



August 14, 2017

**Via US Mail and Electronic Mail (mbataille@cohb.org)**

Mario Bataille, CMC  
City Clerk  
City of Hallandale Beach  
400 S. Federal Highway  
Hallandale Beach, FL 33009

**Re: Public Records Request**

Dear Mr. Bataille:

This firm represents Lina Duran in connection with this initial public records request. You will be receiving in the week to come a more detailed public records request.

In the meantime, pursuant to Article I, Section 24 of the Florida Constitution, and Chapter 119, Florida Statutes, we are requesting copies of the following public records: all documents, communications, notes and correspondence related to Ms. Duran's employment since June 21, 2017 in general, as well as with respect to the investigation conducted by the City Attorney following Ms. Duran's email to Mr. Carlton on June 21, 2017 entitled "Follow-Up" in particular. The foregoing includes all ESI in the form of emails, SMS and Text Messages to, from and/or between any combination of the following individuals (which may include other addressees and recipients): Roger Carlton, Jeremy Earle, Nydia Rafols, Jennifer Merino, Steven Zelkowitz, Radu Dodea, Nickens Remy, Joy Cooper, Keith London, Michele Lazarow, Anabelle Taub and Anthony Sanders. Such ESI includes both official and personal accounts as well as any deleted ESI. In particular, please provide any records specifically relating to (a) the appointment of the City Attorney as the investigator of Ms. Duran's email noted above, (b) the City Attorney's, City Manager's and Mr. Remy's allegations that Ms. Duran reviewed and approved the invoices of the CRA Attorney, (c) any invoices of the CRA Attorney allegedly reviewed and approved by Ms. Duran, (d) that certain email from Jennifer Frastai to CRA staff dated December 15, 2016 relating to the policy for invoice approval, and (e) the telephone records (both official and personal accounts) for Roger Carlton, Jennifer Merino and Jeremy Earle from May 1, 2017 to date.

If you contend that any of the above information is not publicly accessible, confidential, and/or exempt from public disclosure, you are required to advise us in writing and with particularity the reasons for withholding such information by citing to the applicable exemption for the Public Records Act. See, Florida Statute §119.07(1)(e) and (1)(f). If the purported exemption you are claiming only applies to a portion of the records, please redact or delete that portion of the records and provide copies of the remainder of the records in accordance with §119.07(1)(d), Florida Statutes.

We will pay the actual costs of duplication as defined in §119.07, Florida Statutes. Please review the amount of data that you have in your custody, control, or possession and provide me with either a verbal and/or written estimate of the total costs at the earliest practicable date so we may obtain the records. If you have any questions or need additional information, please contact me.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason R. Alderman", is written over the word "Sincerely,".

Jason R. Alderman