

CALIFORNIA PUBLIC RECORDS ACT REQUEST

VIA EMAIL

May 9, 2022

California Health and Human Services Agency
ATTN: PRA Request
1215 O Street
Sacramento, CA 95814
CHHSMAIL@chhs.ca.gov

Re: Ghaly Communications Regarding Glasgow (*IR#0703A*)

Dear Sir or Madam:

This firm represents the Informed Consent Action Network (“ICAN”). On behalf of ICAN, we are requesting records pursuant to the California Public Records Act, Cal. Gov’t Code § 6250 *et seq.* (“CPRA”). Please provide the records in your possession via email to foia@sirillp.com:

All communications sent or received by Mark Ghaly that include the term “Glasgow”, “booster”, “Scotland”, “UN”, “vaccine”, “climate summit”, “trip”, and/or “COP26” dated between October 26, 2021 and November 20, 2021.

We ask that the agency use its discretionary authority to waive any and all fees or charges pursuant to Cal. Gov’t Code § 6253(e). ICAN is a not-for-profit news media organization whose mission is to raise public awareness about vaccine safety and to provide the public with information to give informed consent. (**Exhibit A**). As part of its mission, ICAN actively investigates and disseminates information regarding vaccine safety issues for free, including through its website,¹ a weekly health news and talk show,² and through press events and releases. ICAN is seeking the information in this public records request to allow it to contribute to the public understanding of the government’s vaccine safety programs, including the government’s efforts to promote vaccine safety. The information ICAN is requesting will not contribute to any commercial activities.

If only portions of a requested file are exempted from release, the remainder must still be released. We therefore request that we be provided with all non-exempt portions which are reasonably segregable. We further request that you provide an index of any deleted or withheld material and specify the statutory basis for denying access to such materials. Such statements may help to avoid unnecessary litigation. ICAN reserves all rights to commence an action if necessary.

¹ <https://www.icandecide.org/>.

² <https://thehighwire.com/>.

The CPRA requires a response within ten (10) days. Failure to respond in a timely manner shall be viewed as a denial of this request and ICAN may immediately take further action. If you would like to discuss our requests or any issues raised in this letter, please feel free to contact us at (212) 532-1091 or via email at foia@sirillp.com during normal business hours. Thank you for your time and attention to this matter.

Very truly yours,

/s/ Aaron Siri

Aaron Siri, Esq.

Elizabeth A. Brehm, Esq.

Colin M. Farnsworth Esq.

DECLARATION OF CATHARINE LAYTON

STATE OF TEXAS

COUNTY OF HAYS

I, Catharine Layton, being duly sworn on oath do say:

1. I am the Chief Operating Officer of the Informed Consent Action Network (ICAN), a not-for-profit 501(c)(3) organization whose mission is to disseminate scientific health information to the public.

2. I have been an officer of ICAN since its founding in 2016. I oversee all day-to-day operations of the organization and all ICAN's programs. Together with our CEO and Board, I ensure that all efforts are focused on our mission statement and ensure that ICAN stays in compliance with all required rules and regulations.

3. In pursuit of its mission, ICAN relies primarily on its own investigative reporting. ICAN is both instrumental in orchestrating cutting edge investigations into the safety of various medical products, as well as widely disseminating its findings through various media channels. Most notably, ICAN's popular website hosts the organization's largest education program, The HighWire with Del Bigtree. Utilizing its media teams' 40+ years of experience in TV production and investigative journalism, The HighWire provides hours of new video content to the public each week for free.

4. The HighWire website has approximately 3.4 million weekly visitors. On Twitter, The HighWire has approximately 140,000 followers and 1 to 2.5 million impressions in a 28-day period. Between Rumble and Bitchute, The HighWire has approximately 60,000 followers and growing. Additionally, ICAN has 29,000 text subscribers and 194,245 email subscribers.

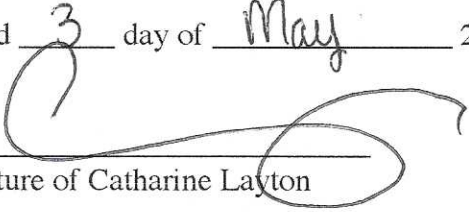
5. The size of ICAN's audience and subscribers continues to grow and is illustrative of the wide public interest in the subject of health and medical safety. Moreover, critical to ICAN's mission is its proven ability to find and review critical scientific and governmental records and meaningfully report about their social impacts.

6. One of the tools ICAN uses to gather the raw material it uses in its popular investigative reporting is the Freedom of Information Act (FOIA).

7. ICAN uses records it obtains from its FOIA requests to carry out its public mission and support its role as a non-profit news-media organization in the field of health and medical safety, but as a non-profit, ICAN does not have a commercial interest in the records it seeks through FOIA.

8. Based on what I know as the Chief Operating Officer, as well what has been demonstrated by ICAN's past and current investigative reporting, for purposes of FOIA's Fee Waiver provisions, ICAN certainly qualifies as a "representative of the news media."

Signed 3 day of May 2022


Signature of Catharine Layton

I, Amy Blackwell Notary public for the state of Texas witnessed
said Catharine Layton sign the above statement this 3 day of May, 2022
(month)

Notary Public for 

