

**From:** Linda Joseph <[linda4nmb@gmail.com](mailto:linda4nmb@gmail.com)>  
**Sent:** Wednesday, March 11, 2026 8:09:36 AM  
**To:** City Clerk Staff <[CityClerk@citynmb.com](mailto:CityClerk@citynmb.com)>; Williams, Darwin <[Darvin.Williams@citynmb.com](mailto:Darvin.Williams@citynmb.com)>; [jcazeau@northmiamibeachfl.gov](mailto:jcazeau@northmiamibeachfl.gov) <[jcazeau@northmiamibeachfl.gov](mailto:jcazeau@northmiamibeachfl.gov)>; Joseph, Michael <[Michael.Joseph@citynmb.com](mailto:Michael.Joseph@citynmb.com)>  
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**Subject:** Formal Notice – Public Records Request, Sunshine Law Compliance, and Preservation of Evidence

Dear City Officials,

This letter serves as formal notice that I am prepared to pursue federal civil rights relief should actions interfering with my candidacy or participation in public affairs continue.

The right of citizens to participate in the political process and to seek elected office is protected under the First and Fourteenth Amendments to the United States Constitution. Any attempt by government officials to intimidate, retaliate against, or otherwise interfere with a candidate's lawful participation in the electoral process raises serious constitutional concerns.

In recent weeks, I have observed conduct and actions that raise significant concerns regarding possible interference with my candidacy and participation in city matters. I have also been contacted by former candidates and community members who have expressed similar concerns regarding past conduct within the City. Some individuals have indicated that they believe certain actions taken against candidates in prior situations may have involved discriminatory treatment.

These concerns are deeply troubling. Any conduct by government officials that interferes with a citizen's constitutional rights—particularly where questions of equal protection or discriminatory treatment may arise—creates serious legal exposure for the individuals involved as well as the City itself.

Accordingly, please be advised that if such conduct continues, I am prepared to pursue all legal remedies available under federal civil rights law, including but not limited to claims brought pursuant to **42 U.S.C. §1983** for violations of constitutional rights.

Such litigation may involve discovery procedures including subpoenas for past communications, emails, text messages, and other records that may reveal coordination or actions taken outside the scope of lawful government conduct. Depositions and sworn testimony of current and former officials may also be required if litigation becomes necessary.

I remain hopeful that these matters can be resolved through full transparency and strict adherence to Florida's open government and public records laws. My intent is not confrontation, but rather the protection of the fundamental democratic principles that ensure all citizens have the right to participate in the political process free from intimidation or retaliation.

However, I must be clear that continued conduct interfering with my candidacy or civic participation will leave me with no choice but to pursue appropriate relief in federal court.

Please consider this letter a formal notice of my intent to protect my constitutional rights should further action become necessary.

Sincerely,

Linda Joseph Noel  
Candidate, North Miami Beach City Commission  
Phone: 305-632-9442

**2 attachments**

 **NMB\_public\_records\_and\_sunshine\_letters.pdf**  
5K

 **NMB\_litigation\_hold\_preservation\_notice.pdf**  
4K

# Public Records Request – Commissioner Communications

Dear City Clerk, Pursuant to the Florida Public Records Act, Chapter 119, Florida Statutes, I respectfully request access to and copies of the following public records. Please provide all communications, records, and electronically stored information from January 1, 2025 through the present that reference or relate to:

- Linda Joseph Noel
  - My candidacy for North Miami Beach City Commission
  - Any discussion regarding my participation on boards, committees, or city activities
  - Any investigation, complaint, or discussion referencing me
  - Any discussion regarding the removal or exclusion of any individual from city boards or meetings This request specifically includes, but is not limited to:
- Emails sent or received by commissioners, the City Manager, the City Clerk, and relevant staff
  - Text messages, SMS, and messaging applications (including WhatsApp, Signal, Telegram, or similar platforms)
  - Communications sent or received from personal phones, personal email accounts, or private devices used for city business
  - Internal memoranda, notes, meeting summaries, or reports
  - Communications with former commissioners or outside individuals concerning city decisions involving me
- Please note that under Florida law, public records include communications relating to official business regardless of whether they are stored on personal devices or private email accounts. If any responsive records are withheld, please identify the specific statutory exemption relied upon and provide a written explanation for the denial. If responsive records exist on personal devices or private email accounts used for city business, please confirm that the City has conducted a good-faith search of those sources as required by Florida law. Thank you for your prompt attention to this request.
- Sincerely,

Linda Joseph Noel  
Candidate, North Miami Beach City Commission  
Phone: 305-632-9442

# Sunshine Law Compliance Notice and Request

Dear City Clerk, This letter serves as formal notice regarding compliance with Florida's Government in the Sunshine Law, Florida Statutes §286.011. Florida law requires that deliberations and discussions between members of a public board or commission concerning official business occur in properly noticed public meetings. To ensure transparency and compliance with state law, I request confirmation as to whether any communications or discussions have occurred outside a public meeting involving two or more commissioners regarding:

- My candidacy for North Miami Beach City Commission
  - My participation in city boards or advisory bodies
  - Any investigation, complaint, or discussion concerning me
  - Any actions affecting my participation in city matters
- If such communications occurred through emails, text messages, phone calls, or intermediaries, those communications may constitute public records and may also raise concerns under Florida's Sunshine Law. Accordingly, please provide any records reflecting such communications or confirm whether the City has reviewed and preserved those records. Transparency in government is essential to maintaining public trust. Sincerely,

Linda Joseph Noel  
Candidate, North Miami Beach City Commission  
Phone: 305-632-9442

# Litigation Hold and Preservation of Evidence Notice

Dear City Officials, This letter serves as a formal Litigation Hold and Preservation of Evidence Notice. I am placing the City of North Miami Beach, its elected officials, staff, and any individuals acting in coordination with the City on notice that all records, communications, and electronically stored information related to me, my candidacy, or discussions regarding my participation in city matters must be preserved immediately. I have reason to believe that communications and actions involving city officials may have occurred concerning my candidacy for public office and my participation in city affairs. The right to run for public office and participate in the political process is protected under the United States Constitution. Accordingly, all relevant parties must preserve any and all documents and communications, including but not limited to:

- Emails from government or personal accounts used for city business
- Text messages and messaging applications (SMS, WhatsApp, Signal, Telegram, or similar platforms)
- Communications stored on personal phones or personal devices used for city business
- Internal memoranda, notes, calendars, and meeting summaries
- Phone logs, call records, and voicemail
- Social media messages or communications referencing city business

• Any surveillance or security footage related to meetings or visits involving city officials This preservation obligation applies to communications involving commissioners, former commissioners, city staff, the city clerk's office, outside consultants, investigators, attorneys, or any third parties communicating with city officials regarding matters involving me. Additionally, I am aware that allegations of coordination or interference involving public officials are serious matters. If necessary, I will pursue legal remedies available under federal and state law. This includes the ability to subpoena past records, communications, and testimony related to such conduct. If conduct that interferes with my lawful participation in the electoral process continues, I will consider pursuing appropriate legal action to protect my constitutional rights and to ensure transparency in government operations. My request is simple and direct: that any behavior intended to interfere with my candidacy or participation in city affairs cease immediately, and that the City ensure full compliance with Florida's public records and open government laws. Please confirm that the City has taken steps to preserve all relevant records. Sincerely,

Linda Joseph Noel  
Candidate, North Miami Beach City Commission  
Phone: 305-632-9442