

From: Benedict P. Kuehne [<mailto:ben.kuehne@kuehnelaw.com>]
Sent: Saturday, June 04, 2016 4:47 PM
To: Joseph, Dotie <Dotie.Joseph@citynmb.com>
Cc: Sosa-Cruz, Candido <Candido.Sosa-Cruz@citynmb.com>; NMBMGR
<NMBMGR@citynmb.com>
Subject: *** PUBLIC RECORDS REQUEST ***

**NOTICE OF INTENT TO FILE SUIT TO COMPEL PUBLIC RECORD
PRODUCTION**

To: Dotie Joseph, Deputy City Attorney:

On April 21, 2016, I submitted the attached emailed Public Records Request to candido.sosa-cruz@citynmb.com seeking the following, none of which has been provided:

REQUEST FOR PUBLIC RECORDS:

All documents concerning the Notices of Violations and Notices of Hearing issued to Council Member Frantz Pierre for

alleged code compliance violations dated February 25, 2015, for a Compliance Date of March 12, 2015, including all

times the Code Compliance Officer ever came to Council Member Pierre's home in connection with the citations, as well

as any disposition of the citations.

Before I initiate litigation to compel compliance with the Public Records Request, I am hopeful you can bring this long-standing request to the attention of the appropriate City personnel for an expedited compliance.

Additionally, I am requesting this related information:

1. Any Statement, Report, Documentation, computer information, and any form of documentation by Code Compliance employee Tasheema Lewis concerning her positing of a Notice of Violation at the residence at 2120 NE 171 Street, North Miami Beach, FL 33162.
2. All documentation concerning City Employee Tasheema Lewis on April 30, 2015, including any record of her assignments, duty responsibilities, citations issued, locations visited, time sheet entries, records of times and places she visited.
3. All telephone log records, text message records, and any electronic forms of communication by and concerning Tasheema Lewis occurring on April 30, 2015.

4. The entire personnel file for City Employee Tasheema Lewis.

Benedict P. Kuehne
Law Office of Benedict P. Kuehne, P.A.
100 S.E. 2d Street, Suite 3550
Miami, FL 33131-2154
[305.789.5989](tel:305.789.5989) x7 Tel
[305.789.5987](tel:305.789.5987) Fax
ben.kuehne@kuehnelaw.com
bkuehne@bellsouth.net

www.kuehnelaw.com