

DATE: 12/21/2023

OFFICE OF ATTORNEY GENERAL
RIGHT-TO-KNOW OFFICER
15TH FLOOR, STRAWBERRY SQUARE
HARRISBURG, PA 17120
rtkl@attorneygeneral.gov

REQUESTORS:

Leah Hoopes & Greg Strenstrom
241 Sulky Way
Chadds Ford, PA 19317
leahfreedelcopa@protonmail.com

REGARDING:

Public Records Request with Communications, Meetings, and other things between the Pennsylvania Attorney General's Offices, Josh Shapiro, former Governor Tom Wolf, Attorney Special Agent: Aidi Marcial, and Special Agent Benjamin Walton, Special Agents John A Trevisan Jr, Special Agent Matthew Smith dispatched from Norristown, PA field office, Duane Morris Law Firm, Partner Attorney J Manly Parks *Esq.* and Nicholas Centrella,, President Joe Biden, former Former State Representative, Bob Brady, James Savage, Kathy Boockvar, President of Athena Strategies, Brennan Center for Justice, Factcheck.org , the Federal Bureau of Investigation including special agent Jason Huff, Delaware County District Attorney's Office, Delaware County Board of Elections, Delaware County Council, Delaware County Row Offices and Officers, Southeastern Pennsylvania United States Attorney's office, William McSwain, and US Attorney General William Barr, and their agents, representatives and third parties as it relates to the 2020 Election Fraud investigations.

MEMORANDUM OF LAW:

Pursuant to the Pennsylvania Right-to-Know Law, 65 §67.101 eq seq. ("RTKL") We, Leah Hoopes, and Greg Stenstrom, "Requesters" are requesting and seek the records from Pennsylvania Attorney General's office , for any/all information regardless of its physical form or character, tangible, or intangible forms, electronic or written that documents a transaction or activity of an agency, personnel or 3rd parties, and is created, received, or retained pursuant to law or in connection with a transaction, business or activity of any agency." 65. P.S. §67.102.

These requests for information are very specific, detailed and numbered and notwithstanding the extensiveness of these requests, because the subject matter of these requests for information that feature and involves "agents" that have been found to be factually involved in public corruption, exploitation, criminal malicious misuse, and engaged in manipulations of their public offices, and where this same Agency is tasked, and is designed to protect, prevent and prosecute individuals, agencies or other bodies if they have been found to be engaged in ongoing public acts distrust, malicious criminal corruption or prosecution as was factually found with this agency and why the Requesters are requesting these records

and providing quantifiable support as to why these records are being requested do not enjoy any privilege to withhold or deny.

INTRODUCTION AND BACKGROUND:

The time frame periods we are requesting for this new Right to Know Request information is more specific, detailed, and enumerated by the please provide detail of each detailed requests to provide ALL material from on or before April 2020, to the present time in the year of 2023 regarding the November 2020 general election.

On November 7th, 2020, Gregory Stenstrom and Leah Hoopes provided sworn declarations to US Attorney General William McSwain see (exhibit A1 and 2) as to what we witnessed during the November 3rd, 2020 election. These sworn declarations were provided to the United States Attorney Offices of Southeastern Pennsylvania jurisdiction under the threat of penalty of perjury, imprisonment, and fines. We also provided certified letters, with certificates, and emails to the US Attorney William McSwain, Pennsylvania Attorney General Josh Shapiro, and Delaware County District Attorney Jack Stollsteimer, demanding that an investigation into our factually supported complaint and findings see (Exhibit B 1 and B2). We also filed emergency injunctions in Delaware County, and we exercised our 1st Amendment rights to petition our government, as we pledged and swore to defend and fulfill our statutory duties as poll watchers, an elected committee woman and to our Pledge to Defend the United States Constitution from threats both domestic and foreign during the November 2020 election.

What has transpired since these events is nothing short of lawfare, retaliation, criminal malfeasance and obstruction into an investigation. On November 17th, 2020, Governor, then Attorney General, Josh Shapiro personally instructed, order “field attorney agents” to come to Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll’s homes. A special agent was unable to make contact with Leah in person, but did call her phone, and she spoke with a Pennsylvania Attorney Special Agent: Aidi Marcial who called from a phone number [REDACTED]-9266. There was also another Special Agent Benjamin Walton who came to Leah Hoopes, Gregory Stenstrom homes under the orders of former Attorney Josh Shapiro. Special Agents John Trevisan Jr and Matthew Smith arrived to Joe Driscoll’s home and spoke with him on that same day as well. Leah Hoopes memorialized the events in a social media Facebook post on November 17th, 2020. (See exhibits C 1, C2, C3 C4)

Most recently it has come to our attention through a Right to Know Request, specifically billing invoices from the Duane Morris Law Firm, whom attorney’s J Manly Parks is a (partner along with with Bill McSwain, former US Attorney for the South Eastern District of Pennsylvania), appointed by President Donald Trump) and Nicholas Centrella , were there is communication details in the invoices with a representative from the Pennsylvania Attorney General’s office on November 19, 2020 (Exhibit D), and again days following per the redacted details and notes on of the Duane Morris invoices that were not blacked out/redacted and that without any doubt implicate acts of criminal concealment, and other planning of criminal conspiracies with some of these, and other bad actors detailed of redacted. The

importance of this is that (just 48 hours after the Acting Pennsylvania Attorney General Josh Shapiro, sent special agents to Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll's homes in November 2020 following the Social Media Post on Facebook.)

Please (see exhibit E) As per US Attorney, William McSwain's letter to President Trump dated June 2021, and were US Attorney General, William Barr shut down US Attorney, William McSwain's investigation of Leah Hoopes and Greg Stenstrom irrefutable and factual verified findings of Election Fraud. US Deputy Attorney, William McSwain stated, and has since stated, that he was instructed to hand over all of our information to then Pennsylvania Attorney General, Josh Shapiro. William Barr's memo on November 9th, 2020, 48 hours after our declarations were submitted, the US Attorneys were given permission to pursue substantial allegations of voting and vote tabulation irregularities (Exhibit F1). Our declarations were given to William Barr November 7th and made their way through the entire Department of Justice as evidenced by the FOIA request. (see Exhibit F2). Also see notification and memorializing of our testimony and findings during the November 25th 2020 Gettysburg Senate Committee hearing, as reported to then US Deputy Attorney General Richard Donoghue by Senator Doug Mastriano in the December 28th 2020 letter which was a part of the United States Senate Judiciary Committee Report. Senator Mastriano not only specifically mentions Delaware County, but also that allegations with findings of fact were not investigated. Please see report , <https://www.judiciary.senate.gov/imo/media/doc/Interim%20Staff%20Report%20FINAL.pdf>

Greg Stenstrom when visited by the Attorney General Agents, was told specifically by the male agent Walton, that Josh Shapiro had sent them personally to his home. What is concerning, is that these agents were given political instructions and directives by now Governor Shapiro to come to our homes to intimidate, threaten, and harass, victimize, whistleblowers, and federally protected witnesses in their attempt to obstruct, interfere, and criminally spoil the criminal investigation of election the fraud itself with false and fraudulent propaganda themselves which should be considered facts and true that is supported evidence and future discovery.

Leah Hoopes filed a Right to Know request with this same Agency or the Attorney General's office on October 11th 2023, requesting any and all investigation details, documents, and other things in reference to: Leah Hoopes, where the Pennsylvania Attorney General Agency came back with "no reports, or no records. (Exhibit G)

The concern here is you have a private law firm, representing the Delaware County Election Board, where detailed attorney notes invoices detail there was in fact communications with the Delaware County Election Board and the Pennsylvania Attorney General's Office regarding Leah Hoopes, Gregory Stenstrom, and many others, and other bad actors which leaves us to question who ordered and who sent the Pennsylvania Attorney General Agents to our homes. Subsequently because our court filings, our whistleblower videos and audio which are irrefutable proof which depict Delaware County government officials deleting, altering and fabricating evidence is irrefutable evidence of the fraud with depositions from these bad actors, which these videos were released to the media in November of 2021.

The Delaware County District Attorney Jack Stollsteimer squashed the investigation into our factual findings and declarations, and he never interviewed a single witness, never did a forensic analysis of any of the videos and audio, being that he was a personal friend, and also the main co-conspirator with James Savage who was Stollstierner's political campaign buffer. DA Stollsteimer shut down all of our claims and destroyed them and memorialized it in a letter laced with material misstatements to the since resigned Delaware County Board of Elections President Gerald Lawrence. Please see (exhibit H) where Investigations were obstructed on a Federal, State and County level, political warfare, lawfare and endless harassment, and threats have ensued ever since Leah Hoopes and Gregory Stenstrom with consequential frivolous defamation ,malicious prosecution cases being manufactured with fraud, making every single person part and parcel to the criminal conspiracy to cover up the criminal acts that have been factually verified committed in Delaware County and should be considered a true fact to this public record request.

Subsequently, we filed a Right to Know request with Delaware County on September 20th, 2023 demanding they provide all billing and invoices from Duane Morris a 3rd party law firm, who has contracted with Delaware County Board of Elections, and providing attorneys to represent the County officials in any/all misinformation elections criminal lawfare operations. On September 27th the County responded and requested to have a 30-day extension for this right to know request. That request was denied October 27th, 2023 by the County for illegitimate and unlawful purposes, to which we appealed to the office of Open records in Harrisburg and that information was released by the Solicitor of Delaware County. The County stonewalling, redacting and withholding public records that would implicate their crimes and civil conspiracies, are repeatedly violating the laws of the Commonwealth of Pennsylvania , the Right to know Laws and Federal FOIA violations continuously. In the billing there are 100's if not 1000's amount of blacked out redactions. Please see (exhibit I). The County has been gaslighting and making open material misstatements during public meeting that Leah Hoopes and Greg Stenstrom were the reasons for their cause of their over spending misappropriating county tax payers funds with fraud on the courts, and they have also blamed Leah Hoopes and Greg Stenstrom for millions of dollars in spending deficits to defend the County which is also material misstatement. The Taxpayers did not approve these unwarranted expenses, nor can the County be a harmed party. Also, they did not include the amount of money spent in filing petitions against us, which is lawfare, harassment of witnesses and grand Mal corruption.

We have rung the bell with the Federal Government, in several courts across the Commonwealth and in the Supreme Court of the United States, documented, and memorialized in public statements, a book and also have backed up digitally all of our evidence. We have submitted all of this information in many court cases as either plaintiffs or as defendants in that material mis statements, obstruction of investigations, malfeasance, fabricated evidence, false public statements by government officials , conspiracy with news media , 3rd parties, attorneys, judges, law enforcement and other government officials have occurred since our declarations and court petitions have been submitted since the November 3rd 2020 general election.

DOCUMENTS & OTHER THINGS TO PROVIDE TO THIS RIGHT TO KNOW REQUEST

- 1) Please provide the First and Last Names of the Pennsylvania Attorney Agents who ordered, responded, and directed to Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll's homes on, before, during or after November 17th, 2020 to the present time and date and per the follow up phone call to Agent:
- 2) Please provide the Pennsylvania Attorney Agents reports, orders and detailed directives from their supervisors from their visit to Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll's homes on, before, during or after November 17th, 2020 to the present time and date? Please see (exhibit F).
- 3) Please provide all reports, emails, phone calls, faxes, developed by Special Agent Aidi Marcial, and any other agents or involved staff as it pertains to Leah Hoopes and Gregory Stenstrom.
- 4) Please provide Global Positioning Data of their State Issued Cell Phones, and as well GPS of Special Agent, Aidi Marcial and any/all other agents that visited Leah Hoopes, Gregory Stenstrom, and also Joe Driscoll's homes on, before, during or after November 17th, 2020 to the present time and date and per the follow up phone call to Agent:
- 5) Provide any and all communications between Josh Shapiro (previous AG) and William McSwain and/or US Attorney General's office of the Eastern District in regard to criminal referral for voter fraud during timeframe of April 2020 to ending December 2022.
- 6) Please provide the dates, times, e-mails, phone calls, texts, or meetings that took place when US Attorney William McSwain contacted Pennsylvania Attorney General, Josh Shapiro and what information was shared by e-mails, phone calls, text, or meetings took place to discuss the election fraud, and regarding Leah Hoopes and Greg Stenstrom sworn affidavits that were provided to US Attorney William McSwain, to provide to the US Attorney General at the time Bill Barr.
- 7) Please provide any and all communications, e-mails, letters, invoices and other things with Kathy Boockvar, President of "Athena Strategies LLC."- a company that advertises as "Election Security, Democracy, and Trust, and also please provide "Brennan Center for Justice" communications e-mails, letters, invoices and other things, and assistance that Kathy Boockvar has provided to Josh Shapiro regarding Leah Hoopes, and Greg Stenstrom any and all assistance and communications while Josh Shapiro was Attorney General to the present date of him being the Governor of Pennsylvania.
- 8) Please provide all financial records that Josh Shapiro used to investigate, intimidate, harass, or threaten Leah Hoopes, and Greg Stenstrom when and following them reporting Election Fraud and reporting that Josh Shapiro sent Special Agents to their homes uses State Tax dollars.
- 9) Please provide any/all criminal or civil investigative records, complaint forms online/digital, interoffice e-mails, or paper records with the complaint number(s) with the Pennsylvania Attorney General's office, agency as it pertains to any/all criminal investigations initiated in November 2020 regarding Leah Hoopes and Greg Stenstrom which is not privileged and is not confidential information, per the Duane Morris invoices that detailed communications are communications with the Attorney General's office and Duane Morris law firm.
- 10) Please provide any/all sworn or non-sworn statements, complaints, or communications made about Leah Hoopes and Gregory Stenstrom. This should also include any human resources employed or not employed by Pennsylvania Attorney General's office as pertains to the Respondents complaints and

sworn falsifications that they have made on and off public records and in litigation that involved agents have manufactured without facts in the form of court reports and Sworn Affidavit.

- 11) Please provide the names of any/all investigator(s), assistants, special agents, involved parties, private law firms, county employees, private investigators that were assigned, tasked or participated in any/all investigations that that were discussed, initiated start and end dates of any and all investigations as it pertains to Leah Hoopes and Gregory Stenstrom who are Federally protected Witnesses and Whistleblowers as it pertains to the 2020 Presidential General Election Fraud. This should also include any/all employees and or agents that were involved in these matters must be identified, and their names released; (unless they are engaged in undercover work, and budgets cannot be classified.) (Names of the Persons that sued Leah and Greg or made statements to media or anything.)
- 12) Please provide any/all communications, information, letters, e-mails, texts, US mail sent and received, dates, timelines, phone calls made to or from Pennsylvania Attorney General's Josh Shapiro or his agents to the Federal Bureau of Investigation, US Attorney's Office, Delaware County District Attorney's, Delaware Board of Elections, Delaware County Council or any other county agent office by ways and or any/all means, and methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants.
- 13) Please provide This should also include ALL electronic copies of ALL email records to and from the various email domains that include specific and detailed list of keywords the agencies could of or did use to conduct any investigation, search or filing complaints against the Requesters Leah Hoopes and Gregory Stenstrom.
- 14) Please provide any/all agent reports, photographs, interviews or any other information that the agency have, maintained, e-mails, sent, received, deleted or destroyed as it pertains to Leah Hoopes and Gregory Stenstrom.
- 15) Please provide any/all in person meeting dates, names, and title/ capacity of any witnesses that were interviewed during the investigation and the (detailed time frames from when to when). We or the "Requesters" Leah Hoopes and Greg Strenstrom, (are not asking for personal information), just the name of sources, witnesses, or agents that do not enjoy any legal protections from withholding these public records, and where the "Respondents" have accused the "Requesters" to have acted, defamed, or slandered in a criminally malicious operation in attempt to stop, prevent, or cover up their own bad acts, material misstatements, acts of verifiable recorded fraud, because they are elected officials and they hold positions of public trust which is even more important why these records do not have legal privilege to withhold that negatively affect the public body they serve.
- 16) Please provide any/all agendas, notes, statements, recordings, agency VoIP phone calls, agency cell phones, private cell phone communications conducting State business on personal devices that have been made on or off record by phone, text, e-mail, encrypted chat apps, mail, or private couriers or other means.
- 17) Please provide all emails, meetings with adverse republican or independent parties involved political parties to Pennsylvania Attorney General, Governor Wolf's office, and any local politicians as it pertains to election fraud uncovered in Delaware County.
- 18) Please provide all communications provided by Mike Verb, Katie Muth to the Attorney General, or Governor, or Media outlets or any other party before and after these time frames regarding any and all things in this right to know request.

- 19) Please provide any/all communications the Pennsylvania Attorney General Josh Shapiro, his agents, employees, or 3rd parties communicated information to Media outlets, Political Action Committees, or independent 3rd parties such as Factcheck.org, NAACP, The Annenberg Foundation Trust or any other domestic or foreign agency in any shape or form this is to include public statements made to the Media by Josh Shapiro, made about President Donald Trump and all things related to the Election Fraud in Delaware County or anywhere else in or outside the Commonwealth of Pennsylvania that influenced, swayed, or interfered, or postured investigations to control outcomes of public opinions, trust, and votes.
- 20) Please provide any/all communications, information, letters, e-mails, texts, US mail sent and received, dates, timelines, phone calls made to or from United States Attorney General's William Barr or his agents to the Pennsylvania Attorney General's office , also included Federal Bureau of Investigation, US Attorney's Office, Delaware County District Attorney's, Delaware County Board of Elections, Delaware County Council or any other county agent office by ways and or any/all means, and methods used by its employees, agents or hired, or pro bono, volunteer 3rd parties, contractors, or consultants.
- 21) Please provide any geofencing and metadata of any tracking in human, or electronic, or AI form of Leah Hoopes and Gregory Stenstrom's phone or online footprint, for all communications including emails, phone records etc. even if it included unlawful tracking of social media or cellular digital locations of Leah Hoopes and Gregory Stenstrom's cell phones, or unauthorized illegal wire taps.
- 22) Please provide all information and communications sent or received from Factcheck.org relative to any/all of the request to know and please provide.

Provided below is a link, which brings you to a cloud which has all stored and corresponding exhibits listed above. <https://cloud.patriot.online/s/oJCyi9nwZJiPcw7>

*Since these right to knows requests for public information deal with public matters of public officials engaged in public distrust and public corruption , the attorney general's office and governor's office do not enjoy any executive legal privileges in their defense as a plaintiff or defendant alike, when matters of that negatively affect the general public due to non-disclosure, concealment or fraud on the courts and other conspiracies cannot be used as a defense or work product doctrine or attorney client privilege cannot be used as a defense.

Respectfully submitted and requested by the "Requestors"

Leah Hoopes & Greg Strenstrom

Federally Protected Witnesses, and Whistleblowers