

June 17, 2020

BY EMAIL: clbrown@coj.net

Cheryl L. Brown
Director/Council Secretary
Office of the City Council
117 W. Duval Street
City Hall, Suite 425
Jacksonville, FL 32202

Dear Ms. Brown:

Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for records from the City Council of Jacksonville pursuant to the Public Records Act, Chapter 119 of the Florida Statutes. Specifically, CREW requests the following records:

1. All records from May 1, 2020 to the date this request is processed reflecting any discussion, analysis, or consideration of the public health risks associated with hosting the Republican National Convention (“RNC”) in Jacksonville during the COVID-19 pandemic, and any precautions, protocols, standards, or guidelines to be utilized in order to mitigate those risks.
2. All communications from May 1, 2020 to the date this request is processed between the City Council of Jacksonville and the Republican National Committee regarding the potential or actual hosting of the RNC in Jacksonville.
3. All communications from May 1, 2020 to the date this request is processed between the City Council of Jacksonville and the White House regarding the potential or actual hosting of the RNC in Jacksonville. For purposes of this request, the “White House” includes any official with an “eop.gov” email address.
4. All communications from May 1, 2020 to the date this request is processed between the City Council of Jacksonville and the Centers for Disease Control and Prevention regarding the potential or actual hosting of the RNC in Jacksonville.

By way of background, on June 11, 2020, the Republican National Committee announced its selection of Jacksonville, Florida as the host city to celebrate the re-nomination of President

Trump later this year.¹ The event will be held at a 15,000-person arena.² The announcement comes amid reports from the Florida Department of Health of record-high COVID-19 cases in the Jacksonville area.³ The requested records would shed light on the steps, if any, the state of Florida is pursuing in order to mitigate the public health risks associated with hosting the RNC during the ongoing COVID-19 pandemic.

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.

Where possible, please produce records in electronic format. Please send the requested records to me at either 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.

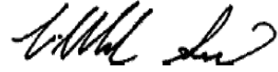
¹ RNC Press Release, Chairwoman Announces Jacksonville, FL as Host City to Celebrate Nomination, June 11, 2020, available at <https://gop.com/chairwoman-announces-jacksonville-fl-as-host-city-to-celebrate-nomination/>

² Dan Merica and Jeff Zeleny, Trump to accept nomination in Jacksonville after moving most of convention out of Charlotte, *CNN*, June 11, 2020, available at <https://www.cnn.com/2020/06/11/politics/republican-convention-jacksonville/index.html>

³ Jim Piggot, Despite peak in COVID-19 cases, Jacksonville mayor says other metrics show improvement, *News 4 Jax*, <https://www.news4jax.com/news/local/2020/06/16/despite-peak-in-covid-19-cases-jacksonville-mayor-says-other-metrics-show-improvement/>

Thank you for your assistance.

Sincerely,

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

Nikhel Sus
Senior Counsel