

**DR. ORLY TAITZ, ESQ**  
**29839 SANTA MARGARITA, STE 100**  
**RANCHO SANTA MARGARITA, CA 92688**  
**PH 949-683-5411 FAX 949-766-7687**

**United States District Court**  
**Southern District of Texas**  
**FILED**

**DEC 18 2014**

**David J. Bradley, Clerk of Court**

**US DISTRICT COURT**

**SOUTHERN DISTRICT OF TEXAS**

**BROWNSVILLE DIVISION**

**DR. ORLY TAITZ ESQ, )**

**Case #**

**B-14-264**

**PLAINTIFF**

**V )**

**SYLVIA BURWELL,**

**IN HER CAPACITY AS THE**

**SECRETARY OF HHS,**

**DEFENDANT )**

**COMPLAINT FOR VIOLATION OF FOIA 5 USC 552 (CASE RELATED TO 14 -CV 00119 ASH)**

## **JURISDICTION**

Jurisdiction is under 28 USC 1331, brought for enforcement of a federal statute 5 USC 552-Freedom of Information Act. The case at hand is related to an ongoing case *Taitz v Johnson et al* 14-cv-00119 USDC Southern District of Texas, Brownsville division, Hon Andrew S. Hanen. FOIA request in question was submitted in conjunction to 14-cv-00119.

## **PARTIES**

Dr. Orly Taitz, ESQ, plaintiff

Sylvia Burwell, in her capacity as the Secretary of HHS, Defendant

## **STATEMENT OF FACTS**

1. Plaintiff submitted to CDC a FOIA request on November 2, 2014. This FOIA request is related to an ongoing case *Taitz v Johnson et al* 14-cv-00119. FOIA request was sent to the Center of Disease control (Hereinafter CDC), which is a part of the Department of Health and Human Services, which is run by the Secretary of Health and Human Services, Sylvia Burwell.
2. On the next day, November 3, 2014 CDC acknowledged receipt of FOIA request for information.
3. Under FOIA, 5 USC 552, agency is obligated to respond within twenty days.
4. Forty five days passed and no response was received.

## **ARGUMENT**

Due to the fact that the agency is required to respond within 20 days and the agency did not respond within 45 days, plaintiff is entitled to relief, an order directing the defendant to provide the response to FOIA request.

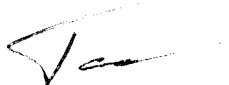
## **PRAYER FOR RELIEF**

Plaintiff respectfully requests:

1. Order by the court directing the defendant to provide the plaintiff with the response to her FOIA request.

2. Order by the court directing the agency to provide the plaintiff the Vaughn index, enumerating all documents in agency's possession responsive to FOIA request at hand.

Respectfully, Dr. Orly Taitz, ESQ



12.17.2014

Exhibit 1

Declaration by Orly Taitz

I, Orly Taitz, declare that the attached FOIA request is a true and correct copy of the FOIA request, submitted by me to the CDC, and the attached e-mail, confirmation receipt of the FOIA request, is true and correct copy of the e-mail receipt from CDC, received by me.

Signed



Dr. Orly Taitz, ESQ

12.17.2014

RE: CDC-INFO: Inquiry [ ref: \_00DU0YCBU.\_500U0FPyko:ref ]

From **CDC INFO** <cdcinfo@cdc.gov> [hide details](#)

To **orly.taitz** <orly.taitz@hushmail.com>

Sent Monday, November 3, 2014 at 6:33 AM

Encrypted No

Signed No

[Show all headers](#)

Thank you for your inquiry to CDC-INFO regarding Freedom of Information Act (FOIA) request.

Your request has been forwarded to the CDC's FOIA office on your behalf. They will contact you directly if they have questions.

In the future, you may send your FOIA request to:

Mail:

CDC/ATSDR

Attn: FOIA Office

Williams Building

Floor 2

2877 Brandywine Road

Atlanta, GA 30341

Email: FOIARequests@cdc.gov

For more information, please call 1-800-CDC-INFO (800-232-4636), visit [www.cdc.gov](http://www.cdc.gov) and click on "Contact CDC-INFO," or go to [www.cdc.gov/info](http://www.cdc.gov/info). If you have questions or comments, please send them via our online form at [www.cdc.gov/info](http://www.cdc.gov/info).

CDC-INFO is a service of the Centers for Disease Control and Prevention (CDC) and the Agency for Toxic Substances and Disease Registry (ATSDR). This service is provided by Verizon and its subcontractors under the Networx Universal contract to CDC and ATSDR.

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A.D.H.

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

From: [cdcinfoforms@cdc.gov]  
Sent: 11/2/2014 7:50 AM  
To: cdcinfo@cdc.gov  
Subject: CDC-INFO: Inquiry

Subject: Quarantine of people exposed to an infectious disease

From: Clinician

Email Address: orly.taitz@hushmail.com

Your Question: Dr. Orly Taitz, ESQ  
29839 Santa Margarita ste 100  
Rancho Santa Margarita, CA 92688  
ph. 949-683-5411 fax 949-766-7603  
orly.taitz@hushmail.com

Attention Dr. Martin Cetron,  
Director for the Division of Global Migration and Quarantine (DGMQ)  
U.S. Centers for Disease Control

- Centers for Disease Control and Prevention  
1600 Clifton Rd  
Atlanta, GA 30333
- 800-CDC-INFO  
(800-232-4636)  
TTY: (888) 232-6348
- Contact CDC-Info

**REQUEST FOR INFORMATION UNDER 5 USC 552-FREEDOM OF INFORMATION ACT.**

Per 5 USC Freedom of Information act I am requesting any and all documents relative to the request below and providing the following information:

1. During October 29, 2014 hearing in Taitz v Johnson US District Court Southern District of TX 14-cv-00119 Judge Andrew S. Hanen, a government witness, Quarantine Officer, Miguel Escobedo testified that

you, Martin Cetron, sign quarantine orders on behalf of the federal government and the Secretary of Health and Human Services. Based on this testimony I am requesting a form quarantine order, which explains under which federal statutes/ authority individuals are being quarantined and/or isolated.

2. Any and all quarantine/isolation orders issued for Ebola patients or individuals exposed to Ebola.

3. Any and all Tuberculosis/ quarantine orders issued since 2012.

Any and all Enterovirus D-68 quarantine/ isolation orders issues since 2012.

4. Any other quarantine/isolation orders issued since 2012.

5. Certification of Ebola Risk level.

6. If any of the orders contain names of the individuals or any other identifying information, which is redactable under HIPAA, please, redact this information.

7. Prediction of total Ebola cases expected by January 2015.

8. Any and all documents showing quarantine/isolation of sick individuals in HHS camps created to accommodate the surge of minor illegal aliens from 2012-2014.

9. Any and all documents relating to rabies quarantine, particularly regarding rabies related death of

#### Optional Information

Contact: Dr. Orly Taitz, ESQ, Doctor of Dental surgery, Dr. Taitz

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