

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 RONALD RAMSINGH RELATED TO THE PRODUCTION OF DOCUMENTS IN RESPONSE TO SUBPOENAS SERVED BY THE STATE ATTORNEY'S OFFICE IN AUGUST AND NOVEMBER 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 November 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 Ronald 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 the Rules Regulating The Florida Bar; 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 Benedict Kuehne and/or Victoria Méndez with former City Attorney Ronald Ramsingh relating to the production of documents responsive to the subpoenas served by the State Attorney's Office in August and November 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 its attorney-client privilege, solely to the extent necessary to permit testimony and questioning of Benedict Kuehne and/or Victoria Méndez regarding communications with Ronald 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~~ November 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 Ronald Ramsingh concerning the production of group text communications and public record text communications in relation to the scope of the State Attorney's Office's investigatory subpoenas served in August and November 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 in section 3(a);

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

(d) This resolution and waiver are not intended to have any bearing on Ronald Ramsingh's ability to assert or waive any attorney-client privilege he holds

individually. Nor does this resolution and waiver have any bearing on Ronald Ramsingh's ability to assert a more limited waiver.

(e) This resolution and waiver are not intended to have any bearing on any Commission Member's, Former Commission Member's, or City Official's ability to assert or waive any attorney-client privilege that he or she holds individually.

(f) 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 regarding the subject matter described in section 3. 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: 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.

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