From:	Lanny Russell
Sent:	Friday, May 1, 2020 3:16 PM
То:	Garrett, Christopher
Cc:	Wilson, Scott; 'RDiamond@coj.net'; 'BPJackson@coj.net'; 'RDefoor@coj.net'; Gabriel,
	Jason; Stephen D. Busey
Subject:	COJ/JEA - JEA Document Production
Attachments:	Attachment 1- JEA Comp Committee 6.18.19_Redacted.pdf; Attachment 2 - JEA Comp
	Committee Appendix_Redacted.pdf; Untitled; Attachment 4 - FY2020 LTI Estimate.xlsx;
	Attachment 5 - JEA ITN 124-18_McKinsey_PROPOSED REDACTIONSpdf

Hello, Chris. I hope you are well.

We need your assistance with a few issues concerning JEA's recent partial document productions:

- We received a number of Willis Towers Watson reports on April 23 and 26 containing redactions pursuant to Section 119.0713(4)(a)(5), Fla. Stat. As an example, JEA produced "JEA Comp Committee 6.18.19\_Redacted" and "JEA Comp Committee Appendix\_Redacted" (attachments 1 and 2, respectively) on April 26 in response to the committee's document request 13. Those Willis Towers Watson reports were presented to JEA's compensation committee and board in June 2019. They were published online without redaction (available here and here at pp. 162-202). Several draft Willis Towers Watson reports, including the March 19 and April 22 reports previously disclosed by JEA and/or OGC, now contain similar redactions. Section 119.0713(4)(a)(5) does not apply to those documents, including the previously disclosed reports. The committee needs the redacted information to complete its investigation, regardless of whether Section 119.0713(4)(a)(5), and please produce any information from the committee on the basis of Section 119.0713(4)(a)(5), and please produce any information previously withheld on that basis from prior productions to the committee. If you do not agree, please let me know so we can resolve the issue.
- In response to document request 13, JEA produced a file entitled "Re Follow up" (attachment 3) on April 26. It contains an email from Ryan Wannemacher to David Wathen dated March 27, 2019. The email references an "attached spreadsheet"; however, we did not receive the attachment, and we cannot confirm whether we have received the referenced spreadsheet. Please provide us Wannemacher's March 27, 2019 email in native format, including its attachment.
- On March 31, JEA produced a file entitled "FY2020 LTI Estimate" (attachment 4). We did not receive any context or supporting documents with the file. Please (i) provide us the original file, (ii) explain where it came from and (iii) provide all versions of the file, including all emails to which any version of the file is attached.
- JEA produced a heavily redacted McKinsey ITN proposal on April 23, 2020 (attachment 5) with no explanation for its redactions. Please produce an unredacted version of this document, or explain the basis for withholding this information from the committee.
- For any future productions, including JEA's Relativity production, please provide a log that (i) identifies each document redacted or withheld by JEA or OGC and (ii) states the basis for the redaction.

We request the information in bullet points 1-4 to be provided to us by May 8. We are available to discuss the timeframe for producing the logs requested in bullet point 5.

Regards, Lanny

Lanny Russell

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