

April 16, 2020

**BY EMAIL:** [Records@em.myflorida.com](mailto:Records@em.myflorida.com)

Public Records Liaison Officer  
2555 Shumard Oak Blvd.  
Tallahassee, Florida 32399-2100

Dear Public Records Liaison Officer:

Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for records from the Florida Division of Emergency Management pursuant to the Public Records Act, Chapter 119 of the Florida Statutes.

First, CREW requests all records from March 16, 2020 to the date this request is processed mentioning, referencing, or relating to World Wrestling Entertainment, Inc. (“WWE”). This request includes without limitation (1) any records concerning whether to designate WWE as an “essential service” under Executive Order 20-91, and (2) any responsive communications between the Florida Division of Emergency Management and the Executive Office of the Governor or the Office of Orange County Mayor Jerry Demings.

Second, CREW requests all communications from March 16, 2020 to the date this request is processed between the Florida Division of Emergency Management and WWE. This request includes without limitation (1) communications with any official, employee, representative, or agent acting on behalf of either entity, and (2) any communications between Director Jared Moskowitz and Vincent McMahon or Linda McMahon.

By way of background, on April 1, 2020, Governor DeSantis issued Executive Order 20-91, designating certain businesses “essential services” that may continue operating during the COVID-19 public health emergency. The order did not include WWE as an essential service. Later, on April 9, 2020, the Florida Division of Emergency Management issued a memorandum adding certain businesses to the list of essential services under Executive Order 20-91, including “professional sports and media production[s] with a national audience.” Per this memorandum, Orange County Mayor Jerry Demings announced at an April 13, 2020 press conference that WWE could stay open despite Florida’s stay-at-home order. According to Demings, a conversation with Governor DeSantis led to this change.<sup>1</sup>

Vince and Linda McMahon, who founded WWE, have close ties to the Trump Administration and campaign, with Linda McMahon previously serving in President Trump’s

---

<sup>1</sup> See, e.g. Samantha J. Gross, [DeSantis deems pro wrestling ‘essential business’ amid statewide stay-at-home order](https://www.miamiherald.com/news/coronavirus/article241989596.html), *The Miami Herald*, April 13, 2020, available at <https://www.miamiherald.com/news/coronavirus/article241989596.html>.

cabinet and currently serving as chair of a pro-Trump super PAC, America First Action.<sup>2</sup> The April 9, 2020 memorandum deeming WWE an “essential service” was issued the same day America First Action announced a \$18.5 million dollar ad buy for Tampa and Orlando.<sup>3</sup>

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, as well as emails to which the subjects of this request were cc’ed or bcc’ed.

If it is your position that any portion of the requested records is exempt from disclosure, Chapter 119 requires you to state the basis of the exemption you contend is applicable. Fla. Stat. § 119.07(1)(e). CREW further requests that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential. Fla. Stat. § 119.07(1)(f). If some portions of the requested records are properly exempt from disclosure, Chapter 119 requires you to redact those portions and produce the remainder of the requested records. Fla. Stat. § 119.07(1)(d).

CREW agrees to pay up to \$100 for copies of the requested records. If copying fees are expected to exceed this amount, or if you anticipate that “extensive use” of information technology resources or extensive clerical or supervisory assistance as defined in section 119.07(4)(d) will be needed to fulfill this request, please contact me at (202) 408-5565 or [nsus@citizensforethics.org](mailto:nsus@citizensforethics.org).

Where possible, please produce records in electronic format. Please send the requested records to me at either [nsus@citizensforethics.org](mailto:nsus@citizensforethics.org) or Nikhel Sus, Citizens for Responsibility and Ethics in Washington, 1101 K St., N.W., Suite 201, Washington, D.C. 20005.

Please contact me if you have any questions about this request or foresee any problems in fully releasing the requested records. We anticipate you will fulfill your obligations under Chapter 119. If it is necessary to file an action to enforce the Public Records Act, the court may award reasonable costs of enforcement, including attorneys’ fees. Fla. Stat. § 119.12.

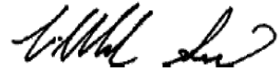
Thank you for your assistance.

---

<sup>2</sup> See, e.g. Alfred Konuwa, [Linda McMahon’s Trump Ties Under Scrutiny As WWE Is Deemed Essential In Florida](https://www.forbes.com/sites/alfredkonuwa/2020/04/15/linda-mcmahons-trump-ties-under-scrutiny-as-wwe-is-deemed-essential-in-florida/#5fd132fc1391), *Forbes*, April 15, 2020, available at <https://www.forbes.com/sites/alfredkonuwa/2020/04/15/linda-mcmahons-trump-ties-under-scrutiny-as-wwe-is-deemed-essential-in-florida/#5fd132fc1391>.

<sup>3</sup> See, e.g. America First Action, [America First Action PAC Announces \\$26.6M Investment in Battleground States](https://www.a1apac.org/news/america-first-action-pac-announces-26.6m-investment-in-battleground-states/), April 9, 2020, available at <https://www.a1apac.org/news/america-first-action-pac-announces-26.6m-investment-in-battleground-states/>.

Sincerely,

A handwritten signature in black ink, appearing to read "Nikhel Sus".

Nikhel Sus  
Senior Counsel