

Exhibit A



February 15, 2017

Mr. Kenneth Wolfe
Acting Chief Freedom of Information Officer
Hubert H. Humphrey Building, Room 729H
200 Independence Avenue, SW
Washington, D.C. 20201
Email: FOIARequest@hhs.gov
Phone: 202-690-7453
Fax: 202-690-8320

Re: Freedom of Information Act Request

Dear Mr. Wolfe:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, The Protect Democracy Project hereby requests that your office produce within 20 business days the following documents (see below for clarity on the types of records sought):

1. Any and all records created or transmitted between November 9, 2016 and the present date by or between Department of Health and Human Services (HHS) employees regarding or including Presidential Transition Team questionnaires about or referring to the “Affordable Care Act,” the “ACA,” or “Obamacare” including but not limited to communications between, from, or concerning the following individuals:
Donald Trump, Stephen Bannon, Reince Priebus, Stephen Miller, Kellyanne Conway, Sean Spicer, Michael Pence, Jared Kushner, Andrew Bremberg, Paula Stannard, Scott Gottlieb, Eric Hargan, Nina Owcharenko Schaefer, Tom Price, Renee Amooore, John Brooks, Kamran Daravi, Ed Haislmaier, Manuel Iglesias, Demetrios Kouzoukas, Patrick Lawler, Marie Meszaros, and Maggie Wynne.
2. Any and all records created or transmitted between November 9, 2016 and the present date by or between HHS employees regarding or including Presidential Transition Team questionnaires about or referring to the abortion policy and/or staff working on abortion or birth control policy including but not limited to communications between, from, or concerning the following individuals:
Donald Trump, Stephen Bannon, Reince Priebus, Stephen Miller, Kellyanne Conway, Sean Spicer, Michael Pence, Jared Kushner, Andrew Bremberg, Paula Stannard, Scott Gottlieb, Eric Hargan, Nina Owcharenko

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Schaefer, Tom Price, Renee Amoore, John Brooks, Kamran Daravi, Ed Haislmaier, Manuel Iglesias, Demetrios Kouzoukas, Patrick Lawler, Marie Meszaros, and Maggie Wynne.

3. Any and all records created or transmitted between November 9, 2016 and the present date by or between HHS employees regarding or including personnel or assignment changes within the agency including but not limited to communications between, from, or concerning the following individuals:
Donald Trump, Stephen Bannon, Reince Priebus, Stephen Miller, Kellyanne Conway, Sean Spicer, Michael Pence, Jared Kushner, Andrew Bremberg, Paula Stannard, Scott Gottlieb, Eric Hargan, Nina Owcharenko Schaefer, Tom Price, Renee Amoore, John Brooks, Kamran Daravi, Ed Haislmaier, Manuel Iglesias, Demetrios Kouzoukas, Patrick Lawler, Marie Meszaros, and Maggie Wynne.

FEE WAIVER

FOIA provides that a waiver of fees associated with a request is waived if “disclosure of the information is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in the commercial interest of the requester.” 5 U.S.C 552(1)(4)(A)(iii). The core mission of The Protect Democracy Project, a new organization awaiting 501(c)(3) status, is to inform public understanding on operations and activities of the government. This request is submitted in consort with the organization’s mission to gather and disseminate information that is likely to contribute significantly to the public understanding of executive branch operations and activities. The Protect Democracy Project has no commercial interest, and releasing the contents of the requested documents for public consumption is not in the financial interest of the organization.

In addition to satisfying requirements for a waiver of fees associated with the search and processing of records, The Protect Democracy Project is entitled to a waiver in duplication costs. Federal law mandates a waiver of document duplication costs for requesters that qualify as a representative of the news media. The Protect Democracy

Project, a new organization formed in December 2016, emerges in the tradition of 501(c)(3) good government organizations that qualify under FOIA as “news media organizations.” Like these organizations, the purpose of The Protect Democracy Project is to “gather information of potential interest to a segment of the public, use its editorial skills to turn the raw materials into distinct work, and distribute that work to an audience.” Cf *National Security Archive v. Department of Defense*, 880 F.2d 1381, 1387 (D.C. Cir. 1989). We intend to give the public access to documents transmitted via FOIA on our forthcoming website, www.protectdemocracyproject.org.

RESPONSIVE RECORDS

We ask that all types of records and all record systems be searched to discover records responsive to our request. We seek records in all medium and format. This includes, but is not limited to: agendas, manifests, calendars, schedules, notes, and any prepared documentation for meetings, calls, tele-conferences, or otherwise discussions responsive to our request; voicemails; e-mails; e-mail attachments; talking points; faxes; facsimiles; training documents and guides; table of contents and content of binders; documents pertaining to instruction and coordination of couriers; and any other preservation of work product. We ask that you search all system of record, including electronic, in use at your agency. The Protect Democracy Project would prefer records in electronic format, saved as PDF documents, and transmitted via email or CD-rom.

If you make a determination that any responsive record, or any segment within a record, is exempt from disclosure, we ask that you provide an index of those records at the time you transmit all other responsive records. In the index, please include a description of the record and the reason for exclusion with respect to each individual

exempt record or exempt portion of a record, as provided by *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974). When you deem a portion of a record exempt, we ask for the remainder of the record to be provided. 5 U.S.C. 552(b).

Given the 20-day statutory deadline, we hope to be as helpful as possible in clarifying or answering questions about our request. Please contact us at FOIA.protectdemocracy@gmail.com or (404) 819-1630 if you require any additional information. We appreciate your cooperation, and look forward to hearing from you very soon.

Sincerely,



Ian Bassin
Executive Director
The Protect Democracy Project