

IN THE CIRCUIT COURT OF THE FOURTH
JUDICIAL CIRCUIT, IN AND FOR NASSAU
COUNTY, FLORIDA

CASE NO.

RAYDIENT LLC (d/b/a RAYDIENT
PLACES + PROPERTIES LLC), and
RAYONIER INC.,

Plaintiffs,

vs.

NASSAU COUNTY, FLORIDA, a political
subdivision of the State of Florida,

Defendant.

COMPLAINT

Plaintiffs, Raydient LLC (d/b/a Raydient Places + Properties LLC) (“Raydient”) and Rayonier Inc. (“Rayonier”) (collectively, “Plaintiffs”), sue Defendant, Nassau County, Florida (“the County”), for violations of the Florida Public Records Act under Chapter 119, Florida Statutes, and in support thereof, state as follows:

Introduction

1. This complaint centers around the County’s repeated failure to produce records directly responsive to an October 12, 2018 public records request and seeks, among other things, declaratory and mandamus relief, the immediate production of all responsive records, the recovery of any deleted records, and an award of Plaintiffs’ attorneys’ fees and costs in prosecuting this action.

2. On multiple occasions, Plaintiffs asked the County to produce public records (including specifically text messages). The County initially failed to produce the records, then when pressed further about the text messages, the County claimed that it was “*not aware of any*

text messages.” When Plaintiffs challenged the veracity of that assertion because they knew County officials regularly sent and received text messages on their cell phones about County business, and squarely asked the County if it had searched for the requested text messages, the County simply said it stood by its initial response. The County’s evasive and misleading responses demonstrate that the County has violated Florida’s Public Records Act.

3. Recent events have demonstrated that text messages responsive to Plaintiffs’ public records request existed, but were never produced by the County. According to multiple media reports, the County’s former Office of Management and Budget Director, Justin Stankiewicz (“Stankiewicz”), filed a grievance stating that County Attorney Michael Mullin (“Mullin”), in response to Plaintiffs’ public records requests, directed him (and other County employees) to delete more than 150 responsive text messages, and shortly after Stankiewicz refused to obey that order, Mullin fired him. According to the media reports, it is also alleged that Mullin deleted text messages responsive to the public records request.

4. As part of his grievance filing, Stankiewicz attached more than thirty (30) pages of individual and group text messages between himself, Mullin, County Commissioners, and other County employees that were responsive to Plaintiffs’ public records request, but were never produced by the County.

Parties, Jurisdiction, and Venue

5. Plaintiff, Raydient LLC (d/b/a Raydient Places + Properties LLC) is a Delaware limited liability company with its principal place of business in Wildlight, Florida.

6. Plaintiff, Rayonier Inc. is a North Carolina corporation with its principal place of business in Wildlight, Florida.

7. This Court has jurisdiction over this action pursuant to Sections 26.012 and 86.011, Florida Statutes.

8. Venue is appropriate in this County pursuant to Section 47.011, Florida Statutes.

**The Public Records Request and the County's Failure to Produce
Any of the Responsive Text Messages**

9. On October 12, 2018, Plaintiffs, through their undersigned counsel, submitted a public records request to Nassau County, a copy of which request is attached as **Exhibit 1**.

10. The public records request called for a variety of “documents” and correspondence” relating to, among other topics, the East Nassau Community Planning Area (“ENCPA”), the Stewardship District Legislation, House Bill 1075, House Bill 697, and various correspondence sent or received by County officials and other County employees relating to the matters outlined in the public records request.

11. These topics are directly related to Plaintiffs’ development and approval efforts relating to approximately 24,000 acres of land that are largely owned by Rayonier-related entities in Nassau County.

12. The County officials and County employees specifically named in the public records request that are believed to have sent or received correspondence relating to the topics identified in the public records request include Michael Mullin, Daniel Leeper, Pat Edwards, Stephen Kelley, George Spicer, Justin Taylor, Shanea Jones, Justin Stankiewicz, Taco Pope, Doug McDowell, Peter King, Scott Herring, and Becky Bray.

13. The terms “documents” and “correspondence” were specifically defined on the first and second pages of the public records request under the heading “Definitions and Scope.” Specifically, the term “**correspondence**” was defined as follows:

For purposes of this request, the term “**correspondence**” means any writing of any kind, including but not limited to, letters, electronic mail, text messages, facsimiles, memoranda, or records of any telephone conversation or other communications. To the extent any County employee or County Commissioner uses or has used any personal telecommunications device (cell phone, smart phone, laptop, personal computer, I-pad, etc.) to communicate regarding any County-related business, regardless of whether such device is owned by that individual, his or her family member, his or her business, the County, or by some other third party, all such communications are included within the aforementioned definition of “correspondence.”

(emphasis in original).

14. Plaintiffs explicitly sought, in both the individual categories of documents requested and the “Definitions and Scope” section, all text messages and other documents that may have been communicated from any personal or County-issued telecommunications device regarding any County-related business.

15. On October 19, 2018, the County responded that the estimated costs to produce the responsive documents would be \$349.48, and that the County was still waiting on its Planning Department and County Attorneys’ office to advise of any extensive use fees and the costs of duplication.

16. On October 25, 2018, the County advised that the public records request had been completed “*with the exception of emails*” which were being reviewed by Mullin for privilege. The County advised that the revised costs for the responsive documents, including the emails, would be \$391.03.

17. On October 26, 2018 the County produced its documents responsive to the public records request. Notably, the County produced no text messages in its document production.

18. On November 8, 2018, the County produced supplemental documents, including emails that the County had reviewed for privilege and personal information. Again, the County produced no text messages in its supplemental production.

19. On November 15, 2018, Plaintiffs' counsel sent a letter to the County and stated:

We have reviewed the documents the County produced to our office in response to our October 12, 2018 public records request. *However, it appears that none of the requested text messages were produced by the County. We know that such text messages exist and request they be produced to us as soon as possible.* A copy of our prior public records request is attached for your convenience. Please advise when we can expect these responsive documents to be made available for pickup.

(emphasis added). A copy of Plaintiffs' November 15 letter to the County is attached as **Exhibit 2**.

20. Later that same afternoon on November 15, 2018, the County responded with a short, one-sentence e-mail stating, "*We are not aware of any text messages.*" Mullin was copied on the County's November 15 response, a copy of which email is attached as **Exhibit 3**.

21. The following day, November 16, 2018, Plaintiffs' counsel sent a follow-up email to Mullin and another County employee inquiring further about the County's failure to produce *any* responsive text messages, and questioned the County's assertion that it was not "aware of any text messages," particularly since Plaintiffs knew County officials have routinely used their cell phones to send text messages regarding County business. Plaintiffs' counsel inquired whether the County had searched for the requested text messages. A copy of Plaintiffs' November 16 email is included within the email exchange in Exhibit 3 and is reproduced below:

Dear Megan and Mike:

In response to our inquiry yesterday about the failure of the County to produce any text messages in response to our public records request, the County responded that it is "*not aware of any text messages.*" We find that difficult to believe given that County officials have routinely used their cell phones to send text messages regarding the very subject matter

that is the scope of our public records request. **Has the County conducted any searches of any personal telecommunications device belonging to any County employee or County Commissioner?**

Regardless if County employees and commissioners were using a personal, business, or government cell phone, any communications regarding County-related business are squarely within the scope of our public records request. We tried to make that clear in our request by underlining those types of communications in our definition of “correspondence” in Paragraph 2 of the “Definition and Scope” section, and we expect those communications to be produced. Please let us know when we can expect to receive those responsive documents. Thank you.

(emphasis in original).

22. Four days later on November 20, 2018, the County provided an evasive response in which it refused to acknowledge whether it had conducted a search for the requested text messages, and simply stated, “*The County has responded to the public records dated October 12, 2018 as set forth in our responses previously sent.*” See Exhibit 3.

23. Plaintiffs gave the County multiple opportunities to search for and produce the requested text messages, but the County chose to repeatedly dodge the Plaintiffs’ direct inquiries about the existence of the text messages, and the efforts (if any) the County had undertaken to search for the requested text messages. Instead, the County provided implausible explanations evidencing that the County had and was continuing to violate Chapter 119, Florida Statutes.

**Multiple News Outlets Report that County Attorney Mike Mullin
Ordered the Deletion of Text Messages Responsive to Plaintiffs’ Public Records Request**

24. On February 4, 2019, several media outlets reported that former County Office of Management and Budget Director, Stankiewicz, had filed grievance papers with Mullin on January 7, 2019 contesting his termination from the County *without* cause.

25. In his grievance papers, Stankiewicz stated that the County had terminated him in retaliation for his refusal to obey Mullin’s direction on November 6, 2018 to delete text messages

that were responsive to the Plaintiffs' public records request. Stankiewicz wrote to Mullin and stated:

[O]n November 6, 2018, Taco Pope, Susan Gilbert and I met at 2:00 pm with you for the intent to discuss the Enclave and Summer Beach trail walkover issue; ***however, the discussion was solely about the public records request that was submitted by Gunster Law Firm, Raydient/Rayonier's legal firm, which in addition to other things, specifically asked for text messages relating to county business that had been sent on personal phones.*** During this meeting is when I disclosed that I had messages related to this request on my personal phone and stated that you, Taco, at least 3 of the Commissioners and Shanea Jones would also have messages as many of them were group messages. ***You directed me to delete these messages, which is a direct violation of Chapter 119, Florida Statutes. Furthermore, you stated that you have already deleted your text messages*** which in addition to a violation of law, is a violation of Section 2.01, Code of Conduct of the Employee Policy and Procedures Manual. After understanding the magnitude and unethical conduct of what you were directing, Susan Gilbert, asked to excuse herself from the meeting stating that she "did not want to be part of this meeting." With you and Taco still in the room, I asked multiple times for you to confirm that you were directing me to delete text messages that are public record to which you affirmed. Immediately following this meeting, I expressed verbally my concern of violating Chapter 119 of Florida law to Taco Pope, Megan Sawyer and Sabrina Robertson. Additionally, I later express[ed] this same concern to Tina Keiter and Chris Lacambra.

After this November 6, 2018 meeting, your behavior and attitude towards me changed. I was not included in any other meetings or conversations regarding the response to Gunster's public records request, you did not obtain the messages that I told you that I had in response to Gunster's request and I was not copied on the county's response to Gunster. ***I was told by staff that you reported to Gunster that no text messages exist and that Gunster asked you again for the messages.***

...

To conclude, I feel that I was singled out in retaliation of expressing and refusing to delete public records at your direction. ***I have identified over 150 individual and group text messages between a combination of you, Commissioner Edwards, Commissioner Taylor, Commissioner Leeper, Shanea Jones, Kristi Dosh, Taco Pope, and myself that should have been turned over in response to Raydient/Rayonier's public record request.***

(emphasis added). A copy of Stankiewicz's employee grievance to Mullin is attached as **Exhibit 4**.

26. In support of his claim, Stankiewicz attached to his grievance more than thirty (30) pages of individual and group text messages between himself, Mullin, County Commissioners, and other County employees that were responsive to Plaintiffs' public records request, but were never produced by the County. A copy of the text messages included with Stankiewicz's grievance filing are attached as **Exhibit 5**.

27. The sequence of the alleged events above is significant. According to Stankiewicz's grievance, he informed Mullin on November 6, 2018 that he had more than 150 text messages responsive to Plaintiffs' public records request, Mullin allegedly directed him to delete those text messages, and then nine (9) days later on November 15, 2018, the County advised Plaintiffs' counsel that it was *"not aware of any text messages."*

28. To date, the County has not produced any text messages responsive to Plaintiffs' October 12, 2018 public records request despite their obvious existence. It seems highly probable that other responsive text messages exist that have not been produced by the County.

29. The requested documents are public records which are required to be made available for inspection and copying and are not exempt or claimed to be exempt by any statute.

30. Plaintiffs have retained the undersigned counsel and have incurred attorneys' fees and costs in bringing this suit.

31. All conditions precedent to this suit have been satisfied or have been waived.

Count I – Writ of Mandamus to Require Production of Public Records

32. Plaintiffs re-allege and incorporate the allegations contained in paragraphs 1 through 31 as if fully set forth herein.

33. Section 119.011(12) defines public records as “all documents, papers . . . books, tapes . . . or other material, regardless of the physical form, characteristics, or means of transmission, made or received pursuant to law or ordinance or in connection with the transaction of official business by any agency.”

34. The Florida Attorney General’s Government in the Sunshine Manual provides with respect to text messages:

In Inf. Op. to Browning, March 17, 2010, the Attorney General’s Office advised the Department of State (which is statutorily charged with development of public records retention schedules) that the “same rules that apply to e-mail should be considered for electronic communications including Blackberry PINS, SMS communications (text messaging), MMS communications (multimedia content), and instant messaging conducted by government agencies.”

In response, the Department revised the records retention schedule to recognize that retention periods for text messages and other electronic messages or communications “are determined by the content, nature, and purpose of the records, and are set based on their legal, fiscal, administrative, and historical values, regardless of the format in which they reside or the method by which they are transmitted.” Stated another way, it is the content of the electronic communication that determines how long it is retained, not the technology that issued to send the message. See General Records Schedule GS1-SL for State and Local Government Agencies, Electronic Communications, available online at <http://dlis.dos.state.fl.us>.

(emphasis added).

35. Section 119.07(1)(a), Florida Statutes, provides: “Every person who has custody of a public record shall permit the record to be inspected and copied by any person desiring to do so, at any reasonable time, under reasonable conditions, and under supervision by the custodian of the public records.”

36. Article I, Section 24(a) of the Florida Constitution also provides: “Every person has the right to inspect or copy any public record made or received in connection with the official business of any public body, officer or employee of the state, or persons acting on their behalf . . .”

37. The County, through its employees and elected officials, has made or received public records responsive to Plaintiffs' records request that, upon information and belief, remain in the custody or control of the County that have not been produced and have been unlawfully withheld.

38. The County, upon information and belief, has not conducted an adequate search to locate the records requested. Specifically, the County, upon information and belief, has not demanded that the County employees and elected officials who are specifically named in the public records request, produce to the County's information technology technicians or records specialist copies of all text messages on their cell phones that are responsive to Plaintiffs' records request.

39. The failure of the County to conduct an adequate search for all of the requested records and to produce the requested records for inspection and copying constitutes a nondiscretionary refusal to produce public records that violates section 119.07, Florida Statutes, and Article I, Section 24, Florida Constitution.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order:

(a) Directing the County to immediately conduct a search for records responsive to Plaintiffs' public records request, including specifically a search for responsive text messages and searches of the cell phones of all individuals who have been specifically named in the October 12, 2018 public records request;

(b) Directing the County by writ of mandamus or otherwise, to immediately produce to Plaintiffs all of the records requested that have not already been produced;

(c) Directing the County, at the County's expense, to authorize any third parties (including any cell phone carriers) to recover any responsive records including text messages that may have been deleted;

(d) Directing the County, at the County's expense, to have the County officials and employees named in the October 12, 2018 public records request to produce all electronic devices within their possession custody or control for forensic examination on parameters to be approved and under the supervision of the Court for purposes of determining when and to what extent responsive records may have been deleted from such devices;

(e) Awarding Plaintiffs their costs and attorneys' fees incurred in prosecuting this action pursuant to Section 119.12, Florida Statutes; and

(f) Awarding such other and further relief as the Court deems just and appropriate.

Count II – Declaratory Judgment

40. Plaintiffs re-allege and incorporate the allegations contained in paragraphs 1 through 31 as if fully set forth herein.

41. Section 119.021, Florida Statutes, provides:

(2)(a) The Division of Library and Information Services of the Department of State shall adopt rules to establish retention schedules and a disposal process for public records.

(b) Each agency shall comply with the rules establishing retention schedules and disposal processes for public records which are adopted by the records and information management program of the division.

42. The Florida Division of Library and Information Services has promulgated a General Records Schedule specifying the manner in which public records must be kept. The General Records Schedule is intended for use by public records custodians of state and local governments.

43. With respect to electronic records, the General Records Schedule provides:

Records retention schedules apply to records regardless of the format in which they reside. Therefore, records created or maintained in electronic format must be retained in accordance with the minimum retention requirements presented in these schedules. Printouts of standard

correspondence in text or word processing files are acceptable in place of the electronic files. Printouts of electronic communications (email, instant messaging, text messaging, multimedia messaging, chat messaging, social networking, or any other current or future electronic messaging technology or device) are acceptable in place of the electronic files, provided that the printed version contains all date/time stamps and routing information. However, in the event that an agency is involved in, or can reasonably anticipate litigation on, a particular issue, the agency must maintain in native format any and all related and legally discoverable electronic files.

(emphasis added).

44. The General Records Schedule also directs that administrative correspondence and memorandum must be retained for three fiscal years and that program and policy development correspondence and memoranda shall be retained for five fiscal years.

45. The County did not comply with the requirements of the Public Records Law when it failed to conduct a timely search for text messages as requested by Plaintiffs.

46. The County, upon information and belief, does not have procedures in place that are adequate to ensure that all public records are retained for the required periods.

47. Any public officer who commits a knowing violation of the Public Records Law is subject to suspension and removal or impeachment and commits a misdemeanor of the first degree. Fla. Stat. § 119.10(1)(b).

48. A declaration that the County's current lack of control of text messages violates the Public Records Law is essential to preventing future violations of the Public Records Law.

49. Plaintiffs are in doubt about their rights, status, and other equitable legal relations as affected by these statutes and therefore seeks a declaration that the County acted in violation of section 119.021 and 119.10(1)(b), Florida Statutes.

WHEREFORE, Plaintiffs respectfully request that this Court:

(a) Enter a declaratory judgment that the County has willfully and knowingly failed to

maintain text messages made or received by County officials and employees pursuant to law or ordinance or in connection with the transaction of official business in a manner that allows them to be located and made accessible within a reasonable time upon public request;

(b) Enter a declaratory judgment that the County has willfully and knowingly allowed text messages made or received by County officials and employees pursuant to law or ordinance or in connection with the transaction of official business to be destroyed prior to expiration of the applicable retention schedule;

(c) Award Plaintiffs their costs and attorneys' fees incurred in prosecuting this action pursuant to Sections 119.12, Florida Statutes; and

(d) Award Plaintiffs such other and further relief that the Court deems just and appropriate.

Dated this 6th day of February, 2019.

Respectfully submitted,

/s/ Christopher P. Benvenuto

CHRISTOPHER P. BENVENUTO, ESQ.

Florida Bar No. 649201

WILLIAM E. ADAMS, ESQ.

Florida Bar No. 467080

STACI M. REWIS, ESQ.

Florida Bar No. 811521

S. KAITLIN DEAN, ESQ.

Florida Bar No. 124973

GUNSTER, YOAKLEY & STEWART, P.A.

225 Water Street Street, Suite 1750

Jacksonville, FL 32202

Telephone: 561-655-1980

Facsimile: 561-655-5677

Primary: cbenvenuto@gunster.com

Primary: badams@gunster.com

Primary: srewis@gunster.com

Primary: kdean@gunster.com

Secondary: dpeterson@gunster.com

Secondary: eservice@gunster.com

Exhibit 1



GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Phone Number: (904) 354-1980
Writer's E-Mail Address: SRewis@gunster.com

October 12, 2018

VIA CERTIFIED MAIL AND EMAIL (msawyer@nassaucountyfl.com)

Nassau County – Records Management
96135 Nassau Place, Suite 1
Yulee, Florida 32097

Re: Public Records Request

Dear Sir or Madam:

Pursuant to Chapter 119 of the Florida Statutes, please allow this letter to serve as our public records request to Nassau County (the "County") for the documents described below. In accordance with public records laws, we are willing to pay the reasonable copying costs along with third party vendors necessary to assist with searches for the requested documents. In the event the copying and searching costs are anticipated to exceed \$300.00, please advise before proceeding further.

Definitions and Scope

1. For purposes of this request, the term "**documents**" shall mean any and all media in whatever form containing information of any kind, including copies by whatever means made which differ in any way from the original. Specifically, the term shall mean the original or, if unavailable, a copy of the original, in draft or final form, of all writings, tangible things, typing, letters, correspondence, electronic mail (e-mail) or other communications, text messages, memoranda, notes, minutes of meetings, records, journals, calendars, schedules, studies, summaries, reports, drawings, diagrams, exhibits, photographs, tapes, recordings, transcripts, contracts, amendments, proposals, estimates, data sheets, computer printouts, or computer diskettes or drives, whether sent or received, and all copies or reproductions thereof which are different in any way from the original, regardless of whether designated confidential, privileged, or otherwise.
2. For purposes of this request, the term "**correspondence**" means any writing of any kind, including but not limited to, letters, electronic mail, text messages, facsimiles, memoranda, or records of any telephone conversation or other communications. To the extent any County employee or County Commissioner uses or has used any personal telecommunications device (cell phone, smart phone, laptop, personal computer, I-pad, etc.) to communicate regarding any County-related business, regardless of whether such device is owned by that individual, his or her family member, his or her business, the County, or by some

other third party, all such communications are included within the aforementioned definition of “correspondence.”

3. This public records request seeks documents for the time period **June 1, 2016 through the present.**

REQUESTED DOCUMENTS

1. Any and all documents and correspondence relating to the East Nassau Community Planning Area (a/k/a the ENCPA).
2. Any and all documents and correspondence relating to the East Nassau Community Planning Area (a/k/a the ENCPA) Chester Road Detailed Specific Area Plan (a/k/a DSAP #2);
3. Any and all documents and correspondence relating to the funding of any ENCPA public facility (e.g. park, fire station, etc.);
4. Any and all documents and correspondence relating to any ENCPA related approval, including but not limited to, the ENCPA Mobility Fee Agreement, the ENCPA Mobility Fee Tax Increment Finance (TIF) Ordinance (a/k/a the ENCPA Mobility Fee Subsidy Ordinance), or the ENCPA Sector Plan.
5. Any and all documents and correspondence relating to a Municipal Services Tax Unit Ordinance for the ENCPA.
6. Any and all documents and correspondence relating to House Bill 1075 (a/k/a HB 1075, the Stewardship District Legislation), including but not limited to any proposed changes or amendments thereto.
7. Any and all documents and correspondence relating to proposed House Bill 697 (a/k/a HB 697, the Sector Plan Legislation or the Sector Plan Amendment), including but not limited to any opposition relating thereto.
8. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Daniel Leeper** relating to any of the matters listed in requests numbers 1 through 7 above.
9. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Pat Edwards** relating to any of the matters listed in requests numbers 1 through 7 above.
10. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Stephen Kelley** relating to any of the matters listed in requests numbers 1 through 7 above.

11. Any and all correspondence (including but not limited to emails or text messages) sent or received by **George Spicer** relating to any of the matters listed in requests numbers 1 through 7 above.
12. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Justin Taylor** relating to any of the matters listed in requests numbers 1 through 7 above.
13. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Michael Mullin** relating to any of the matters listed in requests numbers 1 through 7 above.
14. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Shanea Jones** relating to any of the matters listed in requests numbers 1 through 7 above.
15. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Justin Stankiewicz** relating to any of the matters listed in requests numbers 1 through 7 above.
16. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Taco Pope** relating to any of the matters listed in requests numbers 1 through 7 above.
17. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Doug McDowell** relating to any of the matters listed in requests numbers 1 through 7 above.
18. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Peter King** relating to any of the matters listed in requests numbers 1 through 7 above.
19. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Scott Herring** relating to any of the matters listed in requests numbers 1 through 7 above.
20. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Becky Bray** relating to any of the matters listed in requests numbers 1 through 7 above.
21. Any and all correspondence (including but not limited to emails or text messages) sent or received by any other (current or former) County staff member not specifically referenced herein relating to any of the matters listed in requests numbers 1 through 7 above.

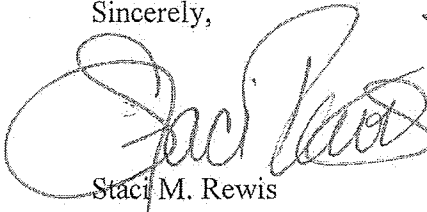
Consistent with the County's obligations under Chapter 119, Florida Statutes, please forward to us documents that are readily available and easy to obtain while the others are being

Nassau County – Records Management
October 12, 2018

searched. If the County asserts that an exemption applies to a particular public record or part of such a record, please provide a detailed list of the records for which the exemption is claimed and the statutory basis for the exemption, as required in Fla. Stat. §§119.07(1)(d)-(f). If only a portion of the record allegedly falls within the exemption, please provide the remainder of the record for inspection. Please state the basis for any asserted exemption per Fla. Stat. §§119.07(1)(d)-(f).

Again, we understand that the County may charge a reasonable amount for the costs of copying. To the extent a third party vendor may be necessary to search electronic devices and retrieve the public records requested herein, we will agree to pay the reasonable costs associated with such searches and copying. In the event the searching and copying costs are anticipated to exceed \$300.00, please advise before proceeding further with this request.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci M. Lewis", is written over the printed name.

Staci M. Lewis

cc: Michael Mullin, Esq.
Heather J. Encinosa, Esq.
Gregory T. Stewart, Esq.

Exhibit 2



GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Our File Number: 00035418-00005
Writer's Direct Dial Number: (904) 354-1980
Writer's E-Mail Address: srewis@gunster.com

November 15, 2018

BY CERTIFIED MAIL AND EMAIL

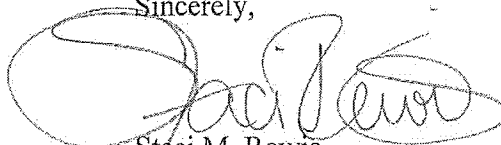
Megan Sawyer
Nassau County Board of County Commissioners
County Manager's Office
96135 Nassau Place, Suite 1
Yulee, FL 32097

Re: Public Records Request

Dear Ms. Sawyer,

We have reviewed the documents the County produced to our office in response to our October 12, 2018, public records request. However, it appears that none of the requested text messages were produced by the County. We know that such text messages exist and request they be produced to us as soon as possible. A copy of our prior public records request is attached for your convenience. Please advise when we can expect these responsive documents to be made available for pickup.

Sincerely,



Staci M. Rewis

SMR/pd

Enclosure

cc: Michael Mullin, Esq.
Heather J. Encinosa, Esq.
Gregory T. Stewart, Esq.



GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Writer's Phone Number: (904) 354-1980
Writer's E-Mail Address: SRewis@gunster.com

October 12, 2018

VIA CERTIFIED MAIL AND EMAIL (msawyer@nassaucountyfl.com)

Nassau County – Records Management
96135 Nassau Place, Suite 1
Yulee, Florida 32097

Re: Public Records Request

Dear Sir or Madam:

Pursuant to Chapter 119 of the Florida Statutes, please allow this letter to serve as our public records request to Nassau County (the "County") for the documents described below. In accordance with public records laws, we are willing to pay the reasonable copying costs along with third party vendors necessary to assist with searches for the requested documents. In the event the copying and searching costs are anticipated to exceed \$300.00, please advise before proceeding further.

Definitions and Scope

1. For purposes of this request, the term "**documents**" shall mean any and all media in whatever form containing information of any kind, including copies by whatever means made which differ in any way from the original. Specifically, the term shall mean the original or, if unavailable, a copy of the original, in draft or final form, of all writings, tangible things, typing, letters, correspondence, electronic mail (e-mail) or other communications, text messages, memoranda, notes, minutes of meetings, records, journals, calendars, schedules, studies, summaries, reports, drawings, diagrams, exhibits, photographs, tapes, recordings, transcripts, contracts, amendments, proposals, estimates, data sheets, computer printouts, or computer diskettes or drives, whether sent or received, and all copies or reproductions thereof which are different in any way from the original, regardless of whether designated confidential, privileged, or otherwise.
2. For purposes of this request, the term "**correspondence**" means any writing of any kind, including but not limited to, letters, electronic mail, text messages, facsimiles, memoranda, or records of any telephone conversation or other communications. To the extent any County employee or County Commissioner uses or has used any personal telecommunications device (cell phone, smart phone, laptop, personal computer, I-pad, etc.) to communicate regarding any County-related business, regardless of whether such device is owned by that individual, his or her family member, his or her business, the County, or by some

other third party, all such communications are included within the aforementioned definition of “correspondence.”

3. This public records request seeks documents for the time period **June 1, 2016 through the present.**

REQUESTED DOCUMENTS

1. Any and all documents and correspondence relating to the East Nassau Community Planning Area (a/k/a the ENCPA).
2. Any and all documents and correspondence relating to the East Nassau Community Planning Area (a/k/a the ENCPA) Chester Road Detailed Specific Area Plan (a/k/a DSAP #2);
3. Any and all documents and correspondence relating to the funding of any ENCPA public facility (e.g. park, fire station, etc.);
4. Any and all documents and correspondence relating to any ENCPA related approval, including but not limited to, the ENCPA Mobility Fee Agreement, the ENCPA Mobility Fee Tax Increment Finance (TIF) Ordinance (a/k/a the ENCPA Mobility Fee Subsidy Ordinance), or the ENCPA Sector Plan.
5. Any and all documents and correspondence relating to a Municipal Services Tax Unit Ordinance for the ENCPA.
6. Any and all documents and correspondence relating to House Bill 1075 (a/k/a HB 1075, the Stewardship District Legislation), including but not limited to any proposed changes or amendments thereto.
7. Any and all documents and correspondence relating to proposed House Bill 697 (a/k/a HB 697, the Sector Plan Legislation or the Sector Plan Amendment), including but not limited to any opposition relating thereto.
8. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Daniel Leeper** relating to any of the matters listed in requests numbers 1 through 7 above.
9. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Pat Edwards** relating to any of the matters listed in requests numbers 1 through 7 above.
10. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Stephen Kelley** relating to any of the matters listed in requests numbers 1 through 7 above.

11. Any and all correspondence (including but not limited to emails or text messages) sent or received by **George Spicer** relating to any of the matters listed in requests numbers 1 through 7 above.
12. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Justin Taylor** relating to any of the matters listed in requests numbers 1 through 7 above.
13. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Michael Mullin** relating to any of the matters listed in requests numbers 1 through 7 above.
14. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Shanea Jones** relating to any of the matters listed in requests numbers 1 through 7 above.
15. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Justin Stankiewicz** relating to any of the matters listed in requests numbers 1 through 7 above.
16. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Taco Pope** relating to any of the matters listed in requests numbers 1 through 7 above.
17. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Doug McDowell** relating to any of the matters listed in requests numbers 1 through 7 above.
18. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Peter King** relating to any of the matters listed in requests numbers 1 through 7 above.
19. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Scott Herring** relating to any of the matters listed in requests numbers 1 through 7 above.
20. Any and all correspondence (including but not limited to emails or text messages) sent or received by **Becky Bray** relating to any of the matters listed in requests numbers 1 through 7 above.
21. Any and all correspondence (including but not limited to emails or text messages) sent or received by any other (current or former) County staff member not specifically referenced herein relating to any of the matters listed in requests numbers 1 through 7 above.

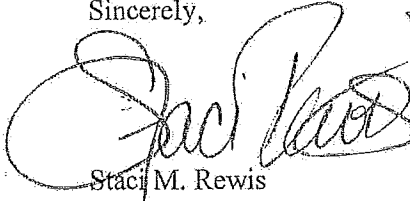
Consistent with the County's obligations under Chapter 119, Florida Statutes, please forward to us documents that are readily available and easy to obtain while the others are being

Nassau County – Records Management
October 12, 2018

searched. If the County asserts that an exemption applies to a particular public record or part of such a record, please provide a detailed list of the records for which the exemption is claimed and the statutory basis for the exemption, as required in Fla. Stat. §§119.07(1)(d)-(f). If only a portion of the record allegedly falls within the exemption, please provide the remainder of the record for inspection. Please state the basis for any asserted exemption per Fla. Stat. §§119.07(1)(d)-(f).

Again, we understand that the County may charge a reasonable amount for the costs of copying. To the extent a third party vendor may be necessary to search electronic devices and retrieve the public records requested herein, we will agree to pay the reasonable costs associated with such searches and copying. In the event the searching and copying costs are anticipated to exceed \$300.00, please advise before proceeding further with this request.

Sincerely,



Staci M. Rewis

cc: Michael Mullin, Esq.
Heather J. Encinosa, Esq.
Gregory T. Stewart, Esq.

Exhibit 3

Benvenuto, Christopher

From: Megan Sawyer <msawyer@nassaucountyfl.com>
Sent: Tuesday, November 20, 2018 2:27 PM
To: Rewis, Staci
Cc: Benvenuto, Christopher; Delaney, Paula; Michael Mullin; Susan Gilbert; Sabrina Robertson
Subject: RE: Public Records Request follow-up

Ms. Rewis,

The County has responded to the public records dated October 12, 2018 as set forth in our responses previously sent.

Thank You,
Megan Sawyer
Nassau County Board of County Commissioners
96135 Nassau Place, Ste. 1
Yulee, FL 32097
(904)530-6010-Phone
(904)321-5784-Fax

From: Rewis, Staci <SRewis@gunster.com>
Sent: Friday, November 16, 2018 9:21 AM
To: Michael Mullin <mmullin@nassaucountyfl.com>; Megan Sawyer <msawyer@nassaucountyfl.com>
Cc: Benvenuto, Christopher <CBenvenuto@gunster.com>; Delaney, Paula <PDelaney@gunster.com>
Subject: FW: Public Records Request follow-up

Dear Megan and Mike:

In response to our inquiry yesterday about the failure of the County to produce any text messages in response to our public records request, the County responded that it is "*not aware of any text messages.*" We find that difficult to believe given that County officials have routinely used their cell phones to send text messages regarding the very subject matter that is the scope of our public records request. **Has the County conducted any searches of any personal telecommunications device belonging to any County employee or County Commissioner?**

Regardless if County employees and commissioners were using a personal, business, or government cell phone, any communications regarding County-related business are squarely within the scope of our public records request. We tried to make that clear in our request by underlining those types of communications in our definition of "correspondence" in Paragraph 2 of the "Definition and Scope" section, and we expect those communications to be produced. Please let us know when we can expect to receive those responsive documents. Thank you.



GUNSTER
FLORIDA'S LAW FIRM FOR BUSINESS

Staci M. Rewis | Shareholder
225 Water Street, Suite 1750
Jacksonville, FL 32202
P 904-354-1980 F 904-350-6039

Confidentiality Notice: The material in this transmission is intended only for the use of the individual to whom it is addressed and may contain information that is confidential. If you have received this transmission in error, please immediately notify us by return e-mail (srewis@gunster.com) or telephone (904-354-1980) to arrange for the return of this material to us. Thank you.

Tax Advice Disclosure: To ensure compliance with requirements imposed by the IRS under Circular 230, we inform you that any U.S. federal tax advice contained in this communication (including any attachments), unless otherwise specifically stated, was not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the Internal Revenue Code or (2) promoting, marketing or recommending to another party any matters addressed herein.

From: Delaney, Paula
Sent: Thursday, November 15, 2018 3:00 PM
To: Rewis, Staci; Benvenuto, Christopher
Subject: FW: Public Records Request follow-up

From: Megan Sawyer [<mailto:msawyer@nassaucountyfl.com>]
Sent: Thursday, November 15, 2018 2:59 PM
To: Delaney, Paula
Cc: Michael Mullin; Susan Gilbert; Sabrina Robertson
Subject: RE: Public Records Request follow-up

Ms. Delaney,

We are not aware of any text messages.

Megan Sawyer
Nassau County Board of County Commissioners
96135 Nassau Place, Ste. 1
Yulee, FL 32097
(904)530-6010-Phone
(904)321-5784-Fax

From: Delaney, Paula <PDelaney@gunster.com>
Sent: Thursday, November 15, 2018 10:11 AM
To: Megan Sawyer <msawyer@nassaucountyfl.com>
Subject: Public Records Request follow-up

Megan,

Please see attached.

Paula



GUNSTER

FLORIDA'S LAW FIRM FOR BUSINESS

Paula Delaney

Legal Administrative Assistant to Lynn Pappas, Esq., Staci Rewis, Esq. and Chelsea Anderson, Esq.

225 Water Street, Suite 1750

Jacksonville, FL 32202

P 904-350-7412 F 904-354-2170

gunster.com

Email me: PDelaney@gunster.com



Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, please do not send electronic mail to this entity. Instead, please contact this office by phone or in writing.

Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public records request, please do not send electronic mail to this entity. Instead, please contact this office by phone or in writing.

Exhibit 4

TO: Michael S. Mullin, County Manager and County Attorney

FROM: Justin Stankiewicz, Former OMB Director

DATE: January 7, 2019

SUBJECT: Employee Grievance

This grievance is being made in accordance with Section 13.02 of the Nassau County Board of County Commissioners Employee Policies and Procedures Manual. Pursuant to this section, "the primary purpose of this is to determine what is right rather than who is right". Additionally, all 3 steps for the process (step 1 the immediate supervisor, step 2 the department head and step 3 the County Manager) are all the same person, therefore I am requesting to initiate this grievance at step 3. Step 3 states that "upon receipt by the County Manager, the employee will be given the opportunity to explain his position to the County Manager or his appointed designee. After considering all the information, the County Manager shall make a decision which shall be final and binding within twenty working days of the meeting." Since my grievance reports wrong doing by you as the County Manager, I respectfully request that a Commissioner or a neutral party hear my grievance and make the final and binding decision. Should the county deny this request, I will follow the policy as written.

As you know, you placed me on paid administrative leave in a meeting which included Ashley Metz and Susan Gilbert on December 11, 2018, stating both verbally and in writing that this was related to the "the investigation regarding the \$1,000 (EXHIBIT A)." You stated in the meeting with me that "paid administrative leave is a standard procedure when an employee is being investigated and that it would apply to you as well if you were being investigated". However, there is no policy relating to the treatment of employees while under an investigation and this statement is untrue since you have not been placed on leave (and in fact have been promoted) since you have been under investigation for an alleged ethics violation that was reported in the spring of 2018 and is still being investigated by the Florida Bar. You also stated in the meeting on the 11th that this situation could take "one week, two weeks....four weeks, you don't know" and that "upon completion you and I would sit back down to discuss my status with the County." This is even confirmed by Susan Gilbert's, your legal executive's, notes (EXHIBIT B), where she wrote once "investigation over will sit back down and go over conclusion." Yet, on December 28, 2018, only 10 working days after being put on paid admin leave, I was called in to meet with you, Ashley and Susan regarding my employment status. You and the Sheriff's office both confirmed that the investigation is still ongoing.

At the December 28, 2018, meeting you gave me two options: resign or get terminated. After I showed no desire to resign and asked for time to consult with a labor attorney, you became angry and provided a termination letter to me (EXHIBIT C) without stating a reason, providing any documentation as to why or any option for a corrective action plan. I specifically inquired as to the reason for my termination, asking if this is related to the \$1,000 investigation and you stated that it is not and that is a separate matter. I again asked for a reason and requested all documentation related to your decision. You stated that "after reflection and interviews of staff that you don't restore trust for the position," but would not give any names or specifics and stated that there were no documents or any investigation which supports your claim. I also followed up with a public records request to which Human Resources confirmed, that there are not "any records responsive to the request for complaints, write-ups, internal investigation documents or supporting documentation related to his [me] administrative leave and termination or any other

disciplinary actions (EXHIBIT D)." Therefore, I can't find this claim accurate. When I asked what would be reported in my file and to future potential employers, you stated that it would be "termination without cause." The same public records request to Human Resources requested a list of all employees separated from the county in the last 5 years and the reason for separation. Their report confirmed that not a single of the 202 other employees were "terminated without cause (EXHIBIT E)." Several however, have executed separation agreements with the county outlining terms and conditions for the employee and the employer to mutually agree to separate (records in Human Resources).

Based on this information, I find my termination to be in violation of Section 13.01 of the Employee Policy, which identifies discharge as a step 4 disciplinary action. The policy states, "disciplinary actions are a means of calling employees to accountability for some act of commission or omission regarded as adverse to the employer/employee relationship." It also states that "it is the intent of Nassau County that the administration of discipline will be constructive, corrective and progressive." I was disciplined with termination though there was no "act of commission or omission regarded as adverse to the employer/employee relationship". Additionally, effective October 1, 2018, you, as Interim County Manager, issued my annual evaluation which resulted in an "exceptional" rating and a 3.5% pay increase with no comments provided in the sections regarding "areas of improvement" or "recommendations for development (EXHIBIT F)." This abrupt discipline of termination was not only for no cause but it was not "constructive, corrective and progressive" as outlined by policy. No other Nassau County employee has been disciplined (including current and former Department Heads) without first investigating the alleged wrong doing and determining what violations (if any) have occurred and their severity before determining the appropriate disciplinary action (records in Human Resources).

I believe that my termination and unequal treatment is a retaliatory action by you which began on November 6, 2018 and I'll explain. On October 15, 2018, you were notified by the Clerk's office of the missing \$1,000. You gave me a copy of the notification on Wednesday, October 31, 2018 which was the day I returned from a 2.5 week vacation. I was in Tallahassee on county business on Thursday, November 1, 2018 so we met again on Friday morning November 2, 2018 to discuss the missing funds and the remedy. I explained where the money was kept, who had access to the safe, the last time I saw the money, the process that occurs at the EOC during an emergency activation, etc. We agreed that I would write this in a response to the Clerk's Office and that since I was the custodian of the funds, the corrective action would be for me to personally pay the \$1,000 missing to the County so no taxpayer dollars would be lost. There was no other discussion of any other remedy or disciplinary action and the issue was resolved. On the same day, Friday, November 2, 2018, you signed off on increasing my signing authority by an additional \$50,000 (from \$50,000 to \$100,000) (EXHIBIT G). I was included in typical county meetings in your office on Monday, November 5th and your behavior, attitude and actions remained unchanged with no other mention of the \$1,000. However, on November 6, 2018, Taco Pope, Susan Gilbert and I met at 2:00 pm with you for the intent to discuss the Enclave and Summer Beach trail walkover issue; however, the discussion was solely about the public records request that was submitted by Gunster Law Firm, Raydient/Rayonier's legal firm, which in addition to other things, specifically asked for text messages relating to county business that had been sent on personal phones (EXHIBIT H). During this meeting is when I disclosed that I had messages related to this request on my personal phone and stated that you, Taco, at least 3 of the Commissioners and Shanea Jones would also have messages as many of them were group messages. You directed me to delete these messages, which is a direct violation of Chapter 119, Florida Statutes. Furthermore, you stated that you have already deleted your text messages which in

addition to a violation of law, is a violation of Section 2.01, Code of Conduct of the Employee Policy and Procedures Manual. After understanding the magnitude and unethical conduct of what you were directing, Susan Gilbert, asked to excuse herself from the meeting stating that she "did not want to be part of this meeting." With you and Taco still in the room, I asked multiple times for you to confirm that you were directing me to delete text messages that are public record to which you affirmed. Immediately following this meeting, I expressed verbally my concern of violating Chapter 119 of Florida law to Taco Pope, Megan Sawyer and Sabrina Robertson. Additionally, I later express this same concern to Tina Keiter and Chris Lacambra.

After this November 6, 2018 meeting, your behavior and attitude towards me changed. I was not included in any other meetings or conversations regarding the response to Gunster's public records request, you did not obtain the messages that I told you that I had in response to Gunster's request and I was not copied on the county's response to Gunster. I was told by staff that you reported to Gunster that no text messages exist and that Gunster asked you again for the messages. Additionally, I had no other meeting with you after November 6, 2018 or any other conversation regarding the missing \$1,000 until the Sheriff's Office contacted me for an interview and said that you had turned over the \$1,000 issue for Law Enforcement investigation on November 12, 2018.

I suspected and concluded that you were seeking retaliation against me, so I went to the Human Resource Director, Ashley Metz, in accordance in Section 1.05, Open Door Policy, of the Employee Policies and Procedures Manual for consultation and guidance. Once providing the facts stated in the above paragraphs, HR felt that there was merit to my claim, however stated that since you are my (as well as the HR Department's) supervisor, Department Head, the County Manager and County Attorney, I had no recourse until an adverse action was taken. Section 2.12 Chain of Command, of the Employee Policies and Procedures Manual prohibits "contact of a County Commissioner directly regarding a County employment matter, grievance or complaint" so I had exhausted all avenues at that point.

However, it didn't take much longer before the adverse action occurred, ultimately resulting in termination of my employment which is supposedly "without cause." To conclude, I feel that I was singled out in retaliation of expressing and refusing to delete public records at your direction. I have identified over 150 individual and group text messages between a combination of you, Commissioner Edwards, Commissioner Taylor, Commissioner Leeper, Shanea Jones, Kristi Dosh, Taco Pope and myself that should have been turned over in response to Raydient/Rayonier's public record request (EXHIBIT I).

As a remedy, I request that I be reinstated to my former position of OMB Director at the same salary and benefits/leave accruals at the time of termination, along with back pay and accruals that would have occurred from December 28, 2018 to the date of reinstatement. With the reinstatement, I also request a different Chain of Command which does not include you as my supervisor.

Should the above request be denied, I request a mutually agreed upon separation agreement which includes the maximum severance allowed by law, back pay and benefits/leave accruals from December 28, 2018 until the date of the separation agreement, payout of all leave as of the date of the separation, rescission of my termination and any other terms and conditions that are mutually beneficial to me and the county.

Justin Stankiewicz

Exhibit 5

8:47

Exhibit I



PE

Pat >

Fri, Sep 28, 11:19 AM

The transcript is interesting. They either are having internal discussion on cooperating or how to get around us. Still not my idea of a working partnership.

I took it as more trying to screw us and build a legal case. I am with you as far as the partnership

I see no way to insure the county doesn't get screwed except killing 1075. Even a new amendment won't stop them. To much \$\$ to try to keep track of what they are doing.

We are on the same page. Completely agree. An amendment would require as much as a fight as a repeal, so for me if it's over it's over. Time to move on.



iMessage





Kristy >

Text Message
Mon, Feb 26, 4:16 PM

Do you know if the Dalton Agency represents Rayonier/Raydient for PR? They just emailed me and asked to have a call.

Nevermind, I got in touch with Mike. This woman that contacted me represents Raydient for PR.

Wed, Feb 28, 6:53 PM

(1/2)I'm around 17 hours of work. Mike had told me to let you know if I hit 20. He's thinking this may go until Monday and is wanting me to do some more over

(2/2)the next couple of days. Do I need you to okay me continuing?

That's no problem. Take how ever much time you need to complete the tasks he wants. I know this is now going on longer than anticipated.

When he first told me 20 hours I



Text Message





KD

Kristy >

When he first told me 20 hours I thought there was no way I could do that many. But it has ended up dragging on way longer than we initially thought!

Fri, Mar 9, 3:59 PM

Look up 9-16-15 Tab C presentation. I didn't listen to it yet.

OK, thanks!

Thu, Mar 22, 8:30 AM

(1/2)Mike just sent me the page that went up on the website. They did not cut the videos down or give the timestamps. I think people will struggle to go through

(2/2)the full videos and find what we want them to see.

IT put it up. I don't know why they excluded the times. Give me a few minutes & I'll have them add the times.



Text Message





KD

Kristy >

ADDRESS

Thank you!

Thu, Mar 22, 1:17 PM

Hey, here is the link with the direct webpage. IT added the time stamps for the videos.

raydient-encpa.hassaucountyfl.com

I see Raydient has issued another statement in the Fernandina Observer today. I guess it's time to get this info circulating.

Issued

I just got out of a lunch. I will get it distributed as soon as I get back to my computer.

Thanks!

FYI - this story is on The County Insider and the County's Facebook page. <http://www.thecountyinsider.com/home/update-on-concerns-related-to->



Text Message





KD

Kristy >

...the on... the... the...
...the... the... the...
It may be easier for you to just share it
but I don't to whatever you prefer

Ok, thanks! I'll be back at my
computer in about 15 to 20 minutes.

Just want to make sure...I can post
this in the Facebook groups too,
right?

Yes

Ok, thanks!

Sent to the media I think would cover
it and also posted in FB groups.

Thank you!

I'll let Mike & the Commission know.

I texted Mike too 😊

Oh good!



Text Message



8:53 7



4 People >

Tue, Oct 9, 12:08 PM

Y'all see this?

**The truth about Nassau
County's dispute with Raydient**
info.raydientplaces.com

Ru

Danny Leeper

No. Looks like they want
spread their false narratives
They are worried we will now
and have taken action that
could hurt them. Amazing
corporate greed....

Pat Edwards

They could have saved money
by building parks! PR people
are expensive!

Wed, Oct 10, 8:03 AM

Pat Edwards

Saw this on Facebook earlier
yesterday but couldn't find it
last night. Comments seemed
to back BOCC. Is it still up?
Thanks



iMessage



8:53



4 People >

Justin Taylor



It's still up. It's posted on all the various Facebook groups.

Pat Edwards



Thanks

Justin Taylor

Yesterday at 11:31 AM • 🌐



Buddy Harden

Correct me if I'm wrong, but didn't Raydient get a massive break on impact fees for Wildlight?

15h Like Reply



Buddy Harden

That is my understanding also Sarah.

15h Like Reply



Buddy Harden

Which commissioner?

14h Like Reply



Tim Peak

Sarah Sammantha Lamfers, which post did Taylor say this in?

12h Like Reply



Sarah Sammantha Lamfers

Tim Peak has posted on the

Yesterday at 11:31 AM • 🌐



Buddy Harden

Which commissioner?

14h Like Reply



Tim Peak



iMessage



8:53



4 People >

14h Like Reply



Tim Peak

Sarah Sammantha Lamfers,
which post did Taylor say this in?

12h Like Reply



Sarah Sammantha Lamfers

Tim Peak it was posted on the

Yesterday at 11:31 AM · 🌐



Buddy Harden

Which commissioner?

14h Like Reply



Tim Peak

Sarah Sammantha Lamfers,
which post did Taylor say this in?

12h Like Reply



Sarah Sammantha Lamfers

Tim Peak it was posted on the
Nassau buzz. It was a news cover
with first coast news.

12h Like Reply



Tim Peak

Sarah Sammantha Lamfers I'd be
curious to see that if you can find
it. PM it to me...

12h Like Reply



Write a reply...



And Tim Peak must've been
drunk last night

Pat Edwards



No doubt!!



iMessage





MM JS TP

3 People >

Fri, Mar 30, 6:44 PM

Taco Pope

You guys read the story in the bugle?
Interesting twist... they couldn't come
because they had staff All around the
country and we wouldn't
reschedule... do you guys know
Barbero?

TP

Mike Mullin

Know dn see the bugle

MM

Justin Stankiewicz

Didn't see it.

JS

Taco Pope

Adams claims that throughout the
process the county tacked on more
and more obligations for Raydient
to fulfill, which he says Raydient
was amenable to, up until the
county apparently added language
that would require Raydient to
fund the construction of all pub-
lic facilities in the development
the night before the development
order was to be signed. Typically,
Adams says, the developers only
donate the land that public ameni-
ties are to be built on while build-
ers pay impact fees to mitigate the
cost of the construction of those
facilities. Adams then stated that

surro
bills,
trated
"No
made
tween
legislat
"No on
able to
specific
cific co
and cau
"We
power
tion)."
islation
67 cou



Text Message





MM US TP

3 People >

ers pay impact fees to mitigate the cost of the construction of those facilities. Adams then stated that Raydient withdrew the project, as he felt that the county was asking Raydient to essentially "sign a blank check". He also alleges that the County has stalled all applications for development from Raydient until they agree to the County's demands.

Talks between the County and

tion).
islation
67 cou
was or
was a
"It
Adam
throu
unan
reach
is wh
out a

De-
(DSAP)
out the
on more
Raydient
Raydient
the
language
et to
I pub-
ment
present
ically,
is only
amen-
s build-
gate the
throu
d that
ect, as
asking
in a
es that
edica-
Ray-
Cour-
y and
here
at

When I asked Adams and Barbero about the controversy surrounding the Senate and House bills, Barbero grew visibly frustrated.

"No one, to this today, has made a specific connection between our promises and what that legislation said," Barbero said. "No one in the county has been able to draw a line that shows 'this specific language refers to this specific commitment from Raydient and causes it to be gone'."

"We just don't have that kind of power (to influence state legislation)," he continued. "This is legislation that would have impacted 67 counties in Florida, and there was only one county (Nassau) that was against it."

"It was non-controversial," Adams added. "The bills made it through all the committees, with unanimous approval, and then it reaches the final committee, which is when the county lobbyist found out about it, and then it suddenly became controversial."

Both Adams and Barbero ex-

Fern

Co

P

\$7

Ele

Pl



Text Message



MM JS TP

3 People >

while Raydient alleges that the County is singling them out for financial assistance above and beyond what is required of developers and that the County has canceled and rescheduled meetings without properly informing them.

Adams told me that the County informed them that representatives from Raydient, that are based throughout the state and throughout the country, would be required to appear at these meetings, and then refused to reschedule when they were told these representatives would be unable to attend. That's when Adams said that the relationship between the County and Raydient truly broke down and the County claimed that Raydient was reneging on their agreements.

TP

while Raydient alleges that the County is singling them out for financial assistance above and beyond what is required of developers and that the County has canceled and rescheduled meetings without properly informing them.

Adams told me that the County informed them that representatives from Raydient, that are based throughout the state and through-



Text Message





MM US TP

3 People >

they were told these representatives would be unable to attend. That's when Adams said that the relationship between the County and Raydient truly broke down and the County claimed that Raydient was reneging on their agreements.

TP

While Raydient alleges that the County is singling them out for financial assistance above and beyond what is required of developers and that the County has canceled and rescheduled meetings without properly informing them.

Adams told me that the County informed them that representatives from Raydient, that are based throughout the state and throughout the country, would be required to appear at these meetings, and then refused to reschedule when they were told these representatives would be unable to attend. That's when Adams said that the relationship between the County and Raydient truly broke down and the County claimed that Raydient was reneging on their agreements.

TP



Text Message





info





6 People >

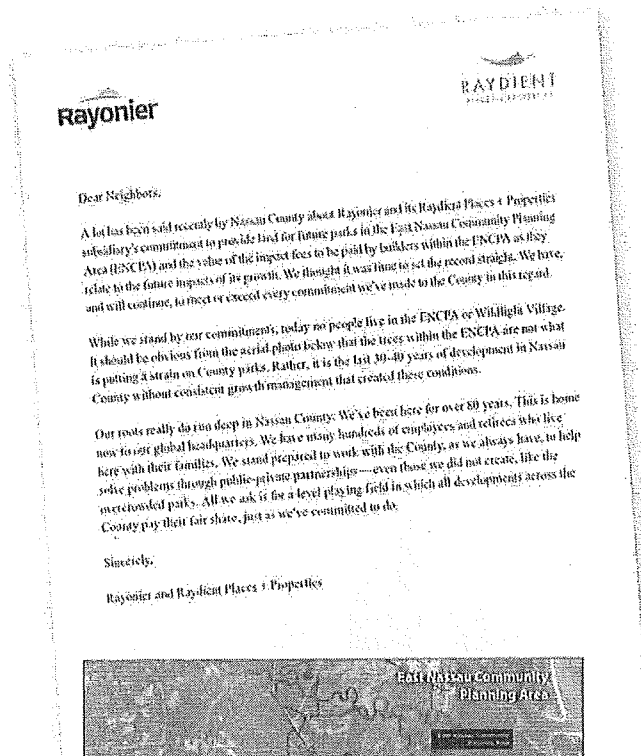
Fri, Feb 23, 7:01 AM

Rayonier

RAYDIENT
PLACES + PROPERTIES

**We all have to work together.
We all have to do our fair share.**

An open letter from Rayonier to the residents of Nassau County



Full page ad in the Newsleader

Justin Stankiewicz

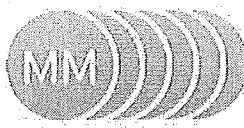


JS



Text Message





6 People >

Danny Leeper



We need to be three steps ahead of them

Justin Taylor



Should we post a screenshot of the language from 1075 next to the proposed language from the bill we're fighting with a statement that we just want developers to honor their promises to the tax payers?

Pat Edwards



Yes, the part about recreational infrastructure and public parks along with 324's kill language. I'd like a copy of that at 4 to read into the minutes

Justin Stankiewicz



Agree and I can get that for.

Danny Leeper



We need to say " Unlike the false narratives being distributed by our partner the FACTS" are what our taxpayers need to know.....



Text Message





6 People >

Pat Edwards



Agree!!

Mike Mullin



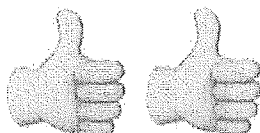
Yes we will have that

Danny Leeper



Good

Justin Taylor



Fri, Feb 23, 9:15 AM

SENATE BILL 324 - Nassau

County voices heard
"loud and clear"

By Susan Hardee Steger

February 23, 2018 8:50 a.m.

The Florida
State Senate
Committee
"temporarily
postponed" a
vote on the
proposed SB
324 following



Text Message





6 People >

By Susan Hardee Steger**February 23, 2018 8:50 a.m.**

The Florida State Senate Committee "temporarily postponed" a vote on the proposed SB 324 following Senator Aaron Bean's last minute amendment to the bill (bill amendment details will be posted when they are received). The matter has



COUNTY MANAGER
SHANEA JONES

fernandinaobserver.com

Justin Taylor

**Good! Still lots of work to do!**

Need to confirm that I'm reading the website correctly but it appears the House Bill 697 was added to the special order calendar for 2/28 (Wednesday).



Text Message





6 People >

[Redacted text]

Justin Stankiewicz



That is correct

Mon, Feb 26, 9:49 AM

Oh Lordy Raydient taking a new angle to shut Mike down. Lol

Justin Taylor



They're pulling out all the stops.

Mike Mullin



They luv me

Taco Pope



? Did we miss the memo?

I feel the love vibes being sent your way.

I just forwarded the email to you Taco & Justin.

Mike Mullin

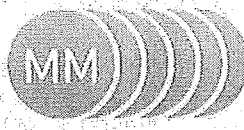


I feel them everywhere



Text Message





6 People >

It's all of a sudden a conflict of interest if you thought you've been back since March of 2019. I had a conflict of interest with them and represent the Board.

Mike Mullin



Yes isn't that strange. There goes my thanksgiving day invitation

Justin Stankiewicz



Think we need a new word stronger than irretrievably broken

Mike Mullin



Yes

Danny Leeper



What would happen if we deny the conflict. I say let them spend their money

Mike Mullin



We may do that. I guess I am off the easter dinner list

Danny Leeper

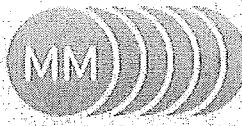


Lol. All of us



Text Message





6 People >

Danny Leeper



Lol. All of us

Mike Mullin



Yes

Mon, Feb 26, 7:57 PM

news4jax.com



Justin Stankiewicz



Yes. We saw that. What idiots.

Tue, Feb 27, 1:20 PM

Y'all got the win????

Justin Stankiewicz



Yes ma'am!

Pat Edwards



Danny Leeper

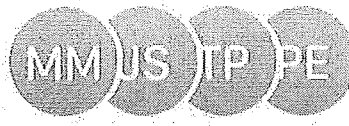


Yes ma'am!!!



Text Message





4 People >

Text Message
Wed, Feb 14, 5:57 PM

To: Shanea Jones >

Hide 

Cc: jonathanj@hgslaw.com > SarahW@hgslaw.com >

wrathelc@whhassociates.com >

mark.bridwell@rayonier.com >

charles@raydientplaces.com >

MathewsH@etmnc.com > Michael Mullin >

Pat Edwards >

East Nassau Stewardship District

Today at 5:50 PM

Ms. Jones,

Attached please find the letter response in
reference to Mr. Edwards letters dated February 14,
2018, regarding to the upcoming February 15th
meeting of the East Nassau Stewardship District.

Best regards,

Mike Hahaj

Chair, Board of Supervisors

February 14, 2018

Via E-mail To: sjones@nasscountynfl.com

Ms. Shanea Jones
County Manager
Nassau County, Florida
96135 Nassau Place, Suite 6
Yulee, Florida 32097

Dear Ms. Jones,

This letter is a scanned copy of Chairman Hahaj's letter dated February 14, 2018.

Text Message



MMJSTPPE

4 People >

February 14, 2018

Via E-mail To: sjones@nassaucountyfl.com

Ms. Shanea Jones
County Manager
Nassau County, Florida
96135 Nassau Place, Suite 6
Yulee, Florida 32097

Dear Ms. Jones,

This letter is to acknowledge receipt of Chairman Edwards' letter dated February 14, 2018, requesting a continuance of public hearings to consider business items scheduled for the February 15, 2018, meeting of the East Nassau Stewardship District ("District").

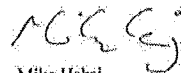
As you are aware, the District's Board of Supervisors ("Board") held its initial meeting on August 10, 2017, at which time the Board considered the preliminary reports prepared by England-Thims & Miller, Inc. and Wrathell, Hunt and Associates, LLC, ("Reports") related to a portion of the public infrastructure contemplated by the District which are referenced in Chairman Edwards' letter.

At that meeting, the Board originally scheduled public hearings related to the Reports for September 28, 2017. After Nassau County ("County") expressed concerns related to the Reports to be considered during those public hearings, the Board elected to continue the public hearings to October 19, 2017, and then again, to November 15, 2017. In addition, County staff was added to the regular distribution of District meeting agendas including all attachments. At the September and October meetings, the Board elected to continue the scheduled public hearings as a courtesy to the County and to allow ample time for the County to work with Raydient LLC, including its affiliates ("Raydient"), and the District to address the concerns expressed. During the months of September, October, and November, District staff as well as myself, as Board Chair, engaged in multiple discussions with County staff. The Board ultimately determined not to take action and to cancel the continued public hearings to allow for ongoing conversations.

In response to feedback received from County staff during those discussions, the District incorporated specific comments and revisions in the Reports and brought the Reports back to the Board for consideration at the District's regular meeting on December 14, 2017. County staff was included on the distribution of meeting agendas in advance of the meeting. District staff did not receive comments from County staff regarding the meeting materials. Accordingly, at the December 14, 2017, meeting, the Board considered the revised Reports and determined to schedule public hearings related to those Reports for February 2, 2018. On January 26, 2018, County staff received the regular distribution of February 2, 2018, meeting materials. On January 29, 2018, County staff again expressed concerns regarding the Reports. In response, on February 2, 2018, the Board elected to continue the scheduled public hearings to February 15, 2018, to allow additional opportunity for

We believe the District reasonably accommodated the County, including those points set forth in Chairman Leeper's letter to Chris Corr dated September 22, 2017, and responded to specific comments when provided by the County. Accordingly, I intend to ask the Board to proceed with considering all items included in the February 15, 2018, meeting agenda, a copy of which was provided to County staff on February 8, 2018.

Sincerely,



Mike Hahaj
Chair, Board of Supervisors
East Nassau Stewardship District

cc: Mark Bridwell, Esq.
Craig Wrathell
Hugh Matthews
Jorriathan T. Johnson
Michael S. Mullin, Esq.
Pat Edwards



Text Message





Mike ▾



audio



FaceTime



info

Did you ask Mark why Chris Corr would think the county is going "yell at them"? Also, if Leeper & Taylor agree with them, then why are they hesitant to show up at the meeting? Plus, why would he think that we are going to "embarrass their company" if they aren't doing anything wrong?



Ur dead on as usual. When i asked him yesterday he gave different answers. He told mark that i often yelled at him. Mark also asked if chris could meet with mark and i. I told him only with a recorder and at a public mtg

Sun, Feb 11, 11:39 AM

So how was the meeting with Mark? Productive at all?



iMessage





2 People >

D.S. WARE HOMES NOW SELLING WILDLIGHT



D.S. Ware Homes is proud to announce that we are now selling homes in the much anticipated community of Wildlight.

Homes range from 1500 sq. ft. to over 3400 sq. ft. with prices starting at \$259,900 which includes fabulous standard features.

The community will have it all including resort style amenities, natural gas, ball fields, walking trails, bike trails, lakes that invite fishing and kayaking, a park for everything and state of the art

Wildlight Elementary School, just to name a few!

Please contact Sandi Braithwaite for information:
904.591.0266 sandib@dswarehomes.com



6301 Gator-Ten Park Place 44 Suite 105 Jacksonville, FL 32257



GREAT HOMESITES ARE STILL AVAILABLE BUT

WON'T BE FOR LONG! CALL

Are they building ball fields? Like the ad says?

Ha! That's false advertising.

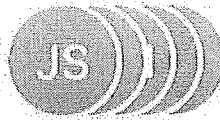
Danny Leeper

Very interesting. You have to wonder what Raydient has told the builders



iMessage





5 People



audio



FaceTime



info

Fri, Mar 2, 6:57 PM

Danny Leeper

Tap to Load Preview



facebook.com



Pat Edwards



BS

Justin Stankiewicz



They are all 🐼 heads and full of 🐼

Danny Leeper



Will never give up or tell the truth.
It's not over

Mike Mullin

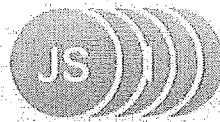


I will crank up out p r person



iMessage





5 People >

Mike Mullin



I will crank up out p r person

Pat Edwards



People need to know that Charles is a liar! Aaron asked us to back off the attack's, I don't think we have a choice but to rebut.

Mike Mullin



Yes sir

Justin Taylor



I agree - We have to defend ourselves.

Danny Leeper



No backing off

Mike Mullin



Agree

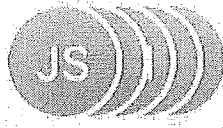
Tue, Mar 6, 8:32 PM

Justin Taylor



iMessage

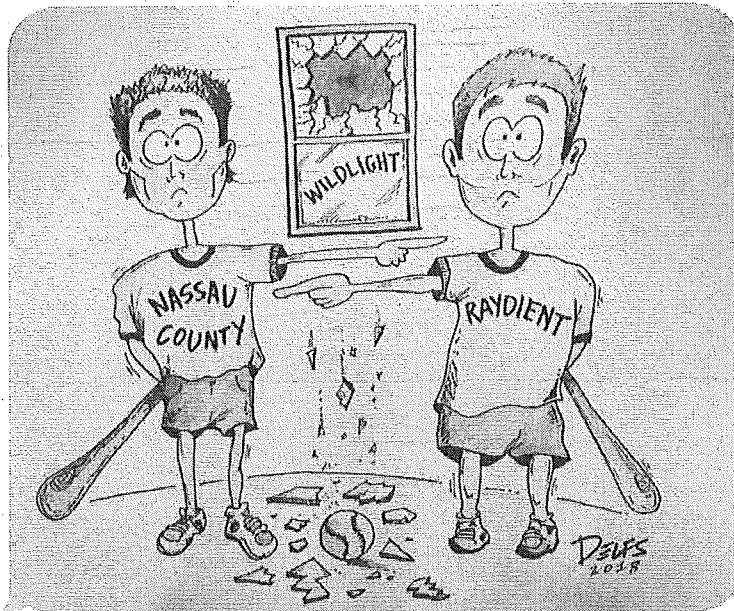




5 People >

Tue, Mar 6, 8:32 PM

Justin Taylor



Mike Mullin



Cute

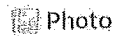
Thu, Mar 22, 2:19 PM



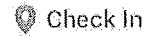
what's on your mind?



Live



Photo



Check In



Kristi Dosh shared a link to the group: Amelia Island Fernandina Beach Yulee Network.

4 mins •

If you've been following the (now very public) debate between Nassau County and Raydient regarding the commitment Raydient made to fund recreation space inside of the ENCPA (where Wildlight is located)...

Nassau County has released a statement, videos and documents it believes supports its position that Raydient



iMessage

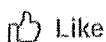




5 People >

Nassau County has released a statement, videos and documents it believes supports its position that Raydient made certain promises it's now seemingly renegeing on after getting what it wanted from the County (its stewardship district designation that provides a wealth of benefits).

FL-NASSAUCOUNTY2.CIVICPLUS.COM
| Nassau County - Official Website
BOCC Statement on Raydient/ENCPA



Like



Comment



Share

Steven Bowens likes Mini Golf King.



Mini Golf King - Multiplayer

FYI - Kristi has put the County's info out on social media.

It has also been sent to all media sources.

Justin Taylor



Great!

Pat Edwards



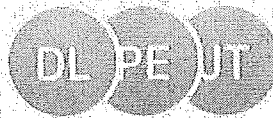
Let the ---- fly!

Danny Leeper



iMessage





3 People >

To: laura@nassauflorida.com >

Hide

Cc: BOCC Commissioners Distribution >

Michael Mullin > Sabrina Robertson > Joyce Bradley >

Justin Stankiewicz > Taco Pope >

Fwd: Recent discussions of the news

Today at 6:46 PM

Laura,

I'm being asked why this would be distributed by your staff to the Economic Development Board members. Please explain. Additionally, you reported to the County (more than once) that "the Economic Development Board is going to remain neutral" on this topic. What has changed and why wasn't the BOCC extended the courtesy of advance notice? Please respond to all on this email.

The County requests that the Economic Development Board refrains from any discussion regarding this topic without County representatives present.

Justin Taylor



I'm anxious to see it

Danny Leeper

Hmmm

Let them provide all their funding then
Done with her



iMessage





3 People >

Thu, Mar 15, 8:16 PM

Pat Edwards



FYI, observer has posted the letter tonight.

Danny Leeper



Yes. Mike Bell trying to save his job working overtime

Pat Edwards



Hopefully he fails 😏

Danny Leeper



False narratives always bites you in the ...

Kristi (the lady that has been putting out the Facebook info) sent Mike & I a draft release today. We will finalize tomorrow & send out with video links to BOCC meetings where they made promises.

Danny Leeper



iMessage





3 People >

Fri, Feb 23, 1:22 PM

Danny Leeper

DL

Have we requested Raydient to build any parks to date based on their development in ENCPA?

No, none expected to be built now. We've only discussed planning parks that will be needed based on their development entitlements and timeline.

Mike Mullin

MM

I agree

Danny Leeper

DL

Thought so

Mon, Feb 26, 3:20 PM

Danny Leeper

We need a full page ad with three photographs...a big X across a ball field another X across a park and another one saying what is the next broken promise from Raydient?

If you are thinking about buying or



iMessage





JS DL MM

3 People >

DL

any parks to date based on their development in ENCPA?

No, none expected to be built now. We've only discussed planning parks that will be needed based on their development entitlements and timeline.

Mike Mullin

MM

I agree

Danny Leeper

DL

Thought so

Mon, Feb 26, 3:20 PM

Danny Leeper

We need a full page ad with three photographs...a big X across a ball field another X across a park and another one saying what is the next broken promise from Raydient?

If you are thinking about buying or building in the ENCPA Wildlight Community be very concerned about Broken Promises!

DL



iMessage





2 People >

FYI - I sent both of you the stewardship documents that they sent me this morning. Short version - the \$45m for phase 1a does not include public recreation (except for the mobility trails). The whole Central Planning Area is approved for up to \$660m in bonds & the draft allocation shows \$10m of that for future recreation.

Pat Edwards

PE

Is that \$10m a year 🤔

Sep 14, 2017, 9:03 AM



ENCPA Agenda Item.pdf

Can you please look at this really quick & tell me if this is what you had in mind? Sabrina is about to publish Monday's agenda. Thank you!

Pat Edwards



iMessage





MM PE

2 People >

shows a point of view that is not
recreation.

Pat Edwards

PE

Is that \$10m a year 😊

Sep 14, 2017, 9:03 AM



ENCPA Agenda Item.pdf

Can you please look at this really quick & tell me if this is what you had in mind? Sabrina is about to publish Monday's agenda. Thank you!

Pat Edwards

Shanea, in the original ENCPA and Stewardship documents was language about park & REC. Mike had those earmarked I believe. Are these excerpts from the originals?

PE

Mike Mullin

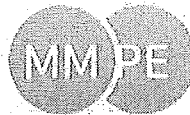
MM

I do and putting all that together



iMessage

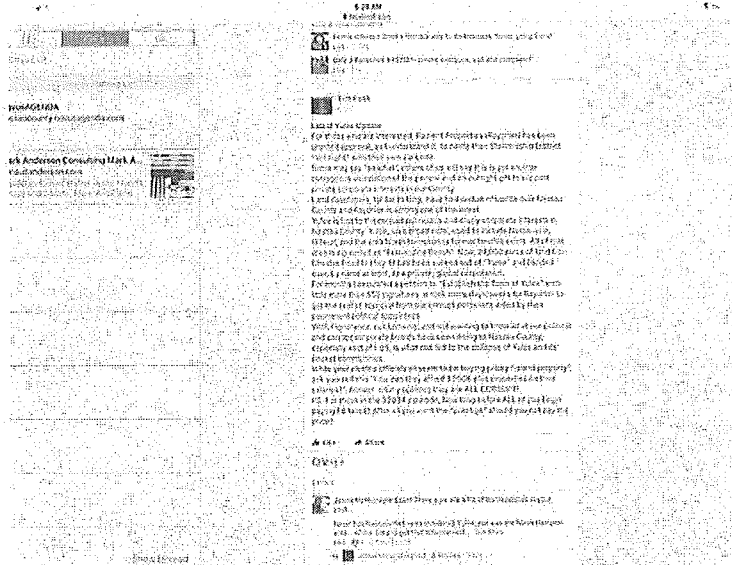




2 People >

Aug 30, 2017, 6:41 AM

Pat Edwards



He got really drunk last night.



Mike Mullin



Wtf

SECTION 197.363(4)(b), FLORIDA STATUTES, BY THE EAST NASSAU STEWARDSHIP DISTRICT**NOTICE OF REGULAR MEETING OF THE EAST NASSAU STEWARDSHIP DISTRICT**

The East Nassau Stewardship District Board of Supervisors ("Board") will hold public hearings on Thursday, September 28, 2017 at 10:00 a.m., at Florida State College, Nassau Center, 76344 William Burgess Boulevard, Yulee, Florida 32097, to consider the adoption of an assessment roll, the imposition of special assessments to secure proposed bonds on benefited lands within the East Nassau Stewardship District ("District"), a depiction of which lands is shown below, and to provide for the levy, collection and enforcement of the special assessments. The streets and areas to be improved are depicted below and in the District's *Engineers Report for Widdlight Village Phase I*, dated August 10, 2017 (the "Improvement Plan"). The public hearing is being conducted pursuant to Chapters 170, 189 and 197, *Florida Statutes*. A description of the property to be assessed and the amount to be assessed to each piece or parcel of property may be ascertained at the District's Records Office located at 2300 Glades Road, Suite 410W, Boca Raton, Florida 33431, (561) 571-0910.

The District is a unit of special-purpose local government responsible for providing infrastructure improvements for lands within the District. The infrastructure improvements ("Improvements") are currently expected to include, but are not limited to, roadway improvements, stormwater management system, water distribution system, wastewater system, landscaping, hardscaping, and irrigation system improvements, and other improvements, all as more specifically described in the Improvement Plan, on file and available during normal business hours at the address provided above.

The District intends to impose assessments on benefited lands within the District in the manner set forth in the District's *Master Special Assessment Methodology Report for the Widdlight Village Phase I*, dated August 10, 2017 (the "Assessment Report"), which is on file and available during normal business hours at the address provided above. The Assessment Report identifies the legal description of the property within the District which will be subject to the assessments and the assessments per parcel for each land use category that is currently expected to be assessed. The method of allocating assessments for the improvements to be funded by the District will initially be determined on an equal assessment per acre basis. The methodology is explained in more detail in the Assessment Report. Also as described in more detail in the Assessment Report, the District's assessments will be levied against all assessable lands within the District. Please consult the Assessment Report for more details.

The annual principal assessment levied against each parcel will be based on repayment over thirty (30) years of the total debt allocated to each parcel. The District expects to collect sufficient revenues to retire no more than \$58,965,000 in debt to be



iMessage



MM PE

2 People >

The annual principal assessment levied against each parcel will be based on repayment over thirty (30) years of the total debt allocated to each parcel. The District expects to collect sufficient revenues to retire no more than \$58,265,000 in debt to be assessed by the District, exclusive of fees and costs of collection or enforcement, discounts for early payment and interest. The proposed annual schedule of assessments is as follows:

Wildlight Village Phase 1

Land Use	Combined Master and Neighborhood Infrastructure Improvements Annual Assessment Apportionment		Combined Annual Master and Neighborhood Assessment Apportionment	
	Master Infrastructure Improvements EAU per 1,000 Sq. Ft./Acre/Unit	Neighborhood Infrastructure Improvements EAU per Unit	Combined Total Master and Neighborhood Assessment Apportionment per 1,000 Sq. Ft./Acre/Unit	Combined Annual Master and Neighborhood Assessment Apportionment per 1,000 Sq. Ft./Acre/Unit
Commercial				
Village Center	1.47	n/a	\$35,135.63	\$2,802.70
Educational/Community				
Elementary School	n/a	n/a	\$0.00	\$0.00
Community Center	n/a	n/a	\$0.00	\$0.00
Wellness Center/Private School	5.91	n/a	\$141,140.92	\$11,258.48
Residential				
SF 30'	0.61	0.58	\$29,521.15	\$2,354.85
SF 45'	0.87	0.86	\$42,948.54	\$3,425.93
SF 55'	1.00	1.00	\$19,662.24	\$3,961.47
SF 70'	1.28	1.36	\$65,628.50	\$5,235.07
Apartment	0.51	0.56	\$26,615.76	\$2,123.09
Undeveloped/Unplatted				
Gross Acre			\$91,937.45	\$7,333.68

Haha! While talking about the ENCPA, this is in today's paper...advertisement for the Stewardship district to hold public hearing to borrow more than \$45m (which will cost more than \$58m over 30 years) for Wildlight Phase 1a. and levy annual special assessments for repayment. The assessments appear extremely expensive. It mentions funding roads, drainage, landscaping, irrigation, & other improvements outlined in the improvement plan. I bet that plan doesn't include public recreational facilities but it's public record so I'm going to ask for a copy on behalf of the county.



iMessage





MM PE

2 People >

record so I'm going to ask for a copy on behalf of the county.

Pat Edwards

If no public recreational improvement wording is included, we can use that as a bargaining point.

PE

Mike Mullin

I agree plus we need to formally ask for a mtg with the exec dir. it appears that they are doing what we suspected- raydient will claim no control of the didtrict board and move forward without rec. time to put chris on notice

MM

Pat Edwards

PE

Yes!

I'll send an email requesting all of the documents this morning & let you know when I get them so we can all go through them.

Mike Mullin

MM

Tx



iMessage





MM PE

2 People >

MM

IX

The hearing isn't until Sept 28th so we can pressure them to change the plan before adoption.

Mike Mullin

Do you think tim got some of the juice from george

MM

Yes to the change

Probably pomegranate flavored.

Mike Mullin

MM

Ha.

There is no doubt about raydient & the district they knew their plan for what is in the ad when chris met with you and i

MM

I'll have to go back to the ad but I think it says the report is dated August 10th (before he met with us) & they would have been working on it for much longer.



iMessage





MM PE

2 People >

they would have been working on it for much longer.

Mike Mullin

MM

Yes. Very calculated

Pat Edwards

PE

Public/Private partnership

Mike Mullin

MM

Yes that is their definition . Its raydient speak for f you

Pat Edwards

PE

I think it's time we bring George & Steve into the mix. Maybe ask Tim Peak to join them!

Mike Mullin

MM

I thought you could take all 3 to lunch

Pat Edwards

PE

I will if you and Chris will join us 😊

Mike Mullin

MM



iMessage

