

Attn: Tyler Selle

ID: SPIR-2016-TX-0044

Parkland Health & Hospital System

5200 Harry Hines Blvd.

Dallas, Texas 75235

piarequest@phhs.org

Sent via: Electronic mail

December 27th, 2016

Mr. Selle,

Under the Texas Public Information Act, §6252-17a et seq., I am requesting an opportunity to obtain copies of records that the Parkland Health & Hospital System has in its possession. I hereby request the following records:

1. All records that is in regards and pertaining to the Parkland Health & Hospital System privacy practices and policies as to the disclosure of healthcare information and other information of patients and of other individuals to military and to federal officials for intelligence, national security or counterintelligence activities/purposes;
2. All written communication to and from federal officials that has been received and sent by the Parkland Health & Hospital System in which are requests and disclosures as to the health information and other information of individuals to military and federal officials for intelligence, national security or counterintelligence activities/purposes;
3. Records reflecting a list of all cases, with docket numbers if available, including but not limited to sealed cases, in which military and federal officials were disclosed the health care information and other information of individuals by the Parkland Health & Hospital System for intelligence, national security or counterintelligence activities/purposes;
4. A copy as to all healthcare information and all other information of all individuals that the Parkland Health & Hospital System has disclosed to military and federal officials for intelligence, national security or counterintelligence activities/purposes;
5. All written communication, including but not limited to emails, of attorneys and legal professionals of the Parkland Health & Hospital System, that are or that have acted on behalf, by and or through the Parkland Health & Hospital System, in which are legal conclusions, legal analysis and all other communications from them as to the Parkland Health & Hospital System disclosing information to military and federal officials for intelligence, counterintelligence, and other national security activities/purposes;

Please note that virtually all of the information that is in a governmental body's physical possession constitutes public information that is subject to the Act. Id. § 552.022(a)(1); see also Open Records Decision Nos. 549 at 4 (1990), 514 at 1-2 (1988). The Act also is applicable to information that a governmental body does not physically possess, if the information is collected, assembled, or maintained for the governmental body, and the governmental body owns the information or has a right of access to it. Gov't Code § 552.002(a)(2); see also Open Records Decision No. 462 at 4 (1987).

The Texas Public Information Act requires that you "promptly produce" the requested records unless, within 10 days, you have sought an Attorney General's Opinion. As provided by the Texas Public Information Act, I will expect your response within ten (10) business days. Twenty (20) days if my request requires substantial programming or manipulation of data. See Tex. Gov't Code Ann. Secs. 552.221(d) and 231(c). If you expect a significant delay in responding to this request, please contact me with information about when I might expect copies or the ability to inspect the requested records. You can reach me via email at: iscampaign@usa.com.

If you deny any or all of this request, please provide a written explanation for the denial and cite each specific statutory exemption(s) you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. If your "governmental body" wants to seek the Attorney General's Opinion regarding any of our request, I ask that you immediately notify me and then seek a formal decision from the Texas Attorney General not later than ten (10) calendar days from your receipt of this request, as required by the Texas Public Information Act. See Sec. 552.301. I would then ask your governmental body to release to me all of the items in which you have not sought the Attorney General's Opinion on. See Sec. 552.301, 302; see also Open Records Decision No. 664 (2000)(if a governmental body concludes that no exceptions apply to the requested information, it must release the information as soon as possible).

As you may already know that violation of the open records law can result in a fine of up to \$1,000, imprisonment of up to six months, or both. See Tex. Gov't Code Ann. Sec. 552.353(e). Litigation costs and reasonable attorney fees may also be assessed against you. See Sec. 552.323.

I would prefer to receive all of the requested information to me by email. My email address is at: iscampaign@usa.com. You can also send me my requested records by mail at the following mailing address:

Isaiah X. Smith

Isaiah Smith Campaign

P.O Box 163411

Fort Worth, Texas, 76161

Isaiah X. Smith

Respectfully,

Isaiah X. Smith

Isaiah Smith Campaign

P.O Box 163411

Fort Worth, Texas, 76161

www.isaiahxsmith.com