

IN THE CIRCUIT COURT OF THE  
SECOND JUDICIAL CIRCUIT IN AND  
FOR LEON COUNTY, FLORIDA

**JEREMY A. MATLOW,**

Plaintiff,

CASE NO.: 22-CA-972

v.

**BLUEPRINT INTERGOVERNMENTAL  
AGENCY, a political subdivision,**

Defendant.

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**VERIFIED MOTION TO DISQUALIFY JUDGE ANGELA DEMPSEY**

COMES NOW, the Plaintiff, JEREMY MATLOW, by and through undersigned counsel and pursuant to Fla.R.Jud.Admin. 2.330(d) and § 38.10, Florida Statutes, and hereby moves the Honorable Judge Angela Dempsey to disqualify herself from any further proceedings in the above-styled action, and as grounds states:

**GENERAL STATEMENT OF FACTS AND PROCEDURAL HISTORY**

1. No previous Motion to Disqualify has been filed and granted in this case. The instant Motion must be treated as an Initial Motion. See Fla.R.J.Ad. 2.330(f) and § 38.10, Florida Statutes.
2. The instant Motion is timely and filed within ten days of learning that the Honorable Judge Angela Dempsey is assigned to this case.
3. This is a case against the Blueprint Intergovernmental Agency due to the failure of its Intergovernmental Management Committee to comply with the Sunshine Amendment to the Florida Constitution.

4. Blueprint consultant, VancoreJones, has an extensive history as a paid consultant crafting and messaging the Blueprint Intergovernmental Agency and influencing policy, the IMC and elected officials. VancoreJones has been the single private-sector architect of the system of government at issue in this case. VancoreJones was retained as a “strategic communications” consultant weeks after the vote to create the Office of Economic Vitality (OEV) in 2016. VancoreJones has received hundreds of thousands of dollars in public Blueprint dollars, all through contracts awarded through the IMC, that were never discussed in the sunshine.

5. More than a mere consultant, VancoreJones has played an active role in policy formation working as an arm of Blueprint itself. VancoreJones designed the messaging, designed the OEV websites, the Blueprint website, and in written proposals highlighted their deep connection to the agency and their connection with elected officials responsible for the agency. VancoreJones, in their written documents, highlight the intersection of working as both a campaign consultant and an ability to secure favorable government outcomes.

6. The City Manager and County Administrator collectively make up the IMC, and both have a decades long history working with VancoreJones. VancoreJones is so close to the Defendant in this case, that they have worked together to draft public comments made at public appearances. In an email by VancoreJones employee Kari Headings, she forwards along a speech she has written for IMC Member/City Manager Reese Goad in preparation for a podcast appearance by Reese Goad for the FCMA, and Steven Vancore, a principal at VancoreJones. VancoreJones reportedly played an active role in influencing the City Commission to select Reese Goad as City Manager.

7. Political clients represented by VancoreJones, including John Dailey, Gil Ziffer, Mary Ann Lindley, and Jack Campbell, have routinely criticized Plaintiff on a personal level in

op-eds and public appearances, denigrating his profession and going as far to label him an “evil man.”

8. Plaintiff has been a frequent critic of VancoreJones, a political consulting firm working for private clients, elected officials and on the public payroll at the same time. This discovery of IMC approved contracts to VancoreJones led to further discovery of IMC decision making outside of the sunshine and to this instant case.

9. VancoreJones has worked for Judge Angela Dempsey as a political consultant. Judge Dempsey’s 2020 political campaign spent \$130,475 total. \$97,928, or 75%, of total campaign expenditures were paid to VancoreJones Communications. Upon information and belief, the relationship between VancoreJones, and Judge Dempseys spans 15 years. The relationship between Judge Dempsey’s contractor, VancoreJones, and the awarding of their contracts through and to the Defendant, through the IMC, is integral to this case.

10. VancoreJones not only has represented Judge Dempsey and the Defendant in this case, but its principal, Drew Jones, has personal knowledge of the material facts in the case and the Plaintiff plans to call Drew Jones as a witness. Judge Dempsey would be required to rule on the credibility of testimony of her long-standing political consultant.

11. Plaintiff reasonably fears that, no matter how much the judge attempts to be neutral, it is clear that it is impossible to eliminate natural bias or prejudice in favor of a witness with whom that person has a decades long professional relationship including providing guidance and support.

12. Additionally, Greg James is a pastor and political consultant in Leon County. Greg James operates a church located at 4409 Blountstown Highway.

13. A new valley curb and driveway apron was installed per IMC direction outside of the sunshine at 4409 Blountstown Highway and associated with a nearby road expansion project.

14. Greg James also served as a political consultant for Judge Angela Dempsey and will be called as a witness in this case.

15. The Plaintiff fears that for these reasons he would not receive a fair trial in that Judge Dempsey has a bias and prejudice against him and in favor of the Defendant and Defendant subsets. Any reasonable person faced with these circumstances would experience a well-grounded fear that he or she would not receive a fair hearing in front of a judge with these relationships.

16. Plaintiff wishes for the judge to grant the instant Motion and recuse herself from any further involvement in the above-styled action. Further, Plaintiff wishes for the judge to refer this action to the Chief Judge of the Second Judicial Circuit for reassignment to a Circuit Court Judge.

#### **MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISQUALIFY**

While the procedure for disqualification of judges in civil cases is governed by Fla. R. Civ. P. 1.432, the substantive standards for disqualification are found in the Code of Judicial Conduct and in Fla. Stat. ch. 38.10 (1987). The Code of Judicial Conduct provides, in part, that a judge should disqualify herself in a proceeding in which his impartiality might reasonably be questioned. Fla. Bar Code Jud. Conduct Canon 3C. Breakstone v. MacKenzie, 561 So. 2d 1164 (Fla. 3d DCA 1989).

The principal issue presented in a motion to disqualify a judge is that of legal sufficiency. See Livingston v. State, 441 So.2d 1083, 1086, (Fla. 1983). The trial judge cannot pass upon the truth or falsity of the facts contained in the affidavit, nor adjudicate whether in reality prejudice exists. The facts set forth in the affidavit are taken as true, and if legally sufficient, the trial judge

must withdraw. Breakstone, 561 So. 2d at 1167.

Legal sufficiency is governed by a reasonable person standard. Id. The affidavit must recite "facts and circumstances that would lead any normal human being in the position of [the movant] to 'fear' that he would not receive a fair trial. . . ." Dickenson v. Parks, 104 Fla. 577, 582, 140 So. 459, 462 (1932); accord Fischer v. Knuck, 497 So.2d 240, 242 (Fla. 1986); Livingston v. State, 441 So.2d at 1087. "If the attested facts supporting the suggestion are reasonably sufficient to create such a fear, it is not for the trial judge to say that it is not there." Livingston, 441 So.2d at 1087 (quoting State ex rel. Davis v. Parks, 141 Fla. 516, 518, 194 So. 613, 614 (1939)). So long as the allegations "are not frivolous or fanciful, they are sufficient to support a motion to disqualify. . . ." Hayslip v. Douglas, 400 So.2d 553, 556 (Fla. 4th DCA 1981) (quoting State ex rel. Brown v. Dewell, 131 Fla. 566, 573, 179 So. 695, 697-98 (1938)).

Here, the facts supporting disqualification are reasonably sufficient to create a fear that the Plaintiff would not receive a fair trial and disqualification is required.

### CONCLUSION

The judge currently assigned to the above-styled action, the Honorable Judge Angela Dempsey, must disqualify and recuse herself from any further involvement in the above-styled action, based on the foregoing Motion. The above-styled action should be referred to the Chief Judge of the Second Judicial Circuit for reassignment to a Circuit Court Judge.

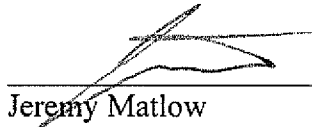
WHEREFORE, Plaintiff respectfully requests and prays that this honorable court GRANT the Motion to Disqualify Judge Angela Dempsey and refer the above-styled action to the Chief Judge of the Second Judicial Circuit for reassignment to a Circuit Court Judge.

### ATTESTATION

I hereby attest that the statements contained above are true and correct. This Motion is

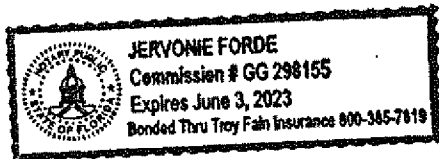
filed within 10 days of being advised of facts supporting the disqualification requested herein. Additionally, I adopt all of the numbered paragraphs set forth above and attest as to the truth of each of them. I fear bias by the judge against me or in favor of the Defendant and its subsets for the reasons set forth above.


Dated this 20<sup>th</sup> day of June, 2022.

  
\_\_\_\_\_  
Jeremy Matlow

**ATTESTATION**

**BEFORE ME** personally appeared Jeremy Matlow who states that the foregoing is true and correct. He is personally known to me.



  
\_\_\_\_\_  
Notary Public (Signature)

Jervonie Forde  
\_\_\_\_\_  
Notary Public (Printed Name)

My Commission expires: 6/3/2023

Respectfully submitted,

/s/ Marie A. Mattox  
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**CERTIFICATE OF GOOD FAITH**

I HEREBY CERTIFY that the foregoing Motion to Disqualify Judge Angela Dempsey and accompanying Affidavit from Plaintiff are made in good faith.

/s/ Marie A. Mattox  
Marie A. Mattox

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent by electronic transmission to all counsel of record this 19<sup>th</sup> day of June, 2022:

/s/ Marie A. Mattox  
Marie A. Mattox