



OFFICE OF THE CITY COUNCIL

117 WEST DUVAL STREET, SUITE 425
4TH FLOOR, CITY HALL
JACKSONVILLE, FLORIDA 32202

Duval DOGE Committee Document Requests and Interrogatories RE Jacksonville Tele-Health Contracts

Definitions

1. The "City" means the City of Jacksonville.
2. The "Administration" means anyone working in the office of Mayor Donna Deegan or acting on Mayor Deegan's behalf including but not limited to the Mayor's direct staff, Procurement, and/or Sunil Joshi.
3. The "Contract" means the City of Jacksonville contract with Telescope Health for tele-health services.
4. "Communication" and "communications" means any and all inquiries, discussions, conferences, conversations, negotiations, agreements, meetings, interviews, telephone conversations, letters correspondence, notes, telegrams, facsimiles, electronic mail (email), text messages, memoranda, documents, writings, or other forms of communications, including but not limited to both oral and written communications.
5. "Document" means any written, recorded, or graphic material of any kind, whether prepared by you or by any other person, that is in your possession, custody, or control. The term includes agreements; contracts; letters; telegrams; inter- office communications; memoranda; reports; records; instructions; specifications; notes; notebooks; scrapbooks; diaries; plans; drawings; sketches; blueprints; diagrams; photographs; photocopies; charts; graphs; descriptions; drafts, whether or not they resulted in a final document; minutes of meetings, conferences, and telephone or other conversations or communications; invoices; purchase orders; bills of lading; recordings; published or unpublished speeches or articles; publications; transcripts of telephone conversations; phone mail; electronic-mail; ledgers; financial statements; microfilm; microfiche; tape or disc recordings; and computer print-outs. The term "document" also includes electronically stored data from which information can be obtained either directly or by translation through detection devices or readers; any such document is to be produced in a reasonably legible and usable form. The term "document" includes all drafts of a document and all copies that differ in any respect from the original, including any notation, underlining, marking, or information not on the original. The term also includes information stored in, or accessible through, computer or other information retrieval systems (including any computer archives or back-up systems), together with instructions and all other materials necessary to use or interpret such data compilations. Without limitation on the term "control" as used in the preceding paragraph, a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person.
6. "Including" means including, but not limited to.
7. "Relating to" means containing, constituting, considering, comprising, concerning, discussing, regarding, describing, reflecting, studying, commenting or reporting on, mentioning, analyzing, or referring, alluding, or pertaining to, in whole or in part.
8. "Relevant time period" means July 1, 2023 through the date of service of these requests.



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Administration

Document Requests:

1. All Communications between the Administration and Telescope Health during the Relevant Time Period.
2. All Communications between the Administration and UF Health Jacksonville related to tele-health during the Relevant Time Period.
3. All Communications between the Administration and Emergency Resources Group during the Relevant Time Period.
4. All Communications from or to the Administration related to tele-health during the Relevant Time Period.
5. All Communications between the Administration and Dr. Matthew Thompson.
6. All Communications related to RightSight Health during the Relevant Time Period.
7. All Communications between the Administration and Jacksonville Fire and Rescue Department related to tele-health during the Relevant Time Period.
8. All Communications between the Administration and Jacksonville Fire and Rescue Department related to Telescope Health during the Relevant Time Period.
9. All Documents related to tele-health during the Relevant Time Period.

Interrogatories:

1. Has the Jacksonville Fire and Rescue Department Medical Director filed a conflict-of-interest form/disclosure of any type regarding any potential conflict at any time? If so, please state in detail what forms have been filed.



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Telescope Health

Document Requests:

1. All Communications between Telescope Health and the Administration during the Relevant Time Period.
2. All Communications between the Telescope Health and Emergency Resources Group during the Relevant Time Period related to the City of Jacksonville tele-health contract(s).
3. All Communications between Telescope Health and Jacksonville Fire and Rescue Department during the Relevant Time Period.
4. All Documents related to the screening reports inquired about in Interrogator No. 5 below.
5. All Documents related to monthly Contract-required reporting, including encounter logs and payer-status screening.

Interrogatories:

1. Please explain in detail your ownership structure including the names of anyone who has a beneficial/ownership interest in Telescope Health.
2. Please explain in detail your relationship with Emergency Resources Group.
3. Please state any affiliate, subsidiary, and/or parent corporations related to Telescope Health.
4. The Contract is intended to cover uninsured patients only. What controls does Telescope Health use at intake to ensure that Medicare or Medicaid patients are not receiving City-funded services?
5. Please describe your exception reports for screening out Medicare and Medicaid patients? How many federally insured patients were screened out?
6. Telescope Health states that its efforts on behalf of the City have saved over \$11 million in healthcare costs. Please provide the raw data, methodology, and patient-level reconciliation that verifies those alleged savings.
7. As to the savings discussed in Interrogatory No. 6 above, how do those alleged savings align with UF Health Jacksonville's continued increase in uncompensated-care subsidies with the City?
8. What safeguards are in place to ensure that Telescope Health does not directly or indirectly steer patients to Emergency Resources Group facilities or away from UF Health Jacksonville?



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9. Telescope Health stated that Telescope Health does not bill Medicare or Medicaid. Can you provide an auditable log confirming that Telescope Health and/or any associated or partner organization including, but not limited to, Emergency Resources Group have never billed a federal payer for a patient first encountered through the City-funded tele-health program governed by the Contract?
10. Who at Telescope Health is responsible for ensuring that program design, referrals, or telehealth recommendations do not create a financial benefit to Emergency Resources Group? Is there a firewall in place to ensure this does not happen? If so, please describe in detail that firewall.
11. In September 2025, Telescope Health made significant campaign contributions to a political action committee controlled by lobbyists that subsequently made contributions to elected officials just prior to the City of Jacksonville approving a \$1.5 million dollar tele-health contract to Telescope Health, why did you make these contributions at that time?

Emergency Resources Group

Document Requests:

1. All Communications between Emergency Resources Group and the Administration during the Relevant Time Period.
2. All Communications between the Telescope Health and Emergency Resources Group during the Relevant Time Period related to the City of Jacksonville tele-health contract(s).
3. All Communications between Emergency Resources Group and Jacksonville Fire and Rescue Department during the Relevant Time Period.

UF Health – Jacksonville

Document Requests:

1. All Communications between UF Health Jacksonville and the Administration during the Relevant Time Period.
2. All Communications between UF Health Jacksonville and Telescope Health during the Relevant Time Period.

Interrogatories:

1. Please describe in detail why UF Health Jacksonville opted not to work with Telescope Health.
2. Please describe in detail the financial impact the City's tele-health contracts have on UF Health Jacksonville's ability to serve uninsured patients in our community.



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3. Please describe in detail the redundancies created by the City's work with Telescope Health with UF Health Jacksonville's tax-payer funded indigent care and primary care clinics.
4. Please describe any changes in emergency department intake at UF Health Jacksonville since the implementation of the City's tele-health contract(s).
5. Does the emergency department at UF Health Jacksonville receive referred patients from other emergency departments for uninsured patients?

RightSite Health

1. Please describe in detail the services you provide the City of San Antonio?
2. Please describe in detail the effect your services would have on healthcare costs for the City of Jacksonville and the Jacksonville healthcare community generally.