

IN THE CIRCUIT COURT OF THE 17TH  
JUDICIAL CIRCUIT, IN AND FOR  
BROWARD COUNTY, FLORIDA

CASE NO.

B&L SERVICE, INC., a Florida  
corporation

Plaintiff,

v.

BROWARD COUNTY, FLORIDA, a  
Political Subdivision

Defendants.

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**COMPLAINT FOR  
VIOLATIONS OF FLORIDA'S PUBLIC RECORDS ACT**

COMES NOW, the Plaintiff, B&L SERVICE, INC. ("B&L"), a Florida corporation, by and through its undersigned counsel, hereby files this Complaint for Violation of Florida's Public Records Act against the Defendant, BROWARD COUNTY, FLORIDA, a Political Subdivision and states:

**GENERAL ALLEGATIONS**

1. This is an action to enforce the public right of access to records of government, pursuant to Section 119.11 of the Florida Statutes, and as guaranteed by Art. I, Sec. 24, Constitution of Florida and by Sec. 119.07, Florida Statutes.

2. Plaintiff seeks declaratory relief under Secs. 86.011 and 86.021, Fla. Stats., and a Writ of Mandamus under Rule 1.630 of the Florida Rules of Civil Procedure, for the purpose of enforcing the public right of access to records of government.

3. Plaintiff is a Florida corporation organized and existing under the laws of the State of Florida, whose principle place of business is in Fort Lauderdale, Florida and which provides taxi services in Broward County under the fictitious name Yellow Cab of Broward County.

4. Defendant, BROWARD COUNTY, FLORIDA is a political subdivision of the State of Florida, and a public agency.

5. Venue is proper in Broward County, Florida under Section 119.11, Florida Statutes, and because Defendant breached its statutory duty to comply with Florida's Public Records Act and produce an existing public record in Broward County, Florida.

6. All conditions precedent to the bringing of this action have occurred, been met, or been waived.

7. A Transportation Network Company ("TNC") is a new transportation provider designation in Broward County. According to the Defendant, a TNC includes companies which provide a digital network platform or software application service to connect passengers to TNC drivers.

8. TNCs provide pre-arranged, for-hire vehicle transportations services to passengers.

9. TNCs include companies such as Uber, formally known in Broward County as Rasier-DC, LLC.

10. On November 30, 2015, Rasier-DC, LLC ("Uber") was granted a provisional license to operate in Broward County.

11. On October 27, 2015, Uber was granted a preliminary license to operate in Broward County.

12. On or about October 16, 2015, Uber entered into an Operating Agreement with Defendant for operations at the Fort Lauderdale-Hollywood International Airport ("Airport"), as

well as Port Everglades ("Port").

13. Pursuant to that Operating Agreement, and Broward County's Code of Ordinances, Uber is required to pay Defendant \$4.50 for every pick-up of passengers via motor vehicle it makes at the Airport.

14. Uber is also required to pay Defendant \$2.00 for every pick-up at the Port.

15. Uber is required to pay the trip fees to Defendant on a monthly basis.

16. Those trip fees are public funds.

17. Uber is required to maintain an accounting of its monthly pick-up and drop-off activities at the Airport and Port, and provide that information to Defendant on a monthly basis to justify trip fees paid.

18. The monthly reports are based on data collected by Uber's digital network platform/software application service, because Uber refused to allow the County to monitor its trips by other means.

19. The monthly report must identify the TNC services provider, the date and time and location of each pick-up, and the date and time and location of each drop-off.

20. On February 12, 2016, Plaintiff, through its retained counsel, made a written public records request to Defendant seeking production of the following public records:

*All reports or documents reflecting pick-ups by Rasier-DC, LLC or Uber at the Fort Lauderdale-Hollywood International Airport, and the sums of money paid or owing to Broward County for those trips, beginning in October, 2015 and through the present.*

A copy of Plaintiff's public records request is attached as Exhibit "A".

21. On February 12, 2016, Defendant responded to Plaintiff's public records request by providing documents that redacted the information sought by the Plaintiff. A copy of

Defendant's response to the public records request and the pertinent attachments thereto from Uber, is attached as Composite Exhibit "B".

22. The redacted documents were not labeled trade secret, and there was no indication on the documents that they were to be treated as trade secret information.

23. On February 13, 2016, Defendant provided an affidavit it says it received from Uber in support of its contention that the records at issue are trade secrets. A copy of the Affidavit and the correspondence transmitting it are attached as Composite Exhibit "C".

24. Similarly, on November 17, 2015, Plaintiff, through its retained counsel, made a written public records request to Defendant seeking production of the following public records:

*All TNC application filings, emails related to TNC applications, and any other documents (including correspondence) between Broward County and TNC applicants.*

A copy of Plaintiff's Public Records Request is attached hereto as Exhibit "D".

25. The Defendant responded to that public records request in batches, and more than two months after the request it provided a redacted version of Uber's monthly airport activity report of activities from the dates October 15, 2015 through October 31, 2015. The pertinent information in the document received from the County was redacted, and the Defendant alleged it was trade secret information. A copy of the monthly report produced, as well as the correspondence transmitting it, are attached as Exhibit "E".

26. On February 9, 2016, the County again refused to produce an un-redacted version of that Uber monthly report.

27. The Defendant has failed to establish that the records sought are protected as a trade secret under Florida law, including Sections 688.002, Florida Statutes and 812.081, Florida

Statutes, and it has the burden of doing so under Florida law.

28. The Defendant has also failed to establish that the records sought were properly identified and labeled as trade secret information, pursuant to Florida law.

29. In addition, Defendant has already admitted the information at issue is not a trade secret, since it produced almost the same exact information to the Plaintiff regarding Uber's airport trips on October 2, 2015, a copy of which is attached as Exhibit "F". Correspondence in which the County admits the information at issue is not a trade secret, dated September 28, 2015, is attached as Exhibit "G".

30. Further, Defendant produced to the Plaintiff the records of Airport trips and the amounts paid to the County for them, from a different TNC called Lyft. See Exhibit "B".

31. Plaintiff, which have been providing for-hire vehicle services in Broward County for decades, also operates at the Airport and Port pursuant to the Code and operating agreements.

32. Defendant has always required Plaintiff to report the number of trips originating from the Airport and Port, and/or has monitored the trips.

33. Since 2012, Defendant itself has accounted for the number of trips made by Plaintiff.

34. Records reflecting Plaintiff's activities at the Airport and Port have always been considered public record, and have been available for inspection and copying.

35. Pursuant to Section 119.11(1) of the Florida Statutes, Plaintiff requests an immediate hearing to enforce the provisions of Florida's Public Records Act and require Defendant to produce for inspection and copying the public records sought, un-redacted.

36. Plaintiff has retained the services of undersigned counsel to represent it in this matter and has agreed to pay such attorneys reasonable fees for services performed.

37. Pursuant to Section 119.12 of the Florida Statutes, Plaintiff seeks the recovery of its attorneys' fees and costs from Defendant. Defendant has intentionally refused to produce an admitted existing public record, and Plaintiff has incurred and will continue to incur attorneys' fees and costs in this matter.

**COUNT I -**  
**DECLARATORY RELIEF**

38. Plaintiff adopts and realleges Paragraphs 1 through 37 above.

39. There is a present dispute between Plaintiff and Defendant regarding Plaintiff's right to access public record within the Defendant's custody and control.

40. Declaratory relief is appropriate here because such judgment will serve a useful purpose in clarifying and settling the legal disputes between the parties as they relate to the alleged trade secret protection of public records.

41. Plaintiff contends that the Defendant is required by law to furnish copies of the requested records.

42. Plaintiff contends Defendant has failed to demonstrate that the records at issue are protected trade secrets, or that they were appropriately labeled as such upon submission to Defendant.

43. Plaintiff has repeatedly asked for copies of the requested records, and Defendant has refused to furnish such copies.

44. The harm to Plaintiff from the continuing denial of the constitutional and statutory right of access to the requested records is irreparable.

45. There is no rational basis to treat the records of Uber differently than those of the Plaintiff.

46. Plaintiff is entitled to a declaration of the existence of its right of access to the records in the custody of Defendant, and immediate access to those records.

47. Unless this Court declares its duties to be otherwise, Defendant will continue to deny and abridge the public right of access guaranteed by the Constitution of Florida and its public records laws.

WHEREFORE, Plaintiff respectfully requests this Court:

- a. Hold an immediate hearing to enforce the provisions of Florida's Public Records Act;
- b. Determine that the records at issue are not trade secret;
- c. Order Defendant to produce for inspection and copying the requested public records;
- d. Award Plaintiff its attorneys' fees and costs incurred in connection with this matter;
- e. Impose any appropriate sanction pursuant to Section 119.10 of the Florida Statutes; and
- f. Award such other and further relief as this Court deems just and proper.

**COUNT II –**  
**COMPLAINT FOR MANDAMUS FOR ACCESS TO REQUESTED PUBLIC RECORDS**

48. Plaintiff adopts and realleges Paragraphs 1 through 37 above.

49. Plaintiff seeks a Writ of Mandamus compelling Defendant to perform certain ministerial duties.

50. Plaintiff has a clear legal right to have Defendant perform its duties in furnishing copies of the requested records, as they are public records and not trade secrets as defined 688.002 Florida Statutes, and Section 812.081, Florida Statutes.

51. Plaintiff reasonably and properly invoked the statutory duty of Broward County, under Section 119.07(1)(a) to “furnish a copy...of the record”.

52. Defendant improperly failed and refused to comply with the request for access to the requested records.

53. These acts are ministerial and require no discretion on the part of the Defendant.

WHEREFORE, Plaintiff respectfully requests this Court:

- a. Hold an immediate hearing to enforce the provisions of Florida’s Public Records Act;
- b. Determine that the records at issue are not trade secret;
- c. Order Defendant to produce for inspection and copying the requested public records, un-redacted;
- d. Award Plaintiff its attorneys’ fees and costs incurred in connection with this matter, pursuant to Section 119.12, Fla. Stat
- e. Impose any appropriate sanction pursuant to Section 119.10 of the Florida Statutes; and
- f. Award such other and further relief as this Court deems just and proper.



DATED this 17<sup>th</sup> day of February, 2016.

BECKER & POLIAKOFF, P.A.  
*Attorneys for Plaintiff*  
625 N. Flagler Drive, 7th Floor  
West Palm Beach, FL 33401  
Telephone: (561) 655-5444  
Facsimile: (561) 832-8987  
[mstempler@bplegal.com](mailto:mstempler@bplegal.com)

By: /s/ Mark J. Stempler  
Mark J. Stempler, Esq.  
Florida Bar No. 0016262

ACTIVE: B21854/375150;8151160\_1

**Blanchard, Jennifer**

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**From:** Stempler, Mark  
**Sent:** Friday, February 12, 2016 4:33 PM  
**To:** DARTHUR@broward.org  
**Subject:** Public Records Request

Pursuant to Chapter 119, Florida Statutes, on behalf of our client B&L Service, Inc., it makes the following public records request:

All reports or documents reflecting pick-ups by Rasier-DC, LLC or Uber at the Fort Lauderdale-Hollywood International Airport, and the sums of money paid or owing to Broward County for those trips, beginning in October, 2015 and through the present.

Time is of the essence for a response to this request. Please send the documents to me via email at [mstempler@bplegal.com](mailto:mstempler@bplegal.com). If you are unable to send the records via email, please advise when the records have been located and how we can obtain them. If there is a cost for this request, please provide it before any copies are made.

Thank you for your anticipated assistance.

Sincerely,



## Blanchard, Jennifer

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**From:** Arthur, David <DARTHUR@broward.org>  
**Sent:** Friday, February 12, 2016 5:13 PM  
**To:** Stempler, Mark  
**Subject:** RE: Public Records Request  
**Attachments:** Lyft Dec2015.xlsx; Lyft Email 10-15-15.pdf; Lyft Nov2015.xlsx; Lyft Oct2015.xlsx; (TNC - Backpayment) Lyft (161303).png; Uber - FLL - Dec Report - Redacted.pdf; Uber - FLL - Oct Report - Redacted.pdf; Uber - Port Everglades- Dec Report - Redacted.pdf

Mark,

I acknowledge B&L Service, Inc.'s ("B&L") public records request below. Pursuant to our discussion this afternoon, I attach the responsive documents, all of which we already provided you in connection with your firm's recent public record request. As you know, the difference here is the request is made explicitly on behalf of your client B&L.

Further, our position as to the reports Rasier-DC, LLC ("Uber") marked trade secret is unchanged, that is, pursuant to Section 9.4 of Uber's License Agreement with Broward County, we will refrain from disclosing the unredacted reports because Uber has not authorized us to do so. We attach Uber's redacted reports. I confirm you have a copy of Uber's License Agreement with County.

In an abundance of caution, I will verify there are no other TNC reports filed since your last public records request and this one.

If you intend to go to court in connection with this issue, please let me know what hearing date if any you are seeking.



*David Arthur*

Assistant County Attorney  
Broward County Aviation Department  
2200 SW 45<sup>th</sup> Street, Suite 101  
Dania Beach, FL 33312  
Office: 954-359-2251  
Fax: 954-359-1292  
[www.broward.org](http://www.broward.org)

**From:** Stempler, Mark [mailto:MStempler@bplegal.com]  
**Sent:** Friday, February 12, 2016 4:33 PM  
**To:** Arthur, David <DARTHUR@broward.org>  
**Subject:** Public Records Request



Pursuant to Chapter 119, Florida Statutes, on behalf of our client B&L Service, Inc., it makes the following public records request:

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Time is of the essence for a response to this request. Please send the documents to me via email at [mstempler@bplegal.com](mailto:mstempler@bplegal.com). If you are unable to send the records via email, please advise when the records have been located and how we can obtain them. If there is a cost for this request, please provide it before any copies are made.

Thank you for your anticipated assistance.

Sincerely,

**Mark J. Stempler**

Shareholder  
Board Certified in Construction Law  
LEED Green Associate

Bank of America Centre | 625 N. Flagler Drive, 7th Floor | West Palm Beach, FL 33401  
Tel: 561.655.5444 | Fax: 561.832.8987 | [E-Mail](#)  
[Website](#) | [Connect on LinkedIn](#)

**BECKER &  
POLIAKOFF**



Visit the [Florida Construction Law Authority Blog](#) today!

Visit [The Green Building Law Blog](#) today!

The Becker & Poliakoff **Client CARE Center** is here to serve our valued clients. If we can be of assistance in any way, please call us toll-free at 1-844-CAREBP1 (1-844-227-3271) or by email at [care@bplegal.com](mailto:care@bplegal.com).

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Under Florida law, most e-mail messages to or from Broward County employees or officials are public records, available to any person upon request, absent an exemption. Therefore, any e-mail message to or from the County, inclusive of e-mail addresses contained therein, may be subject to public disclosure.

**PUBLIC REDACTED VERSION**

Fort Lauderdale International Airport - Raster-DC, LLC Monthly Report  
 Days covered: Dec 1, 2015 - Dec 31, 2015  
 TNC Company Identification: Raster-DC, LLC, a subsidiary of Uber Technologies, Inc

Summary	Number of Pickups	Number of Donations	Fee Amount	Fees
Location FLA			9	9

Date & Time	Longitude	Pickup	Latitude	First 3 Digits of License
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

REMAINING  
PAGES  
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Part Everglades • Rawlco-DC, LLC Monthly Report  
 Dates covered: Dec 1, 2015 - Dec 31, 2015  
 THG Company Store #4501: Rawlco-DC, LLC, a subsidiary of Uper Technology, Inc.

Location	Number of Pickups	Number of Drop-offs	Fee (USD)
Summit			
Antelope			

Prof. Frank Miller Pathways			
Date & Time	Longitude	Latitude	Final Quality of License

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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PUBLIC REDACTED VERSION

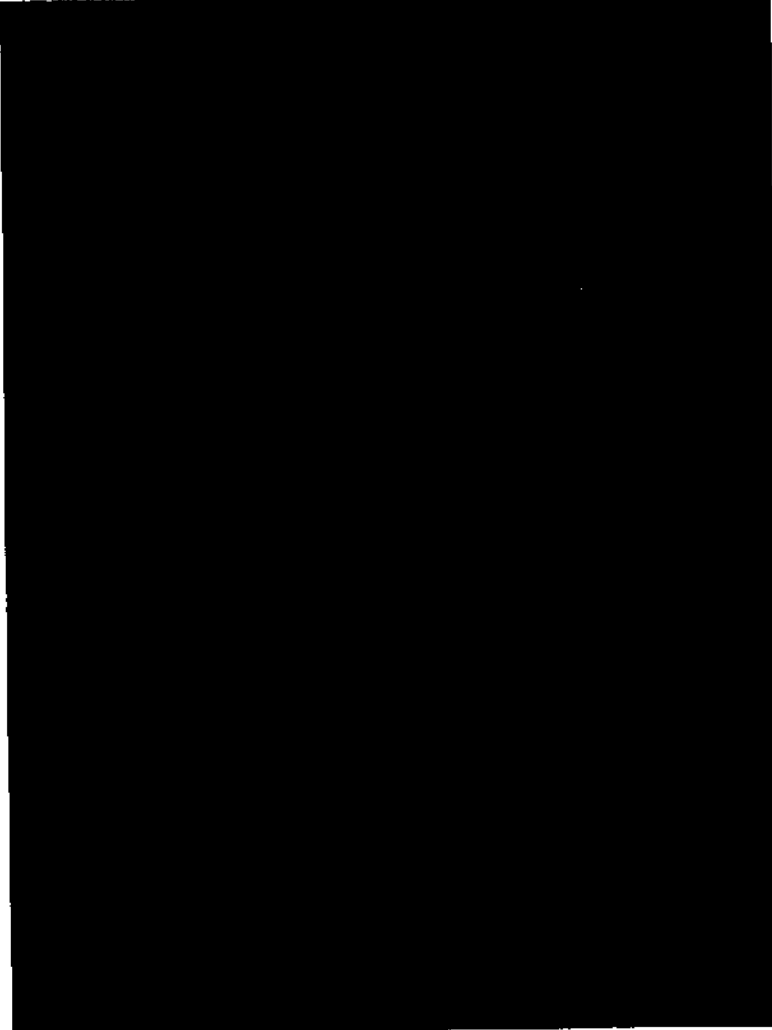
**Fort Lauderdale International Airport - Rasier-DC, LLC Monthly Report**

Dates covered: Oct. 16, 2015 8:00:00 am - Oct. 31, 2016 11:59:59 pm

TNC Company Identification: Rasier-DC, LLC, a subsidiary of Uber Technologies, Inc.

<u>Summary</u>				
<u>Location</u>	<u>Number of Pickups</u>	<u>Number of Drop-Offs</u>	<u>Fee Amount</u>	<u>Fees</u>
Fort Lauderdale Airport			4.50 \$	

<u>Fort Lauderdale International Airport: Pickups</u>			
<u>Date &amp; Time</u>	<u>Longitude</u>	<u>Latitude</u>	<u>First 3 Digits of License</u>



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Part Evereadies - RestonDC, LLC Monthly Report  
 Dates covered: Dec 1, 2016 - Dec 31, 2016  
 THG Company Identifiers: RestonDC, LLC, a subsidiary of Uster Technologies, Inc.

Port Everglades, Fla.			
Date & Time	Longitude	Latitude	Field Number & Name

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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**PUBLIC REDACTED VERSION**

**Port Everglades - Realer-DC, LLC Monthly Report**  
 Generated May 1, 2016 - May 22, 2017

Discs covered Nov. 1, 2015 - Nov. 30, 2015

TNC Company (collectively "Razer-DC, LLC," a subsidiary of Razer Technologies, Inc.

Location	Number of Pickups	Number of Drop-Offs	Fee Amount	Fees
Port Everglades	1	1	\$ 2.00	\$ 2.00

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[REDACTED]

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PUBLIC REDACTED VERSION

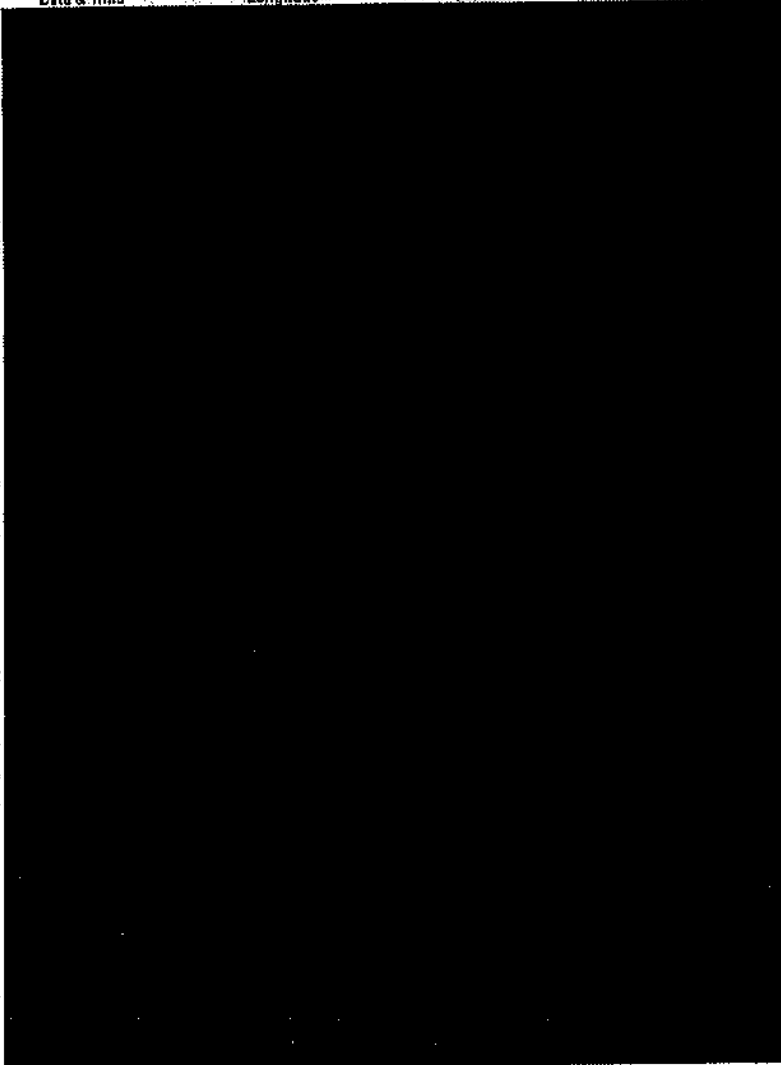
**Port Everglades - Rasler-DC, LLC Monthly Report**

Dates covered: Oct. 16, 2016 8:00:00 am - Oct. 31, 2016 11:59:59 pm

TNC Company Identification: Rasler-DC, LLC, a subsidiary of Uber Technologies, Inc.

Summary				
Location	Number of Pickups	Number of Drop-Offs	Fee Amount	Fees
Port Everglades			\$ 2.00	

Port Everglades: Pickups				
Date & Time	Longitude	Latitude	First 3 Digits of License	



## Frick, Tatjana

---

**From:** Davis, Melva  
**Sent:** Thursday, October 15, 2015 1:33 PM  
**To:** Frick, Tatjana  
**Cc:** Smith, Aida  
**Subject:** FW: FW: Lyft FLL Permit

FYL...

**BROWARD**  
**FLORIDA**

Melva Davis, Manager-Financial Operations  
Broward County Aviation Department  
Fort Lauderdale Hollywood International Airport  
2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312  
Phone: 954-359-6135; Fax: 954-359-1293  
[mdavis@broward.org](mailto:mdavis@broward.org)  
[www.fll.net](http://www.fll.net)

**From:** Ohara, John  
**Sent:** Thursday, October 15, 2015 1:31 PM  
**To:** Alex Hillis; Davis, Melva  
**Cc:** James-Rendleman, Helena; Wiltshire, Glenn  
**Subject:** RE: FW: Lyft FLL Permit

Alex

Fll should only receive from you the back payments due to the Airport and the Airport Security deposit. The port related fees and back payments will need to be coordinated directly with the Port.

**From:** Alex Hillis [<mailto:ahillis@lyft.com>]  
**Sent:** Thursday, October 15, 2015 1:25 PM  
**To:** Davis, Melva  
**Cc:** James-Rendleman, Helena; Ohara, John  
**Subject:** Re: FW: Lyft FLL Permit

$4066 * \$4.50 = 18297$

Our finance team will be initiating payments shortly to cover the fees required for the airport agreement:

- |   |               |
|---|---------------|
| 1) Back payment for past pickups at FLL: 4,066 pickups since 8/7/14 * \$4.50 = \$18,297         | — <i>Lyft</i> |
| 2) Security deposit: \$12,000   | — <i>Lyft</i> |
| 3) Back payment for past pickups at Port of Broward: 422 pickups since 8/24/14 * \$2.00 = \$844 |               |
| 4) Security deposit: \$3,500  |               |

For future payments, we've also added your information to our payment processing system, so you should be seeing a test payment come through of \$0.01. Please let me know when you see that!

On Thu, Oct 15, 2015 at 10:05 AM, Alex Hillis <[ahillis@lyft.com](mailto:ahillis@lyft.com)> wrote:

Thank you!



**From:** Ohara, John  
**Sent:** Thursday, October 15, 2015 1:31 PM  
**To:** Alex Hillis; Davis, Melva  
**Cc:** James-Rendleman, Helena; Wiltshire, Glenn  
**Subject:** RE: FW: Lyft FLL Permit

Alex

Fll should only receive from you the back payments due to the Airport and the Airport Security deposit. The port related fees and back payments will need to be coordinated directly with the Port.

**From:** Alex Hillis [<mailto:ahillis@lyft.com>]  
**Sent:** Thursday, October 15, 2015 1:25 PM  
**To:** Davis, Melva  
**Cc:** James-Rendleman, Helena; Ohara, John  
**Subject:** Re: FW: Lyft FLL Permit

Our finance team will be initiating payments shortly to cover the fees required for the airport agreement:

- 1) Back payment for past pickups at FLL: 4,066 pickups since 8/7/14 \* \$4.50 = **\$18,297**
- 2) Security deposit: **\$12,000**
- 3) Back payment for past pickups at Port Everglades: 433 pickups since 8/7/14 \* \$2.00 = **\$866**
- 4) Security deposit: **\$3,500**

For future payments, we've also added your information to our payment processing system, so you should be seeing a test payment come through of \$0.01. Please let me know when you see that!



Accession	Accession_Files	Type	Size
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AT000003	100001-0301.gzip	gzip	15.0K
AT000004	100001-0401.gzip	gzip	15.0K
AT000005	100001-0501.gzip	gzip	15.0K
AT000006	100001-0601.gzip	gzip	15.0K
AT000007	100001-0701.gzip	gzip	15.0K
AT000008	100001-0801.gzip	gzip	15.0K
AT000009	100001-0901.gzip	gzip	15.0K
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AT000022	100001-2201.gzip	gzip	15.0K
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AT000028	100001-2801.gzip	gzip	15.0K
AT000029	100001-2901.gzip	gzip	15.0K
AT000030	100001-3001.gzip	gzip	15.0K
AT000031	100001-3101.gzip	gzip	15.0K
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AT000072	100001-7201.gzip	gzip	15.0K
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AT000074	100001-7401.gzip	gzip	15.0K
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AT000077	100001-7701.gzip	gzip	15.0K
AT000078	100001-7801.gzip	gzip	15

**g\_gnu**

[illegible]

[illegible]

9.674  
22% 14.72 6.124

time

Register	Aspiral_Chr	Type	Rate
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28A08	13A02011 08 14 chip		54.0
B0144	13A02011 04 14 chip		54.0
BA067	13A02011 17 14 chip		54.0
B0145	13A02011 05 14 chip		54.0
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EP254	13A02011 06 22 chip		54.0
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EP256	13A02011 08 22 chip		54.0
EP257	13A02011		

Lyrta Pickups			
File Number	Alt File Name	Type	Rate
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V13453	1312000155 140 pickup		\$4.50
CDJ35	1312000156 140 pickup		\$4.50
CDJ36	1312000157 140 pickup		\$4.50
CDJ37	1312000158 140 pickup		\$4.50
CDJ38	1312000159 140 pickup		\$4.50
CDJ39	1312000160 140 pickup		\$4.50
CDJ40	1312000161 140 pickup		\$4.50
CDJ41	1312000162 140 pickup		\$4.50
CDJ42	1312000163 140 pickup		\$4.50
CDJ43	1312000164 140 pickup		\$4.50
CDJ44	1312000165 140 pickup		\$4.50
CDJ45	1312000166 140 pickup		\$4.50
CDJ46	1312000167 140 pickup		\$4.50
CDJ47	1312000168 140 pickup		\$4.50
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CDJ253	1312000374 140 pickup		\$4.50
CDJ254	1312000375 140 pickup		\$4.50
CDJ255	1312000376 140 pickup		\$4.50
CDJ256	1312000377 140 pickup		\$4.50
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CDJ258	1312000379 140 pickup		\$4.50
CDJ259	1312000380 140 pickup		\$4.50
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CDJ263	1312000384 140 pickup		\$4.50
CDJ264	1312000385 140 pickup		\$4.50
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CDJ267	1312000388 140 pickup		\$4.50
CDJ268	1312000389 140 pickup		\$4.50
CDJ269	1312000390 140 pickup		\$4.50
CDJ270	1312000391 140 pickup		\$4.50
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CDJ272	1312000393 140 pickup		\$4.50
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CDJ275	1312000396 140 pickup		\$4.50
CDJ276	1312000397 140 pickup		\$4.50
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CDJ287	1312000408 140 pickup		\$4.50
CDJ288	1312000409 140 pickup		\$4.50
CDJ289	1312000410 140 pickup		\$4.50
CDJ290	1312000411 140 pickup		\$4.50
CDJ291	1312000412 140 pickup		\$4.50
CDJ292	1312000413 140 pickup		\$4.50
CDJ293	1312000414 140 pickup		\$4.50
CDJ294	1312000415 140 pickup		\$4.50
CDJ295	1312000416 140 pickup		\$4.50
CDJ296	1312000417 140 pickup		\$4



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### Lyft Pickups

[illegible]

[illegible]

## Lyft Pickups

PickupNumber	Approximate Time	Type	Rate
EBT127	12/27/2013 18:13 pickup		\$4.50
12/27/2013 18:13 pickup			\$4.50
NEW PLATES	12/27/2013 17:30 pickup		\$4.50
CD-208	12/27/2013 17:20 pickup		\$4.50
Bolt 706	12/27/2013 17:06 pickup		\$1.90
DCR006	12/27/2013 17:38 pickup		\$1.90
Buys 20	12/27/2013 17:30 pickup		\$1.90
DMR14	12/27/2013 16:27 pickup		\$1.90
OVAN17	12/27/2013 14:38 pickup		\$4.50
OVAN18	12/27/2013 14:38 pickup		\$4.50
OVAN19	12/27/2013 14:38 pickup		\$4.50
OVAN20	12/27/2013 14:38 pickup		\$4.50
OVAN21	12/27/2013 14:38 pickup		\$4.50
OVAN22	12/27/2013 14:38 pickup		\$4.50
OVAN23	12/27/2013 14:38 pickup		\$4.50
OVAN24	12/27/2013 14:38 pickup		\$4.50
OVAN25	12/27/2013 14:38 pickup		\$4.50
OVAN26	12/27/2013 14:38 pickup		\$4.50
OVAN27	12/27/2013 14:38 pickup		\$4.50
OVAN28	12/27/2013 14:38 pickup		\$4.50
OVAN29	12/27/2013 14:38 pickup		\$4.50
OVAN30	12/27/2013 14:38 pickup		\$4.50
OVAN31	12/27/2013 14:38 pickup		\$4.50
OVAN32	12/27/2013 14:38 pickup		\$4.50
OVAN33	12/27/2013 14:38 pickup		\$4.50
OVAN34	12/27/2013 14:38 pickup		\$4.50
OVAN35	12/27/2013 14:38 pickup		\$4.50
OVAN36	12/27/2013 14:38 pickup		\$4.50
OVAN37	12/27/2013 14:38 pickup		\$4.50
OVAN38	12/27/2013 14:38 pickup		\$4.50
OVAN39	12/27/2013 14:38 pickup		\$4.50
OVAN40	12/27/2013 14:38 pickup		\$4.50
OVAN41	12/27/2013 14:38 pickup		\$4.50
OVAN42	12/27/2013 14:38 pickup		\$4.50
OVAN43	12/27/2013 14:38 pickup		\$4.50
OVAN44	12/27/2013 14:38 pickup		\$4.50
OVAN45	12/27/2013 14:38 pickup		\$4.50
OVAN46	12/27/2013 14:38 pickup		\$4.50
OVAN47	12/27/2013 14:38 pickup		\$4.50
OVAN48	12/27/2013 14:38 pickup		\$4.50
OVAN49	12/27/2013 14:38 pickup		\$4.50
OVAN50	12/27/2013 14:38 pickup		\$4.50
OVAN51	12/27/2013 14:38 pickup		\$4.50
OVAN52	12/27/2013 14:38 pickup		\$4.50
OVAN53	12/27/2013 14:38 pickup		\$4.50
OVAN54	12/27/2013 14:38 pickup		\$4.50
OVAN55	12/27/2013 14:38 pickup		\$4.50
OVAN56	12/27/2013 14:38 pickup		\$4.50
OVAN57	12/27/2013 14:38 pickup		\$4.50
OVAN58	12/27/2013 14:38 pickup		\$4.50
OVAN59	12/27/2013 14:38 pickup		\$4.50
OVAN60	12/27/2013 14:38 pickup		\$4.50
OVAN61	12/27/2013 14:38 pickup		\$4.50
OVAN62	12/27/2013 14:38 pickup		\$4.50
OVAN63	12/27/2013 14:38 pickup		\$4.50
OVAN64	12/27/2013 14:38 pickup		\$4.50
OVAN65	12/27/2013 14:38 pickup		\$4.50
OVAN66	12/27/2013 14:38 pickup		\$4.50
OVAN67	12/27/2013 14:38 pickup		\$4.50
OVAN68	12/27/2013 14:38 pickup		\$4.50
OVAN69	12/27/2013 14:38 pickup		\$4.50
OVAN70	12/27/2013 14:38 pickup		\$4.50
OVAN71	12/27/2013 14:38 pickup		\$4.50
OVAN72	12/27/2013 14:38 pickup		\$4.50
OVAN73	12/27/2013 14:38 pickup		\$4.50
OVAN74	12/27/2013 14:38 pickup		\$4.50
OVAN75	12/27/2013 14:38 pickup		\$4.50
OVAN76	12/27/2013 14:38 pickup		\$4.50
OVAN77	12/27/2013 14:38 pickup		\$4.50
OVAN78	12/27/2013 14:38 pickup		\$4.50
OVAN79	12/27/2013 14:38 pickup		\$4.50
OVAN80	12/27/2013 14:38 pickup		\$4.50
OVAN81	12/27/2013 14:38 pickup		\$4.50
OVAN82	12/27/2013 14:38 pickup		\$4.50
OVAN83	12/27/2013 14:38 pickup		\$4.50
OVAN84	12/27/2013 14:38 pickup		\$4.50
OVAN85	12/27/2013 14:38 pickup		\$4.50
OVAN86	12/27/2013 14:38 pickup		\$4.50
OVAN87	12/27/2013 14:38 pickup		\$4.50
OVAN88	12/27/2013 14:38 pickup		\$4.50
OVAN89	12/27/2013 14:38 pickup		\$4.50
OVAN90	12/27/2013 14:38 pickup		\$4.50
OVAN91	12/27/2013 14:38 pickup		\$4.50
OVAN92	12/27/2013 14:38 pickup		\$4.50
OVAN93	12/27/2013 14:38 pickup		\$4.50
OVAN94	12/27/2013 14:38 pickup		\$4.50
OVAN95	12/27/2013 14:38 pickup		\$4.50
OVAN96	12/27/2013 14:38 pickup		\$4.50
OVAN97	12/27/2013 14:38 pickup		\$4.50
OVAN98	12/27/2013 14:38 pickup		\$4.50
OVAN99	12/27/2013 14:38 pickup		\$4.50
OVAN100	12/27/2013 14:38 pickup		\$4.50



### Lift Trucks

[illegible]

**Table 1** Demographic characteristics of study population



[illegible]



[illegible]









[illegible]







### Lyft Pickups

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[illegible]

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[illegible]





Star name	Right asc.	Decl.	Type	Age
66488	150959.9 21.14	49.00	main	14.50
66493	150959.211 49.00	main	14.50	
66494	150959.211 49.00	main	14.50	
66495	150959.2091 49.00	main	14.50	
66496	150959.1920 49.00	main	14.50	
66497	150959.1849 49.00	main	14.50	
66498	150959.1768 49.00	main	14.50	
66499	150959.1687 49.00	main	14.50	
66500	150959.1606 49.00	main	14.50	
66501	150959.1525 49.00	main	14.50	
66502	150959.1444 49.00	main	14.50	
66503	150959.1363 49.00	main	14.50	
66504	150959.1282 49.00	main	14.50	
66505	150959.1201 49.00	main	14.50	
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66524	150959.1362 49.00	main	14.50	
66525	150959.1381 49.00	main	14.50	
66526	150959.1400 49.00	main	14.50	
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66727	150959.5219 49.00	main	14.50	
66728	150959.5238 49.00	main	14.50	
66729	1509			



## Blanchard, Jennifer

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**From:** Arthur, David <DARTHUR@broward.org>  
**Sent:** Saturday, February 13, 2016 3:56 PM  
**To:** Stempler, Mark  
**Subject:** Public Records Request  
**Attachments:** 2. Affidavit page 1\_11-14-2015.pdf; 3. Affidavit page 2\_11-14-2015.pdf

I attach the affidavit in support of Rasier-DC, LLC's trade secret filings. The same affidavit is used for each report I sent you, so I did not scan two more copies.



*David Arthur*

Assistant County Attorney  
Broward County Aviation Department  
2200 SW 45<sup>th</sup> Street, Suite 101  
Dania Beach, FL 33312  
Office: 954-359-2251  
Fax: 954-359-1292  
Cell: 954-868-8817  
[www.broward.org](http://www.broward.org)

**From:** Arthur, David  
**Sent:** Friday, February 12, 2016 1:24 PM  
**To:** 'Aaron Brand' <aaron.brand@uber.com>  
**Subject:** RE: Affidavits re trade secrets

Aaron,

Thanks for the prompt response. We have reviewed the information provided. However, the affidavits were repeatedly produced without trade secret designation and do not actually contain material that can be protected under Florida trade secrets laws. See *Seapro Corp. v. Florida Dep't of Env't'l Protection*, 839 So. 2d 781 (Fla. 1<sup>st</sup> DCA 2003). The purpose of the requirement in the parties' license agreement that sworn affidavits be provided for any trade secret designated material is to enable the County to provide justification to any third party records request as to the rationale for maintaining the protected material as exempt.

As a public entity, the County is required to produce non-exempt public records, and we intend to produce the requested affidavits to the requestor by the end of day today. However, if Uber intends to file an emergency action to resolve this issue, we will temporarily refrain from producing the affidavits so that the issue may be promptly resolved by the court. If we do not hear from you by the end of business today, we will assume Uber does not intend to proceed with seeking emergency relief, and we will produce the affidavits. Time is of the essence, so if you are considering proceeding in court, please let me know asap.

If there are any questions, you may call me.





*David Arthur*

Assistant County Attorney  
Broward County Aviation Department  
2200 SW 45<sup>th</sup> Street, Suite 101  
Dania Beach, FL 33312  
Office: 954-359-2251  
Fax: 954-359-1292  
[www.broward.org](http://www.broward.org)

**From:** Aaron Brand [<mailto:aaron.brand@uber.com>]  
**Sent:** Friday, February 12, 2016 11:17 AM  
**To:** Arthur, David <[DARTHUR@broward.org](mailto:DARTHUR@broward.org)>  
**Subject:** Re: Affidavits re trade secrets

David,

Please see the enclosed letter. Please do not hesitate to contact me with questions.

Best,  
Aaron

---

Under Florida law, most e-mail messages to or from Broward County employees or officials are public records, available to any person upon request, absent an exemption. Therefore, any e-mail message to or from the County, inclusive of e-mail addresses contained therein, may be subject to public disclosure.

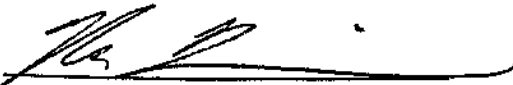
### **AFFIDAVIT OF Kasra Moshkani**

1. I, Kasra Moshkani, hereby attest that I have knowledge of the facts herein by virtue of my position as the manager of Rasier-DC, LLC's ("Rasier's") operations in Broward County. Rasier is a subsidiary of Uber Technologies, Inc.

2. In accordance with the agreement between Rasier and Broward County (the "County"), Rasier will remit a monthly fee to the Airport and Port. Because the fee is based on the number of passenger pickups, knowledge of the total deposited sum is equivalent to knowledge of the volume of business conducted by Rasier at the Airport or Port. In addition, Rasier must submit monthly reports that provide detailed information regarding the date, time, and location of each passenger pickup and dropoff.

3. The volume of Rasier's business at the airport and the associated trip data are trade secrets. It would be extremely valuable to other Transportation Network Companies ("TNCs") and other competitors. This information would allow competitors to analyze the attractiveness of expanding and entering into the relevant marketplace. It would also allow a third party to estimate Rasier's revenue for business conducted at the Airport or Port during the relevant time period. Repeated requests for the same trip and fee data would reveal details about the local market that are not widely known, such as seasonal variations and growth of the market over time.

4. Rasier does not voluntarily disclose this type of information. When it produces this information to airports or ports in connection with contractual requirements, Rasier marks the information as confidential and subject to protection as a trade secret. It is also Rasier's practice to bargain for contractual provisions specifically recognizing that this type of information is a trade secret. Rasier bargains for protections to prevent disclosure of this information, as reflected in section 9.4 of the agreement between Rasier and the County. Rasier has challenged the public release of equivalent trip information in other markets in response to public records requests, with favorable results. Rasier would contest public release of its trade secrets related to trips conducted at the Airport or Port, as well.

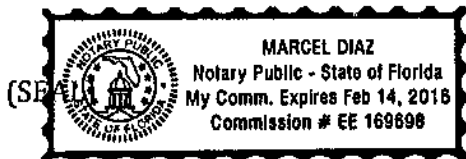
  
Signature

11/13/15  
Date

State of FL

County of Dade

On this 13<sup>th</sup> day of November 2015 before me personally appeared Kasra Moshkan, being known to me, who signed the above affidavit, and who, being duly sworn, declared that the statements therein made were true and correct.



  
(Notary Public)

## Blanchard, Jennifer

---

**From:** Stempler, Mark  
**Sent:** Tuesday, November 17, 2015 11:55 AM  
**To:** aashton@broward.org; jacoffey@broward.org; 'jburkholder@broward.org'; 'Vialpando, Lenny'; CLEE@broward.org; DARTHUR@broward.org; johara@broward.org  
**Cc:** Friedman, Bernie; LaPlant, Colleen; Blanchard, Jennifer  
**Subject:** Public Records Request

Please provide all TNC application filings, emails related to TNC applications, and any other documents (including correspondence) between Broward County and TNC applicants.

Time is of the essence for a response to this request. Please send the documents to me via email at [mstempler@bplegal.com](mailto:mstempler@bplegal.com). If you are unable to send the records via email, please advise when the records have been located and how we can obtain them. If there is a cost for this request, please provide it before any copies are made.

Thanks,





## Blanchard, Jennifer

---

**From:** Cooper, Sharlene <SCOOPER@broward.org>  
**Sent:** Tuesday, February 02, 2016 2:37 PM  
**To:** Stempler, Mark; LaPlant, Colleen  
**Cc:** Blanchard, Jennifer; Arthur, David; Meyer, Gregory  
**Subject:** RE: Public Records Request (PRR No.: 376422)  
**Attachments:** 5. FLL Broward Monthly Report\_Public Record\_Oct. 2015\_11-14-15.pdf

Dear Mr. Stempler:

We have identified the records that respond to the above-referenced public records request. Since the document that you requested existed electronically, there will be no charge for this request.

Please be advised the trade secret information contained in the attached document has been redacted as this information is exempt from disclosure.

If you have any questions, please feel free to call.

Sincerely,

Sharlene Cooper  
Records Coordinator



Broward County Aviation Department  
Fort Lauderdale-Hollywood International Airport  
2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312  
Office: 954-359-6129 / [fll.net](http://fll.net)  
Follow us on [Twitter@FLLFlyer](https://twitter.com/FLLFlyer)

---

**From:** Cooper, Sharlene  
**Sent:** Tuesday, February 02, 2016 10:54 AM  
**To:** 'Stempler, Mark'; LaPlant, Colleen  
**Cc:** Blanchard, Jennifer; Arthur, David; Meyer, Gregory  
**Subject:** RE: Public Records Request (PRR No.: 376422)

Dear Mr. Stempler:

We have identified the records that respond to the above-referenced request. Research to identify the records required 2 hours of clerical time.

Therefore, the costs for the records you have requested are:

2 Hours of research time @ \$10.00 hour \$ 20.00



Please forward payment in the amount of **\$20.00** to: Broward County Aviation Department, 2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312.

If you have any questions, please feel free to call.

Very truly yours,

Sharlene Cooper  
Records Coordinator



Broward County Aviation Department  
Fort Lauderdale-Hollywood International Airport  
2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312  
Office: 954-359-6129 / [fll.net](http://fll.net)  
Follow us on [Twitter@FLLFlyer](https://twitter.com/FLLFlyer)

---

**From:** Stempler, Mark [<mailto:MStempler@bplegal.com>]

**Sent:** Tuesday, January 12, 2016 2:18 PM

**To:** Cooper, Sharlene

**Cc:** Arthur, David; Meyer, Gregory; Friedman, Bernie; LaPlant, Colleen; Blanchard, Jennifer; Ohara, John; Ashton, Annika; Coffey, Joni Armstrong; Burkholder, John; Vialpando, Lenny; Lee, Christine

**Subject:** RE: Public Records Request (PRR No.: 376422)

We are in receipt of the County's response to our public records request below. While the majority of the documents were not related to our request, we want to ensure that we did receive all the documents that were related. Notably, we received no documents regarding Transportation Network Company ("TNC") applications. Though we did receive documents regarding operating agreements between Uber and the County and Lyft and the County regarding the port and airport, we did not receive anything regarding TNC applications for operations in the County. Our request was not limited to the port or airport. Have no TNCs applied or been granted a permit to operate in Broward County? Have no TNCs paid registration or license fees?

In addition, to the extent not already provided to us, please provide all documents and records regarding, reflecting or relating to the opinions or conclusions of John Burkholder or the County's Risk Management Division regarding any insurance information submitted to, or received by, Broward County regarding any TNC, TNC applicant, potential TNC, Uber or Lyft, from November 1, 2015 through the present. Time is of the essence for a response to this request. Please send the documents to me via email at [mstempler@bplegal.com](mailto:mstempler@bplegal.com). If you are unable to send the records via email, please advise when the records have been located and how we can obtain them. If there is a cost for this request, please provide it before any copies are made.

Thank you for your assistance.

Sincerely,

---

**From:** Cooper, Sharlene [<mailto:SCOOPER@broward.org>]

**Sent:** Thursday, December 17, 2015 1:09 PM

**To:** Stempler, Mark

**Cc:** Arthur, David; Meyer, Gregory; Friedman, Bernie; LaPlant, Colleen; Blanchard, Jennifer; Ohara, John  
**Subject:** RE: Public Records Request (PRR No.: 376422)

Dear Mr. Stempler:

We have identified the records that respond to the above-referenced request. The records total 161 single-sided pages. Research to identify the records required 4 hours of clerical time.

The charges associated with obtaining copies of public records are: .15 per page single-sided, .20 per page double-sided, after the first fifty (50) pages, plus \$2.50 per quarter hour for clerical time, after the first quarter-hour.

Therefore, the costs for the records you have requested are:

111 Single-sided copies @ .15 per page \$ 16.65

5.75 Hours of research time @ \$10.00 hour \$ 57.50

Please forward payment in the amount of \$ 74.15 to: Broward County Aviation Department, 2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312.

If you have any questions, please feel free to call.

Very truly yours,

Sharlene Cooper  
Records Coordinator



Broward County Aviation Department  
Fort Lauderdale-Hollywood International Airport  
2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312  
Office: 954-359-6129 / [fil.net](http://fil.net)  
Follow us on [Twitter@FLLFlyer](https://twitter.com/FLLFlyer)

---

**From:** Cooper, Sharlene [<mailto:SCOOPER@broward.org>]

**Sent:** Tuesday, November 17, 2015 4:09 PM

**To:** Stempler, Mark <[MStempler@bplegal.com](mailto:MStempler@bplegal.com)>

**Cc:** Arthur, David <[DARTHUR@broward.org](mailto:DARTHUR@broward.org)>; Meyer, Gregory <[GMeyer@broward.org](mailto:GMeyer@broward.org)>; Friedman, Bernie <[BFRIEDMAN@bplegal.com](mailto:BFRIEDMAN@bplegal.com)>; LaPlant, Colleen <[CLAPLANT@bplegal.com](mailto:CLAPLANT@bplegal.com)>; Blanchard, Jennifer <[JBlanchard@bplegal.com](mailto:JBlanchard@bplegal.com)>; Ohara, John <[JOHARA@broward.org](mailto:JOHARA@broward.org)>

**Subject:** RE: Public Records Request (PRR No.: 376422)

Dear Mr. Stempler:

This letter acknowledges your November 17, 2015, Email pursuant to the Florida Public Records Act, to receive the following:

- All TNC application filings, emails related to TNC applications, and any other documents (including correspondence) between Broward County and TNC applicants

Please be advised that Broward County intends to comply fully with the public records law in Chapter 119, Florida Statutes. In accordance with that law, you are and will be permitted to inspect and examine all public records that are in our possession [as you requested]. Additionally, upon payment of the required fees, you will be furnished with such copies, verified or otherwise, as you may request at the time of your inspection and examination of the documents. Florida law permits Broward County to charge for copies and for extensive use of information technology and resources in complying with a request for public records.

Broward County's policy is to provide the first fifteen (15) minutes of assistance time at no charge. Thereafter, charges are incurred at the rate of \$2.50 per fifteen minutes (or portion thereof). Charges for extensive use of information technology and resources are as follows: \$0.021785 per minute of CPU time, \$0.00049 per page for CPU read/write time, and \$0.00113 per line for printer time. Photocopy costs for pages 8.5" x 14" or smaller are \$0.15 per page for 1-sided copies and \$0.20 for 2-sided copies (if such copies are made internally), with the first fifty (50) pages provided at no charge, and actual cost of copying if the copies are made by an outside vendor.

Your inspection and examination of the documents requested is subject to the exemptions provided in Chapter 119, Florida Statutes. As you know, there is no obligation imposed on the County by the public records law or any other statute to research County records on your behalf or to arrange County records in a form useful to your purposes. Also, as you are aware, all of the records need to be reviewed so that any which are not public records are not disclosed and exempt material is redacted.

With respect to your request, the public records, if they exist, may be available at Broward County Aviation Department, 2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312. To arrange a time to commence your inspection and examination of the public records, and to find out if there is a charge for the public records requested, please contact me.

Sincerely,

Sharlene Cooper  
Records Coordinator



Broward County Aviation Department  
Fort Lauderdale-Hollywood International Airport  
2200 SW 45<sup>th</sup> Street, Suite 101, Dania Beach, FL 33312  
Office: 954-359-6129 / [fll.net](http://fll.net)  
Follow us on [Twitter@FLLFlyer](https://twitter.com/FLLFlyer)

**From:** Stempler, Mark [<mailto:MStempler@bplegal.com>]

**Sent:** Tuesday, November 17, 2015 11:55 AM

**To:** Ashton, Annika <[AASHTON@broward.org](mailto:AASHTON@broward.org)>; Coffey, Joni Armstrong <[JACOFFEY@broward.org](mailto:JACOFFEY@broward.org)>; Burkholder, John <[JBURKHOLDER@broward.org](mailto:JBURKHOLDER@broward.org)>; Vialpando, Lenny <[LVIALPANDO@broward.org](mailto:LVIALPANDO@broward.org)>; Lee, Christine <[CLEE@broward.org](mailto:CLEE@broward.org)>;

Arthur, David <DARTHUR@broward.org>; Ohara, John <JOHARA@broward.org>

Cc: Friedman, Bernie <BFRIEDMAN@bplegal.com>; LaPlant, Colleen <CLAPLANT@bplegal.com>; Blanchard, Jennifer <JBlanchard@bplegal.com>

**Subject:** Public Records Request

Please provide all TNC application filings, emails related to TNC applications, and any other documents (including correspondence) between Broward County and TNC applicants.

Time is of the essence for a response to this request. Please send the documents to me via email at [mstempler@bplegal.com](mailto:mstempler@bplegal.com). If you are unable to send the records via email, please advise when the records have been located and how we can obtain them. If there is a cost for this request, please provide it before any copies are made.

Thanks,

## **Mark J. Stempler**

Shareholder

Board Certified in Construction Law

LEED Green Associate

Bank of America Centre | 625 N. Flagler Drive, 7th Floor | West Palm Beach, FL 33401

Tel: 561.655.5444 | Fax: 561.832.8987 | [E-Mail](#)

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Under Florida law, most e-mail messages to or from Broward County employees or officials are public records, available to any person upon request, absent an exemption. Therefore, any e-mail message to or from the County, inclusive of e-mail addresses contained therein, may be subject to public disclosure.

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REMAINING PAGES REDACTED

**Blanchard, Jennifer**

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**From:** Ashton, Annika <AASHTON@broward.org>  
**Sent:** Friday, October 02, 2015 5:23 PM  
**To:** Stempler, Mark  
**Cc:** Friedman, Bernie; mmoskowitz@mmsslaw.com; 'Aaron Brand'; O'Hara, Dennis M.; Cohen, Jordan S.; Coffey, Joni Armstrong; Harrod, Rene  
**Subject:** Public Records Request Letter  
**Attachments:** Uber Trust Letter\_8 24 15.pdf

Mr. Stempler,

Attached is a copy of the record responsive to your September 2, 2015 public records request.

Best,



Annika E. Ashton  
Assistant County Attorney  
Broward County Attorney's Office  
115 S. Andrews Avenue, Room 423, Fort Lauderdale, FL 33301  
Phone: (954) 357-7600 Fax: (954) 357-7641  
[aashton@broward.org](mailto:aashton@broward.org)

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Under Florida law, most e-mail messages to or from Broward County employees or officials are public records, available to any person upon request, absent an exemption. Therefore, any e-mail message to or from the County, inclusive of e-mail addresses contained therein, may be subject to public disclosure.





**NOT FOR DISTRIBUTION  
CONTAINS CONFIDENTIAL TRADE SECRET INFORMATION  
SUBJECT TO FLA. STAT. § 815.045**

August 24, 2015

Mr. Kent George  
2200 SW 45 Street  
Suite 101  
Dania Beach, FL 33312

Dear Mr. George,

This letter is to confirm that Rasier, LLC ("Rasier"), a wholly-owned subsidiary of Uber Technologies, Inc. ("UTI"), has deposited \$771,996.00 into the trust account maintained by our outside counsel in Ft. Lauderdale, Moskowitz, Mandell, Salim & Simowitz, P.A.

This amount reflects the sum of \$3.00 for each passenger pick up and \$3.00 for each passenger drop off by Rasier driver-partners at FLL between January 13, 2015 and July 31, 2015. We have directed our counsel to hold these funds in its trust account during our ongoing negotiations with BCAD about an agreement governing Rasier's operations at FLL. We have also directed our counsel to disburse the funds in this trust fund, or a portion of the funds, to BCAD in accordance with the parties' final operating agreement, which will specify the amount Rasier must remit to cover pre-agreement trips. If the parties do not enter into an agreement by February 24, 2016, the trustee will refund the funds back to Rasier.

Please be advised that we consider the dollar figure referenced in this letter – and any information that may be derived from that figure, including the number of trips conducted by Rasier driver-partners at FLL – to be trade secrets that must be kept confidential under Fla. Stat. § 815.045. **Consistent with Fla. Stat. § 815.045, we request that you not disclose these figures in any public forum, including a County Commission meeting.** In addition, if you receive a request for those figures or for this letter under the Public Records Law, I request that you promptly notify me so that Rasier will have an opportunity to prevent the disclosure of this information.

Sincerely,



Matthew Gore  
General Manager  
Uber Florida

CC: County Attorney Joni Coffey

## Blanchard, Jennifer

---

**From:** Ashton, Annika <AASHTON@broward.org>  
**Sent:** Monday, September 28, 2015 5:23 PM  
**To:** Stempler, Mark  
**Subject:** FW: In re Rasier Public Records Request

Mark, Here is what we sent to Uber's attorneys today. We anticipate producing the record on Wednesday.

Annika

Annika E. Ashton  
Assistant County Attorney  
Broward County Attorney's Office  
115 S. Andrews Avenue, Room 423, Fort Lauderdale, FL 33301  
Phone: (954) 357-7600 Fax: (954) 357-7641  
[aashton@broward.org](mailto:aashton@broward.org)

---

**From:** Ashton, Annika  
**Sent:** Monday, September 28, 2015 5:15 PM  
**To:** 'Cohen, Jordan S.'  
**Cc:** Aaron Brand ([aaron.brand@uber.com](mailto:aaron.brand@uber.com)); mmoskowitz@mmsslaw.com; O'Hara, Dennis M.; Coffey, Joni Armstrong; Harrod, Rene  
**Subject:** RE: In re Rasier Public Records Request

Mr. Cohen,

We have reviewed the information and authorities cited in Mr. O'Hara's letter of September 4, 2015, as well as the contrary argument and authorities offered by the public records requestor, Mark Stempler, regarding the assertion of trade secret for the amount of funds deposited by Uber as set forth in the August 24, 2015 letter from Matthew Gore. We conclude that the contemplated financial transaction with the County is not protected by trade secret under applicable law. To that end, we intend to respond to the public records requestor's demand to produce the unredacted letter and provide the record by close of business Wednesday, September 30, 2015, unless otherwise instructed by a court of competent jurisdiction. Please advise us if you intend to seek emergency injunctive relief so that we can abide by any applicable court order.

Best,

Annika E. Ashton  
Assistant County Attorney  
Broward County Attorney's Office  
115 S. Andrews Avenue, Room 423, Fort Lauderdale, FL 33301  
Phone: (954) 357-7600 Fax: (954) 357-7641  
[aashton@broward.org](mailto:aashton@broward.org)



**From:** Cohen, Jordan S. [mailto:JCohen@wickersmith.com]  
**Sent:** Friday, September 04, 2015 5:11 PM  
**To:** Ashton, Annika  
**Cc:** Aaron Brand (aaron.brand@uber.com); mmoskowitz@mmsslaw.com; O'Hara, Dennis M.  
**Subject:** In re Rasier Public Records Request

Ms. Ashton,

Thank you for your courtesies on our call earlier today.

Attached please find correspondence being submitted on behalf of our client Rasier, LLC, a wholly-owned subsidiary of Uber Technologies, Inc. for consideration by the County Attorney's office.

Please let us know if you have any questions or we can be of any further assistance in this regard.

Best,

Jordan S. Cohen, Esq.

**Jordan S. Cohen | Attorney at Law**



Wicker Smith O'Hara McCoy & Ford P.A.  
SunTrust Center  
515 East Las Olas Blvd., Suite 1400  
Fort Lauderdale, FL 33301  
Tel: 954-847-4800 | Fax: 954-760-9353  
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