

IN THE SUPREME COURT OF FLORIDA

FLORIDA SUPREME COURT

MICHAEL GORDON REYNOLDS,

Appellant,

v.

STATE OF FLORIDA,

Appellee.

Case No. SC17-793

07/06/2017

ON APPEAL FROM THE CIRCUIT COURT
OF THE EIGHTEENTH JUDICIAL CIRCUIT,
IN AND FOR SEMINOLE COUNTY, FLORIDA

ANSWER BRIEF OF APPELLEE

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PRELIMINARY STATEMENT

This brief will refer to Appellant as such, Appellant, or by proper name, *e.g.*, "Reynolds." Appellee, the State of Florida, was the prosecution below; the brief will refer to Appellee as such, the prosecution, or the State. Unless the contrary is indicated, bold-typeface emphasis is supplied; cases cited in the text of this brief and not within quotations are italicized; other emphases are contained within the original quotations.

FACTS AND PROCEDURAL BACKGROUND

Michael Gordon Reynolds was convicted of the July 1998 first-degree murders of Robin Razor and Christina Razor and the second-degree murder of Danny Privett. *Reynolds v. State*, 934 So. 2d 1128, 1135 (Fla. 2006). The trial testimony revealed the following:

The evidence established that on July 22, 1998, Shirley Razor, the mother of victim Robin Razor, traveled to the crime scene to deliver items Danny used in the work he was doing on trailers at that location. Upon arriving at the property, Shirley noticed Danny lying on the ground outside. Shirley, being accustomed to seeing Danny drunk and passed out, proceeded to her separate trailer on the property and ate her lunch. After finishing her lunch, Shirley walked over to the trailer in which Danny and Robin were living when she noticed that Danny had a "hole in his head." After discovering that Danny was dead, Shirley ran to a neighbor's residence and called the authorities. Subsequent to the arrival of the fire department personnel, Shirley went to her daughter's trailer and upon looking inside found that her daughter, Robin, and her granddaughter, Christina, were inside and apparently dead.

At trial, a medical examiner, Dr. Sara Hyatt Irrgang, testified that the deaths had occurred at least eight hours, but probably more than twelve hours prior to her arrival at the crime scene, placing the time of death between nine p.m. on July 21 and seven a.m. on the morning of July 22. The evidence demonstrated that Danny Ray Privett was found lying outside beneath a large pine tree on his side with his face down, surrounded by bloody pieces of concrete block and broken pieces of glass. Danny's jeans were partially unzipped suggesting that he had been in the process of urinating when the attack occurred. The autopsy of Danny Ray Privett revealed that he suffered a large depressed skull fracture with additional injuries to the head area. The wounds appeared to have been caused by three or more separate blows, with the injuries indicating that the assailant had been behind the victim. There was no indication of any defensive wounds on Danny, and examination of his major skull injury revealed that the injury was likely caused by a partially broken cinder block, based on fragments found within the wound. The medical examiner was unable to determine the order in which the injuries had been inflicted upon him. The cause of death for Danny was determined to be primarily due to blunt force trauma to the head with the large depressed skull fracture probably being the fatal blow. If this blow had been inflicted first, the medical examiner opined that the victim would have lost consciousness within a second to a minute or two.

Robin and Christina Razor were found dead inside the living room portion of the camper trailer being used as living quarters. Robin was found lying on the floor, face up. Christina was found nearby sitting on the couch and leaning to her left. The living room area was in disarray and a large amount of blood was scattered throughout this area of the trailer. Robin Razor's autopsy revealed that she suffered multiple stab wounds along with multiple blows to the side of her face and a broken neck resulting in injuries to her spinal cord. Closer examination revealed that Robin suffered ten stab wounds to the head and neck area and one to the torso area. The wounds appeared to have been inflicted with a sharp object such as a knife or scissors. Based on examination of the Robin's body and the defensive wounds present, the medical examiner opined that she had been involved in a violent struggle. In addition to the above wounds, Robin suffered multiple superficial wounds to her

torso area which the medical examiner stated to be consistent with torment wounds—wounds produced not to cause serious injury but to cause aggravation and produce fear in the victim. The medical examiner was of the opinion that because blows to the victim's head were inflicted at different angles and the presence of significant defensive wounds, it was likely that she was conscious and struggling when these wounds were inflicted. The primary cause of death for Robin was determined to be the broken neck and spinal cord injury, although bleeding from the stab wounds would have also resulted in death.

The autopsy of Christina Razor revealed that she suffered blunt force trauma to her head, a stab wound to the base of her neck that pierced her heart, and another stab wound to her right shoulder that pierced her lung and lacerated her pulmonary artery. These latter two wounds would have resulted in significant internal and external hemorrhaging and would have been fatal. The medical examiner indicated that the only sign of defense wounds to Christina was the presence of a small contusion to her left hand, which could have occurred as she attempted to block a blow from her assailant. The medical examiner opined that Christina would have lost consciousness within a minute or two of receiving the stab wounds. The primary cause of death for Christina was determined to be internal and external hemorrhaging.

Id. at 1135-7.

Following the convictions, the State presented four witnesses during the penalty phase. *Id.* at 1137. Reynolds, after thorough consultation with his attorneys and the trial court, waived his right to present mitigating evidence. *Id.* at 1138. The jury unanimously recommended that Reynolds be sentenced to death for both first-degree murder convictions. *Id.*

The trial court followed the jury's recommendation and imposed a sentence of death for both first-degree murders. *Id.* The trial court found that the State had

proven beyond a reasonable doubt the existence of four statutory aggravators for the murder of Robin Razor: (1) Reynolds had previously been convicted of another capital felony or a felony involving a threat of violence to the person; (2) Reynolds committed the murder while he was engaged in or was an accomplice in the commission of or an attempt to commit a burglary of a dwelling; (3) the murder was committed for the purpose of avoiding a lawful arrest; and (4) the murder was committed in an especially heinous, atrocious, or cruel fashion. As to Christina Razor's murder, the trial court found that the State had proven beyond a reasonable doubt the existence of five statutory aggravators: (1) Reynolds had previously been convicted of another capital felony or a felony involving a threat of violence to the person; (2) Reynolds committed the murder while he was engaged in or was an accomplice in the commission of or an attempt to commit a burglary of a dwelling; (3) the murder was committed for the purpose of avoiding a lawful arrest; (4) the murder was committed in an especially heinous, atrocious, or cruel fashion; and (5) the victim of the murder was a person less than twelve years of age. *Id.*

The conviction and death sentences were confirmed on direct appeal. *Id.* at 1161. The case became final when the Supreme Court of the United States denied Reynolds' writ of certiorari on January 8, 2007. *Reynolds v. Florida*, 549 U.S. 1222, 127 S. Ct. 943 (2007).

Reynolds filed a motion for postconviction relief on December 28, 2007, asserting 17 claims. *Reynolds v. State*, 99 So. 3d 459, 469 (Fla. 2012). Due to a conflict, Reynolds was given new counsel after which an amended motion was filed that added five claims to his original motion. *Id.* at 470. Several claims were summarily denied and an evidentiary hearing was held on ten (10) claims. The trial court denied all of the claims. *Id.* This Court affirmed the denial on September 27, 2012, and denied the Appellant's petition for writ of habeas corpus. *Id.* at 501.

On January 12, 2016, the United States Supreme Court ruled in *Hurst v. Florida*, 136 S. Ct. 616 (2016), that Florida's sentencing scheme, which permitted the judge alone to find the existence of an aggravating circumstance, is unconstitutional under the Sixth Amendment of the United States Constitution. *Id.* at 624. In October 2016, this Court ruled in *Hurst v. State*, 202 So. 3d 40 (Fla. 2016) and *Perry v. State*, 210 So. 3d 630 (Fla. 2016), that the Sixth Amendment required that all of the critical findings necessary before the trial court may consider imposing a sentence of death must be found unanimously by the jury. *Hurst*, 202 So. 3d at 44. The specific findings include the existence of each aggravating factor that has been proven beyond a reasonable doubt, the finding that the aggravating factors are sufficient, and the finding that the aggravating factors outweigh the mitigating circumstances. *Id.* The *Hurst* decision also included a

holding that under the Eighth Amendment to the United States Constitution, the jury's recommended sentence of death must be unanimous in order for the trial court to impose a sentence of death. *Id.* This Court ruled that a harmless error review would focus on the effect of the error on the trier of fact and that there is no reasonable possibility that the error contributed to the sentence. *Id.* at 68. In December 2016, this Court, in *Mosley v. State/Jones*, 209 So. 3d 1248 (Fla. 2016), addressed the issue of retroactivity for cases that became final after the ruling in *Ring v. Arizona*, 536 U.S. 584 (2002). This Court determined that Appellants, whose sentences were final after *Ring*, fell into the category of Appellants who should receive the benefit of *Hurst*. Based upon the ruling in *Mosley*, the *Hurst* ruling applies retroactively to the Appellant's case because it became final after the *Ring* decision in 2002.

The Appellant filed a successive motion based upon *Hurst*, which was ultimately denied by the trial court.

STANDARD OF REVIEW

The trial court's denial of Reynolds's successive motion to vacate the death penalty is ultimately a legal question subject to *de novo* review. The factual findings made by the trial court should be accepted where supported by substantial, competent evidence to guide the *de novo* review. *Jackson v. State*, 64 So. 3d 90, 92

(Fla. 2011).

ARGUMENT

I. THE TRIAL COURT PROPERLY RULED IN DENYING REYNOLDS' CLAIM THAT HIS DEATH SENTENCE IS UNCONSTITUTIONAL UNDER *HURST*.

In *Hurst v. State*, this Court set out the requirements for a harmless error analysis based upon a *Hurst* claim. “Where the error concerns sentencing, the error is harmless only if there is no reasonable possibility that the error contributed to the sentence.” *Hurst*, 202 So. 3d at 68, citing *Zack v. State*, 753 So. 2d 9, 20 (Fla. 2000).

This Court applied this analogy in *Davis v. State*, 207 So. 3d 142 (Fla. 2016), where the jury unanimously recommended a death sentence for the murder of two people in Polk County. *Id.* at 146, 156. The Court found that Davis’s unanimous jury recommendations of death “allow us to conclude beyond a reasonable doubt that a rational jury would have unanimously found that there were sufficient aggravators to outweigh the mitigating factors.” *Id.* at 174.

In *King v. State*, 211 So. 3d 866 (Fla. 2017), this Court again held that any *Hurst* error was harmless when the jury unanimously recommended the death penalty. *Id.* at 890. This Court stated:

We initially must emphasize the unanimous jury recommendation of death in this case. The jury reached this unanimous recommendation

even though it was specifically instructed, “In these proceedings it is not necessary that the advisory sentence of the jury be unanimous.” Thus, this unanimous recommendation begins a foundation for us to conclude beyond a reasonable doubt that a rational jury would have unanimously found that there were sufficient aggravators to outweigh the mitigating factors. The instructions that were given informed the jury that it needed to determine whether the aggravation outweighed the mitigation before it could recommend a sentence of death.

Id.

Despite the Appellant’s arguments, this Court has consistently held that a *Hurst* error is harmless when the jury’s death recommendation is unanimous. See *Tundidor v. State*, 2017 WL 1506854, *14 (Fla. Apr. 27, 2017) (the jury unanimously found all of the facts necessary for the imposition of the death sentence by virtue of its unanimous recommendation); *See also Truehill v. State*, 211 So. 3d 930 (Fla. 2017); *Middleton v. State*, 42 Fla. L. Weekly S295, 2017 WL 930925 (Fla. Mar. 9, 2017); *Jones v. State*, 212 So. 3d 321 (Fla. 2017); *Hall v. State/Jones*, 212 So. 3d 1001 (Fla. 2017); *Knight v. State/Jones*, 42 Fla. L. Weekly S133, 2017 WL 411329 (Fla. Jan. 31, 2017); *Kaczmar v. State/Jones*, 42 Fla. L. Weekly S127, 2017 WL 410214 (Fla. Jan. 31, 2017).

Reynolds also argues that in order to treat a jury’s advisory recommendation as binding, the jury must be correctly instructed as to its sentencing responsibility under *Caldwell v. Mississippi*, 472 U.S. 320 (1985). *IB* at 12. However, this Court rejected a *Caldwell* argument in *Knight*, where the Appellant argued that the jury

must be correctly instructed as to its sentencing responsibility under *Caldwell*. Knight *Second Supplemental Initial Brief* of Appellant at 21. In *Hall v. State*, 212 So. 3d 1001 (Fla. 2017), this Court noted that it has repeatedly held that challenges to the standard jury instructions that refer to the jury as advisory and that refer to the jury's verdict as a recommendation violate *Caldwell* are without merit. *Hall* at 55.

The Appellant's arguments regarding what trial counsel would have done differently under *Hurst v. Florida* and the new Florida law are irrelevant. *IB* at 16. Any claim that counsel would have acted differently in picking a jury if the need for unanimity was required is a prototypical ineffectiveness claim. And *Strickland* claims are analyzed under the law in effect at the time of trial, not at the time of the postconviction proceedings. See *Strickland v. Washington*, 466 U.S. 668, 689 (1984) (stating courts are to evaluate ineffectiveness claims "from counsel's perspective at the time" of trial); *Harrington v. Richter*, 562 U.S. 86, 89 (2011) (relying on hindsight to cast doubt on a trial that took place over 15 years ago is precisely what *Strickland* seeks to prevent). In *Lebron v. State*, 135 So. 3d 1040, 1054 (Fla. 2014), this Court noted that it has consistently held that trial counsel cannot be held ineffective for failing to anticipate changes in the law. *Strickland* does not permit claims of ineffectiveness premised on changes in the law.

The Appellant is not entitled to *Hurst* relief.

II. THE TRIAL PROPERLY RULED THAT REYNOLDS' DEATH SENTENCE DID NOT VIOLATE THE EIGHTH AMENDMENT UNDER *HURST V. FLORIDA*, *HURST V. STATE*, AND *PERRY V. STATE*.

The Appellant again argues that under *Caldwell v. Mississippi*, 472 U.S. 320 (1985), a unanimous jury verdict in favor of a death sentence violates the Eighth Amendment if the jury was not correctly instructed as to its sentencing responsibility.

However, in order to establish constitutional error under *Caldwell*, an Appellant must show that the comments or instructions to the jury “improperly described the role assigned to the jury by local law.” *Romano v. Oklahoma*, 512 U.S. 1, 9 (1994). The jury was properly instructed on its role based upon the law existing at the time of Appellant’s trial. It would have been impossible for the jury to have been instructed in accordance with a constitutional change in the law that occurred after the trial.

The Appellant also challenges his indictment. Reynolds was indicted by a grand jury for two counts of first-degree murder. He argues, however, that his death sentence should be vacated because the State never presented the aggravating factors in the indictment. He contends that he was denied his right to a proper grand jury indictment, and he was never formally informed of the full nature and

cause of the accusations against him.

However, aggravating factors are not elements of a crime that must be included within an indictment. This Court has stated that, “the Supreme Court's decision in *Hurst v. Florida* requires that all the **critical findings** necessary before the trial court may consider imposing a **sentence** of death must be found unanimously by the jury.” *Hurst v. State*, 202 So. 3d at 44 (emphasis added). This Court explained that the required fact-finding was equivalent to an element of an offense, both of which a jury must determine unanimously.

In its analysis, this Court repeatedly made the analogy, and, hence, the distinction between, an element and a required penalty phase fact-finding, using phrases like: “just as elements of a crime” (*Id.* at 53); “these findings occupy a position **on par with** elements of a greater offense” (*Id.* at 57) (emphasis added); and using quotation marks around the word “elements.” (*Id.* at 57). The fact that the court analogized a critical factual finding with an element did not turn the aggravator into an actual element of the crime.

This Court has long rejected the argument that aggravating circumstances must be alleged in the indictment. *Pham v. State*, 70 So. 3d 485, 496 (Fla. 2011); *Rogers v. State*, 957 So. 2d 538, 554 (Fla. 2007); *Coday v. State*, 946 So. 2d 988, 1006 (Fla. 2006); *Ibar v. State*, 938 So. 2d 451, 473 (Fla. 2006); *Ferrell v. State*,

918 So. 2d 163, 180 (Fla. 2005); *Blackwelder v. State*, 851 So. 2d 650, 654 (Fla. 2003); and *Porter v. Crosby*, 840 So. 2d 981 (Fla. 2003). Neither *Hurst v. Florida* nor *Hurst v. State* change or impact this well-established law.

Notably, Appellant has not cited any case since the issuance of the *Hurst* opinions that support his proposition. Since its *Hurst v. State* opinion, this Court has not vacated any death sentence based on the absence of aggravating factors being listed in the indictment. *See, e.g. Asay v. State*, 210 So. 3d 1 (Fla. 2016); *Mosley v. State*, 209 So. 3d 1248 (Fla. 2016); *Simmons v. State*, 207 So. 3d 860 (Fla. 2016).

Even if the absence of aggravating circumstances in an indictment could somehow be attributed to a Sixth Amendment *Hurst* error, the harmless error standard would still be applicable. While Appellant claims he is entitled to a resentencing hearing, he has failed to show why any alleged error in the indictment would warrant such relief.

In addition to there being no Sixth Amendment violation, there is also no due process violation. Appellant still had notice even though the State was not required to list the aggravating factors in his indictment. The indictment charged Appellant with a contemporaneous violent felony, which thereby, provided notice of aggravation. The State also filed a Notice of Intent to Seek the Death Penalty,

which provided sufficient notice to Appellant.

The United States Supreme Court has further held that a capital Appellant does not have a due process right to an indictment. In *Hurtado v. People of State of Cal.*, 110 U.S. 516, 517–18 (1884), a capital Appellant who had been convicted of murder and sentenced to death was never afforded an indictment or presentment by a grand jury even though it was required by the state constitution and the state penal code. The United States Supreme Court held that there was no error and no due process violation, because the indictment “is merely a preliminary proceeding, and can result in no final judgment[.]” *Hurtado*, 110 U.S. at 538. If the United States Supreme Court has found no error by the complete lack of an indictment, there can certainly be no error in this case warranting relief of any kind.

Appellant had no right to have the aggravating factors included in his indictment. Even if he did, he cannot establish that the absence of the aggravating factors listed in the indictment impacted his sentence of death. As the United States Supreme Court has explained, an indictment is merely a preliminary proceeding that does not carry a due process right or result in a final judgment. *Hurtado*, 110 U.S. at 538. There can certainly be no error in Appellant’s death sentence caused by a defect purported to be in the indictment.

For all these reasons, relief must be denied.

The Appellant's final argument that the system that was previously in place at the time of his sentence influenced him to waive his presentation of mitigation has no merit. It is based upon his trial counsel's affidavit which is not relevant because what trial counsel would have done differently is not applicable here.

There is no legal basis for vacating Reynolds' death sentences. They were obtained based upon the unanimous recommendations of death by his jury.

CONCLUSION

Based on the foregoing discussions, the State respectfully requests this Honorable Court affirm the trial court's ruling.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 6, 2017, a true and correct copy of the above has been furnished by e-mail/e-portal to: Julissa R. Fontán, Assistant CCRC-Middle, fontan@ccmr.state.fl.us; Maria E. DeLiberato, Assistant CCRC-Middle, deliberato@ccmr.state.fl.us; and Chelsea Shirley, Assistant CCRC-Middle shirley@ccmr.state.fl.us and support@ccmr.state.fl.us, 12973 N Telecom Parkway, Temple Terrace, FL 33637, the attorneys for the Appellant.

CERTIFICATE OF COMPLIANCE

I certify that this brief was computer generated using Times New Roman 14

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Respectfully submitted,

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