

IN THE CIRCUIT COURT OF THE NINETEENTH JUDICIAL CIRCUIT,
IN AND FOR INDIAN RIVER COUNTY, FLORIDA
CIVIL DIVISION

JOHN DOE, A/K/A
SAVEVEROBEACH@GMAIL.COM,

CASE NO: 312019CA000980XXXXXX

Plaintiff,

vs.

INDIAN RIVER COUNTY SCHOOL DISTRICT,
a government agency,

and

DR. SUSAN MOXLEY,
or her successor-in-interest, in his or her
capacity as the Superintendent of
SCHOOL DISTRICT OF INDIAN RIVER COUNTY,
and in her capacity as executive officer of
SCHOOL BOARD OF INDIAN RIVER COUNTY,

and

SCHOOL BOARD OF INDIAN RIVER COUNTY,
a government agency,

and

TIFFANY JUSTICE,
in her capacity as a member of the
SCHOOL BOARD OF INDIAN RIVER COUNTY,

Respondent(s).

COMPLAINT FOR WRIT OF MANDAMUS

Plaintiff, JOHN DOE a/k/a SAVEVEROBEACH@GMAIL.COM, an individual, files this
Complaint for Writ of Mandamus against Respondent(s), SCHOOL DISTRICT OF INDIAN
RIVER COUNTY, DR. SUSAN MOXLEY, or her successor-in-interest, in his or her capacity as

Superintendent of SCHOOL DISTRICT OF INDIAN RIVER COUNTY and in his or her capacity as executive officer of SCHOOL BOARD OF INDIAN RIVER COUNTY, and SCHOOL BOARD OF INDIAN RIVER COUNTY, and TIFFANY JUSTICE in her capacity as a member of the SCHOOL BOARD OF INDIAN RIVER COUNTY, and alleges:

PRELIMINARY STATEMENT

This is an action brought pursuant to Chapter 119 of the Florida Statutes (2019), known more commonly as the Florida Public Records Law (“Public Records Law”), which prohibits covered persons and entities from unlawfully denying access to covered public records to which requestors are statutorily and constitutionally entitled. The Respondent’s unlawful refusal to permit access to covered public records to Plaintiff for inspection gives rise to claims for violations of Florida’s Public Records Law and Art. I, §24 of the Florida Constitution. The Plaintiff seeks a writ of mandamus under Fla. R. Civ. P. §1.630, and attorney’s fees and costs as provided for under Florida law, and such other and further relief as this Court may deem appropriate.

JURISDICTION & VENUE

1. The jurisdiction of this Circuit Court arises under Fla. R. Civ. P. §1.630, Fla. Stat. §26.012 (2019), and Fla. Stat. §119.11 (2019). Venue is proper in this Circuit pursuant to Fla. Stat. §47.011 (2019), as the claims arose from Respondent’s acts perpetrated therein. Plaintiff requests that this Court expedite consideration of this cause pursuant to Fla. Stat. §119.11(1) (2019).”

ALLEGATIONS AS TO PARTIES

2. At all times material hereto, Plaintiff, John Doe a/k/a SaveVeroBeach.com (“Save Vero Beach”), is a “person” within the meaning of Fla. Stat. §119.07(1)(a) and was the requestor of the covered public records described herein. Because Respondents are not entitled to condition

access to the requested public records on ascertaining Plaintiff's identity or purpose of the requests, Plaintiff desires to maintain anonymity so as not to frustrate the purpose of the Public Records Law. ; *See generally Chandler v. City of Greenacres*, 140 So.3d 1080, 1084-85 (Fla. 4th DCA 2014); *Town of Gulf Stream v. O'Boyle*, 654 Fed. Appx. 439 (11th Cir. 2016); *Plaintiff B v. Francis*, 631 F.3d 1310 (11th Cir. 2011). Plaintiff is not an employee, agent, shareholder, or affiliate of the undersigned law firm and Plaintiff made the public records requests identified herein on Plaintiff's own volition and at Plaintiff's sole discretion.

3. At all times material hereto, the School District of Indian River County ("IRC School District") was a constitutionally created "agency" of the State of Florida as said term is defined under Fla. Stat. §119.011(2). *See* Art. IX, Sec. 4, Fla. Const. The IRC School District is located at 6500 57th Street, Vero Beach, Florida 32967. Art. I, Sec. 24(a), Fla. Const., specifically includes each entity created pursuant to law of the Constitution.

4. At all times material hereto, Dr. Susan Moxley, or her successor-in-interest, ("Moxley") was and is the IRC School District Superintendent acting on behalf of the IRC School District and a "public officer" within the meaning of Art. I, Sec. 24, Fla. Const. and Fla. Stat. §119.011(2) (2019). *See* Art. IX, Sec. 5, Fla. Const.; *See also Locke v. Hawke*, 595 So.2d 32, 37 (Fla. 1992), holding that the definition of agency in §119.011 was intended to apply to local governmental entities and their officers; thereby making them subject to the Public Records Law. At all times material hereto, Moxley is and was the executive officer of the IRC School Board and advises and counsels the IRC School Board on all educational matters and recommends to the board such matters as should be acted upon.

5. At all times material hereto, the School Board of Indian River County ("IRC School Board") was a statutorily and constitutionally created "agency" of the State of Florida as said term

is defined under Fla. Stat. §119.011(2). *See* Art. IX, Sec. 4, Fla. Const. Art. I, Sec. 24(a), Fla. Const., specifically includes each entity created pursuant to law of the Constitution. The IRC School Board is located at 6500 57th Street, Vero Beach, Florida 32967. The IRC School Board exercises powers for the benefit of the IRC School District. The IRC School Board is responsible for the organization and control of the public schools of the IRC School District and is empowered to determine the policies necessary for the effective operation and the general improvement of the school system. The IRC School Board exercises its limited executive power through Moxley, or her successor-in-interest.

6. At all times material hereto, Respondent Tiffany Justice (“Justice”) was and is an IRC School Board elected board member acting on behalf of the IRC School Board for the benefit of the IRC School District and she is a “public officer” within the meaning of Art. I, Sec. 24(a), Fla. Const. and Fla. Stat. §119.011(2) (2019). *See Locke v. Hawke*, 595 So.2d 32, 37 (Fla. 1992), holding that the definition of agency in §119.011 was intended to apply to local governmental entities and their officers; thereby making them subject to the Public Records Law.

FACTUAL ALLEGATIONS COMMON TO ALL COUNTS

7. At all times material hereto, Brenda Davis (“Davis”) was and is an employee of IRC School District in the office of the Superintendent and is the designated “custodian of the requested public records” as said term is defined under Fla. Stat. §119.011(5) and *Mintus v. City of West Palm Beach*, 711 So.2d 1359 (Fla. 4th DCA 1998).

8. Davis has previously authorized Plaintiff to make public records requests directly to Justice, and Justice has previously forwarded those requests to Davis for fulfillment, and to the extent the requested records are in Justice’s custody, Justice has a duty to acknowledge Plaintiff’s requests for those public documents and to promptly respond to such requests in good faith. *See*

Fla. Stat. §119.01(1) (2019); Board of Trustees, Jacksonville Police & Fire Pension Fund v. Lee, 189 So.3d 120, 128 (Fla. 2016).

9. At all times and in all respects relevant to this complaint, Moxley or her successor-in-interest, and his or her subordinate employees, and attorneys, have been acting on behalf of the IRC School District in her official capacity as Superintendent and on behalf of the IRC School Board in her capacity as its executive officer.

10. At all times and in all respects relevant to this complaint, Justice, her subordinate employees, and attorneys, have been acting on behalf of the IRC School Board in her official capacity as a school board member and for the benefit of the IRC School District.

11. At all times and in all respects relevant to this complaint, Justice used an IRC School District-purchased and Superintendent-issued cellular phone, electronic mail account and social media account, as described in the IRC School Board bylaws.

12. Upon information and belief, Justice's agency-issued cellular phone is an iPhone and is therefore automatically linked to an iCloud account that backs up all data and communications made or received on the device.

13. According to the IRC School Board Bylaw 0167.1, all written communications sent or received using IRC School District-issued electronic mail account or any other social media, including but not limited to webmail, text messages, instant messages, websites, software and internet-based applications that facilitates communication and networking between individuals or groups is subject to disclosure under the Public Records Act absent an applicable exemption.

14. According to the IRC School Board Bylaw 0123(L), at all times and in all respects relevant to this complaint, Justice was prohibited from using her board member position for personal or political gain.

15. As described below, Plaintiff made numerous public records requests to Justice on November 12, 2019 and November 13, 2019 related to her use of the agency-issued cellular device, electronic mail account and social media accounts. Despite receiving all of Plaintiff's requests, Justice initially only forwarded one of requests to Davis. Davis acknowledged receipt of the same to Plaintiff on November 13, 2019.

16. All conditions precedent to the bringing of this action have occurred, and Plaintiff is entitled to the peremptory writ of mandamus sought herein.

COUNT I
(Justice/Flowers Phone and Message Logs)

17. This is an action for mandamus for violation of Florida Statutes §119.07, known more commonly as the Florida Public Records Law (the "Public Records Law") brought herein pursuant to the jurisdiction of the Court.

18. Plaintiff realleges and reaffirms the allegations contained in Paragraphs 1 through 16 above as if set forth hereat in full.

19. On November 12, 2019, Plaintiff, John Doe, a/k/a SaveVeroBeach@gmail.com requested from Respondent Justice a copy of the phone and text message logs for communications between Justice and Eric Flowers ("Flowers") for February 2019 ("PRR 75751"), December 2018 ("PRR 75752"), March 2019 ("PRR 75753"), April 2019 ("PRR 75754"), May 2019 ("PRR 75755"), June 2019 ("PRR 75756"), July 2019 ("PRR 75757"), August 2019 ("PRR 75759"), September 2019 ("PRR 75760"), and October 2019 ("PRR 75761"). [Exhibit A].

20. At all times material hereto, the record requested in PRR 75751, PRR 75752, PRR 75753, PRR 75754, PRR 75755, PRR 75756, PRR 75757, PRR 75759, PRR 75760, and PRR 75761 was a “public record” as that term is defined under Fla. Stat. § 119.011(12) and Art. I, Sec. 24(a), Fla. Const. because any phone or text message between Justice and Flowers was made or received by Justice on her agency-issued cellular phone in the course of performing her duties as an IRC School Board member.

21. Having received no acknowledgment or response to PRR 75751, PRR 75752, PRR 75753, PRR 75754, PRR 75755, PRR 75756, PRR 75757, PRR 75759, PRR 75760, or PRR 75761, Plaintiff gave notice of intent to file a civil enforcement action to Davis on November 22, 2019 at 2:48 p.m. pursuant to Fla. Stat. §119.12(1)(b). [Exhibit E].

22. Thereafter, Justice forwarded PRR 75751, PRR 75752, PRR 75753, PRR 75754, PRR 75755, PRR 75756, PRR 75757, PRR 75759, PRR 75760, and PRR 75761 to Davis on November 22, 2019 at 4:27 p.m., and Davis acknowledged receipt of the same to Plaintiff. [Exhibit A].

23. As of the date of this action, Respondents have failed or refused to provide any further response to PRR 75751, PRR 75752, PRR 75753, PRR 75754, PRR 75755, PRR 75756, PRR 75757, PRR 75759, PRR 75760, or PRR 75761 and has failed to provide Plaintiff access to the requested public records.

24. By virtue of the acts described above, the Respondents have violated and continue to violate the Public Records Law provisions found in Fla. Stat. § 119.07 (2019), by unlawfully preventing or denying Plaintiff access to the requested records.

25. Plaintiff has no other adequate remedy to compel the Respondents to perform their duty to furnish access to the requested records.

26. Plaintiff has stated a prima facie case for the relief requested is therefore entitled to the issuance of a Writ of Mandamus pursuant to Fla. R. Civ. P. §1.630 and Fla. Stat. §119.11 (2019) requiring the Respondents to produce the requested records or to show cause why the records should not be produced.

27. Plaintiff reasonably and properly invoked the statutory duty of Respondents to furnish a copy of the requested records under Fla. Stat. §119.07(1)(a).

28. Plaintiff has retained the undersigned law office to represent his or her interest herein and is obligated to pay said law office a reasonable fee for its services.

WHEREFORE, Plaintiff asks this Court to:

a. Grant this matter expedited consideration pursuant to Fla. Stat. §119.11(1) (2019).

b. Issue its alternative writ of mandamus directed to Respondents, compelling the Respondents to:

- i. produce copies of or access to the requested records to Plaintiff; or
- ii. in the alternative, to show cause to this Court why the Respondents should not do so.

c. Award Plaintiff its reasonable attorneys' fees and costs of enforcement as provided by sec. 119.12(1); and

d. Grant such other relief as may be proper.

COUNT II
(Justice/Zudans Phone and Message Logs)

29. This is an action for mandamus for violation of Florida Statutes §119.07, known more commonly as the Florida Public Records Law (the "Public Records Law") brought herein pursuant to the jurisdiction of the Court.

30. Plaintiff realleges and reaffirms the allegations contained in Paragraphs 1 through 16 above as if set forth hereat in full.

31. On November 12, 2019, Plaintiff, John Doe, a/k/a SaveVeroBeach@gmail.com requested that Respondent Justice furnish Plaintiff with a copy of the phone and text message logs for communications between Justice and Val Zudans (“Zudans”) for December 2018 (“PRR 75769”), January 2019 (“PRR 75770”), February 2019 (“PRR 75771”), March 2019 (“PRR 75773”), April 2019 (“PRR 75774”), May 2019 (“PRR 75775”), June 2019 (“PRR 75776”), July 2019 (“PRR 75777”), August 2019 (“PRR 75778”), September 2019 (“PRR 75779”), and October 2019 (“PRR 75780”). [Exhibit B].

31. At all times material hereto, the record requested in PRR 75769, PRR 75770, PRR 75771, PRR 75773, PRR 75774, PRR 75775, PRR 75776, PRR 75777, PRR 75778, PRR 75779, and PRR 75780 was a “public record” as that term is defined under Fla. Stat. § 119.011(12) and Art. I, Sec. 24(a), Fla. Const. because any phone or text message between Justice and Zudans was made or received by Justice on her agency-issued cellular phone in the course of performing her duties as an IRC School Board member.

33. Having received no acknowledgment or response to PRR 75769, PRR 75770, PRR 75771, PRR 75773, PRR 75774, PRR 75775, PRR 75776, PRR 75777, PRR 75778, PRR 75779, and PRR 75780, Plaintiff gave a first notice of intent to file a civil enforcement action to Justice on November 15, 2019 pursuant to Fla. Stat. § 119.12(1)(b). [Exhibit B].

13. Having received no acknowledgment or response to PRR 75769, PRR 75770, PRR 75771, PRR 75773, PRR 75774, PRR 75775, PRR 75776, PRR 75777, PRR 75778, PRR 75779, and PRR 75780, Plaintiff gave notice of intent to file a civil enforcement action to Davis on November 22, 2019 at 2:48 p.m. pursuant to Fla. Stat. § 119.12(1)(b). [Exhibit E].

14. Thereafter, Justice forwarded PRR 75769, PRR 75770, PRR 75771, PRR 75773, PRR 75774, PRR 75775, PRR 75776, PRR 75777, PRR 75778, PRR 75779, and PRR 75780 to Davis on November 22, 2019 at 4:27 p.m., and Davis acknowledged receipt of the same to Plaintiff. [Exhibit B].

16. As of the date of this action, Respondents have failed or refused to provide any further response to PRR 75769, PRR 75770, PRR 75771, PRR 75773, PRR 75774, PRR 75775, PRR 75776, PRR 75777, PRR 75778, PRR 75779, and PRR 75780 and have failed to provide Plaintiff access to the requested public records.

17. By virtue of the acts described above, the Respondents have violated and continue to violate the Public Records Law provisions found in Fla. Stat. § 119.07 (2019), by unlawfully preventing or denying Plaintiff access to the requested records.

18. Plaintiff has no other adequate remedy to compel the Respondents to perform their duty to furnish access to the requested records.

19. Plaintiff has stated a prima facie case for the relief requested is therefore entitled to the issuance of a Writ of Mandamus pursuant to Fla. R. Civ. P. §1.630 and Fla. Stat. §119.11 (2019) requiring the Respondents to produce the requested records or to show cause why the records should not be produced.

20. Plaintiff reasonably and properly invoked the statutory duty of the Respondents to furnish a copy of the requested records under Fla. Stat. §119.07(1)(a).

21. Plaintiff has retained the undersigned law office to represent his or her interest herein and is obligated to pay said law office a reasonable fee for its services.

WHEREFORE, Plaintiff asks this Court to:

- a. Grant this matter expedited consideration pursuant to Fla. Stat. §119.11(1) (2019).
- b. Issue its alternative writ of mandamus directed to Respondents to:
 - i. produce copies of or access to the requested records to Plaintiff; or
 - ii. in the alternative, to show cause to this Court why the Respondents should not do so.
- c. Award Plaintiff its reasonable attorneys' fees and costs of enforcement as provided by sec. 119.12(1); and
- d. Grant such other relief as may be proper.

COUNT III
(Agency-Issued Cellular Phone iCloud Account)

22. This is an action for mandamus for violation of Florida Statutes §119.07, known more commonly as the Florida Public Records Law (the “Public Records Law”) brought herein pursuant to the jurisdiction of the Court.

23. Plaintiff realleges and reaffirms the allegations contained in Paragraphs 1 through 16 above as if set forth hereat in full.

24. On November 12, 2019, Plaintiff, John Doe, a/k/a SaveVeroBeach@gmail.com requested Respondent Justice furnish Plaintiff with the manufacturer and model number of Justice’s agency-issued cellular phone (PRR 75762), and the contents of Justice’s iCloud account connected to Justice’s agency-issued phone in 2019, including photographs (“PRR 75762-1”), iMessages (“PRR 75763”), notes (“PRR 75764”), deleted messages (“PRR 75765”), contacts list as of November 11, 2019 (“PRR 75766”), emails deleted between January 1, 2019 and November 11, 2019 (“PRR 75767”), and list of linked accounts (“PRR 75768”). [Exhibit C].

25. At all times material hereto, the record requested in PRR 75762, PRR 75762-1, PRR 75763, PRR 75764, PRR 75765, PRR 75766, PRR 75767, and PRR 75768 was a “public record” as that term is defined under Fla. Stat. § 119.011(12) and Art. I, Sec. 24(a), Fla. Const. because any material in the iCloud account and any deleted email was made or received by Justice on her agency-issued cellular phone or using her agency email account or social media account in the course of performing her duties as an IRC School Board member.

26. Justice forwarded PRR 75762-1 to Davis on November 12, 2019, and Davis acknowledged receipt of the same to Plaintiff on November 13, 2019. [Exhibit C].

27. Having received no acknowledgment or response to PRR 75762, PRR 75763, PRR 75764, PRR 75765, PRR 75766, PRR 75767, and PRR 75768, Plaintiff gave a first notice of intent to file a civil enforcement action to Justice on November 15, 2019 pursuant to Fla. Stat. §119.12(1)(b). [Exhibit B].

28. Having received no acknowledgment or response to PRR 75762, PRR 75763, PRR 75764, PRR 75765, PRR 75766, PRR 75767, and PRR 75768, Plaintiff gave notice of intent to file a civil enforcement action to Davis on November 22, 2019 at 2:48 p.m. pursuant to Fla. Stat. §119.12(1)(b). [Exhibit E].

28. Thereafter, Justice forwarded PRR 75762, PRR 75763, PRR 75764, PRR 75765, PRR 75766, PRR 75767, and PRR 75768 to Davis on November 22, 2019 at 4:27 p.m., and Davis acknowledged receipt of the same to Plaintiff, except for PRR 75762, which has never been acknowledged. [Exhibit C].

29. Davis elected to fulfill PRR 75766 on December 2, 2019.

30. As of the date of this action, Respondents have failed or refused to provide any further response to PRR 75762, PRR 75763, PRR 75764, PRR 75765, PRR 75767, and PRR 75768 and has failed to furnish access to the requested public records.

31. By virtue of the acts described above, the Respondents have violated and continue to violate the Public Records Law provisions found in Fla. Stat. § 119.07 (2019), by unlawfully preventing or denying Plaintiff access to the requested records.

32. Plaintiff has no other adequate remedy to compel the Respondents to perform their duty to furnish access to the requested records.

33. Plaintiff has stated a prima facie case for the relief requested is therefore entitled to the issuance of a Writ of Mandamus pursuant to Fla. R. Civ. P. §1.630 and Fla. Stat. §119.11 (2019) requiring the Respondents to produce the requested records or to show cause why the records should not be produced.

34. Plaintiff reasonably and properly invoked the statutory duty of Respondents to furnish a copy of the requested record under Fla. Stat. §119.07(1)(a).

35. Plaintiff has retained the undersigned law office to represent his or her interest herein and is obligated to pay said law office a reasonable fee for its services.

WHEREFORE, Plaintiff asks this Court to:

- a. Grant this matter expedited consideration pursuant to Fla. Stat. §119.11(1) (2019).
- b. Issue its alternative writ of mandamus directed to Respondents to:
 - i. produce copies of or access to the requested records to Plaintiff; or
 - ii. in the alternative, to show cause to this Court why the Respondents should not do so.

c. Award Plaintiff its reasonable attorneys' fees and costs of enforcement as provided by sec. 119.12(1); and

d. Grant such other relief as may be proper.

COUNT IV
(Email Exchange Administrator Logs for Justice Account Changes)

36. This is an action for mandamus for violation of Florida Statutes §119.07, known more commonly as the Florida Public Records Law (the “Public Records Law”) brought herein pursuant to the jurisdiction of the Court.

37. Plaintiff realleges and reaffirms the allegations contained in Paragraphs 1 through 16 above as if set forth hereat in full.

37. On November 13, 2019, Plaintiff, John Doe, a/k/a SaveVeroBeach@gmail.com requested Respondent Justice furnish Plaintiff with a copy of the email exchange server administrator logs for each occurrence in 2019 that an employee accessed Justice’s email account and made a change to it (“PRR 75781”). [Exhibit D].

38. At all times material hereto, the request contained in PRR 75781 was a “public record” as that term is defined under Fla. Stat. § 119.011(12) and Art. I, Sec. 24(a), Fla. Const. because any written electronic mail communication were made or received by Justice on her agency-issued cellular phone, her agency-issued electronic mail account, or her agency-issued social media account in the course of performing her duties as an IRC School District school board member and any changes to Justice’s electronic mail account made by agency employees are made in the course of the employee’s performance of his or her agency duties.

39. Having received no acknowledgment or response to PRR 75781, Plaintiff gave a first notice of intent to file a civil enforcement action to Justice on November 15, 2019 pursuant to Fla. Stat. §119.12(1)(b). [Exhibit D].

40. Having received no acknowledgment or response to PRR 75781, Plaintiff gave notice of intent to file a civil enforcement action to Davis on November 22, 2019 at 2:48 p.m. pursuant to Fla. Stat. §119.12(1)(b). [Exhibit E].

41. Thereafter, Justice forwarded PRR 75781 to Davis on November 22, 2019 at 4:27 p.m., and Davis acknowledged receipt of the same to Plaintiff. [Exhibit D].

42. On November 22, 2019 at 4:32 p.m., Davis notified Plaintiff that PRR 75781 was a duplicate request and would not be processed. [Exhibit D].

43. Plaintiff denied that it was a duplicate request on November 22, 2019 at 5:26 p.m. and again notified Davis of intent to file a civil enforcement action [Exhibit D].

44. As of the date of this action, Respondents have failed or refused to provide any further response to PRR 75781 and have failed to furnish access to the requested public record.

45. By virtue of the acts described above, the Respondents have violated and continue to violate the Public Records Law provisions found in Fla. Stat. § 119.07 (2019), by unlawfully preventing or denying Plaintiff access to the requested records.

46. Plaintiff has no other adequate remedy to compel the Respondents to perform their duty to furnish access to the requested records.

47. Plaintiff has stated a prima facie case for the relief requested is therefore entitled to the issuance of a Writ of Mandamus pursuant to Fla. R. Civ. P. §1.630 and Fla. Stat. §119.11 (2019) requiring the Respondents to produce the requested records or to show cause why the records should not be produced.

48. Plaintiff reasonably and properly invoked the statutory duty of Respondents to furnish a copy of the requested record under Fla. Stat. §119.07(1)(a).

49. Plaintiff has retained the undersigned law office to represent his or her interest herein and is obligated to pay said law office a reasonable fee for its services.

WHEREFORE, Plaintiff asks this Court to:

- a. Grant this matter expedited consideration pursuant to Fla. Stat. §119.11(1) (2019).
- b. Issue its alternative writ of mandamus directed to Respondents to:
 - i. produce copies of or access to the requested records to Plaintiff; or
 - ii. in the alternative, to show cause to this Court why the Respondents should not do so.
- c. Award Plaintiff its reasonable attorneys' fees and costs of enforcement as provided by sec. 119.12(1); and
- d. Grant such other relief as may be proper.

COUNT V

(Identify Person Authorized to Accept Service of Civil Enforcement Action)

50. This is an action for mandamus for violation of Florida Statutes §119.07, known more commonly as the Florida Public Records Law (the “Public Records Law”) brought herein pursuant to the jurisdiction of the Court.

51. Plaintiff realleges and reaffirms the allegations contained in Paragraphs 1 through 16 above as if set forth hereat in full.

52. On November 25, 2019, Plaintiff, John Doe, a/k/a SaveVeroBeach@gmail.com requested Davis furnish Plaintiff with the name and address of the IRC School District staff member, employee, representative or other person to whom Plaintiff should serve in any civil enforcement action (“Service of Civil Action PRR”). [Exhibit E].

53. At all times material hereto, the material requested in the Service of Civil Action PRR was a “public record” as that term is defined under Fla. Stat. § 119.011(12) and Art. I, Sec. 24(a), Fla. Const.

54. Having received no acknowledgment or response to Service of Civil Action PRR, Plaintiff inquired to Davis whether she intended to acknowledge or fulfill the request on November 25, 2019. [Exhibit E].

55. Having received no acknowledgment or response to the Service of Civil Action PRR or to the November 25, 2019 inquiry, Plaintiff gave notice of intent to file a civil enforcement action to Davis on November 28, 2019 at 2:48 p.m. pursuant to Fla. Stat. §119.12(1)(b). [Exhibit E].

56. As of the date of this action, Respondents have failed or refused to provide any further response to the Service of Civil Action PRR and have failed to furnish access to the requested public record.

57. By virtue of the acts described above, the Respondents have violated and continue to violate the Public Records Law provisions found in Fla. Stat. § 119.07 (2019), by unlawfully preventing or denying Plaintiff access to the requested records.

58. Plaintiff has no other adequate remedy to compel the Respondents to perform their duty to furnish access to the requested records.

59. Plaintiff has stated a prima facie case for the relief requested is therefore entitled to the issuance of a Writ of Mandamus pursuant to Fla. R. Civ. P. §1.630 and Fla. Stat. §119.11 (2019) requiring the Respondents to produce the requested records or to show cause why the records should not be produced.

60. Plaintiff reasonably and properly invoked the statutory duty of Respondents to furnish a copy of the requested record under Fla. Stat. §119.07(1)(a).

61. Plaintiff has retained the undersigned law office to represent his or her interest herein and is obligated to pay said law office a reasonable fee for its services.

WHEREFORE, Plaintiff asks this Court to:

a. Grant this matter expedited consideration pursuant to Fla. Stat. §119.11(1) (2019).

b. Issue its alternative writ of mandamus directed to Respondents to:

- i. produce copies of or access to the requested records to Plaintiff; or
- ii. in the alternative, to show cause to this Court why the Respondents should not do so.

c. Award Plaintiff its reasonable attorneys' fees and costs of enforcement as provided by sec. 119.12(1); and

d. Grant such other relief as may be proper.

Dated this December 16, 2019

LegalNinja, LLC

/s/ Catherine J. Jones
CATHERINE J. JONES
Florida Bar No.: 0709271
5575 U.S. Highway 1
Rockledge, Florida 32955
(321) 888-2280 Telephone
(321) 400-1192 Facsimile
Email: jones@mylegalninja.com

Counsel for Plaintiff

EXHIBIT "A"



Save Vero Beach <saveverobeach@gmail.com>

PRR 75751

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:37 PM

We would like to see the phone and text message logs between you and Eric Flowers for Feb 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:06 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75751

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75752

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:37 PM

We would like to see the phone and text message logs between you and Eric Flowers for Dec 2018

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:06 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75752

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75753

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:37 PM

We would like to see the phone and text message logs between you and Eric Flowers for March 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:05 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75753

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75754

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:38 PM

We would like to see the phone and text message logs between you and Eric Flowers for April 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:05 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75754

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75755

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:38 PM

We would like to see the phone and text message logs between you and Eric Flowers for May 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:05 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75755

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75756

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:39 PM

We would like to see the phone and text message logs between you and Eric Flowers for June 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:04 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75756

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75757

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:39 PM

We would like to see the phone and text message logs between you and Eric Flowers for July 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:04 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75757

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75759

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:41 PM

We would like to see the phone and text message logs between you and Eric Flowers for August 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:03 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75759

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75760

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:42 PM

We would like to see the phone and text message logs between you and Eric Flowers for September 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:02 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75760

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75761

2 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 5:42 PM

We would like to see the phone and text message logs between you and Eric Flowers for Oct 2019

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 5:01 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75761

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.

EXHIBIT "B"



Save Vero Beach <saveverobeach@gmail.com>

PRR 75769

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:50 AM

We would like to see any and all text and voice logs between you and Val Zudans for Dec 2018

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:38 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:41 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75769

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75770

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:50 AM

We would like to see any and all text and voice logs between you and Val Zudans for Jan 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:38 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:39 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75770

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75771

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:50 AM

We would like to see any and all text and voice logs between you and Val Zudans for Feb 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:39 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:38 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75771

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75773

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:51 AM

We would like to see any and all text and voice logs between you and Val Zudans for March 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:40 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:38 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75773

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75774

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:52 AM

We would like to see any and all text and voice logs between you and Val Zudans for April 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:40 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:36 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75774

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75775

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:52 AM

We would like to see any and all text and voice logs between you and Val Zudans for May 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:41 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:36 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75775

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75776

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:52 AM

We would like to see any and all text and voice logs between you and Val Zudans for June 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:42 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:35 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75776

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75777

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:52 AM

We would like to see any and all text and voice logs between you and Val Zudans for July 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:42 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:35 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75777

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75778

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:53 AM

We would like to see any and all text and voice logs between you and Val Zudans for Aug 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:43 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:34 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75778

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75779

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:53 AM

We would like to see any and all text and voice logs between you and Val Zudans for Sept 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:43 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:34 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75779

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75780

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:54 AM

We would like to see any and all text and voice logs between you and Val Zudans for October 2019

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:43 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:33 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75780

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.

EXHIBIT "C"



Save Vero Beach <saveverobeach@gmail.com>

PRR 75762

1 message

Save Vero Beach <saveverobeach@gmail.com>

Tue, Nov 12, 2019 at 8:11 PM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

We would like to know the manufacturer name and model of cell phone that as been assigned to by the school district for 2018 and 2019



Save Vero Beach <saveverobeach@gmail.com>

PRR 75762

2 messages

Save Vero Beach <saveverobeach@gmail.com>

Tue, Nov 12, 2019 at 8:19 PM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

We would like to see the photos that are on the icloud from the phone provided by the school district that you use in 2019.

Please note these are public records and we are aware of the existence of these public records.

Davis, Brenda <Brenda.Davis@indianriverschools.org>

Wed, Nov 13, 2019 at 4:33 PM

To: Save Vero Beach <saveverobeach@gmail.com>

I'm in receipt of your public records request and have contacted the appropriate staff. I will let you know, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany [mailto:Tiffany.Justice@indianriverschools.org]**Sent:** Tuesday, November 12, 2019 8:21 PM**Subject:** [EXTERNAL] FW: PRR 75762

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential

12/16/2019

Gmail - PRR 75762

information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75763

3 messages

Save Vero Beach <saveverobeach@gmail.com>

Tue, Nov 12, 2019 at 8:20 PM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

We would like to see a list of imessage conversations you have had from the phone provided by the school district that you use in 2019. This can be obtained from the icloud account associated with the phone.

Please note these are public records and we are aware of the existence of these public records.

Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 15, 2019 at 7:31 AM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.

Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>

Fri, Nov 22, 2019 at 4:44 PM

To: Save Vero Beach <saveverobeach@gmail.com>

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75763

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75764

3 messages

Save Vero Beach <saveverobeach@gmail.com>

Tue, Nov 12, 2019 at 8:21 PM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

We would like to see the notes that are on the icloud from the phone provided by the school district that you use in 2019.

Please note these are public records and we are aware of the existence of these public records.

Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 15, 2019 at 7:32 AM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.

Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>

Fri, Nov 22, 2019 at 4:44 PM

To: Save Vero Beach <saveverobeach@gmail.com>

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75764

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75765

3 messages

Save Vero Beach <saveverobeach@gmail.com>

Tue, Nov 12, 2019 at 8:23 PM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

We would like to see a list of the deleted imessages from the phone provided by the school district that you use in 2019.

Please note these are public records and we are aware of the existence of these public records.

Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 15, 2019 at 7:32 AM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.

Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>

Fri, Nov 22, 2019 at 4:43 PM

To: Save Vero Beach <saveverobeach@gmail.com>

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75765

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75766

5 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 8:25 PM

We would like to see the contact list as of 11/11/19 from your school district supplied cell phone.

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:32 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:43 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75766

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Mon, Dec 2, 2019 at 4:23 PM

Attached are the records responsive to this request. This completes your request and there is no charge.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org

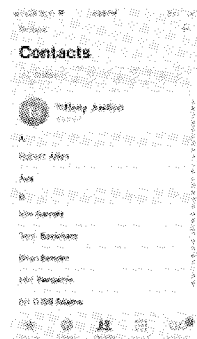


Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

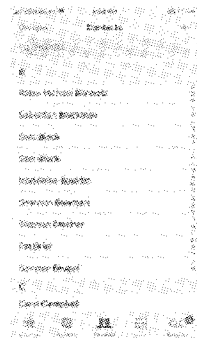
Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

[Quoted text hidden]

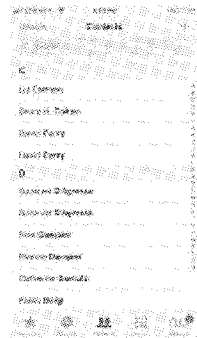
17 attachments



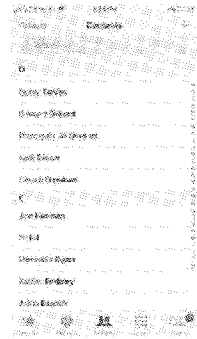
0602826d0a1e23250b62f2ffe9aae2f509730bcc-14.jpg
36K



0602826d0a1e23250b62f2ffe9aae2f509730bcc-24.jpg
29K

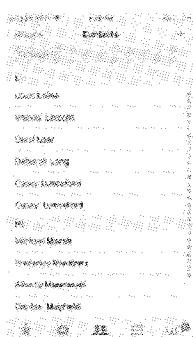


0602826d0a1e23250b62f2ffe9aae2f509730bcc-34.jpg
29K

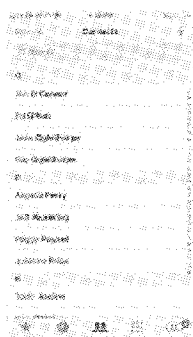
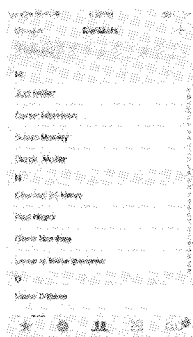
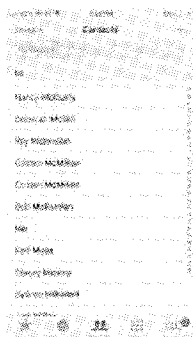


0602826d0a1e23250b62f2ffe9aae2f509730bcc-44.jpg
36K

0602826d0a1e23250b62f2ffe9aae2f509730bcc-54.jpg
37K



0602826d0a1e23250b62f2ffe9aae2f509730bcc-104.jpg
28K



1. **Einleitung**
 2. **Ziele und Zwecksetzung**
 3. **Methoden und Vorgehensweise**
 4. **Ergebnisse und Diskussion**
 5. **Fazit und Ausblick**
 6. **Dank**
 7. **Literaturverzeichnis**
 8. **Anhang**
 9. **Index**
 10. **Abbildung**
 11. **Tabelle**
 12. **Formel**
 13. **Diagramm**
 14. **Skizze**
 15. **Zeichnung**
 16. **Bild**
 17. **Abbildung**
 18. **Tabelle**
 19. **Formel**
 20. **Diagramm**
 21. **Skizze**
 22. **Zeichnung**
 23. **Bild**
 24. **Abbildung**
 25. **Tabelle**
 26. **Formel**
 27. **Diagramm**
 28. **Skizze**
 29. **Zeichnung**
 30. **Bild**
 31. **Abbildung**
 32. **Tabelle**
 33. **Formel**
 34. **Diagramm**
 35. **Skizze**
 36. **Zeichnung**
 37. **Bild**
 38. **Abbildung**
 39. **Tabelle**
 40. **Formel**
 41. **Diagramm**
 42. **Skizze**
 43. **Zeichnung**
 44. **Bild**
 45. **Abbildung**
 46. **Tabelle**
 47. **Formel**
 48. **Diagramm**
 49. **Skizze**
 50. **Zeichnung**
 51. **Bild**
 52. **Abbildung**
 53. **Tabelle**
 54. **Formel**
 55. **Diagramm**
 56. **Skizze**
 57. **Zeichnung**
 58. **Bild**
 59. **Abbildung**
 60. **Tabelle**
 61. **Formel**
 62. **Diagramm**
 63. **Skizze**
 64. **Zeichnung**
 65. **Bild**
 66. **Abbildung**
 67. **Tabelle**
 68. **Formel**
 69. **Diagramm**
 70. **Skizze**
 71. **Zeichnung**
 72. **Bild**
 73. **Abbildung**
 74. **Tabelle**
 75. **Formel**
 76. **Diagramm**
 77. **Skizze**
 78. **Zeichnung**
 79. **Bild**
 80. **Abbildung**
 81. **Tabelle**
 82. **Formel**
 83. **Diagramm**
 84. **Skizze**
 85. **Zeichnung**
 86. **Bild**
 87. **Abbildung**
 88. **Tabelle**
 89. **Formel**
 90. **Diagramm**
 91. **Skizze**
 92. **Zeichnung**
 93. **Bild**
 94. **Abbildung**
 95. **Tabelle**
 96. **Formel**
 97. **Diagramm**
 98. **Skizze**
 99. **Zeichnung**
 100. **Bild**
 101. **Abbildung**
 102. **Tabelle**
 103. **Formel**
 104. **Diagramm**
 105. **Skizze**
 106. **Zeichnung**
 107. **Bild**
 108. **Abbildung**
 109. **Tabelle**
 110. **Formel**
 111. **Diagramm**
 112. **Skizze**
 113. **Zeichnung**
 114. **Bild**
 115. **Abbildung**
 116. **Tabelle**
 117. **Formel**
 118. **Diagramm**
 119. **Skizze**
 120. **Zeichnung**
 121. **Bild**
 122. **Abbildung**
 123. **Tabelle**
 124. **Formel**
 125. **Diagramm**
 126. **Skizze**
 127. **Zeichnung**
 128. **Bild**
 129. **Abbildung**
 130. **Tabelle**
 131. **Formel**
 132. **Diagramm**
 133. **Skizze**
 134. **Zeichnung**
 135. **Bild**
 136. **Abbildung**
 137. **Tabelle**
 138. **Formel**
 139. **Diagramm**
 140. **Skizze**
 141. **Zeichnung**
 142. **Bild**
 143. **Abbildung**
 144. **Tabelle**
 145. **Formel**
 146. **Diagramm**
 147. **Skizze**
 148. **Zeichnung**
 149. **Bild**
 150. **Abbildung**
 151. **Tabelle**
 152. **Formel**
 153. **Diagramm**
 154. **Skizze**
 155. **Zeichnung**
 156. **Bild**
 157. **Abbildung**
 158. **Tabelle**
 159. **Formel**
 160. **Diagramm**
 161. **Skizze**
 162. **Zeichnung**
 163. **Bild**
 164. **Abbildung**
 165. **Tabelle**
 166. **Formel**
 167. **Diagramm**
 168. **Skizze**
 169. **Zeichnung**
 170. **Bild**
 171. **Abbildung**
 172. **Tabelle**
 173. **Formel**
 174. **Diagramm**
 175. **Skizze**
 176. **Zeichnung**
 177. **Bild**
 178. **Abbildung**
 179. **Tabelle**
 180. **Formel**
 181. **Diagramm**
 182. **Skizze**
 183. **Zeichnung**
 184. **Bild**
 185. **Abbildung**
 186. **Tabelle**
 187. **Formel**
 188. **Diagramm**
 189. **Skizze**
 190. **Zeichnung**
 191. **Bild**
 192. **Abbildung**
 193. **Tabelle**
 194. **Formel**
 195. **Diagramm**
 196. **Skizze**
 197. **Zeichnung**
 198. **Bild**
 199. **Abbildung**
 200. **Tabelle**
 201. **Formel**
 202. **Diagramm**
 203. **Skizze**
 204. **Zeichnung**
 205. **Bild**
 206. **Abbildung**
 207. **Tabelle**
 208. **Formel**
 209. **Diagramm**
 210. **Skizze**
 211. **Zeichnung**
 212. **Bild**
 213. **Abbildung**
 214. **Tabelle**
 215. **Formel**
 216. **Diagramm**
 217. **Skizze**
 218. **Zeichnung**
 219. **Bild**
 220. **Abbildung**
 221. **Tabelle**
 222. **Formel**
 223. **Diagramm**
 224. **Skizze**
 225. **Zeichnung**
 226. **Bild**
 227. **Abbildung**
 228. **Tabelle**
 229. **Formel**
 230. **Diagramm**
 231. **Skizze**
 232. **Zeichnung**
 233. **Bild**
 234. **Abbildung**
 235. **Tabelle**
 236. **Formel**
 237. **Diagramm**
 238. **Skizze**
 239. **Zeichnung**
 240. **Bild**
 241. **Abbildung**
 242. **Tabelle**
 243. **Formel**
 244. **Diagramm**
 245. **Skizze**
 246. **Zeichnung**
 247. <


0602826d0a1e23250b62f2ffe9aae2f509730bcc-124.jpg
36K

0602826d0a1e23250b62f2ffe9aae2f509730bcc-174.jpg
34K


Mon, Dec 2, 2019 at 5:28 PM

<https://mail.google.com/mail/u/0?ik=8039b7cb23&view=pt&search=all&permthid=thread-a%3Ar-2341352516227006734&simpl=msg-a%3Ar-15116890...> 5/8

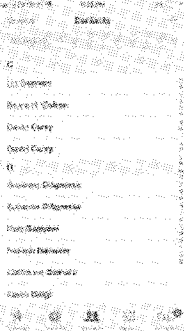
17 attachments




0602826d0a1e23250b62f2ffe9aae2f509730bcc-14.jpg
36K




0602826d0a1e23250b62f2ffe9aae2f509730bcc-24.jpg
29K




0602826d0a1e23250b62f2ffe9aae2f509730bcc-34.jpg
29K



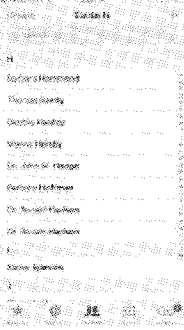
0602826d0a1e23250b62f2ffe9aae2f509730bcc-44.jpg
36K




0602826d0a1e23250b62f2ffe9aae2f509730bcc-54.jpg
37K



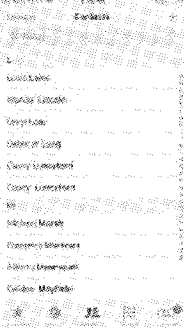
0602826d0a1e23250b62f2ffe9aae2f509730bcc-64.jpg
34K



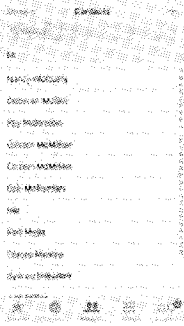
0602826d0a1e23250b62f2ffe9aae2f509730bcc-74.jpg
28K



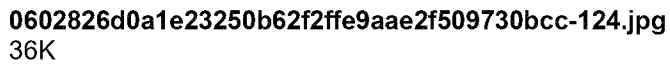
0602826d0a1e23250b62f2ffe9aae2f509730bcc-84.jpg
38K

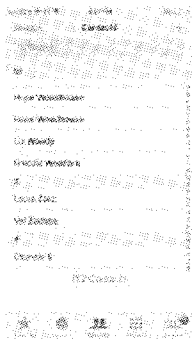


0602826d0a1e23250b62f2ffe9aae2f509730bcc-94.jpg
29K



0602826d0a1e23250b62f2ffe9aae2f509730bcc-104.jpg
28K







Save Vero Beach <saveverobeach@gmail.com>

PRR 75767

3 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Tue, Nov 12, 2019 at 8:26 PM

We would like to see the list of emails you have deleted from 1/1/19 - 11/11/19

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:33 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.
Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:42 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75767

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.



Save Vero Beach <saveverobeach@gmail.com>

PRR 75768

3 messages

Save Vero Beach <saveverobeach@gmail.com>

Tue, Nov 12, 2019 at 8:28 PM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

We would like to see the list of accounts linked to your school district supplied cell phone as of 11/11/19. This can easily be found in the settings section.

Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 15, 2019 at 7:34 AM

To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.

Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>

Fri, Nov 22, 2019 at 4:40 PM

To: Save Vero Beach <saveverobeach@gmail.com>

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75768

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.

EXHIBIT "D"



Save Vero Beach <saveverobeach@gmail.com>

PRR 75781

5 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Wed, Nov 13, 2019 at 7:55 AM

We would like to see administrator logs from the email exchange server for each occurrence that an employee accessed your email account and made a change to it in 2019

We are aware these records exist.

Save Vero Beach <saveverobeach@gmail.com>
To: "Justice, Tiffany" <tiffany.justice@indianriverschools.org>

Fri, Nov 15, 2019 at 7:44 AM

Since you have not acknowledged this legal Public Records Request, I am hereby giving the school district a 5-day notice of filing a civil action in order to compel release of these public records.

Please govern yourself accordingly.

[Quoted text hidden]

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:32 PM

I'm in receipt of your public records request. It will be processed in the order it was received. You will be notified, in advance, if there are any charges associated with your request.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75781

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.

Davis, Brenda <Brenda.Davis@indianriverschools.org>
To: Save Vero Beach <saveverobeach@gmail.com>

Fri, Nov 22, 2019 at 4:48 PM

This is a duplicate request and will not be processed.

Thank you!

Brenda Davis

Administrative Assistant

Superintendent's Office

School District of Indian River County

Phone: 772-564-3149 Fax: 772-564-3128

brenda.davis@indianriverschools.org



Under Florida's "Public Records" law, absent a specific exclusion, written communications to or from the School District of Indian River County employees are considered public records. E-mail communication with this correspondent may be subject to public and media disclosure upon request.

Confidential records that will become public record at a later date must be requested on or after the date it becomes public.

From: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Sent: Friday, November 22, 2019 4:27 PM
To: Davis, Brenda <Brenda.Davis@indianriverschools.org>; D'Agresta, Suzanne <Suzanne.D'Agresta@indianriverschools.org>
Subject: FW: PRR 75781

Tiffany M. Justice

School Board Member

School District of Indian River County

(772) 564-3008

From: Save Vero Beach <saveverobeach@gmail.com>
Sent: Wednesday, November 13, 2019 7:56 AM
To: Justice, Tiffany <Tiffany.Justice@indianriverschools.org>
Subject: PRR 75781

[Quoted text hidden]

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, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. This communication may contain privileged and confidential information intended only for the addressee(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please notify the sender by reply email and destroy all copies of the original message. The School Board of Indian River County, Florida expressly prohibits bullying, including cyberbullying, by or towards any student or employee. See Policy 5517.01: Bullying and Harassment for additional information.

Save Vero Beach <saveverobeach@gmail.com>
To: "Davis, Brenda" <Brenda.Davis@indianriverschools.org>

Fri, Nov 22, 2019 at 5:26 PM

No its not. Not going to argue. I will be filing this civil action

[Quoted text hidden]

EXHIBIT "E"



Save Vero Beach <saveverobeach@gmail.com>

Public Records Request

4 messages

Save Vero Beach <saveverobeach@gmail.com>
To: "Davis, Brenda" <Brenda.Davis@indianriverschools.org>

Fri, Nov 22, 2019 at 2:48 PM

Brenda,

I have well over a dozen public records requests that were sent to Tiffany Justice to which I see she only forwarded you one. The school district failed to acknowledge these requests along with my 5-day notices of a filing a civil action in order to compel release. Again, it appears she only forwarded you one of the requests made within the series. There were other requests to which you and/or other employees did not fulfill or said there was no documentation available. 5-day notices were provided on those as well.

Therefore, my request is as follows:

We would like to know the name and address of the staff member, employee, representative, etc. to whom I should have served on the School Districts behalf of my civil action which has be drawn up. This is a public record.

Save Vero Beach <saveverobeach@gmail.com>
To: "Davis, Brenda" <Brenda.Davis@indianriverschools.org>

Mon, Nov 25, 2019 at 2:32 PM

Do you intend on acknowledging and fulfilling this request?
[Quoted text hidden]

Save Vero Beach <saveverobeach@gmail.com>
To: "Davis, Brenda" <Brenda.Davis@indianriverschools.org>

Thu, Nov 28, 2019 at 7:03 PM

Since you have chosen to ignore my request and not acknowledge it, I am hereby placing the School District on a 5-day notice of filing a civil action in order to compel release of this public record,
[Quoted text hidden]

Save Vero Beach <saveverobeach@gmail.com>
To: jeffreyandros1@gmail.com

Mon, Dec 16, 2019 at 6:41 AM

[Quoted text hidden]