

From: [Elizabeth Sewell](#)
To: [Patricia Sullivan](#)
Subject: FW: Records request for future litigation and bar complaints
Date: Monday, June 12, 2017 11:12:09 AM

From: Elizabeth Sewell
Sent: Friday, June 09, 2017 5:17 PM
To: 'Eric McDonough' <phd2b05@gmail.com>; estetting@wsh-law.com
Cc: agreenstein004@hotmail.com; Felipe Hemming <Felipe.hemming@gmail.com>
Subject: RE: Records request for future litigation and bar complaints

Good afternoon Mr. McDonough,

This is acknowledgement of your public record request dated June 9, 2017.

From: Eric McDonough [<mailto:phd2b05@gmail.com>]
Sent: Friday, June 09, 2017 1:07 AM
To: estetting@wsh-law.com; Elizabeth Sewell <ESewell@cityofhomestead.com>
Cc: agreenstein004@hotmail.com; Felipe Hemming <Felipe.hemming@gmail.com>
Subject: Records request for future litigation and bar complaints

Dear Mrs. Stettin, ATTN: Mr. Sewell,
I am requesting under FSS. 119:

1) Copies of the total amount of billing to date, whether filed/invoiced or not, related to the representation of Murguido in this defamation per se case. These records are not exempt under any provision of FSS. 119. If you need help finding case law since apparently Zeskind does, I will provide it for you.

2) All records/statutes/contracts that allow you to accept Homestead tax dollars to represent Murguido in his individual capacity in this defamation case. The statute Zeskind argued in the FSS. 119 lawsuit, i.e. FSS. 111.07, does not apply. I cannot wait to watch you squirm around this, as Murguido was not acting in his official capacity, it has been alleged he was acting in his individual capacity, it has been alleged that Murguido acted with malice, and both you and Murguido have been provided the irrefutable evidence that he, Gomez and his son acted with malice. Though, I removed the son from the law suit since I am not a monster like your client.

3) All records or documents that support the contention that Murguido was acting in his official capacity when he made the defamatory statements. As both Rolle and Aquino claimed Murguido to be off duty, blocked me from filing a complaint because he was off-duty (which was recorded), and wrote that Murguido was acting as a citizen on the official record. See link: <https://www.documentcloud.org/documents/3723694-Murguido-Off-Duty-1.html> Further, Murguido's time sheets show him off duty. Two of these defamatory statements were made outside of Homestead's jurisdiction. There are no records of this within Homestead, and MDPD records shows Murguido only as a victim.

4) Copies of all records/documents/statutes which would allow for Murguido to act in his

official capacity as a victim, and it not be a conflict of interest, since you are claiming Murguido was acting in his official capacity, and not with malice.

5) All Homestead records relating to the criminal investigation initiated against me by Murguido, since you are claiming Murguido was acting in his official capacity, I am sure you have some records to prove it.

6) An electronic copy of the complete Facebook history for the official Facebook pages of the Homestead Police Department, The City of Homestead and Mayor Porter's respectively. This has been requested in then past and as usual Homestead failed to comply with their legal requirements under FSS. 119. This is available pursuant to Facebook's "Download Your Own Information" Feature. This was requested after all three pages violated my First Amendment rights, and the city lied about it.

7) Copies of any bar complaints and/or disciplinary history of you and all members of your firm who do work for Homestead, since you are acting as a public officials.

8) The total amount your firm has billed Homestead to date in reviewing all records request I have submitted to Homestead. I cringe to imagine this amount of tax dollars wasted, and am anxious to publish the results thereof. You guys have already put Homestead on the hook for over \$55,000 already, because you want to play stupid games. You know what they say about that, play stupid games, win stupid prizes. Would you like me to forward you the updated article? I'm not sure they got your good side in the picture, if you send me a better picture I will use it. Thanks!

9) The total amount WSH has billed Homestead in the last 5 years. I am aware that you guys prefer to keep this hush-hush, but don't you just love government in the Sunshine?

10) The earliest possible time I can come and personally inspect these records or part of these records at your office, with cameras.

It has been fun playing with you, I hope you enjoy this, because I am just getting warmed up, and my team is getting off the bench ready to play. Take care and God bless.

Sincerely,

Dr. James Eric McDonough