OA. 10-13-92 047

FILED
SID J. WHITE
OCT 7 1992
CLERK, SUPREME COURT
By _____ Chief Deputy Clerk

IN THE SUPREME COURT OF FLORIDA

FLORIDA LEAGUE OF CITIES, INC.,
and FLORIDA ASSOCIATION OF COUNTIES, INC.

Petitioners,

CASE NO. 80,489

v.

JIM SMITH, Secretary of State,

Respondent.

PETITIONERS' REPLY

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INTRODUCTION

The interpretation of an amendment to our Florida constitution requires an understanding, not just of the legislative history which led to the actual formulation of the language adopted by our Representatives and Senators, but also a knowledge of the "history of the times in order to determine the evil sought to be remedied and the purpose to be accomplished." State v. Florida State Improvement Commission.[1] In that case, this Court set out to determine if a Special Act creating a Health and Hospital Board could be funded with bonds through the levy of ad valorem taxes, without such taxes having been previously approved by a referendum of the taxpayers. Section 6 of Article IX of the Constitution (1885) seemed to prohibit such a levy. Mr. Justice Matthews, and Associate Justice Hugh Taylor in his partially concurring opinion, both relied upon their personal knowledge of the political and economic history of this state to trace the history of that provision of the state Constitution. They explained that it had been adopted to protect property owners from further imposition of the sort of debts which had been incurred by local governments during the "Boom and Bust" period of the 1920s. This was the evil sought to be remedied by the Legislature in proposing, and the people in adopting, Section 6, Article IX. Their understanding of this history led to the disallowance of the ad valorem levy.

Amicus, ~~Save Our~~ Homes, Inc., has argued that the Court should engage in a historical analysis of their Amendment 10.

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[1] 60 So.2d 747, 750-751 (Fla. 1952).

That is not correct. The rule of State v. Florida State Improvement Commission applies to the historical analysis of how Section 6(d), Article VII of our present Constitution came to be adopted, For this Court to undertake the analysis of this 1980 amendment, we have provided, as our Appendix A, the Florida State University Law Review article written by Pajic, Weber, and Francis.[2] This article was published shortly after the adoption by the people of Section 6(d), in October 1980. It provides an in-depth historical analysis and explanation of how and why our Legislature chose to preserve the standard of full market value assessment for ad valorem tax purposes.

In addition, we have provided tapes of all the Committee deliberations and the floor debates leading to the adoption by the Legislature of Senate Joint Resolution 4-E, adding subsection (d) to Section 6 of Article VII. These will be listed as our Appendix B. The actual tapes, with the certifications from the Division of Archives, have been provided to the Clerk of the Court. We have also provided copies of the initiatives which were circulating in 1979 and 1980 and which led the Legislature to its adoption of SJR 4-E. These are our Appendix C. We have also attached in Appendices D and E other pertinent legislative historical documents.

Finally, we will reply briefly to individual arguments made by Amici, ~~Save Our~~ Homes, Inc. and Tax Cap Foundation, Inc.

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[2] Truth or Consequences: Florida Opts for Truth in Millage in Response to the Proposition 13 Syndrome. FSU Law Review, Vol. 8:593 (Fall 1980).

THE **HISTORY OF SJR** 4-E

In July 1979, Governor Graham announced that he had instructed the Department of Revenue to strictly require each of the 67 county property appraisers to assess all real and tangible personal property at its fair market value.[3]

A number of groups anticipated that the Governor, who had campaigned in 1978 on the promise to reform property taxes in Florida, would take such action, At least seven separate initiatives had begun circulating by 1979. All called for an amendment to the state Constitution limiting increases of assessments on homestead properties.[4]

One of these initiative was entitled the Howard Jarvis Florida Proposition 13 for Tax Relief. Obviously, this proposal was substantially identical to the recently adopted Propasition 13 in California. All of the other provisions called for similar, if less restrictive, assessment caps. At least one called for the total exemption of all homestead property. The legislative committee and floor debates clearly show that another one, which the Legislature referred to as the "property appraisers' initiative," had reached the point where it was fully

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[3]The Constitution uses the term "just value". That term has been defined as being synonymous with "fair market value" and "100% cash value". Walter v. Schuler, 176 So.2d 81 (Fla. 1965).

[4]Certified copies of such initiates, together with the exchange of correspondence with the Division of Elections, and a chart explaining them are attached as Appendix C. References to the actions of Governor Graham are made in the Pajic, et al., law review article which will be cited subsequently in this pleading as Vol. 8:593, for example, the appropriate page.

expected to appear on the November **1980** ballot.[5] There was in the air the sense that Florida was about to be swept up in the taxpayer revolt which had begun in California. Generally, the target was some sort of restriction on assessments.

After the Governor's announcement in July 1979, a number of Special Sessions were held and a number of legislative proposals to address these conflicting issues (just valuation of homesteads versus assessment caps) were submitted and discussed, In November **1979**, SJR 1-B was adopted by both Houses. This called for the addition of a new subsection (c) to Section 6, Article VII. It authorized an increase (by general law) of the homestead exemption for school tax **purposes** to $25,000. This was ratified by the voters at the time of the Presidential Preference Primary in March 1980.

During the Regular Session of **1980**, the legislative plans had become sufficiently focused to formulate language identical to the language which was eventually adopted later that year.6 During the floor debate on this Bill, Senator Gordon, who was Chairman of the Senate Ways and Means Committee, served as the floor leader. Paraphrasing him somewhat, he stated:

> The whole point is to get the increased homestead exemption on the ballot in September so that if the property appraisers are successful in their petition drive and get their petition on the ballot, they will have to explain why the people [in supporting the

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[5]Specific reference is made to this petition drive on tapes 2, 4, 8, and 9, as detailed later in this **Reply.**

[6]**SJR 1344** by Senator Jack Gordon. See Senate Journal 372, May 22, 1980. The Senate and House Journals, reflecting the action taken by committee and on the floor, are attached as Appendix D.

> property appraisers' amendment] should knock out their own homestead exemption.

In short, the people were to be given the choice between an increased homestead exemption or reduced assessments, They could not have both.

During the floor debate, there was never any objection to the repeal provision, but a number of other issues required resolution.[7] A couple of days after the debate began, the Senate had returned to the basic concept of an increased homestead exemption. Senator Gordon (again paraphrasing him) stated:

> The fairest thing we can do is to take a portion of that increased assessment [referring to the fact that all assessments were to be brought up to full, just value] and give it in direct relief to homeowners who would be penalized the most. By doing so in the form of an increased homestead exemption, a bigger percentage of the relief would be afforded to poor people, or at least those with smaller homes rather than larger homes, which I think is the fairest thing to do.

The matter was not resolved during the Regular Session and a Special Session (the "D" Session) was called shortly after adjournment of the Regular Session. Eventually a Joint Resolution was adopted calling for the amendment, adding subsection (d) to Section 6. The issue was to be placed on the ballot during the first primary of the regular elections of 1980 - which would have fallen during September. However, it was not

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[7] Tapes 2, 3, and 4.

received by the Secretary of State in time, and so it was necessary to have another Special Session (the "E" Session).[8]

Representative Steve Pajic of Duval County was the Chairman of the House Finance and Tax Committee during the 1979 and 1980 sessions, and the floor leader for the homestead exemption provision. He briefly explained during an Appropriations Committee hearing that HJR 5-D:

> Just follows up on the homestead exemption for the TRIM Bill...$15,000, $20,000, $25,000 goes on the ballot for September of this year to take effect [inaudible], to be repealed if the 65% passes in November,

Only Representative Frank Mann of Lee County voted against the bill in committee.[9]

Finally, during the Special "E" Session, the Legislature adopted SJR 4-E. When the matter came up for debate on the floor of the House, Representative Pajic stated:

> It's also important to get it [SJR 4-E] on the October ballot because it will help us to defeat the 65% assessment proposal which the property appraisers are passing around and are going to have on the November ballot. Now, if we can show the voters of this state that we are going to give them protection against assessment jumps through the TRIM bill and the homestead exemption, then we can, I believe, defeat that 65% assessment proposal which the property appraisers are pushing. But we need to do that, and we need to do it by putting this matter on the October ballot.

Following that statement, Mr. Pajic yielded the floor to Representative Woodruff who stated that if the homestead

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[8]Tape 8 relates to the committee discussion on the issue during the "D" Session in the House Appropriations Committee. Tape 9 is of the floor debate during the "E" Session,

[9]House Journal, "D" Session, p. 5, June 9, 1980, See Appendix D.

exemption increase passed in October, "the 65% will be defeated in November."

Next, Representative Larry Smith asked a hypothetical question along these lines: "Suppose that SJR 4-E is adopted by the people in October. And what if, then, the people also adopt the property appraisers' amendment. In other words, what if both proposed amendments pass?" Mr. Pajic responded, "For [the following years] that homestead exemption increase will be revoked."[10]

While the "property appraisers' petition'' was foremost in the mind of the Legislators at this time because it was fully expected to be on the ballot in November, the drafters, and the Legislature as a whole, were concerned with all the other initiatives that attacked the just value standard. The Proposition 13 Syndrome was an eminence grise on the political scene, coloring most of what government did. As the Pajic article explains, overcoming its false allure was the driving force behind the TRIM package. One of the initiatives, "Proposition One", remained a threat for years, until this Court finally did it in. Fine v. Firestone, 448 So.2d 984 (Fla. 1984).

In addition to the discussions and debates which take place within committees and on the floor of the two Houses, committee reports are also instructive in determining the legislative

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[10]Tape 9, See Appendix B.

intent of a particular enactment.[11] Certified copies of those reports were attached as appendices H, I, and J of our Petition. The committee report for SJR 1344 states (in Appendix H of our Petition):

> **B** Effect of Proposed Changes:
>
> This amendment would:
>
> * * * *
>
> 3. repeal the increased exemption on the effective date of any Constitutional amendment which would amend Article VII, Section 4 to provide for the fractional assessment of homestead property. (Emphasis **added)**

The identical Senate Bill which was discussed during the D **Session** was SJR 2D. The committee report on that (appearing in Appendix I of our Petition) states:

> B Effect of Proposed Changes:
>
> This amendment would:
>
> * * * *
>
> 2. make the increase contingent upon assessment rolls being in compliance with constitutional assessment requirements and upon the continuation of these requirements; (Emphasis added)

A committee report prepared by the House Committee staff, contained in our Appendix J of our Petition, states:

> The increase stands repealed upon the effective date of any amendment to the constitution providing for the assessment of homestead property ~~at~~ a fraction of its just value. (Emphasis added)

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[11] See The Search for Intent: Aids Statutory Construction in Florida-An Update4. Rhodes and Seereiter. Florida State University Law Review, Vol. 13:486.

It must be noted that the committee report language (our Appendix I) for the D Session bill is the actual ballot summary contained in the bill as finally adopted. Of course, it is also the language which appeared on the ballot.[12]

The Amici who support Amendment 10 argue that the plain meaning of the repealer language in Section 6(d) does not relate to the assessment limitations which will be imposed under their amendment. They must argue that the repealer was intended to apply only to the property appraisers' initiative, of all those which were circulating in 1980, because it used a "specified percentage" of 65%.

Percentages and fractions are two different ways of expressing a portion of a whole. It is clear that the Legislature was committed to a continuation of the assessment of all property at just value, homesteads included. It is equally clear that Amendment 10 will result in the assessment of homestead property at less than just value in all instances where that property is appreciating faster than the caps imposed under the amendment. It is the stated intent of ~~Save Our~~ Homes that such property be assessed at less than just value. The level of assessment of any piece of property can be immediately determined, as Mr. Wilkinson demonstrates in his affidavit. The

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[12]A copy of SJR 4-E, as it appears in Laws of Florida (1980), including the ballot language, is attached in Appendix E. Also attached is a copy of the official ballot form, provided by the Secretary of State. Amendment Number 4 is the amendment to Section 6, Article VII.

level of assessment is always expressed as a specified percentage of the full, or just, value.

Presumably, the Amici would admit that an assessment cap expressed in terms of a fraction, rather than a percentage, would also result in the repeal. To argue otherwise clearly contradicts two of the three committee reports, In essence, the repeal would only apply under the Amici' argument when an amendment calls for a named fraction or percentage, to-wit: 65% or 2/3. To set up a scheme where homestead properties are assessed at differing percentages or fractions of just value will stand muster, they would argue.

Why did the legislative drafters use the term "specified percentage" in the text of the amendment? Does that indicate their intention was as argued by the proponents of Amendment 10? If so, why was that phrase not used in the committee reports? Why is the ballot language, "The increase is contingent upon assessment roles being in compliance with constitutional assessment requirements and upon the continuation of those requirements."? That ballot language clearly comports with the entire thrust of the Pajic article.[13] The interpretation placed upon the phrase "specified percentage of just value" by the proponents of Amendment 10, therefore, conflicts with both the expressed intent of the drafters[14] and the ballot language,

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[13]Vol. 8:609.

[14]Representative Pajic, as chairman of the House Finance and Tax Committee, with his committee counsel, Victoria Weber, and his chief economic analyst, Dr. "Jimmy" Francis, were the drafters of all of the proposals discussed in this Reply.

So what we have is an interpretation of a phrase which is in conflict with the ballot language, in conflict with the apparent intent of the Legislature as expressed in committee and floor debates, and in conflict with the expressed intent of the drafters. So, not only do the proponents of Amendment 10 stand alone in their interpretation of the 1980 amendment and its repeal provision, but the language (and its interpretation) on which they rely was not even before the people when they voted in October 1980. The entire amendment is not printed on the ballot, only a summary (which we refer to as the "ballot language") is before them in the polling places.[15] We must assume that the voters understood that in order to enjoy the five-fold increase in the homestead exemption, it would be necessary that assessments be brought up to "constitutional assessment requirements." We must also assume that they understood that that phrase meant that assessments would have to be brought up to full market, or just, value. Understanding these two things, they must have then understood that anything which would have reduced homestead assessments below full or just value would have resulted in a repeal of the five-fold increase. The plain language before them stated that the increase was contingent upon the continuation of full value assessment. If this was the intent of the drafters, if it was the intent of the Legislature on adoption, and if it was the intent of the people on their

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[15] A copy of the 1980 ballot is included in Appendix E.

ratification, then this Court should so interpret the repeal requirement.

THE RULES OF CONSTRUCTION USED FOR CONSTITUTIONAL INTERPRETATION SUPPORT THE POSITION OF THE PETITIONERS

1. All of the Provisions of the Constitution Bearing on a Particular Subject Must be Construed In Para Materia.

We agree that a homestead assessment provision added to Section 4 of Article VII must be considered in conjunction with the repealer mandate of subsection 6(d). But we must understand that subsection 6(d) (together with all the rest of Section 6) relates only to "homestead exemptions". Section 4 has nothing to do with homestead property (at least presently). Subsection (a) of Section 4 authorizes the classified assessment of agricultural, outdoor recreational, and water recharge properties. It is obvious that 4(a) has nothing to do with 6(d).

Subsection 4(b) allows the assessment of inventory (and cattle) to be at a classified value, to be totally exempted, or to be assessed at a specified percentage of its value. Interestingly, no one has ever been entirely sure what the use of "specified percentage of its value" means in this context either, Nevertheless, 4(b) has nothing to do with 6(d).

Accordingly, Section 4 must be construed in para materia with Section 6 only if Amendment 10 is adopted.

2. Repeal of a Constitutional Provision by Implication is Not Favored and Will be Upheld Only When Irrecancilable Conflict Between the Latter and the Earlier Provisions Shows Intent to Repeal.

This rule is applied when a later enactment seems to conflict directly with an earlier enactment, and there is no mention of repeal in either. Subsection **(d)** calls, expressly, for repeal. This rule simply has no application here.

3. where an Amendment Contains No Express Repeal or Modification of Existing Provisions of Law, the Old and New Provisions Should Stand and Operate Together.

If the drafters of Amendment 10 were aware of the repealer provision in 6(d), why did they not expressly repeal it? Of course, to have done so would have run the risk of dealing with two subjects.

4. In Construing the Constitution, Every Section Should be Given Effect as a Harmonious Whole.

The proponents of Amendment 10 wish to have this Court let them have their cake and eat it too. That is, they want to keep the $25,000 homestead exemption and assess appreciating homestead properties at less than just value. But the whole reason for the addition of subsection 6(d) was to insure that the just value standard was preserved. If homestead property is to **be** assessed

at less than just value, the justification for the homestead exemption disappears,

5. A Construction Which Would Leave Without *Any* Effect *Any* Past of the Constitution Should be Rejected.

Exactly.

6. A Constitutional Provision Which Can Bear Two Constructions Should be Interpreted to Make Two Sections Consistent With One Another.

Amendment 10 provides for the assessment of homestead property at less than just value, Amici, ~~Save Our~~ Homes and **Tax Cap Foundation,** do not set forth their interpretation of the term "specified percentage". They simply argue that the assessment caps provided in their amendment do not "trigger" the repeal. They ask that all the words in the last sentence of Section 6(d) be "given their intended meaning and effect". By this they wish those words be interpreted as they would have us interpret them. They would ignore the import of the preceding sentence. Together, these two sentences require that the enhanced homestead exemption is to be enjoyed only after the constitutional assessment standards of just value have been reached, and are to be discontinued if such standards are constitutionally abandoned.

This is a third way that the proponents of Amendment 10 have of saying, "please let us have our cake and eat it too." The drafters of subsection 6(d) intended to prevent that.

THE REPEAL REQUIREMENT OF SUBSECTION 6(d), ARTICLE VII IS NOT INFERRED, NOR IMPLIED, NOR UNSTATED, NOR UNREQUIRED.

It is expressed, clearly stated, and mandated. In arguing that the repeal requirements of subsection 6(d) are only inferred or implied, the Amici rely upon cases that are not applicable in this situation. Of course, it may be theoretically possible to assess homestead property at a fraction of full value and to have a homestead exemption at the same time. But it is not legally possible in Florida, because the Legislature, with the strong approval of the people of Florida[16], expressly prohibited any such "double **dipping**". That the drafters of Amendment 10 "did not mean to trigger the repeal **in** Subsection 6(d), Article VII" is without legal effect. As stated earlier, their failure to repeal the repealer of subsection 6(d) was probably because they feared that the more than one subject rule would then apply. So the repealer provision stands, expressed, clearly stated, and mandated.

It is of no consequence that the proponents of Amendment 10 may not have intended to repeal Subsection 6(d). If they were aware that their proposal might result in the repeal of our cherished homestead exemption, it seems somewhat disingenuous of them to have concealed it *so* that such a possibility has surfaced

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[16]Records in the Secretary of State's office indicate that Amendment 4, the issue of this action, passed with a vote of 1,251,096 for and only *289,620* against, or in excess of an 81% favorable vote.

for the first time when brought forward by the opponents, at this admittedly late date.

AMENDMENT 10 DOES NOT CALL FOR AN INCREASED HOMESTEAD EXEMPTION AS ITS PROPONENTS ARGUE, BUT AUTHORIZES THE ASSESSMENT OF HOMESTEAD PROPERTY AT A PERCENTAGE OR FRACTION OF ITS FULL VALUE.

The proponents of Amendment 10 do not admit that their proposal authorizes the assessment of homestead properties at a fraction or percentage of full value. Instead, they claim, it effectively exempts from tax any appreciation in value above the minimum increases authorized under their proposal. Speak of sophistry! In essence, their amendment states that all homestead property shall be assessed each year. However, that assessment may change only as provided in the amendment; the change cannot exceed the lesser of 3% or the Consumer Price Index. Property which has been sold or which is no longer homestead property will be reassessed at its full value. In very real terms, under the argument that this simply enhances the homestead exemption, some people will have a homestead exemption worth $25,000 and others will soon be able to boast of an exemption greatly exceedingly $25,000. Section 6 provides for homestead exemptions to be a set dollar sum of $25,000 per homestead, regardless of how long the homestead has been owned, or how fast it is appreciating it in value, But Amendment 10 would provide for a $500,000 home on the Gulf of Mexico increasing in value at the rate of 8% per year to

have a $100,000 homestead exemption in just three years.[17] That, of course, is truly the effect of Amendment 10. And that is one form of the evil which the drafters, and the people, intended to prevent with the adoption of Subsection 6(d).

The drafters of Amendment 10 would have accomplished their goal, exactly, by stating the percentage of value exceeding appreciation (over 3%, at most) shall be subtracted from just value, and each property shall be assessed at that specific percentage of just value. That is precisely what Amendment 10 would do,

THE ADVISORY OPINION OF THIS COURT
AT 581 So.2d 586 (Fla. 1991) IS NOT
BINDING WITH REGARDS TO **THESE** PETITIONERS.

Amici, ~~Save Our~~ Homes, rely upon State ex rel Landis v. Thompson, 120 Fla. 860, 163 So. 270 (Fla. 1935), and quote from it at length. In that case, the Court also stated:

> But under the rule of law prevailing in this state, only before constitutional amendments have been actually advertised, submitted, and voted on, will the courts undertake by judicial processes to determine controversies involving **the** judicial exaction of compliance with the constitutional requirements specified * * *. And the courts will do so at that time only because of the right of citizens of the state to have the constitutional formalities observed that are designed to inure to the benefit of all the citizens and taxpayers of the state as a matter of vested legal right. 163 So., at 277.

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[17] Eight % of $500,000 is $40,000 appreciation per year (non-cumulatively). Of this, no less than 5% is exempted each year, or $25,000. Add the $25,000 per year to the existing $25,000 and in three years the exemption is worth $100,000.

In the State ex rel Landis case, an amendment to the state constitution relating to the judiciary was challenged by a circuit judge sitting under a preexisting special act. His action was brought after that constitutional amendment had been submitted to the voters, approved, and validated by the Secretary of State.

We have dealt at some length with the res judicata issue in our Petition, and will not further prolong this Reply by extending the discussion on this question.

CONCLUSION

The legislative intent of the drafters of the 1980 amendment which increased the homestead exemption for nanschool purposes from $5000 to $25,000 was to insure the continuance of the then existing constitutional requirement that all property be assessed at "just value" except for those special types of property specifically authorized to be taxed under some other method, as listed in Section 4 of Article VII. That intent was clearly embraced by the Legislature, as a body, in its adoption of its Joint Resolution. The people, upon advising themselves as to the nature of the amendment, ratified the amendment as proposed to them. The drafters, the Legislature, and the people have spoken, and their clear desire was that the enhanced homestead exemption was to be enjoyed only upon the achievement of full value assessment of homestead property. Further, its continued enjoyment is dependent upon any alteration to Section 4 that

would allow the assessment of homestead property at some other specified method of assessment resulting in less than fair market value. The conflict between the current constitution and the proposed amendment are real, expressed, and unreconcilable. This conflict has not been disclosed and the ballot language to Amendment 10 is deficient. Therefore, Amendment 10 must be stricken, A Writ of Mandamus issued to the Secretary of State to do so should be entered.

Respectfully submitted,

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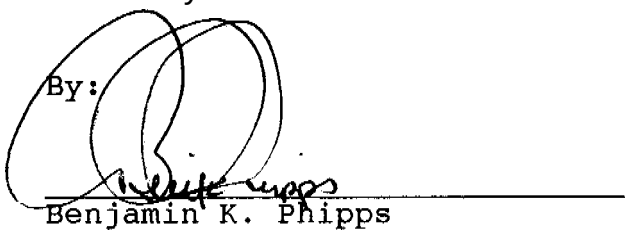
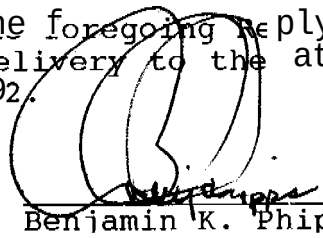
By: 

Benjamin K. Phipps

Certificate of Service

I HEREBY CERTIFY that a copy of the foregoing Reply was furnished by overnight courier or by hand-delivery to the attached service list, this 7th day of October, 1992.



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