

Brian J. Mast
2002 Coconut Drive
Fort Pierce, FL 34949

November 17, 2025

Martin County
Attention: Public Records Liaison
2401 SE Monterey Road
Stuart, Florida 34996

Re: Public Records Request under Chapter 119, Florida Statutes (Florida Public Records Act) and Article I, Section 24, Florida Constitution

To Whom It May Concern:

This is a request under Florida's Public Records Act (Chapter 119, Fla. Stat.) for immediate inspection and copies of public records. Please treat this request as covering all records responsive to the descriptions below, regardless of format or where the records are stored (electronic or paper, device-based, cloud storage, third-party vendor systems, archived backups, etc.). I request electronic copies where feasible (PDF for documents, native format for spreadsheets) delivered by email or by download link.

PRESERVATION NOTICE: Please preserve all records (including but not limited to electronic records, metadata, backups, logs, device images, and communications) that are or may be responsive to this request. This includes records on agency-owned devices and records held by any current or former agency employees, contractors, consultants, or agents, as well as records held on personally-owned devices if used in connection with official business. Do not destroy, delete, or alter any potentially responsive records or devices until this request has been processed.

1. Persons/Entities of Interest

Search for and produce records that reference or involve any of the following — include ALL name variants and spellings:

- Annie (any surname, if known).
- Brian Mast; Brian J. Mast; Brian Jeffrey Mast; "Brian Mass"; "Brian, J, Mast"; any other variations or misspellings of "Brian Mast" or "Mast."
- Stephen Leighton; Stephen G. Leighton; Steven Leighton; "Stephen Leighton" (all spellings/variants).
- Any agency employee, contractor, consultant, vendor, or third party who communicated with, worked for, or performed services on behalf of the named individuals above.

Date range: January 1, 2016 – present (or earlier if records exist).

2. Types of Records Requested

Produce all records relating to the people and matters described above, including but not limited to:

A. Communications and message content

- Emails (sent, received, drafts, attachments) on government or personal accounts used for official business.
- Text messages (SMS/MMS), instant messaging, and chat logs (WhatsApp, Signal, Telegram, Teams, Slack, Google Chat, etc.).
- Direct messages on social media platforms (Twitter/X, Facebook Messenger, Instagram, LinkedIn, etc.).
- Voicemail recordings/transcripts and call logs (agency device and carrier records).

B. Browser and search activity

- Google search queries and search history performed on any public or agency device or account.
- Browser history, cookies, cached pages, autofill entries, bookmarks related to public-business activity.
- Logs or records of web searches performed by or at the direction of the named individuals on agency systems.

C. Documents, reports, and records

- Memoranda, notes, internal reports, drafts, final reports, investigation reports, forensic reports, executive summaries, deliverables, and attachments.
- Contracts, invoices, purchase orders, payment records, statements, receipts, and grant documents for any outside firm(s) retained by the County or Board.
- RFPs, proposals, bids, correspondence with vendors, and procurement files relating to any outside investigations or consulting agreements.

D. Specific request regarding Martin County investigation

Produce all records related to the investigation for which the Martin County Board of County Commissioners (or relevant Martin County office) engaged an outside firm and paid \$75,000 regarding an employee named Michael Merker. This includes:

- The contract/engagement letter or consulting agreement with the outside firm;
- Invoices, payment vouchers, checks, purchase orders, and proof of payment showing the sum of \$75,000 (or any other amounts) paid to the outside firm;
- RFP or solicitation documents, proposals, and evaluation/selection committee notes;
- Scope of work, work product, final and draft reports produced by the outside firm;
- Communications (emails, texts, memos, meeting notes) between County officials/commissioners/staff and the outside firm about the investigation;
- Any attorney-client invoices or communications related to the engagement (to the extent not privileged — if a privilege is asserted, please state the basis and provide a privilege log);
- All communications/documents discussing discipline, findings, recommendations, remedial actions, or settlement related to the employee Michael Merker;
- Records of any Board or committee votes, agenda items, minutes, or public meeting materials referencing the contract, payment, or findings;

We expressly expect production of the entire investigation, including all pages, reports, appendices, exhibits, and supporting materials, in a timely manner as contemplated by Florida's Public Records Act.

E. Device types and storage locations

Produce records from (but not limited to) the following:

- Desktop computers, laptops, and tablets (agency-owned and personally-owned when used for public business);
- Smartphones and mobile devices (iPhone, Android, Blackberry, other);
- Government-issued mobile devices / phones assigned to elected officials, commissioners, department heads, and staff;
- Personal mobile devices used for public business;
- Landline and VOIP phone systems, call logs, and voicemail servers;
- External storage (USB drives, external hard disks, SD cards, removable media);
- Cloud storage and cloud accounts (Google Workspace/Gmail, Google Drive, Microsoft 365/Outlook/OneDrive, Dropbox, iCloud, Box);
- Social media accounts and third-party platforms (agency or personal accounts used for public business);
- Server logs, backup tapes, archived servers, system logs, audit logs, forensic images;
- Collaboration platforms (Slack, Microsoft Teams, Google Chat) and any platforms used by outside firm(s);
- Any third-party vendor or contractor systems where agency-related records may be stored.

F. Public records requests referencing Sarah Merker

Produce copies of any and all public records requests submitted by or on behalf of Sarah Merker to the Martin County Board of County Commissioners (or its Clerk, staff, or any other County office) regarding interactions, emails, text messages, or other communications from or to Stephen Leighton (a/k/a Stephen G. Leighton, Steven Leighton, or any variation thereof). This includes:

- Original requests submitted by or on behalf of Sarah Merker;
- County responses or correspondence to Sarah Merker or her representatives;
- Any responsive records released to Sarah Merker;
- Notes, memoranda, or internal communications among County staff about fulfilling such requests;
- Any billing, fee estimates, or invoices related to fulfilling such requests.

Please construe “public records requests” broadly to include requests made via email, web form, mail, fax, or in person.

3. Exemptions and Redactions

If you withhold or redact records on the basis of an exemption, please provide a privilege/exemption log identifying each withheld/redacted document by date, sender, recipient, brief description, and the specific statutory basis.

4. Fees

If fees apply for copying or data extraction, please provide an itemized estimate before proceeding. If there is no fee, please advise in your acknowledgement.

5. Delivery

I prefer to receive responsive records electronically (PDF for documents/images; native format for spreadsheets; CSV or text for logs). Please send by email to: brian.j.mast@gmail.com or provide a secure download link. If electronic delivery is not possible, inform me and provide cost and delivery method.

6. Acknowledgement

Please acknowledge receipt of this request within five (5) business days and advise the earliest date when responsive records will be available. If any portion of this request is unclear, please construe it broadly; otherwise, please contact me for clarification only if absolutely necessary.

Legal authority / background: Florida's Public Records Act and Constitution establish a broad right of inspection. Records made or received in connection with official business are public records regardless of format, and communications such as emails and text messages used in public business are subject to disclosure. Guidance from the Florida Attorney General confirms that records created on personal devices used for official business can be public records.

Thank you for your assistance. If you have questions or need to discuss search terms, custodians, or delivery, please contact me at brian.j.mast@gmail.com.

Sincerely,

A handwritten signature in black ink, appearing to be 'B. Mast', with a stylized flourish at the end.

Brian J. Mast