

JAMES BOPP, JR.
jboppjr@aol.com

THE BOPP LAW FIRM, PC
ATTORNEYS AT LAW

THE NATIONAL BUILDING
1 South Sixth Street
TERRE HAUTE, INDIANA 47807-3510
Telephone 812/232-2434 Facsimile 812/235-3685
www.bopplaw.com

May 27, 2021

Indiana University Office of the Vice President
& General Counsel
Bryan Hall 211
107 S. Indiana Avenue
Bloomington, Indiana 47405

Re: Public Records Request regarding the IU's
COVID-19 Vaccination Mandate

Dear IU Office of the Vice President,

Please be advised that my law firm represents The IU Family for Choice, not Mandates and we make this Public Records Request on their behalf.

On May 21, 2021, Indiana University notified its community that all students, faculty, and staff would be required to receive a COVID-19 vaccine for the fall 2021 semester. This policy left stringent exemptions for students who refuse the vaccine on medical and religious grounds. Students may see their class registration cancelled, CrimsonCard access terminated, access to IU systems (Canvas, email, etc.) terminated, and will not be allowed to participate in any on campus activity. Any staff member who refuses to comply will be terminated. This stringent exemption policy opens the door to intentional religious discrimination. On behalf of the concerned students and parents, I respectfully ask for all public records regarding the making of this decision and for all public records related to the implementation of this policy to determine whether or not this mandate is justified.

Currently, the rate of survival for those infected with COVID-19 is 99.8% globally and 99.97% under age 70.¹ Furthermore, there are known risks to the taking of the COVID-19 vaccinations that need to be balanced with the risks of COVID-19 infection to those mandated.

Furthermore, under 21 U.S. Code § 360bbb-3(e)(1)(A)(ii)(III) when medical products are authorized for emergency use only, such as the three currently available vaccines, citizens must be informed of

¹<https://www.americasfrontlinedoctors.org/frontline-news/americas-frontline-doctors-files-motion-for-temporary-restraining-order-against-use-of-covid-vaccine-in-children>

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the option to accept or refuse administration of the product, of the consequences, if any, of refusing administration of the product, and of the alternatives to the product that are available and of their benefits and risks. Indiana University has not presented any such option to the mandated administration of the vaccination and could be in violation of federal law.

And, as you may have heard, Indiana's Attorney General has stated this mandate "unquestionably violates the new law by requiring its students, faculty, and staff to show proof of immunization as a condition of continued attendance or employment."²

Pursuant to the Access to Public Records Act (Ind. Code 5-14-3), therefore, I would like to obtain a copy of all public records related to Indiana University's decision to mandate that every member of the student body, faculty, and staff receive a COVID-19 vaccine before returning to any of Indiana University's campuses for the fall 2021 semester and all public records regarding the implementation of that decision, including any such documents in the Office of General Counsel or Office of the President.

I understand that since we are seeking a copy of all such records, there may be a copying fee. Could you please inform me of that cost prior to making the copy? I can be reached at jboppjr@aol.com.

According to the statute, you have seven days to respond to this request. If you choose to deny the request, you are required to respond in writing and state the statutory exception authorizing the withholding of all or part of the public record and the name and title or position of the person responsible for the denial.

Thank you for your assistance on this matter.

Sincerely,

THE BOPP LAW FIRM, PC



James Bopp, Jr.

²https://www.thecentersquare.com/indiana/ag-iu-s-vaccine-mandate-unquestionably-violates-state-law/article_18e08942-be76-11eb-adfa-0fb0e73d771d.html