



Christine, an unincorporated woman &lt;cmssyc@gmail.com&gt;

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**California Public Records Act request re: "virus" and lawsuit**

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Christine, an unincorporated woman &lt;cmssyc@gmail.com&gt;

Mon, Apr 29, 2024 at 5:13 PM

To: CEOPRA@ocgov.com

April 29, 2024

To:  
Frank Kim who acts as County Executive Officer  
County Administration North  
400 W. Civic Center Drive  
Santa Ana, CA 92701

Greetings,

I require access to records per the California Public Records Act.

**Description of Requested Records:**

1. All records that contain litigation/legal/court expenses/fees/costs/expenditures incurred thus far by Orange County in defending the following "covid-19"-related lawsuit:

**Case Name:** Hall vs. County of Orange**Case Number:** 30-2021-01220678**Court:** Superior Court of California, County of Orange**Parties:** Peggy Hall, Petitioner vs. County of Orange; Orange County Board of Supervisors, Defendants.

2. All studies/reports in the possession, custody or control of the institution that scientifically prove/provide evidence of the existence of the alleged "covid-19 virus" aka "SARS-COV2" (showing that the alleged particles with the purported genome and proteins exist and have been found in sick people and cause the illness/symptoms that they are alleged to cause).

Note:

Scientific proof/evidence is NOT

- opinions, speculation, declarations, or
- review papers, or
- descriptive studies.

**Scientific proof/evidence requires** use of the scientific method to test falsifiable hypotheses through valid, rigorous, repeatable controlled experiments - which requires a valid independent variable (suspected "virus" particles that were found in sick "hosts" and purified).

3. All studies/reports in the possession, custody or control of the institution that scientifically demonstrate contagion of the illness / symptoms that are allegedly caused by said purported "virus".

**General Note:**

This request is not limited to records that were authored by someone at the institution or that pertain to work done at/by the institution, rather it includes any record(s) matching the above description authored by anyone, anywhere, ever.

**Publicly Available Records**

If any records match the above description of requested records and are currently available to the public elsewhere, please assist me by providing enough information about each record so that I may identify and access each one with certainty (i.e. title, author(s), date, journal, where the public may access it). Please provide URLs where possible.

**Format:**

Pdf documents sent to me via email; please don't ship anything to me.

**Forward to Correct Department:**

Please forward the request, or portions thereof, to the appropriate department(s) as may be required.

**Contact Information:**

email: [cmssyc@gmail.com](mailto:cmssyc@gmail.com)

**Costs:**

Please provide an estimate in advance if any fees are anticipated.

Thank you in advance and best wishes,  
Christine



Christine, an unincorporated woman <cmssyc@gmail.com>

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## Your Orange County public records request #24-2572 has been opened.

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**Orange County Public Records** <messages@nextrequest.com>  
Reply-To: orangecounty\_24-2572-requester-notes@inbound.nextrequest.com  
To: cmssyc@gmail.com

Tue, Apr 30, 2024 at 12:04 PM

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

### Orange County Public Records

## Your record request #24-2572 has been submitted successfully.

The County is processing your request and will provide you with the status of your PRA request within 10 calendar days. If the 10th day is a weekend or holiday, the reply will be the next business day. A list of County Custodian of Records and Frequently Asked Questions can be found [here](#).

### View Request 24-2572

<https://orangecounty.nextrequest.com/requests/24-2572>

As the requester, you can always see the status of your request by signing into the Orange County [portal](#).

If you haven't already signed in, you may need to [activate or setup your account](#) to get started. Once your account is activated, you can communicate directly with the Orange County through NextRequest.



Reply to this email or sign in to contact Orange County.

[Change your email settings](#) | [Visit our help center](#)



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**California Public Records Act request re: "virus" and lawsuit**

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CEOPRA &lt;ceopra@ocgov.com&gt;

Tue, Apr 30, 2024 at 12:09 PM

To: "Christine, an unincorporated woman" &lt;cmssyc@gmail.com&gt;

Greetings,

The County is processing your PRA request via our online portal, NextRequest. A response will be provided to you with the status of your PRA request within 10 calendar days. If the 10th day is a weekend or holiday, the reply will be the next business day. An email notification will be sent to this email address from Orange County Public Records.

Access your PRA here, <https://orangecounty.nextrequest.com/requests/24-2572>.

Kind regards,

**Xyanya Garza**

Special Projects Coordinator

County Executive Office | Government &amp; Community Relations

Office: (714) 834-2345

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**From:** Christine, an unincorporated woman <cmssyc@gmail.com>**Sent:** Monday, April 29, 2024 2:14 PM**To:** CEOPRA <ceopra@ocgov.com>**Subject:** California Public Records Act request re: "virus" and lawsuit

**Attention:** This email originated from outside the County of Orange. Use caution when opening attachments or links.

[Quoted text hidden]



Christine, an unincorporated woman &lt;cmssyc@gmail.com&gt;

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**California Public Records Act request re: "virus" and lawsuit**

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**Christine, an unincorporated woman** <cmssyc@gmail.com>

Tue, Apr 30, 2024 at 3:12 PM

To: CEOPRA &lt;ceopra@ocgov.com&gt;

Bcc: Olivia - Peggy Hall assistant &lt;olivia@thehealthyamerican.org&gt;

Hi Xyanya,

Is there a provision in the legislation that requires me to associate with an entity called NextRequest LLC in order to receive communications from the County?

I do not wish to associate, contract or create an account with NextRequest LLC (or CivicPlus or ArchiveSocial) and do not agree with their terms. Also, the terms of service listed by NextRequest LLC state:

*"You are not required to register for an account on the Service to make a request to an Agency."*

So it's not clear to me why you have directed me to use the service.

Also please note that I do not wish any of my information to be shared with this entity and have not consented to such.

Best wishes,  
Christine

[Quoted text hidden]



image001.jpg

4K



Christine, an unincorporated woman <cmssyc@gmail.com>

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**Your Orange County public records request #24-2572 has been closed.**

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**Orange County Public Records** <messages@nextrequest.com>  
Reply-To: orangecounty\_24-2572-requester-notes@inbound.nextrequest.com  
To: cmssyc@gmail.com

Tue, Apr 30, 2024 at 3:42 PM

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

## Orange County Public Records

**Record request #24-2572 has been closed. The closure reason supplied was:**

As requested by the requester this PRA will be processed via email. This request is closed.

**View Request 24-2572**

<https://orangecounty.nextrequest.com/requests/24-2572>



Questions about your request? Reply to this email or sign in to contact staff at Orange County.  
Technical support: See our [help page](#)



Christine, an unincorporated woman <cmssyc@gmail.com>

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## California Public Records Act request re: "virus" and lawsuit

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CEOPRA <ceopra@ocgov.com>

Tue, Apr 30, 2024 at 3:41 PM

To: "Christine, an unincorporated woman" <cmssyc@gmail.com>

Greetings,

Thank you for the notification of your desire not to use NextRequest. The NextRequest PRA has been closed and responses to your PRA will be made via email directly to this email address.

[Quoted text hidden]





Christine, an unincorporated woman &lt;cmssyc@gmail.com&gt;

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**California Public Records Act request re: "virus" and lawsuit**

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CEOPRA &lt;ceopra@ocgov.com&gt;

Fri, May 3, 2024 at 5:24 PM

To: "Christine, an unincorporated woman" &lt;cmssyc@gmail.com&gt;

This is in response to your California Public Records Act request received by the County on April 29, 2024.

In response to your request for item 1 listed below, these records are in regards to a pending and active legal matter and are therefore exempt from disclosure as attorney-client privileged, pursuant to Government Code sections 7922.00 and 7927.705; Evidence Code sections 952 and 954; and Los Angeles Cnty. Bd. of Supervisors v. Superior Ct., 2 Cal. 5th 282, 386 P.3d 773 (2016).

In response to your request for items 2 and 3 listed below, the Health Care Agency is unable to locate records responsive to your request.

The concludes the County's response to your request.



**David Kim**  
Program Manager  
County Executive Office | Government & Community Relations

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**From:** Christine, an unincorporated woman <cmssyc@gmail.com>  
**Sent:** Monday, April 29, 2024 2:14 PM  
**To:** CEOPRA <ceopra@ocgov.com>  
**Subject:** California Public Records Act request re: "virus" and lawsuit

**Attention:** This email originated from outside the County of Orange. Use caution when opening attachments or links.

April 29, 2024

[Quoted text hidden]



Christine, an unincorporated woman &lt;cmssyc@gmail.com&gt;

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**California Public Records Act request re: "virus" and lawsuit**

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**Christine, an unincorporated woman** <cmssyc@gmail.com>  
To: CEOPRA <ceopra@ocgov.com>

Mon, May 6, 2024 at 5:28 PM

Thank you for your email, David.

Regarding part 1 of my request, I believe you may have made an error in your response because the request is not specific or exclusive to confidential communications between a client and lawyer and thus attorney-client privilege should be irrelevant to some of the records. Therefore I ask that you assist me, per section 7922.600 of the Government Code:

- (1) Assist the member of the public to identify records and information that are responsive to the request or to the purpose of the request, if stated.
- (2) Describe the information technology and physical location in which the records exist.
- (3) Provide suggestions for overcoming any practical basis for denying access to the records or information sought.

Also, regarding confidential communications between client and lawyer I'm not aware of anyone having claimed, per section 954 of the Evidence Code, the privilege to refuse to disclose or to prevent another from disclosing the requested records, or of the client having exercised the privilege, and your email makes no demonstration of this having happened. Therefore your email seems not to satisfy Section 7922.000 of the Government Code, which states that "an agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this division..."

Finally, I would like to respectfully point out that the court case in question relates to an alleged "virus" for which the County has already confessed to having no valid scientific evidence (becoming the **223rd institution** to have done so) and an allegedly contagious illness for which the County has already confessed to having no valid scientific evidence of contagion, and that section 956 (a) of the Evidence Code states that "There is no privilege under this article if the services of the lawyer were sought or obtained to enable or aid anyone to commit or plan to commit a crime or a fraud."

Best wishes,  
Christine

[Quoted text hidden]