



October 8, 2025

VIA DHCS Public Records Act Portal
Public Records Officer
California Department of Healthcare Services
1501 Capitol Avenue
Sacramento, CA 95814

Dear Public Records Officer:

America First Legal Foundation (“AFL”) is a national, nonprofit organization. AFL works to promote the rule of law in the United States, prevent executive overreach, ensure due process and equal protection for all Americans, and promote knowledge and understanding of the law and individual rights guaranteed under the Constitution and laws of the United States. AFL’s mission includes promoting government transparency and accountability by gathering official information, analyzing it, and disseminating it through reports, press releases, and/or other media, including social media platforms, all to educate the public.

Pursuant to the **California Public Records Act**, Cal. Gov’t Code § 7920.00 *et seq.*, we request the following:

I. Records Request

1. All audits from March 2025 through the present showing data leaks or unauthorized disclosure of Medicaid beneficiary data shared with the federal government.
2. All records from March 2025 through the present documenting data leaks or unauthorized disclosures of Medicaid beneficiary information shared with the federal government.
3. All records, including the results of any audit or investigation, showing the sharing of California state Medicaid beneficiary data with any immigration authority within the state.
4. All records showing that DOGE’s activities from January 2025 to the present interfered with the state’s ability to administer its Medicaid program.
5. All records from January 2025 to the present that show that the state incurred increased uncompensated costs for hospital care in which a treatment or service was not paid for by an insurer or patient, yet is still mandated to be provided by EMTALA.

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6. All records from January 2025 to the present that show that Medicaid-receiving hospitals in the state have been able to serve fewer patients in need.
7. All records from January 2025 to the present showing that State healthcare providers have faced increased administrative costs and burdens.
8. All records from January 2025 to the present showing that noncitizens and individuals in mixed-status families have deferred primary or preventative healthcare.
9. From January 2025 to the present, all documented deaths in the state of undocumented immigrants and their children have been due to a lack of medical care.
10. From January 2025 to the present, all records showing that the state incurred greater costs and burdens to conduct outreach efforts for enrolling families and children in federally-funded healthcare programs.
11. All records from January 2025 to the present showing that noncitizens were more reluctant to enroll in fully state-funded public health insurance programs.

II. Fee Waiver Request

Following *N. Cty. Parents Org. v Dep't of Ed.*, 23 Cal. App. 4th 144, 148, (1994) (holding that a local agency had discretionary authority under the [Public Records] act to reduce or waive fee for duplicating public records), we request a waiver of all fees for this request.

Conclusion

The California Public Records Act requires a response within ten business days. If access to the records requested takes longer than expected, please provide information about the extenuating circumstances delaying the response. If any or all parts of this request are denied, please cite each specific exemption you feel justifies the refusal to release the records and provide notification of the appeal procedures available under the law. If you have any questions about this request or believe further discussions regarding search and processing would facilitate a more efficient production of records, then please contact us at foia@aflegal.org.

Thank you in advance for your cooperation.

Sincerely,

/s/ Will Scolinos

America First Legal Foundation