

**IN THE SUPREME COURT
STATE OF FLORIDA**

CITY OF TALLAHASSEE, FLORIDA,

Petitioner,

v.

CASE NO. SC21-651
LT CASE NO. 1D20-2193

FLORIDA POLICE BENEVOLENT
ASSOCIATION, INC., et al.,

Respondents.

_____ /

**MOTION TO APPEAR AS *AMICUS CURIAE* IN SUPPORT OF
PETITIONER, CITY OF TALLAHASSEE**

Pursuant to Fla.R.App.P. 9.370, the City of Miami Civilian Investigative Panel (“CIP”) hereby moves for leave to file an *amicus curiae* brief on the merits in support of petitioner, City of Tallahassee, Florida.

1. The CIP provides for independent and impartial citizens’ oversight of the Miami Police Department. The CIP provides fair and impartial assessments regarding concerns about police conduct. It provides a balanced judgment of issues and complaints and provides a safe and open environment to express grievances. The CIP conducts investigations and hearings into allegations of police misconduct, and also conducts monthly and emergency public meetings.

2. In performing its mandated functions, the CIP prepares documents and holds proceedings, both of which may identify police officers whose conduct is under investigation. The CIP is subject to both Florida's public records laws and Government in the Sunshine laws, and may not withhold from the public information pertaining to any officer's identity.

3. In light of the First District's decision, the CIP expects it will be asked to withhold the identity of an officer under investigation. Honoring such requests, though, would undermine the CIP's function of providing an open, public forum in which grievances may be addressed.

4. Undersigned counsel has conferred with counsel for the parties, who have graciously indicated they do not object to CIP's participation as amicus.

Respectfully submitted,

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By: /s/ Edward G. Guedes
Edward G. Guedes

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed and served through the e-Portal this 16th day of March, 2022, on counsel included in the attached service list.

 /s/ Edward G. Guedes

SERVICE LIST

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