IN THE
SUPREME COURT OF FLORIDA

CASE NOS. SC00-2346, SC00-2348 & SC00-2349

PALM BEACH COUNTY CANVASSING BOARD	vs.	KATHERINE HARRIS, ETC., ET AL.
VOLUSIA COUNTY CANVASSING BOARD	vs.	MICHAEL MCDERMOTT, ET AL.
FLORIDA DEMOCRATIC PARTY	vs.	MICHAEL MCDERMOTT, ET AL.
Petitioners/Appellants		Respondents/Appellees.

_____

INITIAL BRIEF OF THE ATTORNEY GENERAL

ROBERT A. BUTTERWORTH
ATTORNEY GENERAL
FLORIDA BAR NO. 114422

PAUL F. HANCOCK
DEPUTY ATTORNEY GENERAL
FLORIDA BAR NO. 0140619

GEORGE WAAS
ASSISTANT ATTORNEY GENERAL
FLORIDA BAR NO. 129967

TABLE OF CONTENTS

TABLE OF AUTHORITIES

FLORIDA CONSTITUTION

CASES

LEGISLATIVE HISTORY

STATUTES

CERTIFICATE OF FONT SIZE AND STYLE

This Initial Brief is typed using Times New Roman 14-point font.

STATEMENT OF THE CASE AND FACTS

The fundamental right of a citizen to vote and to have that vote counted is the cornerstone of our democratic system. The cases before the Court will define the parameters of that right.

The Attorney General of the State of Florida, Robert A. Butterworth, is a Respondent in the consolidated case styled *Palm Beach County Canvassing Board v. Katherine Harris.* The litigation arises from conflicting legal advisory opinions issued by the Secretary of State's Division of Elections and the Attorney General, regarding the legal standards and procedures for the recounting of ballots following an election.

The facts as to the merits of the consolidated actions are contained in the other briefs submitted by the parties and will not be repeated here. We will confine our discussion to the legal issue raised by the Attorney General's legal advisory opinion.

THE STATUTORY FRAMEWORK

The Florida law at issue is that governing manual recounts of election results. Section 102.166(4)(a), Florida Statutes, reads as follows:

> Any candidate whose name appeared on the ballot, . . . or any political party whose candidates' names appeared on the ballot may file a written request with the county canvassing board for a manual recount. The

> written request shall contain a statement of the reason the manual recount is being requested.

The provisions of Section 102.166, Florida Statutes, regarding manual recount, were adopted in 1989 as part of the "Voter Protection Act," the purpose of which was to "increase the public's faith in the integrity of the electoral process." See, Florida House of Representatives Committee on Ethics and Elections Final Staff Analysis and Economic Statement on CS/CS/HB 1529 (enacted as Ch. 89-348, Laws of Florida), dated July 5, 1989. (Attached as Exhibit A)

If a timely request[1] for a recount is filed, the county canvassing board "may authorize" the requested recount. The first stage of the recount is a review of a sampling of ballots to determine the nature and extent of possible errors.[2] The law then provides:

> If the [initial] manual recount indicates an error in the vote tabulation which could affect the outcome of the election, the county canvassing board shall:
>
> (a) Correct the error and recount the remaining precincts with the vote tabulation system;

---

[1] To be timely, the request must be filed with the canvassing board prior to the time that the canvassing board certifies the results or within 72 hours after midnight of the date the election was held, whichever occurs later. Section 102.166(4)(b).

[2] This sample must include " at least three precincts and at least 1 percent of the total votes cast." Section 102.166(4)(d).

(b) Request the Department of State to verify the tabulation software; **or**
(c) Manually recount all ballots.

s. 102.166 (5), Fla. Stat. (2000) (emphasis added). *See also, Sparkman v. McClure,* 498 So. 2d 892 (Fla. 1986) (word "or" is generally construed in the disjunctive when used in statute and normally indicates that alternatives were intended); *Linkous v. Department of Professional Regulation*, 417 So. 2d 802 (Fla. 5th DCA 1982) (where limited statutory penalties were series of phrases separated by "or" penalties were in the alternative).

In describing the procedures for a manual recount, the law instructs that if "a counting team is unable to determine a voter's intent in casting a ballot, the ballot shall be presented to the county canvassing board for it to determine the voter's intent." Section 102.166(7)(b), Fla. Stat. (2000). The law further provides that if the "tabulation software" is identified as the source of the problem, the canvassing board may request that the software be verified. Section 102.166(8), Fla. Stat. (2000).

LEGAL ADVISORY OPINION OF THE OFFICE OF THE SECRETARY OF STATE.

On November 13, 2000, the Director of the Division of Elections of the Department of State issued a legal advisory opinion, DEO 00-11, interpreting the above-described statutory framework. In particular, the division addressed the

meaning of the phrase "error in vote tabulation" contained in s. 102.166(5). The division concluded that the phrase means:

> a counting error in which the vote tabulation system fails to count properly marked marksense or properly punched punchcard ballots. Such an error could result from incorrect election parameters, or an error in the vote tabulation and reporting software of the voting system.

See, Letter from L. Clayton Roberts to Chairman, Republican Party of Florida, November 13, 2000.[3]

The letter also stated the office's view as to the type of voting error which would **not** authorize a manual recount of all ballots:

> The inability of a voting system to read an improperly marked marksense or improperly punched punchcard ballot is not a "error in vote tabulation" and would not trigger [a manual recount].

Id.

THE LEGAL ADVISORY OPINION OF THE ATTORNEY GENERAL

On November 14, 2000, the Attorney General issued a Legal Advisory Opinion to the chair of the Palm Beach County Canvassing Board which disagreed with the legal advice offered by the Division of Elections. The Attorney General's Opinion 00-65 states, in part:

---

[3] We understand that the correspondence between the Secretary of State's office and the Florida counties is part of the record before the court in *McDermott v. Harris*. Thus, we have not attached additional copies in this case.

> The division's opinion is wrong in several respects.
>
> > The opinion ignores the plain language of the statute which refers not to an error in the vote tabulation system but to an error in the vote tabulation. The Legislature has used the terms "vote tabulation system" and "automatic tabulating equipment" elsewhere in section 102.166, Florida Statutes, when it intended to refer to a system rather than the vote count. Yet, the division, by reading "vote tabulation" and "vote tabulating system" as synonymous, blurs the distinctions that the Legislature clearly delineated in section 102.166.
> >
> > The error in vote tabulation might be caused by a mechanical malfunction in the operation of the vote counting system, but the error might also result from the failure of a properly functioning mechanical system to discern the choices of the voters as revealed by the ballots. The fact that both possibilities are contemplated is evidenced by section 102.166(7) and (8), Florida Statutes. While subsection (8) addresses verification of tabulation software, subsection (7) provides procedures for an examination of the ballot by the canvassing board and counting teams to determine the voter's intent.

The Attorney General noted that the Legislature specifically authorized the canvassing board "to determine the voter's intent" (s. 102.166[7][b]), and such a review is appropriate under the law "where a punchcard or marksense ballot was not punched or marked in a manner in which the electronic or electromechanical equipment was able to read the ballot."

In the view of the Attorney General:

> Such a deficiency in the equipment in no way compromises the voter's intent or the canvassing board's ability to review the ballot and determine the voter's intent. In fact, . . . Florida Statutes contemplate that such an examination will

occur.

The following excerpt from the Attorney General's opinion summarizes his disagreement with the division's view of the law:

> Clearly, the manual count of the sampling precincts which reveals a discrepancy between votes counted by the automatic tabulating equipment and valid ballots which were not properly read by the equipment but which constitute ballots in which the voter complied with the statutory requirements and in which the voter's intent may be ascertained, constitutes an "error in vote tabulation." If the error is sufficient that it could affect the outcome of the election, then a manual recount of all ballots may be ordered by the county canvassing board.

SUMMARY OF ARGUMENT

This litigation seeks a determination from this Court as to the proper interpretation of Florida statutes authorizing a recount of votes in certain circumstances. The Florida Secretary of State's office -- through its Division of Elections -- and the Attorney General have issued conflicting opinions as to the meaning of these laws.[4] The Division of Elections' view of the law has led the

[4] The Division of Elections and the Attorney General each have statutory authority to issue legal advisory opinions. The division's authority is set forth in s. 106.23(2) of the Florida Statutes. The authority of the Attorney General to issue legal advisory opinions is set forth in s.16.01(3) of the Florida Statutes. The Attorney General normally declines to issue legal advisory opinions regarding election issues and refers such requests to the division. Such practice is a custom, not a legal requirement. In law, the Attorney General's authority to issue legal advisory opinions exists, "[n]othwithstanding any other provision of law." See

Secretary of State to announce formally that she will not count as valid, the votes of Floridians who failed to mark the ballot in a manner such that it could be read by a machine. The votes would be rejected **even if a human review of the ballot revealed the voter's choice among candidates**. Under the Attorney General's interpretation of the law, these votes would be counted as valid votes. The election at issue is the November 7, 2000, election to select, *inter alia*, electors to choose the President and Vice President of the United States. Thus, it is particularly imperative to determine the will of the people in making their selection. Citizens must not be disenfranchished because a machine is incapable of reading their clearly expressed intent.

The Legal Advisory Opinion of the Attorney General is correct for a number of reasons. First, it is supported by a straight-forward reading of the laws of the State of Florida. Second, it continues the long-standing public policy of the State of Florida, as reflected by decisions of this Court, to recognize the votes of its citizens in public elections even in circumstances wherein the voter did not mark the ballot

---

s.16.01(3). In the circumstances at bar, the Attorney General, as the chief state legal officer (Florida Constitution, Art. IV, s. 4(c)), issued an opinion "[b]ecause the Division of Elections opinion is so clearly at variance with the existing Florida statutes and case law, and because of the immediate impact this erroneous opinion could have on the on-going recount process."

precisely as instructed. So long as the intention of the voter can fairly be discerned the vote should be recognized. Finally, this long-standing public policy of the State of Florida is consistent with the public policies of other states.[5]

The decision of the Secretary of State to refuse to accept the results of manual recounts in certain counties is rooted in an incorrect legal standard. This Court should direct the Secretary to apply the correct legal standard and to accept recounted vote results which meet such standard.

ARGUMENT

A. THE ATTORNEY GENERAL'S LEGAL ADVISORY OPINION IS THE CORRECT INTERPRETATION OF THE LAW

The Attorney General's Legal Advisory Opinion is not complex. It is based on a straight-forward reading of the Florida law. There is no disagreement as to what law is applicable. The only disagreement concerns what the law says. And the dispute

---

[5] See *McIntyre v. Wick,* 1996 SD 147, 558 N.W.2d 347, 360-361 (S.D. 1996) ("The overriding consideration in determining the validity of a ballot is the ability to determine the voter's intent. [citations omitted] It is not the policy of South Dakota to disenfranchise its citizens of their right to vote. [citations omitted] 'It has long been the rule in this state that it is the duty of courts and election judges to "determine and carry out the intent of the elector when satisfied that the elector has endeavored to express such intent in the manner prescribed by law or by directions found upon the ballot[.]"' [citation omitted] In this vein, every effort must be made to determine the voter's true and actual intent in marking his ballot."

can be resolved, we submit, merely by reading the law.

Under the law "an error in **vote tabulation** which could affect the outcome of the election" as revealed by a sample review authorizes a manual recount of all ballots. The legislatively mandated procedure for conducting the manual recount includes a requirement "to determine a voter's intent." The division's interpretation would convert the term **vote tabulation** to **vote tabulation system**. The difference is significant. The word "tabulate" means to "condense and list."[6] As used in the law, "an error in the vote tabulation" means merely an error in the listing of the vote results. Converting the term to **vote tabulation system** changes its meaning completely, from a mere listing of votes to a description of the mechanical methods that are used to count votes.

The division would examine only the technology for counting votes to determine if the technology was working properly. The division would ignore the issue of whether the technology correctly recorded the choices of the voters. The law, however, specifically directs that the canvassing board act "to determine a voter's intent." The plain meaning of these words confirms the correctness of the Attorney General's Legal Advisory Opinion and the errors of the division's views.

---

[6] See The American Heritage Dictionary, Second College Edition.

Moreover, nothing in section 102.166(7)(b) which provides for the counting teams and canvassing boards to determine voter's intent, limits its application to the initial sampling of ballots. To read the statute in that manner adds words to the statute which is clearly contrary to the plain language of the statute. *See, M.W. v. Davis,* 756 So. 2d 90 (Fla. 2000) (where language of a statute is clear and unambiguous and conveys a clear and definite meaning, there is no occasion for resorting to the rules of statutory construction as the statute must be given its plain and obvious meaning); *Sieniarecki v. State,* 756 So. 2d 68 (Fla. 2000).

The Legal Advisory Opinion of the Attorney General also is consistent with the public policy of the State of Florida for more than 100 years, as revealed by the decisions of this Court. Even during the days when voters had to prepare their own ballots, this Court held that errors in voting should not invalidate a ballot if the voter's clear intention can be discerned. *State v. Anderson*, 8 So. 1 (Fla. 1890); see also, *Darby v. State,* 75 So. 411 (Fla. 1917) ("Where a ballot is so marked as to plainly indicate the voter's choice and intent in placing his marks thereon, it should be counted as marked unless some positive provision of law would be thereby violated.").

Prior to the advent of mechanical systems for counting ballots, the validity of votes cast on paper ballots was judged by a standard described by this Court as follows:

> The intention of the voter should be ascertained from a study of the ballot and the vote counted, if the will and intention of the voter can be determined, even though [the ballot may not have been marked correctly.]

State ex rel. Carpenter v. Barber, 198 So. 49, 51 (Fla. 1940); see also, *State v. Williams*, 120 So. 310 (Fla. 1929) ("[I]nspectors may in some cases of ambiguity or apparent uncertainty determine from face of ballot person for whom vote was intended.").

The mere fact that mechanical or electronic devices are now used to read a voter's choices in no way alters the public policy of the State or the validity of this Court's prior decisions. Machines do not vote. Citizens vote. The role of the machine is only to read and record the vote and it is logical to assume that ambiguities in interpreting a voter's choices will remain whether a machine or a human being reads the ballot. Where a machine is unable to read or ascertain a vote, then the law requires a manual evaluation of the ballot in an effort to determine the voter's intent. Such a manual count is the only means of accurately tabulating the vote and determining the outcome of the election.

A mechanical vote reading device will not read and record a vote of the voter if the voter, perhaps because of dexterity limitations, fails to apply sufficient force to dislodge the chad from the ballot. That is not to say, however, that a manual review of the ballot would fail to reveal the voter's choice. When such ambiguities arise

under any method of vote tabulation, our law and policy require that election officials make an effort to determine the intention of the voter by examining the ballot. At the same time, if the voter's intention cannot be discerned from an examination of the ballot, no vote should be recorded.

Florida is by no means alone in this law and policy. In the short time available to make this submission, we have identified numerous states, as well as the District of Columbia, and the Virgin Islands, who have effectuated a public policy of discerning voter intention in a manner virtually identical to that effectuated in Florida. A listing of the decisions describing such policies by the highest courts in more than 20 such political jurisdictions is appended as Exhibit B . We have identified no state with a contrary public policy.

Indeed, the recent decision of the Massachusetts Supreme Court in *Delahunt v. Johnston*, 423 Mass. 731, 733-734, 671 N.E.2d 1241 (Mass. 1996), is particularly illustrative of the policies and fundamental principles at issue here. In *Delahunt*, the court considered the standard to apply in ascertaining voters' intent on punch card ballots. Significantly the court held that:

> The critical question in this case is whether a discernible indentation made on or near a chad should be recorded as a vote for the person to whom the chad is assigned. The trial judge concluded that a vote should be recorded for a candidate if the chad was not removed but an impression was made on or near it. We agree with this conclusion. . . . We find

> unpersuasive Johnston's contention that many voters started to express a preference in the congressional contest, made an impression on a punch card, but pulled the stylus back because they really did not want to express a choice on that contest. The large number of ballots with discernible impressions makes such an inference unwarranted, especially in a hotly contested election.
>
> It is, of course, true that a voter who failed to push a stylus through the ballot and thereby create a hole in it could have done a better job of expressing his or her intent. Such a voter should not automatically be disqualified, however, like a litigant or one seeking favors from the government, because he or she failed to comply strictly with announced procedures. The voters are the owners of the government, and our rule that we seek to discern the voter's intention and to give it effect reflects the proper relation between government and those to whom it is responsible.

B. THE DIVISION'S ERRONEOUS INTERPRETATION OF THE LAW HAS CAUSED THE SECRETARY OF STATE TO ANNOUNCE THAT OTHERWISE VALID VOTES WILL NOT BE COUNTED.

The law of the State of Florida requires county canvassing boards to report the certified election returns to the Department of State by the seventh day following the election. Section 102.112, Fla. Stat. (2000). This requirement appeared to preclude the manual recounts authorized pursuant to section 102.166 in heavily populated counties such as Palm Beach and Broward, inasmuch as it would not be possible to complete the manual recount within the seven-day period. The problem was exacerbated by the opinion of the Division of Elections which caused Palm Beach County and Broward County to abort the recount out of fear that they were applying

a legal standard that would violate the law. In our view, the circuit court hearing the consolidated case of *McDermott v. Harris,* Case No:00-2700 (Second Judicial Circuit), properly resolved this practical conflict by holding:

> The County Canvassing Boards are, indeed, mandated to certify and file their returns with the Secretary of State by 5:00 p.m. today, November 14, 2000. There is nothing, however, to prevent the County Canvassing Boards from filing with the Secretary of State further returns after completing a manual recount. It is then up to the Secretary of State, as the Chief Election Officer, to determine whether any such corrective or supplemental returns filed after 5 p.m. today are to be ignored. Just as the County Canvassing Boards have the authority to exercise discretion in determining whether a manual recount should be done, the Secretary of State has the authority to exercise her discretion in reviewing that decision, considering all attendant facts and circumstances, and decide whether to include or to ignore the late filed returns in certifying the election results and declaring the winner.

After entry of this order, the Secretary of State directed the counties conducting manual recounts to submit a written statement of the "facts and circumstances justifying any belief on their part that they should be allowed to amend the certified returns." (See, A Statement from the Secretary of State, Nov. 15, 2000.)

The Palm Beach County Canvassing Board explained that the vote tabulating machines failed to record a vote for President and Vice President on approximately 10,000 ballots.[7] The board conducted a sample manual review which apparently

---

[7] The failure to record votes on this large number of ballots even suggests a failure of the "vote tabulation system" that would authorize a manual review even under the Division of Elections' narrow view of the law.

included an effort to discern the intention of voters on ballots that could not be read by the machine. The board concluded: "Clearly, the results of the manual recount could affect the outcome of this very close presidential election if the manual recounts in the other precincts also vary in this degree from the machine counts." Letter from Honorable Charles Burton to the Secretary of State, November 15, 2000 .

Similarly, the canvassing boards of Broward County and Miami-Dade County stated a need to conduct manual recounts noting their machines had been unable to read a significant number of ballots for President and Vice President.

On the same date that the recounting counties submitted their justifications for recounts, the Secretary of State announced that she would not accepted any supplemental returns. The Secretary said she would accept supplemental returns only in the event of "voter fraud," "substantial noncompliance with statutory election procedures" or "an act of God [such as] a mechanical malfunction of the voting tabulation system." Letter from Secretary of State to Honorable Charles Burton, November 15, 2000. The Secretary specifically stated that she would not allow supplemental returns "that relate to voter error" and suggested that she would not condone an effort to discern voter choice because of ballot ambiguities as a result of "a ballot that may be confusing." By separate letters, the Secretary also stated that she would not accept recounted vote tallies from Broward County, Miami-Dade County

and Collier County.

The circuit judge hearing the *McDermott* case below, reviewed the Secretary's action to determine whether she abused her discretion. We submit, however, that the starting point should be an analysis of whether the Secretary applied the correct legal standard in determining whether, and when, machine-rejected ballots should be manually counted and accepted.

The facts before the Court clearly reveal that the Secretary's decision to reject supplemental returns is based upon a misunderstanding of the law. The Secretary continues to require a "mechanical **malfunction** of the voting tabulation system." (e.s.) In reviewing the Palm Beach submission, it was obvious that although the problem in Palm Beach was not a mechanical system **failure**, the mechancial system was unable to read a significant number of ballots and a vote tabulation change was occurring because canvassing officials were looking to determine the intent of voters whose votes could not be counted by the machines. This, in the view of the Secretary, was not legally acceptable. In fact, the Secretary has stated to this Court that "[t]he legislature never intended for manual recounts to be used to evaluate ambiguous ballots that voters failed to properly execute."[8] That statement is directly contrary to the law

[8] See, Response of Katherine Harris, as Secretary of State, to the Emergency Petition for Extraordinary Writ filed by Palm Beach County Canvassing Board, Case No. 00-2346.

of this State and the decisions of this Court.

Furthermore, the Secretary's authority to reject amended vote totals after a recount is narrow. Under section 102.111 and section 102.112, Florida Statutes, the Secretary may only determine if the results are submitted in a timely manner. Section 102.131, Florida Statutes, prohibits the Secretary and the Elections Canvassing Commission from going beyond the returns in their own review of those returns.

When a public official exercises discretion based on a misunderstanding of the law, she should be required to re-evaluate her decision under the proper legal standard. In Florida, that standard not only permits, but requires that election officials attempt to determine the choices of the voters in conducting a manual review of ballots, especially when a machine is otherwise unable to record the vote. The purpose of the statutory right of a candidate or party to obtain a manual recount is to *accurately* record and count the votes of every citizen whose has cast a ballot, whenever the voter's intent can be determined. It is paramount to conduct a manual review of ballots when the machines are unable to read such a substantial number of votes cast that the outcome of the election can be affected.

Here, that effect is not only on the outcome of the election in Florida, but on the outcome of the election in the nation as a whole. Such an impact mandates that every vote be counted that can be and counsels against placing artificial deadlines and

expediency over thorough and accurate counting of the ballots in our most populous counties. The Secretary of State, in rejecting the results of manual recounts based upon those counties' failure to meet an artificial deadline which has nothing to do with meeting the State's constitutional deadline for electors of December 12th, elevates speed over accuracy and expediency over the integrity of the vote tabulation in three of Florida's most populous counties. This is contrary to this Court's clearly established precedents, the intent of our elections' laws and the fundamental principle underlying our system of government which cherishes and protects every citizen's right to have their vote counted.

Of course, such a review of voter intention must be conducted on the basis of the ballot alone, and unless voter intention can be discerned clearly the vote should not be counted. *See also*, s. 101.5614(5), Fla. Stat. (2000) (Requiring manual review of damaged ballots that "cannot be counted properly by the automatic tabulating equipment.") The standards announced by this Court in its prior decisions provide guidance for such a review.[9]

---

[9] While the Florida Legislature has not adopted specific standards for the conduct of manual recounts, an example of the legislatively approved methods of conducting a manual recount may be found in a law enacted by the State of Texas. The Texas Election Code, Title 8, section 127.130, addressing manually counting provides in part:

(D) Subject to Subsection (e), in any manual count conducted under this code, a vote on a

CONCLUSION

For the foregoing reasons, this Court should declare that the law and policy of the State of Florida authorizes and requires county canvassing boards, in conducting manual recounts pursuant to s. 102.166 of the Florida Statutes, to attempt to determine the choices of the voters even in those situations in which the tabulating machines fail to properly record the vote for whatever reason. If the voter's choice can be ascertained clearly, the vote should be counted.

To ensure uniformity in the conduct of such recounts among the recounting counties, it may be appropriate for the Court to provide more specific guidance for the conduct of such recounts. The law of the State of Texas which addresses manual recounts is one such guidepost which the Court might consider.

Finally, the Court should direct the Secretary of State to implement this legal standard and to accept supplemental vote tallies from the recounting counties which satisfy the legal standard.

---

ballot on which a voter indicates a vote by punching a hole in the ballot may not be counted unless:
(1) at least two corners of the chad are detached;
(2) light is visible through the hole;
(3) an indentation on the chad from the stylus or other object is present and indicates a clearly ascertainable intent of the voter to vote; or
(4) the chad reflects by other means a clearly ascertainable intent of the voter to vote.
(e) Subsection (d) does not supersede any clearly ascertainable intent of the voter.

Respectfully submitted,

ROBERT A. BUTTERWORTH
Attorney General, State of Florida
Florida Bar # 114422

PAUL F. HANCOCK
Deputy Attorney General
Florida Bar # 0140619

GEORGE WAAS
Assistant Attorney General
Florida Bar # 129967

Attorney General's Office
The Capitol, PL-01
Tallahassee. FL 32399-1050

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by hand delivery or fax on this 18th day of November, 2000 to the those persons whose names appear on the attached list of counsel.

_____
Paul F. Hancock
Deputy Attorney General

Gordon P. Selfridge
Deborah K. Kearney
Victoria L. Weber
Kerey M. Carpenter
Joseph P. Klock, Jr.
Donna Blanton
Jonathan Sjostrom
Patrick W. Lawlor
Andrew J. Meyers
William R. Scherer, Jr.
Marcos D. Jimenez
Mark A. Cullen
Mitchell W. Berger
W. Dexter Douglass
Tamara Scrudders
Edward A. Dion
Samuel S. Goren
David Boies
Michael D. Cirullo
Kendall Coffey
Barry Richard
Gary M. Farmer, Jr.
Benedict P. Kuehne
William M. Hunt III
Norman M. Ostrau
Henry B. Handler
Jose Arrojo
John D.C. Newton, II
Frank B. Gummey, III
Hon. Terry P. Lewis
Michael D. Crotty
Terrell C. Madigan
Daniel D. Eckert
Harold McLean
Hon. David Lang, Clerk
Hon. Jon Wheeler, Clerk
Karen Gievers

Tura Schnebley
Bill L. Bryant
Douglas A. Daniels
Harold R. Mardenborough
Mark Herron
Ronald G. Meyer
Harry O. Thomas