attending election conspiracist and MyPillow CEO Mike Lindell's "Cyber Symposium" in Sioux Falls, South Dakota.³

American Oversight seeks records with the potential to shed light on efforts to undermine faith in American elections, including records showing whether and to what extent Sen. Chase participated in these efforts.

Requested Records

I request that your office produce the following records within five working days:

¹ Laura Vozzella, *Republican Contender for Va. Governor Says Trump Should Declare Martial Law*, Wash. Post (Dec. 15, 2020),

https://www.washingtonpost.com/local/virginia-politics/chase-trump-martial-law/2020/12/15/95ca99a4-3ee5-11eb-9453-fc36ba051781_story.html.

² David Weigel, *The Trailer: The "Arizona Model:" Republicans Trek to Phoenix, Planning 2020 Election Audits Back Home*, Wash. Post (June 10, 2021, 5:54 PM),

<https://www.washingtonpost.com/politics/2021/06/10/trailer-arizona-model-republicans-trek-phoenix-planning-2020-election-audits-back-home/>.

³ Matt Shuham, *Dozens of State Lawmakers Sign Letter Calling for MAGA Audit of all 50 States*, Talking Points Memo (Oct. 18, 2021, 2:09 PM),

<https://talkingpointsmemo.com/news/dozens-of-state-lawmakers-sign-letter-calling-for-maga-audit-of-all-50-states>.

1. All records reflecting the full content of any post published to Wickr Pro related to any “election integrity” or “Election Integrity Call” meeting⁴ by Sen. Amanda Chase (including, but not limited to the “2020 Election Remediation” meeting room).
2. All files uploaded by Sen. Chase to Wickr Pro related to “election integrity” meetings (including, but not limited to the “2020 Election Remediation” meeting room).
3. All files downloaded by Sen. Chase from Wickr Pro related to “election integrity” meetings (including, but not limited to the “2020 Election Remediation” meeting room), whether to a government or personal device.
4. All records reflecting the content of Sen. Chase’s Wickr Pro profile.
5. Records sufficient to identify the expiration timer for any Wickr Pro meeting rooms related to “election integrity” meetings (including, but not limited to the “2020 Election Remediation” meeting room).
6. Records sufficient to identify the full list of participants for any Wickr Pro meeting rooms related to “election integrity” meetings (including, but not limited to the “2020 Election Remediation” meeting room).
7. Records sufficient to identify the moderators of any Wickr Pro meeting rooms related to “election integrity” meetings (including, but not limited to the “2020 Election Remediation” meeting room).

Please provide all responsive records from November 3, 2020, through the date the search is conducted.

Please notify me of any anticipated fees or costs in excess of \$100 prior to incurring such costs or fee.

Guidance Regarding the Search & Processing of Requested Records

In connection with its request for records, I provide the following guidance regarding the scope of the records sought and the search and processing of records:

⁴ American Oversight, *Arizona Senate Records Regarding Maricopa County Election ‘Audit’ Part 39/50* at 998–1000, https://www.documentcloud.org/documents/21054163-ocr-az-part-6_part-3#document/p1000 (the “Election Integrity Call” calendar invitation cited, attached as Exhibit A, instructs participants to download an encrypted, ephemeral communications application called Wickr Pro, refers to a “2020 Election Remediation” meeting room, and describes a File Folder button for accessing uploaded documents).

- Please search all locations and systems likely to have responsive records, regardless of format, medium, or physical characteristics. For instance, if the request seeks “communications,” please search all locations likely to contain communications, including relevant hard-copy files, correspondence files, appropriate locations on hard drives and shared drives, emails, text messages or other direct messaging systems (such as iMessage, WhatsApp, Signal, or Twitter direct messages), voicemail messages, instant messaging systems such as Lync or ICQ, and shared messages systems such as Slack.
- In conducting your search, please understand the terms “record,” “document,” and “information” in their broadest sense, to include any written, typed, recorded, graphic, printed, or audio material of any kind. I seek records of any kind, including electronic records, audiotapes, videotapes, and photographs, as well as letters, emails, facsimiles, telephone messages, voice mail messages and transcripts, notes, or minutes of any meetings, telephone conversations or discussions.
- My request for records includes any attachments to those records or other materials enclosed with those records when they were previously transmitted. To the extent that an email is responsive to this request, this request includes all prior messages sent or received in that email chain, as well as any attachments to the email.
- 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.
- In the event some portions of the requested records are properly exempt from disclosure, 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 by the agency before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records.

If you have any questions regarding how to construe this request for records or believe that further discussions regarding search and processing would facilitate a more efficient production of records of interest to me, please do not hesitate to reach out to my contact listed below to discuss this request. We welcome an opportunity to discuss this request with you before you undertake your search or incur search or duplication costs. By working together at the outset, we can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in an electronic format by email to the address listed below. Alternatively, please provide responsive material in native format or in PDF format on a USB drive. Please send any responsive material being sent by mail to Austin Evers, c/o American Oversight, 1030 15th Street NW, Suite B255, Washington, DC 20005. If it will accelerate release of responsive records, please also provide responsive material on a rolling basis.

Conclusion

We share a common mission to promote transparency in government. I look forward to working with your agency on this request. If you do not understand any part of this request, please contact Rachel Baron at records@americanoversight.org or 202.897.2465.

Sincerely,

A handwritten signature in blue ink that reads "Austin Evers". The signature is fluid and cursive, with a long horizontal flourish extending to the left.

Austin Evers

EXHIBIT A

Subject: Election Integrity Call - Saturday
Location: Wickr Pro Meeting Room: 2020 Election Remediation
Start: 7/3/2021 12:00 PM
End: 7/3/2021 1:00 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Jenny Limcher

Required Attendees: Jenny Limcher; Al Hartman; Ivan E. Raiklin; amanda@chaseforva.com; barry@barryfarah.com; bobbypiton@protonmail.com; brianremy@aol.com; Caroline Wetherington; catherine@truethevote.org; Russ Ramsland; chucsmil@live.com; Danielle Romero; retiredn42@aol.com; dmoore@knightvest.com; Chad Levrouw; wpf@fearerlaw.com; Diane Black; drdouglasfrank@protonmail.com; garlandf@msn.com; lwood@fightback.law; garrett.ziegler@icloud.com; garyrabine@rabinepaving.com; schedule@generalflynn.com; jacksonlane@americasfuture.net; jackson@jacksonlahmeyer.com; Hogan Gidley; hogan@americafirstpolicy.com; JLS; jhb@jba.capital; janel@brandtjen.com; jay@jalwest.com; drjallenjohnson@gmail.com; Jill Foote; jtroupis@hotmail.com; jarlinghaus@valoramerica.org; joe@joekentforcongress.com; jeastman@claremont.org; john@johngravespc.com; john5.17@verizon.net; jfindlay@gop.com; The Blue Collar Intellectual; jinimmons@msn.com; kandisstaylor@protonmail.com; Karen Taylor; katherine@florida-capital.com; keet@jkeetlewis.com; kennethblackwell693@gmail.com; kevinjessip@gmail.com; kimberly@momsforamerica.net; Kurt Olson; lance@lancewallnau.com; lindaleetarver@gmail.com; lizdeluca@gmail.com; mark@pearlconsolidated.com; Marylyn Todd; matthew@depernolaw.com; mbowman@alecaction.org; Madison.Engelking@mail.house.gov; mobrooksAL5@mail.house.gov; mollyoitz@me.com; pamela@ffcoalition.com; gorman2006@gmail.com; Patrick Colbeck; pwolf6610@gmail.com; p@bonfiresearch.org; Phillip Jauregui; rzupanc@protonmail.com; ralph@censtrat.com; randy.price@stewardpartners.com; rex@nicholsgroup.com; rob@americaproject.com; ronheuer@gmail.com; jkoesutv@protonmail.com; sean.themea@yaliberty.org; shayne@chaseforva.com; Phyllis Heivilin; steve@coronamconsulting.com; TamaraCPA@outlook.com; Tim Oitzman; TShuppe@protonmail.com; Velma Anne Ruth; wrogers@azleg.gov; ktownsend@azleg.gov; kkubat@azleg.gov; jparker@azleg.gov; lbiasiucci@azleg.gov; mfinchem@azleg.gov; jchaplik@azleg.gov; jesse@binnall.com; rajdothis@defendourunion.org; emily@americaproject.com; kevin@freemanglobal.net; gmarkarian@peoplepc.com

Optional Attendees: mmarkarian@windstream.net; Raj Doraisamy

Join us **every second Saturday** for SITUATION UPDATES and COLLABORATION from active leaders in the **election remediation process at state level** – attorneys with Mike Lindell and Patrick Byrne, data analysts, state legislators, gubernatorial candidates, and grassroots activists whose goal is completing a cyber forensic audit in their state.

Time: 2:00 PM CST

Date: Saturday, July 3, 2021

Place: Wickr Pro Meeting Room – 2020 Election Remediation

Set up in Wickr Pro is necessary for call participation. See instructions below agenda.

COLLABORATION

Freely share in the CHAT your contact information, questions, answers, and how you can assist other patriots in their states.

PROPOSED AGENDA

1. Opening (:00-:05) Prayer & Introductions
2. State Updates (:05-:48) Audits, Lawsuits, Rallies, Recalls, Media
 - * Tier 1
 - i. Arizona (:05-:10) - Phil Waldron, Pam Gormans
 - ii. Georgia (:10-:15) - Kandiss Taylor, Garland Favorito
 - iii. Michigan (:15-:20) - Patrick Colbeck, Linda Lee
 - iv. Pennsylvania (:20-:25) - Mark Still, Karen Taylor

v. Wisconsin (:25-:30) - Kurt Olson, Jim Troupis

* Tier 2

i. New Hampshire (:30-:32) - Julian Acciard

ii. Virginia (:32-36) - Amanda Chase, John Mills

iii. Nevada (:36-:38) - ?

iv. New Mexico (:38-:40) - ?

v. Nebraska (:40-:42) - Velma Ann Ruth

* Tier 3

i. North Carolina (:42-:43) - David Goetze

ii. Alaska, Colorado, Utah, Oregon (:43-:44) - ?

iii. Illinois (:44-:48) - Bobby Piton

3. National Updates (:48-:52) Media, Rallies, Deep Rig movie, AZ Report - Group Discussion

4. Forecast (:52-:57) June 19-July 3 - Ivan Raiklin

5. Financing (:57-:01) - Al Hartman

6. Closing (:01-:02) Prayer - Al Hartman

Wickr Pro APP INSTRUCTIONS

For security reasons, ONLY those with a Wickr Pro account may join the call.

Set Up. After you accept this invite, we will send you an invitation to download the Wickr Pro calling app and join our MEETING ROOM. Please complete this step BEFORE the call begins as it does take time. For a test run in the app or for questions, please email jlimcher@hi-reit.com or text (713) 819-9872. We are glad to assist with registration and have tech support lined up to resolve issues.

Starting Call on Saturday. Once the call starts at 2:00 PM CST, open the Wickr Pro app and click the green JOIN button to enter the Meeting Room. If you lose connection during the call, open the app and again click the green JOIN button.

Using the App. Calls are encrypted in Wickr Pro, but otherwise the app is similar to Zoom. You can turn on and off your mic and your video. We ask participants to keep mics muted unless speaking. Video is up to you. The Information button (the grey circle with "i") shows who is in the call; the File Folder button shows uploaded documents useful for participants. The Telephone button will initiate a call to everyone in the room, so be careful. 😊

Questions. If you have any questions, feel free to reach out. We will work to resolve all app questions before Saturday; however, Wickr Pro has assigned a tech support specialist to assist us throughout the call if issues arise.

Jenny Limcher

Call Administrator

jlimcher@hi-reit.com

(713) 819-9872