

Decentralization challenges:

- City police check state DMV
 - DMV rules determine access
 - DMV rules decide send/City DB rules decide receive
 - City criminal procedures decide if it can be used for probable cause
- City police check NCIC
 - National Crime Prevention and Privacy Compact Council rules determine access and use
- FBI checks state ISE-SAR DB
 - Central Florida Intelligence Exchange (CFIX) rules determine access
 - Statute, Office of Director of National Intelligence, Attorney General guidelines, and FBI rules may determine use
- FBI needs to decide what info to send to City police
 - Will the city release the info under state Sunshine law?

Reasoning challenges:

- **FBI will only transfer data if Florida will protect the information it passes**
 - Florida does not consider the case a “current investigation” and therefore would release the information if requested to do so under Sunshine Law
 - Must be able to reason current/not current
 - FBI would not release the information under FOIA
 - Must be able to reason through exceptions to release
 - Florida law says if sharing agency’s rule is more restrictive, must follow that
 - Must be able to reason that second result is more restrictive and apply that rule