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September 19, 2012

Alabama Department of Public Health
The RSA Tower
Attn: P. Brian Hale, Deputy General Counsel
201 Monroe Street
Montgomery, Alabama 36104
Phone 334-206-5209
Facsimile 334-206-5874

RE: Planned Parenthood Birmingham

To the Alabama Department of Public Health:

This is a request under the Alabama Freedom of Information Act, Ala. Code section 36-12-40. Please provide copies of the following items:

- 1) The “plan of correction” referenced in the consent agreement entered into by Planned Parenthood of Alabama, Inc. (hereinafter referred to as Planned Parenthood) and the Alabama Department of Public Health (hereinafter referred to as ADPH) on January 15, 2010 (hereafter referred to as “the consent agreement” and attached as Exhibit A).
- 2) Any and all reports prepared by ADPH in conjunction with the “on-site inspections of the Center” pursuant to the consent agreement, as required by item number 2 in the consent agreement.
- 3) Any and all evidence obtained by ADPH that proves that Planned Parenthood has achieved and maintained regulatory compliance with the State Board of Health Rules for Abortion or Reproductive Health Centers from January 15, 2010 until present, as required by item number 2 in the consent agreement.
- 4) Any and all evidence collected by the ADPH and/or produced by Planned Parenthood to prove that Planned Parenthood corrected all deficiencies cited in the 2009 Statement of Deficiencies (attached as Exhibit B) as required by item number 4 in the consent agreement.
- 5) Any and all evidence collected by the ADPH and/or produced by Planned Parenthood to prove that Planned Parenthood complied with item number 5 in the consent agreement.
- 6) Any and all information regarding the purported abortion obtained by Roberta Clark on August 20, 2010.
- 7) Any and all information relating to any investigation conducted by ADPH regarding the purported abortion obtained by Roberta Clark on August 20, 2010.

The purpose of the above request is to gain information about the safety of abortion services provided at Planned Parenthood and the ADPH's ability to ensure Planned Parenthood's compliance with Alabama law.

The disclosure of the requested information is in the public interest because it concerns the safety and welfare of women in the state of Alabama. All members of the public have a right to know whether the ADPH is adequately monitoring the medically licensed businesses in the state of Alabama for compliance with health and safety regulations.

In order to help to determine applicable fee assessments, you should know that this information will be used as part of an ongoing effort to research reproductive rights issues, and to educate the public on these matters. Since this request is made as part of an information gathering effort, and is not for a commercial use, I request a waiver of all fees. However, I am willing to pay fees for this request up to a maximum of \$50.00. If you estimate that the fees will exceed this amount, please inform me first.

Thank you for your consideration of this request.

Very truly yours,

Allison K. Aranda
Senior Staff Counsel

On behalf of:

Fr. Terry Gensemer, Director
Sarah Howell, Assistant
CEC For Life

Troy Newman, President
Cheryl Sullenger
Operation Rescue

Sue Turner
Alabama Physicians for Life