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**LAW OFFICES OF**  
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PO20182

June 13, 2017

**SENT VIA U.S. MAIL, CERTIFIED**  
**NO. 7016 0750 0000 1524 4466.**  
**RETURN RECEIPT REQUESTED**

Jacksonville Sheriff's Office  
Attn: Central Records  
501 E. Bay Street  
Jacksonville, FL 32202

**RE: PUBLIC RECORDS REQUEST**

Our Clients/Dates of Loss:  
Date of Loss:  
Our File No.:

Estate of Blane Land (Deceased)  
Wednesday, May 10, 2017  
49879

Dear Sir or Madam:

Please be advised that our office represents the Estate of Blane Land, deceased, as it relates to an incident where he was hit and killed by a JSO cruiser being driven by Officer Tim James. We have also been contacted by the families Daniel Nyman (*Date of Incident: April 26, 2017*) and Elias Campos (*Date of Incident: June 10, 2017*) relating to other well-publicized incidents in which the conduct of Officer Tim James has been called into question. Pursuant to the public records laws in the State of Florida as set out in section 119.07, Florida Statutes, we hereby request a copy of the following records of the Jacksonville Sheriff's Office (JSO):

- 1) Employment file of Officer Tim James;
- 2) Discipline file of Officer Tim James;
- 3) 'Use of Force' forms completed by or on behalf of Officer Tim James;



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- 4) All allegations or reports where Officer Tim James has claimed arrestees spit on him;
- 5) All allegations or reports where Officer Tim James has been involved with any damage to person or property with a JSO vehicle;
- 6) All documents and electronic information (including metadata), including but not limited to diaries, notes, calendar entries, electronic mail messages, other computer files, telephone message slips, correspondence, memoranda, reports completed or statements taken by JSO related to the arrest of Daniel Nyman;
- 7) All documents and electronic information (including metadata), including but not limited to diaries, notes, calendar entries, electronic mail messages, other computer files, telephone message slips, correspondence, memoranda, reports completed or statements taken by JSO related to the arrest Elias Campos;
- 8) All documents and electronic information (including metadata) constituting handouts, manuals, handbooks, computer presentations, videos, and/or other documents/electronic information provided, given or shown to Officer Timothy James concerning the use of force, the making of arrests or the seizing of criminal suspects, determining whether or not there is probable cause for the arrest or seizure of a criminal suspect, warrants, police abuse and misconduct, and an arrestees rights under state or federal constitutional law;
- 9) For the past 10 years, all documents and electronic information (including metadata) reflecting training or instruction provided to Officer Timothy James concerning use of force, the making of arrests or the seizing of criminal suspects, determining whether or not there is probable cause for the arrest or seizure of a criminal suspect, warrants, police abuse and misconduct, or state or federal constitutional law;
- 10) Any and all Complaints against Officer Timothy James;
- 11) All documents and electronic information (including metadata) constituting memoranda, policies, procedures, and/or other documents/electronic information relating to reports of damage to duty vehicles in the possession of Officer Tim James;
- 12) All documents and electronic information (including metadata) constituting pictures, videos, or other pictographic evidence and all cassette tapes and other audio recordings relating to the use of force on Daniel Nyman;
- 13) All documents and electronic information (including metadata) constituting pictures, videos, or other pictographic evidence and all cassette tapes and other audio recordings relating to the arrest of Daniel Nyman;

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- 14) All documents and electronic information (including metadata) constituting pictures, videos, or other pictographic evidence and all cassette tapes and other audio recordings relating to the use of force on Elias Campos;
- 15) All documents and electronic information (including metadata) constituting pictures, videos, or other pictographic evidence and all cassette tapes and other audio recordings relating to the arrest of Daniel Nyman;
- 16) All documents and electronic information (including metadata) constituting pictures, videos, or other pictographic evidence and all cassette tapes and other audio recordings relating traffic homicide of Blane Land;
- 17) All documents and electronic information (including metadata) reflecting communications within JSO, including but not limited to all radio logs, dispatch logs, and all recordings of radio and other communications related to the arrest of James Nyman;
- 18) All documents and electronic information (including metadata) reflecting communications within JSO, including but not limited to all radio logs, dispatch logs, and all recordings of radio and other communications related to the arrest of Elias Campos;
- 19) All documents and electronic information (including metadata) reflecting communications within JSO, including but not limited to all radio logs, dispatch logs, and all recordings of radio and other communications related to the traffic homicide of Blane Land;
- 20) Any and all insurance agreements or policies under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy the judgment, including but not limited to any liability, homeowner's, or umbrella policy, and any documents regarding insurance or coverage which may cover claims by the family of Blane Land;
- 21) Any and all insurance agreements or policies under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy the judgment, including but not limited to any liability, homeowner's, or umbrella policy, and any documents regarding insurance or coverage which may cover claims by Elias Campos;
- 22) Any and all insurance agreements or policies under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy the judgment, including but not limited to any liability,

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homeowner's, or umbrella policy, and any documents regarding insurance or coverage which may cover claims by Daniel Nyman;

- 23) Any noninsurance agreement or government policy under which any person or entity may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy a judgment rendered on behalf of the Estate of Blane Land;
- 24) Any noninsurance agreement or government policy under which any person or entity may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy a judgment rendered on behalf of the Daniel Nyman;
- 25) Any noninsurance agreement or government policy under which any person or entity may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy a judgment rendered on behalf of the Elias Campos;
- 26) For any incident in the past 10 years, all documents and electronic information (including metadata) reflecting or constituting any formal or informal complaint regarding a police officer; any investigation of any such complaint; and/or any action taken as a result of any such complaint;
- 27) For the past 10 years, all documents and electronic information (including metadata) reflecting or constituting any evaluations of the performance of the police department or its members by any consultant, outside agency, or other agency or official;
- 28) For the past 10 years, all documents and electronic information (including metadata) reflecting or constituting internal investigations of members of the police department;
- 29) For the past 10 years, all documents and electronic information (including metadata) reflecting or constituting any survey, poll, study, investigation, correspondence, questionnaires, etc. from any source whatsoever to which the police department has responded or which it has conducted with respect to use of force, use of deadly force, and/or the investigation of same, including but not limited to studies or reviews by independent commissions or other outside evaluators and audits or reviews by expert witnesses retained by plaintiffs in litigation or retained by a defendant or an agent of defendant and disclosed in litigation; and
- 30) All documents and electronic information (including metadata) constituting phone records, including cell phone records of Officer Tim James on Wednesday, May 10, 2017 for a 2 hour period before and after the incident.

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This request includes copies of every document related to the matter, regardless of the format in which the information is stored. If you refuse to provide this information, Chapter 119 requires you advise us in writing and indicate the applicable exemption to the Public Records Act. Also, please state with particularity the reasons for your decision, as required by Section 119.07(2)(a). If the exemption you are claiming only applies to a portion of the records, please delete that portion and provide photocopies of the remainder of the records, according to Section 119.07(2)(a).

We agree to pay the actual cost of duplication as defined in Section 119.07(1)(a). However, if you anticipate that in order to satisfy this request, "extensive use" of information technology resources or extensive clerical or supervisory assistance as defined in Section 119.07(1)(b) will be required, please provide a written estimate and justification.

Once the applicable charges and/or fees have been determined, please let us know at your earliest convenience so we can remit same.

Should you have any questions or concerns, or require any additional information in order to process this request, please do not hesitate to contact our office.

Very truly yours,

A handwritten signature in cursive script that reads "John M. Phillips".

John M. Phillips, Esquire  
(Signed in absence to avoid delay)

PUBLIC RECORDS  
REQUEST

17 JUN 14 PM 3:19