

RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF KEY WEST, FLORIDA, AUTHORIZING A LIMITED WAIVER OF ATTORNEY-CLIENT PRIVILEGE FOR SPECIFIC COMMUNICATIONS BETWEEN OUTSIDE COUNSEL BENEDICT KUEHNE AND VICTORIA MÉNDEZ AND FORMER CITY ATTORNEY RONALD RAMSINGH, FOR THE SOLE PURPOSE OF PERMITTING TESTIMONY AND QUESTIONING REGARDING COMMUNICATIONS WITH RON RAMSINGH RELATED TO THE PRODUCTION OF DOCUMENTS IN RESPONSE TO SUBPOENAS SERVED BY THE STATE ATTORNEY'S OFFICE IN AUGUST AND SEPTEMBER 2024; PROVIDING FOR CONDITIONS AND LIMITATIONS OF SUCH WAIVER; AND PROVIDING FOR AN EFFECTIVE DATE.**

WHEREAS, the City of Key West received subpoenas from the State Attorney's Office served in August and September 2024 requesting the production of certain documents; and

WHEREAS, in response to said subpoenas, communications occurred between the City's Outside Counsel, Benedict Kuehne and Victoria Méndez, and former City Attorney Ron Ramsingh regarding the identification, collection, and production of responsive documents; and

WHEREAS, such communications may be protected by the attorney-client privilege and/or work product doctrine under applicable law; and

WHEREAS, the City Commission recognizes that, in certain circumstances, it is in the best interests of the City to authorize a limited waiver of attorney-client privilege to allow for full and transparent testimony regarding discrete subject

matters; and

WHEREAS, the City Commission desires to authorize a narrowly tailored waiver of attorney-client privilege solely for the purpose of permitting testimony and questioning concerning communications between Ben Kuehne and/or Victoria Méndez with former City Attorney Ron Ramsingh relating to the production of documents responsive to the subpoenas served by the State Attorney's Office in August and September 2024; and

WHEREAS, the City Commission expressly intends that such waiver be strictly limited in scope and shall not constitute a general waiver of attorney-client privilege or work product protections as to any other communications, subject matters, or time periods; and

WHEREAS, the City Commission further intends that all other privileged communications, including but not limited to legal advice, strategy, mental impressions, and communications outside the limited scope described herein, shall remain fully protected and preserved.

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF KEY WEST, FLORIDA:

Section 1: The above recitals are hereby incorporated as if fully set forth herein.

Section 2: The City Commission hereby authorizes a limited waiver of the attorney-client privilege, solely to the extent

necessary to permit testimony and questioning of Benedict Kuehne and/or Victoria Méndez regarding communications with Ron Ramsingh specifically related to the production of documents in response to subpoenas served by the State Attorney's Office on the City of Key West City Commissioner's and employees in August and September 2024.

Section 3: This waiver is expressly limited as follows:

(a) The waiver applies only to communications involving Benedict Kuehne and/or Victoria Méndez with Ron Ramsingh concerning the production of documents responsive to the subpoenas served in August and September 2024;

(b) The waiver does not extend to legal advice, litigation strategy, mental impressions, or any other privileged communications outside the specific subject matter described herein;

(c) The waiver shall not constitute a subject-matter waiver beyond the narrow scope expressly authorized;

(d) All other privileges and protections, including but not limited to the attorney-client privilege and work product doctrine, are expressly preserved.

Section 4: Nothing in this Resolution shall be construed

as a waiver of privilege for any purpose other than the limited testimony and questioning described herein, and any disclosure made pursuant to this Resolution shall not be deemed a waiver in any other proceeding or context.

Section 5: The City Attorney is authorized to take any and all actions necessary to implement the intent of this Resolution and to ensure that the scope of the waiver is maintained consistent with the limitations set forth herein.

Section 6: That this resolution shall go into effect immediately upon its passage and adoption and the authentication by the signature of the Presiding Officer and the Clerk of the Commission.

\*\* REMAINDER OF PAGE INTENTIONALLY LEFT BLANK \*\*

Passed and adopted by the City Commission at a meeting held this \_\_\_\_\_ day of \_\_\_\_\_, 2026.

Authenticated by the Presiding Officer and Clerk of the  
Commission on the \_\_\_\_\_ day of \_\_\_\_\_, 2026.

Filed with the Clerk on \_\_\_\_\_, 2026.

Mayor Danise Henriquez	_____
Vice Mayor Donald "Donie" Lee	_____
Commissioner Lissette Carey	_____
Commissioner Aaron Castillo	_____
Commissioner Monica Haskell	_____
Commissioner Sam Kaufman	_____
Commissioner Greg Veliz	_____

\_\_\_\_\_  
DANISE HENRIQUEZ, MAYOR

ATTEST:

\_\_\_\_\_  
KERI O'BRIEN, CITY CLERK