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FREEDOM OF INFORMATION ACT REQUEST

VIA FEDEX AND EMAIL

February 19, 2019

Roger Andoh Freedom of Information Officer Centers for Disease Control and Prevention 1600 Clifton Road, N.E., Building 57, Room MS D-54 Atlanta, Georgia 30333

Fax: (404) 235-1852

Email: FOIARequests@cdc.gov

Re: <u>Studies Relied Upon by the CDC to Support the Safety of Injecting Aluminum Adjuvant (IR#0083)</u>

Dear Mr. Andoh:

This firm represents Dr. Christopher A. Shaw, PhD and Mary Holland, J.D. On behalf of Dr. Shaw and Ms. Holland, we hereby request records pursuant to the Freedom of Information Act (5 U.S.C. § 552, as amended) from the files of the Centers for Disease Control and Prevention ("CDC").

Please provide the following records in CDC's possession to the above referenced address in electronic form:

Copies of any human or animal studies involving the subcutaneous or intramuscular injection of aluminum adjuvant relied upon by the CDC to establish the safety of injecting infants and children with aluminum hydroxide, aluminum phosphate or amorphous aluminum hydroxyphosphate sulfate.

As required by the FOIA, 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 describe any deleted or withheld material in detail and specify the statutory basis for the denial as well as your reasons for believing that the alleged statutory justification applies. Please also separately state your reasons for not invoking your discretionary powers to release the requested documents in the public interest. Such statements may help to avoid unnecessary appeal and litigation. Dr. Shaw and Ms. Holland reserve all rights to appeal the withholding or deletion of any information.

Access to the requested records should be granted within twenty (20) business days from the date of your receipt of this letter. Failure to respond in a timely manner shall be viewed as a denial of this request and Dr. Shaw and Ms. Holland may immediately file an administrative appeal.

If you would like to discuss our requests or any issues raised in this letter, please feel free to contact me at (212) 532-1091 during business hours. Thank you for your time and attention to this matter.

Very truly yours,

Aaron Siri, Esq.