
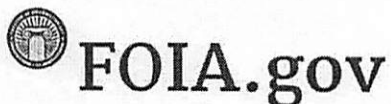


EXHIBIT A

 An official website of the United States government
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MENU



Thank you for visiting **FOIA.gov**, the government's central website for **FOIA**. We'll continue to make improvements to the site and look forward to your input. Please submit feedback to National.FOIAPortal@usdoj.gov.

Submission ID: 614516

Success!

Your FOIA request has been created and is being sent to the Office of the Secretary and Joint Staff.

You'll hear back from the agency confirming receipt in the coming weeks using the contact information you provided. If you have questions about your request, feel free to reach out to the agency FOIA personnel using the information provided below.

Contact the agency

Stephanie Carr, Chief

1-866-574-4970

whs.mc-alex.esd.mbx.osd-js-foia-requester-service-center@mail.mil

[FOIA Requester Service Center](#)

866-574-4970

Tonya Fuentes, [FOIA Public Liaison](#)

571-372-0462

osd.mc-alex.oatsd-pclt.mbx.foia-liaison@mail.mil

OSD/JS FOIA Requester Service Center, Office of Freedom of Information
1155 Defense Pentagon
Washington, DC 20301-1155

whs.mc-alex.esd.mbx.osd-js-foia-requester-service-center@mail.mil

Request summary

Request submitted on **March 10, 2023**.

The confirmation ID for your request is **614516**.



The confirmation ID is only for identifying your request on FOIA.gov and acts as a receipt to show that you submitted a request using FOIA.gov. This number does not replace the information you'll receive from the agency to track your request. In case there is an issue submitting your request to the agency you selected, you can use this number to help.

Contact information

Name

bob finson

Mailing address

859 poor house rd
rustburg, virginia 24588
United States

Phone number

3012923927

Company/organization

Feds for Medical Freedom (F4MF)

Email

bob.finson@pm.me

Your request

SUBJECT: Request for all communications to/from or carbon copying (cc) or blind carbon copying (BCC) David Soldow related to COVID-19 and Operation Warp Speed. This is a Freedom of Information Act Request (FOIA) under the authority of the Privacy Act of 1974. The definition of "documents, documentation, and communication" throughout this FOIA request includes emails (active and deleted), cables, policy, regulations, electronic communications, notes, messages exchanged between chat applications, calendar entries, and/or phone transcripts, in full or part, that can illustrate and provide details to the requested information detailed herein. I am seeking all communications related to Operation Warp Speed (OWS), companies contracted to work with DOD and other government elements on OWS, like Advanced Technology International, vaccine development, mRNA vaccine technology, Pfizer, Moderna, Johnson & Johnson or Jansen. It includes any details related to Astrazeneca, BioNtech, or any other vaccine for COVID-19. This includes any commercial contracts and/or DOD contracts made between the federal government and companies involved in OWS. Search terms should include but should not be limited to: Operation Warp Speed

Contracts Anthony Fauci Rochelle P. Walensky Robert R. Redfield Vivek Murthy Francis Collins Lawrence Tabak Hugh Auchincloss Jen Easterly Nina Jankowitz Katy Kale DHS CISA Advanced Technology International Vaccine mRNA Pfizer Moderna Johnson & Johnson Jansen david.soldow@gmail.com Testing Masking Contract authority Disinformation Misinformation Global Engagement Center Safer Federal Workforce Taskforce Facebook Reddit Microsoft Verizon Media Pinterest LinkedIn Wikimedia Foundation CISA Cyber security Advisory Committee Justice Department National Security Division Religious Accommodation Medical Accommodation Exemption Thank you for the time and effort put forth in this request. Please contact Bob.Finson@pm.me and F4MF-Lawfare-FOIA@proton.me if you have any questions or require additional clarification.

Fees

What type of requester are you?

other

Fee waiver

yes

Fee waiver justification

I am requesting a fee waiver for all expenses pursuant to 5 U.S.C. § 552(a)(4)(A)(iii). Defining the category of requester. For the purposes of determining the applicability of any fees, I am affiliated with the non-profit organization Feds for Medical Freedom (F4MF), which is an organization made up of over 9500 federal government employees from almost every major agency and department in the US Federal Government. F4MF is dedicated to employment issues in the federal workplace related to COVID-19 mitigations efforts. Pursuant to Office and Budget Management (OBM) Guidelines published 27 March 1987 (52 FR 10012), my category of request affords me the ability to seek out full fee waivers with justification. See also, Nat'l Sec. Archive v. U.S. Dep't of Def., 279 U.S. App. D.C. 308, 880 F.2d 1381 (1989) (finding that a nonprofit clearinghouse of information can qualify as a member of the news media). Justification that the request is in the public good and that the release of information enhances public understanding of government operations and procedures. 5 U.S.C. § 552(a)(4)(A)(iv)(III) requires the first 100 copies be provided to me at no charge; however, I am requesting a waiver of all fees. The information I seek is in the public interest because it will contribute significantly to the public understanding of the operations or activities of the government. This is of importance in light of advances in scientific understanding of COVID-19 and the vaccine's failing effectiveness and safety profile, as well as the multitude of legal challenges being levied in federal court. I believe I meet the criteria for a fee waiver recognized by the U.S. Justice Department – in its policy guidance from April 1987 – and by the federal courts. See, e.g., Project on Military Procurement, 710 F. Supp. 362. This

information is in the public interest and will contribute to public understanding. Even a single document has the potential to contribute to the public's understanding. See, *Elizabeth Eudey v. Central Intelligence Agency*, 478 F. Supp. 1175 1176 (D.C.D. 1979). Administrative and seemingly repetitive information is not exempt from fee-waiver consideration. *Campbell v. U.S. Department of Justice*, 334 U.S. App. D.C. (1998). An agency may not reject a fee waiver simply on the assumption that the information sought is covered under a fee waiver. See, *Project on Military Procurement v. Dep of Navy*, 710 F. Supp. (D.D.C. 1989). The fact that the information may soon be turned over to a public body does not exempt the material from fee waiver consideration. See, *Landmark Legal Foundation v. Internal Revenue Service*, 1998 U.S. Dist LEXIS 21722 (D.C.D. 1998). My request concerns the operations or activities of government because as employees and leaders in DOD are aware, COVID-19 health policy and vaccine mandates were levied across the whole of the federal government with the adoption of Executive Order (EO) 14042 and 14043 EO42/43 on 9 September 2021, and there have been numerous legal challenges to both EOs. F4MF is involved in three legal proceedings in federal court challenging EO42/43 and our organization has assisted federal government employees in organizing 11 class action EEO complaints against several federal agencies, to include DOD. These legal challenges include the following cases: Cases organized and/or paid for by Feds4MedFreedom.org. • Federal Practice Group has filed in the United States District Court for the District of Columbia. The case number is 1:21-cv-02779. • Federal Practice Group has also filed in the United States District Court for Florida. The case number is 8:22-cv-00121-JLB-SPF. • Boyden Gray & Associates has filed in the United States District Court for the Southern District of Texas. The case number is 3:21-cv-00356. There are over 1400 federal, state, civil, and EEO lawsuits in the court system demonstrating that EO42 and EO43 are built on a legally questionable foundation. The fact that there are so many legal challenges represents prima facie evidence that providing the public with transparent access to formulation and implementation of COVID-19 health policy is in the interest of public good. Below links are provided detailed information illustrating the legal challenges to vaccine mandates nationwide. <https://www.natlawreview.com/article/challenges-against-employer-covid-19-vaccine-mandates-show-no-sign-slowing> <https://www.jacksonlewis.com/practice/vaccine-mandate-litigation> The links to a publication from The National Law Review, *Challenges Against Employer COVID-19 Vaccine Mandates Show No Sign of Slowing*, Volume XII, Number 331, 19 September 2022, and a publication from Jackson Lewis, a law firm dealing in employer-employee litigation detail extensive nationwide litigation efforts. This demonstrates the pervasive and nationwide distribution of these small and large lawsuits being brought against employers including the federal government and is evidence that litigation has only increased in pace and scope. Given the extensive list of legal challenges facing the federal government and private entities related to COVID-19 health policy, mitigation efforts, and informed consent, it is vitally important that the public has transparent access to information related to <<AGENCY>> COVID-19 protocols, policy decisions, and methods of implementation. The Federal Government is the nation's largest employer, and they retain contract services from numerous private enterprises. Given the impact vaccine mandates have when levied against the nation's largest employer and the myriad of other private entities, the public good and understanding of government operations will be enhanced by access to information that demonstrates agency implementation of COVID-19 policy was in accordance with: • Administrative Procedure Act (APA) statutory requirements. • Careful consideration of medical privacy legal requirements. • Proper handling of violations of the rights of protected classes. • Proper investigatory steps taken to ensure said policies and procedures did not result in constitutional harm which could be subject to additional tort litigation. The same or similar information requests are being levied

against all federal government agencies subject to FOIA requirements. Should any information surface that agencies have failed to meet proper legal and regulatory requirements as outlined by agency internal regulations, federal law, or the APA, this may be used in future litigation, where possible. • Our PR Firm Amber Integrated disseminates information on our behalf. This includes press releases and social media content. • Our website hosts information for the public on religious accommodations, legal updates related to COVID-19, and news on COVID-19 public policy. • Coffee & COVID is a nationwide newsletter/substack sent out daily reaching 100s of readers daily; they have agreed to host all of Feds for Medical Freedom responsive FOIA results in a searchable database, as well as publish how readers can access the data. • Adam Kredo of the Washington Free Beacon has agreed to publish all results coming from this FOIA request. kredo@freebeacon.com Transparency is required to alleviate growing public concern related to government operations that may have resulted in measures that may violate bodily autonomy and medical privacy. Increasingly disturbing scientific research indicates that the mRNA vaccines may cause adverse health effects, preferentially targeting the age demographic typical of federal government employees. Transparent access to all information related to the federal government's implementation of COVID-19 policy will help to alleviate the concern that federal government employees and the public have been harmed by incompetence or illegal activity. Please see the list of published research indicating the possibility for adverse health effects associated with the mRNA vaccines. If the adverse effects preferentially target the average age demographic of federal government employees in <<AGENCY>>, then this information is in the public good. It will illustrate how important it is we fully understand government operations surrounding COVID-19 policy. Failure to provide the information we requested would indicate to the public that the federal government is not taking the possibility of medical harm – caused by the actions of the federal government - seriously. This too could be cause for further litigation. F4MF has a track record of acquiring FOIA information and making it available to the public on our website. More specifically, we provide that information free of charge to the public and work with our public relations firm to disseminate the product on social media and via traditional news outlets. The results of our FOIA requests are also discussed during media interviews. Specifically, we will provide the data to FOX news, CNN, Reuters, and other outlets through our PR firm Amber Integrated. This will include social media outreach. Not only does F4MF have an ability to disseminate this information, but we have experts able to analyze specifically what the data means. As mentioned above, F4MF is an organization with a wide reach throughout the federal government and beyond. As such, we enjoy expert analysis from F4MF members who serve in <<Agency>>. They can assist in refining our search as well as providing analysis of any documentation received. I have no commercial interest in the information and its release is being requested in furtherance of the public good. As an unpaid member of F4MF, a non-profit organization as defined by the IRS, I am acting solely out of a desire to enhance public understanding of federal government operations. I look forward to hearing your response within the 20 working days, as outlined by statute.

Request expedited processing

Expedited processing

no



FOIA.gov

CONTACT

Office of Information Policy (OIP)
U.S. Department of Justice
441 G St, NW, 6th Floor
Washington, DC 20530
E-mail: National.FOIAPortal@usdoj.gov

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| [AGENCY API SPEC](#)

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| [FOIA DATASET DOWNLOAD](#)

| [ACCESSIBILITY](#)

| [PRIVACY POLICY](#)

| [POLICIES & DISCLAIMERS](#)

| [JUSTICE.GOV](#)

| [USA.GOV](#)

EXHIBIT B

8/17/23, 5:48 PM

(660) All mail | bob.finson@pm.me | Proton Mail

RE: OSD/JS FOIA 23-F-0566

From Cooper, Shannon A CIV (USA) <shannon.a.cooper.civ@mail.mil>
To bob.finson <bob.finson@pm.me>
Date Thursday, March 30th, 2023 at 6:29 AM

Good morning,

Receipt acknowledged. Thank you.

V/r,

Shannon A. Cooper

Freedom of Information Division

OSD/JS FOIA Requester Service center

Action Officer

571-372-0412

NIPR: Shannon.a.cooper.civ@mail.mil

SIPR: Shannon.a.cooper.civ@mail.smil.mil

From: Bob Finson <bob.finson@pm.me>
Sent: Wednesday, March 29, 2023 4:17 PM
To: Cooper, Shannon A CIV (USA) <shannon.a.cooper.civ@mail.mil>
Subject: Re: OSD/JS FOIA 23-F-0566

Good Afternoon Shannon,

The date range for my request is 4/1/2020 to 5/1/2022.

8/17/23, 5:48 PM

(660) All mail | bob.finson@pm.me | Proton Mail

Please acknowledge receipt.

Thanks!

Bob

----- Original Message -----

On Wednesday, March 22nd, 2023 at 10:05 AM, Cooper, Shannon A CIV (USA) <shannon.a.cooper.civ@mail.mil> wrote:

Good morning,

This email is in reference to your recent FOIA request 23-F-0566. Our component, that has been tasked with processing your request, had requested that you provide a date range for your request to better aid in an adequate search for your request. If you would please provide a date range as soon as possible, that would be appreciated. I have attached a copy of the request description for your review. Thank you and please do not hesitate to email me if you have any further questions or concerns.

V/r,

Shannon A. Cooper

Freedom of Information Division

OSD/JS FOIA Requester Service center

Action Officer

571-372-0412

NIPR: Shannon.a.cooper.civ@mail.mil

SIPR: Shannon.a.cooper.civ@mail.smil.mil

8/17/23, 5:48 PM

(660) All mail | bob.finson@pm.me | Proton Mail

6.51 KB 1 file attached

smime.p7s 6.51 KB

https://mail.proton.me/u/0/all-mail/szaHU0gdYg1q1LvJMthCxJzJXq_RRLstkAaq9BPSAPw_BkvLWIUTIZplqk_X_oJzYFfmjyT6GfBQmiODys0ag==#key... 3/3

EXHIBIT C

9/22/23, 2:49 PM

Sent | peter@lloydlemmon.com | Proton Mail

Follow up re: FOIA 23-F-0566

From peter@lloydlg.com <Peter@lloydlg.com>
To whs.mc-alex.esd.mbx.osd-js-foia-requester-service-center@mail.mil,
osd.mc-alex-oatsd-pclt.mbx.foia-liaison@mail.mil
CC 'Bob Finson' <bob.finson@pm.me>, James Erdman <jim@feds4medfreedom.org>,
Scott Lloyd <scott@lloydlemmon.com>
Date Monday, September 11th, 2023 at 6:16 PM

To: Stephanie Carr, Chief

Tonya Fuentes, FOIA Public Liaison

Dear Gentlepersons:

This Office and the undersigned represent Feds For Medical Freedom and its volunteer representatives Bob Finson and James Erdman who are copied on this e-mail. I am writing in connection with our client's request for information pursuant to the Freedom of Information Act ("FOIA") referenced in the Subject line above and received by you folks on March 10, 2023.

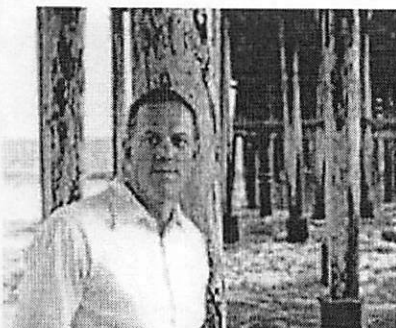
Near the end of March, Shannon Cooper reached out to our client for a date range in connection with this FOIA request, and Mr. Finson provided that date range on March 29, 2023. On March 30, Ms. Cooper acknowledged receipt of the date range. Nothing further has been received from either your office or its representatives. We are writing to you as that is the instruction provided on your "Success" acknowledgment email of March 10, 2023 for submission ID Number 614516 for this FOIA.

We will be filing in federal court in very short order if we do not receive back from you the documents requested and to which our client is entitled. I have calendared end of business for Friday of this week, or September 15, 2023, for your response, after which time we will prepare our lawsuit.

Hoping to hear something favorable from you.

Sincerely,

Peter



9/22/23, 2:49 PM

Sent | peter@lloydlemmon.com | Proton Mail

Lloyd Lemmon, PLLC

Attorneys & Counselors at Law

Garrison House (c. 1882)

15 Chester Street

Front Royal, VA 22630

Peter D. Lemmon, Esq.

Ph: (540) 821-1110

M: (805) 901-9460

Email: peter@lloydlemmon.com

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7.81 KB 1 embedded image

image001.jpg 7.81 KB

9/22/23, 2:50 PM

Sent | peter@lloydlemmon.com | Proton Mail

Subject:OSD/JS FOIA 23-F-0566

Date:Thu, 14 Sep 2023 22:04:08 +0000

From:Cooper, Shannon A CIV (USA) <shannon.a.cooper.civ@mail.mil>

Reply-To:Cooper, Shannon A CIV (USA) <shannon.a.cooper.civ@mail.mil>

To:bob.finson@pm.me <bob.finson@pm.me>

CC:Fisher, Stephen L CIV WHS ESD (USA) <stephen.l.fisher.civ@mail.mil>

Mr. Finson,

We apologize for the amount of time it has taken to process your request. Your request was tasked to our component for search and that keyword search resulted in a return of over 2,000 emails with attachments. The emails must then go through an initial review to make sure that they are responsive to your request. As we do not possess software that is capable of completing that review, the responsiveness review is done manually and due to the voluminous amount of emails, is still taking some time to complete. We apologize again for the delay in processing and any inconvenience it may be causing.

V/r,

Shannon A. Cooper

Freedom of Information Division

OSD/JS FOIA Requester Service center

Action Officer

571-372-0412

NIPR: Shannon.a.cooper.civ@mail.mil

Peter Lemmon

From: Peter Lemmon
Sent: Tuesday, September 19, 2023 9:41 AM
To: 'shannon.a.cooper.civ@mail.mil'; 'whs.mc-alex.esd.mbx.osd-js-foia-requester-service-center@mail.mil'; 'osd.mc-alex-oatsd-pclt.mbx.foia-liaison@mail.mil'
Cc: 'Bob Finson'; 'James Erdman'; 'Scott Lloyd'; 'Dana Hale'
Subject: OSD/JS FOIA 23-F-0566
Importance: High

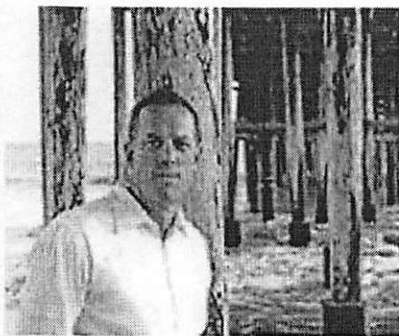
Dear Ms. Cooper:

This Office and the undersigned represent Feds for Medical freedom and our representative, Bob Finson, in connection with OSD/JS FOIA 23-F-0566. I must assume, given the timing of your email letter to Mr. Finson dated last Thursday, two days after I wrote concerning the total lack of response on this FOIA request since March 30, that you were attempting to meet the deadline set by that letter of last Friday September 15 before we would begin preparing our federal lawsuit on this FOIA request.

However, it is clear from your communication e-mail that although you apologize for the amount of time it is taking to process the request and you reference the need for review of 2000 emails with attachments, your office and its outside contractors have had since March, nearly seven months, to get this work done. And your last Thursday e-mail, once again, does not give our clients any promise of a completion date. Obviously, this is not in conformity with FOIA. If you cannot or will not give me a date certain for the documents to be delivered to us pursuant to this FOIA request, we have no choice but to proceed into federal court immediately.

Please advise the documents will be forthcoming by the end of this week with the fee waiver requested therein granted. Meanwhile, regrettably, we must begin preparing the lawsuit.

Sincerely,
Peter



Lloyd Lemmon & Hale, PLLC
Attorneys & Counselors at Law
Garrison House (c. 1882)
15 Chester Street
Front Royal, VA 22630

Peter D. Lemmon, Esq.

Ph: (540) 551-3109

M: (805) 901-9460

Email: peter@lloydlemmon.com

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