

ORIGINAL

IN THE SUPREME COURT OF FLORIDA

CASE NO. SC99-193

**RICKY DIXON,**

Petitioner,

vs.

**STATE OF FLORIDA,**

Respondent.

**FILED**  
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RESPONDENT'S ANSWER BRIEF ON THE MERITS

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CERTIFICATE OF TYPE SIZE AND STYLE

In accordance with the Florida Supreme Court Administrative Order, issued on July 13, 1998, and modeled after Rule 28-2(d), Rules of the United States Court of Appeals for the Eleventh Circuit, counsel for the State of Florida, Respondent herein, hereby certifies that the instant brief has been prepared with 12 point Courier New type, a font that is not spaced proportionately.

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PRELIMINARY STATEMENT

Petitioner was the defendant in the trial court and District Court below and will be referred to herein as "Petitioner and "Defendant". Petitioner, the State of Florida, was the prosecution in the trial court below and will be referred to herein as "Respondent" or "the State". Reference to the record on appeal will be by the symbol "(R", reference to the transcripts will be by the symbol "V", followed by the volume number reference to any supplemental record or transcripts will be by the symbols "SR[vol.]" or ST[vol.]".

STATEMENT OF THE CASE AND FACTS

Respondent agrees with Petitioner's statement of the case and facts.

SUMMARY OF THE ARGUMENT

If this Court holds that Chapter 95-182 violates the single subject provision of the Florida Constitution (State v. Thompson, 25 Fla. L. Weekly S1 (Fla. Dec. 22, 1999)) should also find that the legislature's reenactment of the "Gort Act" in Chapter 96-388 Laws of Florida cured, or mooted, any single subject problem of Chapter 95-182. This Court should adopt the position taken by the Fourth District in Salters v. State, 731 So. 2d 826 (Fla. 4th DCA) rev. granted, 749 So. 2d 503 (Fla. 1999).

Alternatively stated, this Court should find that the significant amendments to the Gort Act by Chapter 96-388 Laws of Florida created a new statute which obviated any problems of Chapter 95-182 and makes the issue of the window period for the Gort Act irrelevant, because career criminal sentencing for all offenses committed after October 1, 1996 is controlled by Chapter 96-388 Laws of Florida.

## ARGUMENT

THE FOURTH DISTRICT CORRECTLY CONCLUDED THAT PETITIONER'S CRIME DID NOT FALL WITHIN THE "WINDOW" PERIOD DURING WHICH THE VIOLENT CAREER CRIMINAL STATUTE WAS IN VIOLATION OF THE "SINGLE SUBJECT" RULE OF THE FLORIDA CONSTITUTION.

Initially, Respondent notes that the claims raised by Petitioner were never raised in the trial court. Respondent acknowledges that violations of the single subject rule have been found to be fundamental error. However, under the facts of this case, such a finding is unwarranted. This is a sentencing issue. It was not raised in the trial court. The ten year sentence received by Appellant would not be illegal even if he had not been sentenced under the career criminal portion of the habitual offender statute. See Welling v. State, 748 So. 2d 314, 315 (Fla. 4<sup>th</sup> DCA 199) (sentence of ten years as habitual offender does not exceed statutory maximum for third degree felony). Accordingly, this claim should not be cognizable here.

### A. THE "WINDOW" PERIOD CLOSED ON THE EFFECTIVE DATE OF CHAPTER 96-388.

In Salters v. State, 731 so. 2d 826 (Fla. 4th DCA), rev. granted, 749 So. 2d 503 (Fla. 1999) the Fourth District held that the window period closed on October 1, 1996, when chapter 96-388 *Laws of Florida* became effective. It held that in chapter 96-388, the Florida legislature readdressed the provisions of the habitual

, offender statutes and that this repassage of the provisions of the violent career criminal section without the arguably civil provisions identified in Thompson cured the single subject problem found in Chapter 95-182 Laws of Florida. Respondent argues that any error was not cured, because Chapter 96-388 Laws of Florida was not a biennial reenactment of the statute. However, the position of the Fourth District in Salters is supported by both case law and logic. In Martinez v. Scanlan, 582 So.2d 1167 (Fla. 1991), this Court found a single subject violation occurred when the legislature combined workers compensation legislation with international trade legislation. In determining the effective dates, this Court held that the problem was cured by the legislature in a special session reenacting the legislation in a manner which separated these two distinct concepts. Id. at 1169 Thus, this Court has recognized that the biennial reenactment of the statutes is not the only way to close the window. The state asserts that what happened in this case is analogous to what transpired in Scanlan. In the 1996 legislative session, the legislature reenacted the career criminal portions of chapter 95-182 without including the objectionable civil damage provisions. Applying Scanlan, the legislative action should be held to have cured the problem. This Court should follow the decision of the Fourth District and hold the window period ended on October 1, 1996.

Approving this cure would be an appropriate resolution of the

problems presented by this single subject violation. This Court has long held that the purpose of the single subject provision is to prevent logrolling. Martinez v. Scanlan, 582 So.2d 1167, 1172 (Fla. 1991); State v. Lee, 356 So.2d 276, 282 (Fla. 1978) The evil that the single subject provision protects against is the attaching of unrelated legislation onto popular measures, thereby, bootstrapping the passage of the unrelated legislation upon the popularity of the primary legislation. Advisory Opinion to the Atty. Gen. re Fish and Wildlife Conservation Com'n, 705 So.2d 1351, 1353 (Fla. 1998). When a statutory section created in this manner is ratified by subsequent legislative reenactment, any prior "logrolling" has been mooted.

It is also appropriate to hold that the subsequent modification and readoption cures a single subject problem because of other Constitutional requirements placed on the passage of legislative bills. Article III Section 6 Fla. Const. requires, when a bill is passed which amends a law in existence, that the sections being amended must be set out in full. Additionally, the enacting clause of the legislation must state, Be it enacted. By complying with the constitutional requirements, the legislature reenacts the statutory provision when it makes modifications. In this case, the legislature reenacted the career criminal provisions of the Gort Act by passage of chapter 96-388 Laws of Florida. Thus, the date of October 1, 1996, closes the window period for the purposes of a single subject challenge to the career criminal

,provisions found in chapter 95-182 Laws of Florida.

Petitioner committed his' offense on March 21, 1997, well after reenactment of the career criminal provisions'. Based upon the foregoing, Petitioner's opportunity to challenge his sentence ended on October 1, 1996. Therefore, Petitioner cannot challenge the constitutionality of the statute.

The other reason that the problem is cured by subsequent legislative is obvious. A criminal defendant must be sentenced in accordance with the law in effect when he committed the crime. When a statutory section is modified, a defendant is not prosecuted or sentenced under the original statute, but, under the version in effect at the time of the commission of the crime. Thus for those individuals who committed their crimes after October 1, 1996, the governing law is Chapter 96-388 Laws of Florida. As to them, Chapter 95-182 Laws of Florida and its manner of passage is irrelevant. Based upon the reenactment of the statute in Chapter 96-388 Laws of Florida, prior to the commission of Petitioner's offenses, Petitioner does not have standing to challenge the act.

**B. CHAPTER 96-388 DOES NOT VIOLATE ARTICLE III, SECTION 6.**

The crux of Petitioner's argument is that the issue regarding the window period of Chapter 96-388 is moot because Chapter 96-388 also violates the single subject provision of Article III, Section

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'The provisions authorizing a ten year mandatory minimum sentence for a violent career criminal who commits a third degree felony are included in 96-388. See Section 775.084(1)(c) and Section 775.084(4)(c)3.

Six. The State disagrees and contends that Chapter 96-388 does not violate the single subject provision, and therefore, is not unconstitutional.

The single subject provision, Article III, Section 6 of the Florida Constitution provides:

"Every law shall embrace but one subject and matter properly connected therewith, and the subject shall be briefly expressed in the title."

The single subject requirement of Article III, Section 6 of the Florida Constitution simply requires that there be "a logical or natural connection" between the various portions of the legislative enactment. State v. Johnson, 616 So. 2d 1, 4 (Fla. 1993) (approving the lower court's pronouncement in Johnson v. State, 589 So. 2d 1370 (Fla. 1st DCA 1991)). The single subject requirement is satisfied if a "reasonable explanation exists as to why the legislature chose to join the two subjects within the same legislative act...." Id. at 4. Similarly, this Court has spoken of the need for a "cogent relationship" between the various sections of the enactment. Bunnell v. State, 453 so. 2d 808, 809 (Fla. 1984). "The act may be as broad as the legislature chooses provided the matters included in the act have a natural or logical connection." Martinez v. Scanlan, 582 So. 2d 1167, 1172 (Fla. 1991).

Also, the purpose of Article 11.1, Section 6 is the prohibition against a plurality of subjects in a single legislative act to

, prevent "logrolling", Martinez v. Scanlan, 582 So.2d 1167, 1172 (Fla. 1991) ; State v. Lee, 356 So.2d 276, 282 (Fla. 1978). Logrolling is a practice wherein several separate issues are rolled into a single initiative in order to aggregate votes or secure approval of an otherwise unpopular issue. In re Advisory Opinion to the Attorney General--Save Our Everslades, 636 So.2d 1336, 1339 (Fla. 1994).

While logrolling is improper, an act may be as broad as the legislature chooses, provided the matters included in the act have a natural or logical connection. Chenoweth v. Kemp, 396 So.2d 1122 (Fla. 1981); Board of Pub. Instruction v. Doran, 224 So.2d 693, 699 (Fla. 1969). Broad and comprehensive legislative enactments do not violate the single subject provision. See Smith v. Department of Ins., 507 So.2d 1080 (Fla. 1987). The test to determine whether legislation meets the single subject provision is based on common sense. Smith, 507 So.2d at 1087.

This Court has accorded great deference to the legislature in the single subject area and the Court has held that the legislature has wide latitude in the enactment of acts. State v. Lee, 356 So.2d 276 (Fla. 1978); State v. Leavins, 599 So.2d 1326, 1334 (Fla. 1st DCA 1992). Examples abound where this Court has held that Acts covering a broad range of topics do not violate the single subject provision. The single subject provision is not violated when an Act provides for the decriminalization of traffic infractions and also creates a criminal penalty for willful refusal to sign a

, traffic citation, State v. McDonald, 357 So.2d 405 (Fla. 1978); the provision is not violated where an Act covers both automobile insurance and tort law, State v. Lee, 356 So.2d 276 (Fla.1978); nor is the provision violated where an Act covers a broad range of topics dealing with medical malpractice and insurance because tort litigation and insurance reform have a natural or logical connection, Chenoweth v. Kemp, 396 So.2d 1122 (Fla. 1981), Smith v. Department of Insurance, 507 So.2d 1080 (Fla. 1987); nor is the provision violated where an Act establishes a tax on services and includes an allocation scheme for the use of the tax revenues. In re Advisory Opinion to the Governor, 509 So.2d 292 (Fla. 1987). Finally, this Court has found that an act which deals with (1) comprehensive criminal regulations, (2) money laundering, and (3) safe neighborhoods is valid since each of these areas bears a logical relationship to the single subject of controlling crime. Burch v. State, 558 So.2d 1 (Fla. 1990).

The State contends that this natural, logical relationship exists. Initially, the State reiterates that 1996 Fla. Laws ch. 388, § 44, states in pertinent part:

Effective October 1, 1996, paragraphs (a)(b) and (c) of subsections (1), and subsections (2), (3), and (4) of section 775.084, Florida Statutes are amended and subsection (6) of said section is reenacted . . . .

96 Fla. Laws ch. 388 § 44, which was approved by the Governor on May 31, 1996, omitted sections 8-10. Sections 8-10 were the

, sections of Ch. 95-182 which dealt with offensive civil domestic violence sanctions. As such, enactment of ch. 388 effectively severed the civil sanctions provided for in 95-182. As the offending civil provisions were severed from the act, then the act is clearly constitutional.

Petitioner does not adequately address the argument set out above, but makes a general statement that ch. 96-388 violates the single subject provision, regardless of the changes to section 775.084, concerning violent career criminals. Petitioner's argument is in error.

There are seventy-four sections of Chapter 96-388. A careful reading of the provisions of Chapter 96-388, Laws of Florida, compels the conclusion that the requisite natural or logical connection between the various sections exists. Chapter 96-388 is titled "An act relating to public safety." Chapter 96-388, Laws of Florida. All portions of the statute concern methods in which to increase public safety across the state. All portions of the statute share a common goal, a common purpose: "public safety."

1. Section One establishes an eight-year revision cycle for the criminal code. The effect of the act in this regard is clearly criminal in nature.

2. Section Two sets forth the policy for public safety. The goals enumerated in this plan include: a) the protection of the public by preventing, discouraging, and punishing criminal behavior; b) lowering the recidivism rate; c) maintenance of safe

, and secure prisons; d) combatment of organized crime; etc.

3. Sections Three through Sixteen are all related to the information systems for public safety agencies. The effect of these perspective sections, included the creation of the criminal and juvenile justice information systems council. The purpose of this council is to facilitate the identification, standardization, sharing and coordination of criminal and juvenile justice data. Sections Three through Sixteen obviously promote the goal of protection of the public. The sections facilitate the sharing of information amongst various criminal and juvenile justice agencies in an effort to minimize the danger to society of criminals and juveniles who have become a risk to society. Such information will help to identify recidivism amongst the adult population who have and continue to commit crimes. Similarly, Sections Seventeen through Twenty One relate to the maintenance of juvenile records. These sections have amended the statutes which govern the procedures relating to fingerprinting and photographing a child who has committed an offense, the circumstances under which a juvenile's criminal history information may be obtained from the Department of Law Enforcement, the sharing of information on a juvenile who has been arrested, the merging of records for a minor who has been adjudicated as an adult for a forcible felony. These sections obviously promote the protection of the public as the sections relate to the sharing and dissemination of information concerning minors who have committed crimes or delinquent act. The

, sharing of such information will facilitate public safety because the various agencies are provided important information concerning crimes that have been committed by juveniles. Such information will help to control and prevent recidivism amongst juvenile offenders.

4. Section 22 revised the language relating to sentence guidelines scoresheets. Sections 50 through 53 also include a revision to the sentencing guidelines. These sections relate to the common theme of the act (public safety) by providing guidance for the preparation of sentencing guideline scoresheets, i.e, providing guidance for the sentencing and punishment of those who have been convicted of crimes, and the scoring of offenses for victim injury, severity of offenses, etc. As such, these sections determine when a person may be released back into society after being convicted and sentenced for commission of a crime. Again, protection of the public and an attempt to reduce the recidivism rate are key here.

5. Sections 23 and 24 concerned regulation of the Juvenile Justice Advisory Board and the Justice Administrative Commission. Section 25 related to the insurance commissioner's ability to contract for the prosecution of criminal violations of the Worker's Compensation Law. Such action definitely relates to the protection of the public or public safety, as prosecution of Worker's Compensation fraud is a serious problem which affects all persons in society.

6. Sections 26 through 31 repealed certain statutes. Statutes which were repealed included, the statute relating to: (1) the

, .Council on Organized Crime; (2) crime prevention information; (3) bail bond advisory council; (4) unfunded drug program; (5) negligent treatment of children. Each of these perspective subjects concern the protection of the public. For instance, organized crime and drugs are undisputed problems facing society as a whole. The State would even venture to say that these problems are one the major dangers to society. And of course crime prevention and bail bond information further the protection of the public. For instance, bail bond information controls the ability of those who have been accused of committing crimes to venture back onto the streets of society.

7. Section 32 related to the Department of Law Enforcement. Law enforcement is synonymous with protecting the public.

8. Sections 33 through 43 relate to the Street Gang Prevention Act. These sections are geared toward "public safety" to protect the public from organized, street gangs. In fact, the purpose of this section is to ensure that every person be "secure and protected from fear, intimidation, and physical harm caused by he activities of street gangs and their members." As facilitated by Sections 3 through 21, these provisions also include considerations of a street gang member's prior record and criminal history, and therefore the recidivism of those who have committed crimes in the past.

9. Sections 44 through 46 redefine the violent career criminal, habitual offender and habitual felony offender. These

provisions relate to the protection of the public as it concerns recidivism of violent criminals.

10. Sections 47 through 49 relate to the definition of burglary, trespass and theft. These sections relate to public safety because they expand the definitions of burglary, trespass and theft, and therefore, focus on the prevention of persons from becoming victims of these crimes.

11. Section 54 amends the trafficking statute. Again, this section falls within the umbrella of protection of the public from illegal drugs.

12. Sections 55 and 57 render certain convicted felons ineligible for early release. Here, the legislature sought to protect citizens from certain types of criminals, thereby, abolishing these criminals' ability to obtain early release from prison.

13. Section 56 relates to the unlawful taking of a police officer's weapon. Of course, the effort to protect the public is clearly evident here, as the public is put in great danger where criminals unlawfully deprive an officer of his weapon.

14. Section 58 makes grammatical corrections to the restitution statute. Restitution directly relates to protection of the public, as victims of crimes have the right to obtain compensation for their injuries and losses.

15. Section 59 amends the gain time statute. This statute relates to the ability of prisoners to receive gain time, and

, therefore an earlier release. As such, the section relates to the protection of the public, as it concerns a prisoner's ability to obtain release back into society.

16. Sections 60 through 67 concerns the Jimmy Ryce Act, which relates to public notification of a sexual offender's release into a certain community. This act concerns protection of the public as it puts communities on notice that a sexual offender has been released from prison and is now living in their neighborhoods.

17. Section 68 relates to the security and arrest surrounding injured apprehendees. Such a provision is vital to the public's safety, as one does not desire that a person who has committed a crime is injured, but escapes due to the lack of security or proper procedures.

18. Sections 69 through 71 concern prosecution for computer pornography. This of course has become a widespread problem, especially where young teenage girls have become the major targets of this crime. Therefore, these sections of the act obviously falls within the umbrella of protection of the public.

19. Section 72 concerns the loss of privileges for persons who loses civil actions arising from the commission of a forcible felony. Again, protection of the public is key here as the legislature attempts to protect and compensate victims of forcible felonies.

20. Section 73 concerns the effective date of the bill relating to security alarms. Such a provision also is key in

, protection of the public, as security alarms are instrumental in protecting households and businesses from burglaries, robberies, etc.

21. Finally, Section 74 contains the effective date of the act.

Based on a review of all the sections of this act and their purposes, it is obvious that the sections are all committed to one theme: "Public Safety." Contrary to Petitioner's argument, the various sections of the act achieve this common theme or goal. There is a natural and logical connection between the sections of this act, as all of these sections meet and provide for one common theme: public safety, protection of the public.

Petitioner's reliance upon State v. Johnson, 616 So.2d 1 (Fla. 1993) and Bunnell v. State, 453 So.2d 808 (Fla. 1984) is misplaced. In Johnson, 616 So.2d 1 (Fla. 1993), this Court held that a chapter law violated the single subject provision because it addressed two subjects: "the first being the habitual offender statute, and the second being the licensing of private investigators and their authority to repossess personal property." 616 So. 2d at 4. The court stated that the two matters had absolutely no cogent connection. Sentencing for repeat offenders and licensing private investigator have no common core.

Similarly, in Bunnell v. State, 453 So.2d 808 (Fla. 1984), this Court held that a session law violated the single subject provision when the law created the criminal offense of obstruction

of justice by false information and made amendments concerning membership of the Florida Council on Criminal Justice. The Thompson Court characterized these amendments as noncriminal and dealing with an executive branch function.

By contrast to Johnson, the instant amendments do have a common core. They concern repeated criminal offenders, street gang prevention, sharing of criminal history information for both adult and juvenile criminals, etc. Moreover, in contrast to Bunnell, which dealt with amendments that involved both legislative and executive functions, these amendments concern traditionally legislative matter. Setting punishment for recidivist offenders and compensating victims are both legislative branch matters. Additionally, as shown all sections of Chapter 96-388 address public safety or protection of the public. Thus, the legislative enactment at issue in this case is significantly different from the acts at issue in Johnson and Bunnell.

Moreover, Petitioner relies upon the Fifth District Court of Appeal's decision in Williams v. State, 459 So. 2d 319 (Fla. 5th DCA 1984). There, the Fifth District held that Chapter 82-150 was unconstitutional as it violated the single subject provision of the Florida Constitution, where one section created a new crime and the other section amended the operation and membership of the Florida Criminal Justice Council. The Fifth District noted that the act was not a comprehensive law or code type of statute. Accordingly, Petitioner argues that Chapter 96-388 is unconstitutional based

upon Williams.

Contrary to Petitioner's position, the State directs this Court's attention to its decision in Burch v. State, 558 So.2d 1 (Fla. 1990). In Burch, this Court held that the Crime Prevention and Control Act did not violate the single subject provision of the Florida Constitution. The Act dealt with (1) comprehensive criminal regulations, (2) money laundering, (3) drug abuse education, (4) forfeiture of conveyances, (5) crime prevention studies, and (6) safe neighborhoods. Id. The Court held that there was a logical and natural connection among these subjects because all of the parts were related to its overall objective of crime control. The Court noted that the sections were intended to control crime, whether by providing for imprisonment or through taking away the profits of crime. The taking away profits language is a reference to the forfeiture section of the Act. A forfeiture proceeding is civil and independent of any criminal act. Kenn v. State, 706 So.2d 1366 (Fla. 5th DCA 1998). All civil forfeiture cases are heard before a circuit judge of the civil division and the rules of civil procedure govern. § 932.704(2), Fla. Stat. (1997). Thus, the legislature may combine criminal sentencing and civil remedies for crimes without violating the single subject provision.

Here, as in Burch, the legislature has provided for protection of the public through sharing of criminal record information, recidivism control, notice to the public of sexual predators living

in their neighborhoods, sentencing guidelines amendments, etc. In Burch, the legislature sought to control crime in different ways. Here, the legislature also sought to protect the public by utilizing several methods, working together. The legislature set forth a comprehensive plan to protect the public, provide for public safety. The legislature may properly set forth a goal of protecting the public. When the legislature does so, the sections have a natural and logical connection and do not violate the single subject provision.

Finally, the Final Bill Analysis and Economic Impact Statement of SEXUAL BATTERY 156 (Appendix) supports the State's position that Chapter 96-388 does not violate the single subject provision of the Florida Constitution.

In the Bill Analysis, the legislature notes that "the bill seeks to improve the overall effectiveness, efficiency, and accountability of Florida's public safety system." SEXUAL BATTERY 156 achieved the above goals by:

1. Requiring the Department of Corrections to prepare all sentencing guidelines scoresheets.
2. Providing that any legislation which amends the sentencing guidelines scoresheet must have an effective date of January 1.
3. Expanding the duties of the criminal and juvenile justice information systems council and codifying the council's guiding principles for the state's management of public safety system information technology.

4. Requiring the Justice Administrative Commission to itemize and explain each of its duties and functions to the Legislature by January 1, 1997.

(SEXUAL BATTERY 156 Analysis, page 3).

Additionally, by enactment of the bill, the legislature intended to address statutory glitches and correct barriers which hindered the effective implementation of current laws. (SEXUAL BATTERY 156 Analysis, page 3). In implementing this bill, the legislature desired to address the public safety system's "big picture." (SEXUAL BATTERY 156 Analysis, page 2). The bill made several substantive changes including:

1. allowance of law enforcement agencies to use juvenile criminal history information for law enforcement purposes and expansion of the public's access to juvenile criminal history records.

2. establishment of an eight-year revision cycle for laws and statutes dealing with public safety.

4. clarification of language making of technical corrections to various statutes (such as the definition of dwelling in the burglary and trespass statutes).

5. revision of statutes concerning street gangs and the Florida Sexual Predator Act.

(SEXUAL BATTERY 156 Analysis, page 1). When one reviews the Senate Bill Analysis, the sections of the bill and the case law concerning single subject violations, Chapter 96-388 does not violate the

single subject provision of the Florida Constitution. The bill has as its common goal or theme, public safety, i.e., protection of the public. All sections of the bill work in conjunction to achieve this purpose. Therefore, Chapter 96-388 is proper. Petitioner's crime was committed after Chapter 96-388 was enacted. As Chapter 96-388 does not violate the single subject provision of the Florida Constitution, Petitioner's conviction and sentence must stand.

CONCLUSION,

Based on the foregoing arguments and the authorities, this Court should affirm the Fourth District's decision.

Respectfully submitted,  
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by courier, to: Allen DeWeese, Assistant Public Defender, Fifteenth Judicial Circuit of Florida, The Criminal Justice Building, 421 Third Street, 6th Floor, West Palm Beach, FL 33401 on February 11, 1999.

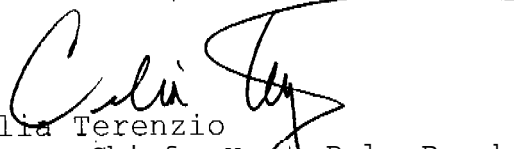
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JAMES J. CARNEY


CONCLUSION

Based on the foregoing arguments and the authorities, this Court should affirm the Fourth District's decision.

Respectfully submitted,  
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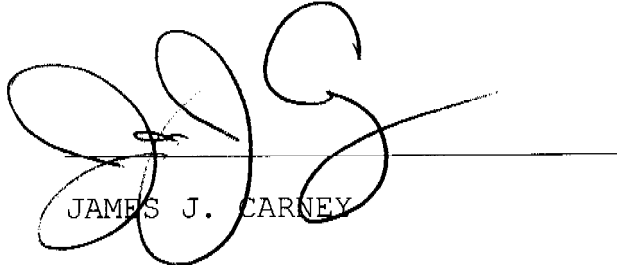
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I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by courier, to: Allen DeWeese, Assistant Public Defender, Fifteenth Judicial Circuit of Florida, The Criminal Justice Building, 421 Third Street, 6th Floor, West Palm Beach, FL 33401 on March 24, 2000.



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