Filing # 230757347 E-Filed 09/03/2025 01:52:50 PM

IN THE SUPREME COURT OF FLORIDA

IN RE: AMENDMENTS TO RULES REGULATING THE FLORIDA BAR — CHAPTER 22
_____/

Case No.SC2025-1281

COMMENTS OF THE FLORIDA BOARD OF BAR EXAMINERS ON PETITION TO AMEND RULES REGULATING THE FLORIDA BAR BY ADDING CHAPTER 22

The Florida Board of Bar Examiners (the "Board") respectfully offers the following comments on the Petition to Amend Rules Regulating The Florida Bar by Adding Chapter 22.

The Board opposes the proposed amendment.

I. The Florida Constitution mandates that the Court have *exclusive* jurisdiction over bar admissions.

Pursuant to the Florida Constitution:

> The supreme court shall have exclusive jurisdiction to regulate the admission of persons to the practice of law and the discipline of persons admitted.

Art. V, § 15, Fla. Const.

This constitutional provision memorializes the inherent and mandatory authority of the Court to regulate attorneys, which is "as ancient as the common law itself." *The Fla. Bar v. Massfeller*, 170 So. 2d 834, 838 (Fla. 1964). "For more than six centuries prior to the adoption of [the Florida] Constitution, the English courts exercised the right to determine who should

be admitted to the practice of law." *In re Fla. Bd. of Bar Examiners*, 353 So. 2d 98, 100 (Fla. 1977). This authority was grounded on the rationale that the power to determine who should be admitted to practice law was a "constituent element" of judicial power, as the quality of justice dispensed by the courts depended upon "the integrity and competence of its bar." *Id.* "An unfaithful or incapable bar could visit reproach upon the administration of justice and upon the courts themselves." *Id.* "The drafters of the Florida Constitution recognized this inherent right of the courts to regulate the admission of persons to the practice of law, imbuing the Supreme Court with *exclusive* jurisdiction to direct such admissions." *Id.* (emphasis added).

The Court has consistently recognized that it has the constitutional authority to regulate bar admissions to the exclusion of the other branches of government. *See In re Fla. Bd. of Bar Exam'rs*, 353 So. 2d at 100; *State ex rel. Fla. Bar v. Evans*, 94 So. 2d 730, 733 (Fla. 1957) (legislature had no further control over bar admissions after constitutional amendment gave the Florida Supreme Court exclusive jurisdiction). Indeed, in direct conflict with what has been proposed, the Court has previously ruled that it "will not allow officials of other branches to tread on the constitutional power vested in this court by the people of this state." *Ciravolo v. The Fla. Bar*, 361 So. 2d 121, 125 (Fla. 1978).

For example, in *In re Fla. Bd. of Bar Exam'rs*, the legislature enacted a statute governing the modification of certain examinations administered by state agencies for individuals who were blind or deaf. 353 So. 2d at 98. The Board petitioned the Court for an advisory opinion on whether the statute was valid as applied to the bar examination. *Id.* at 100. The Court explained that any "legislative enactment which constitutes [a] usurpation of this Court's constitutionally endowed power, by seeking to govern the [Board's] activities must be invalid." *Id.* The Court held that the statute was invalid as applied to the Board. *Id.* at 101.

When adopting the Rules Regulating The Florida Bar, the Court emphasized the importance of the judicial branch's independence from the other branches of government in regulating bar admissions and attorney discipline:

> An independent legal profession is an important force in preserving government under law, for abuse of legal authority is more readily challenged by a profession whose members are not dependent on the executive and legislative branches of government for the right to practice. Supervision by an independent judiciary, and conformity with the rules the judiciary adopts for the profession, assures both independence and responsibility.

R. Regulating Fla. Bar Chapter 4. Rules of Professional Conduct Preamble: A Lawyer's Responsibilities; *The Fla. Bar re Rules Regulating The Fla. Bar,* 494 So. 2d 977, 1022 (Fla. 1986), *opinion corrected sub nom. The Fla. Bar*

re Rules Regulating The Fla. Bar, 507 So. 2d 1366 (Fla. 1987). The Court's emphasis in this regard is not novel, nor should it be surprising. Indeed, separation of powers is a foundational tenet upon which our government was built.

Here, the proposed rule would not only allow the executive branch to encroach on the Court's exclusive authority over bar admissions, it would completely abrogate it. That is because at its very essence, the rule would bestow upon the executive branch the sole and exclusive authority to determine admissions for its attorney employees, seemingly at all levels of government. The executive branch would make a class of candidates eligible for admission to The Florida Bar simply by offering them employment. The candidates could then gain admission to The Florida Bar, for a period of years, without any review by the Board the Court created to evaluate and recommend candidates for admission. *In re Fla. Bd. of Bar Examiners*, 353 So. 2d at 100 ("In the exercise of its constitutional authority, this Court created the Board to evaluate candidates for admission to The Florida Bar.").

Not limited to admissions, the proposed rule would also bestow on the executive branch the exclusive right to terminate an attorney's membership in The Florida Bar without any Court review, this time by simply terminating the attorney's employment. Cutting the Court entirely out of admission and

revocation authority with respect to these Florida attorneys, executive branch attorneys admitted under the proposed rule would be beholden to the executive branch for their bar admission status.

The proposed rule, which seeks to give the executive branch control over the bar admission status of its attorney employees, is at odds with the Florida Constitution, this Court's precedent, principles of separation of powers, and the preservation of an independent judiciary—a key force for preserving government under law.

II. The Board was established by this Court to evaluate candidates for admission to The Florida Bar, and it is best equipped to do so.

"The Court, under its constitutional authority to 'regulate the admission of persons to the practice of law,' has the authority to require proficiency in the law and good moral character before it admits an applicant to practice before the courts of this state." *Fla. Bd. of Bar Examiners v. G. W. L.,* 364 So. 2d 454, 458 (Fla. 1978).

A. The Board's application process ensures candidates have proficiency in the law.

The Court, through the Board, ensures applicants for admission to The Florida Bar are proficient in the law by requiring them to pass the General Bar Examination, which consists of both a multi-state component and a Florida-specific component. Fla. Bar Admiss. R 1-15.1 ("The primary

purpose of the bar examination is to ensure that all who are admitted to The Florida Bar have demonstrated minimum technical competence".).

The proposed rule's discussion provides that attorneys admitted under the rule "will have demonstrated competency by examination in other jurisdictions." Petition, p.3. First, this ignores the fact that an attorney passing a bar exam in another jurisdiction may have passed, at most, *half* of Florida's General Bar Examination. Attorneys admitted under the proposed rule would not have to demonstrate proficiency in Florida law by taking (or passing) the Florida-specific component of the exam.

And, even more, attorneys admitted under the proposed rule may not have passed the multi-state component by Florida's standards. Florida's multi-state component is the Multistate Bar Examination ("MBE"), which is produced by the National Conference of Bar Examiners. Due to differences in minimum passing scores for different jurisdictions, candidates could pass written bar examinations that include the MBE portion in other jurisdictions without earning an MBE score that would meet Florida's minimum passing score. That is to say, competency under the rules of one state does not necessarily mean competency under this Court's rules for admission in Florida. In reality, an attorney admitted under the proposed rule could have affirmatively *failed* to meet Florida's standards and still be admitted to

practice in Florida simply by accepting employment with one of the myriad offices that fall within the ambit of the proposed rule.

Second, and perhaps more importantly, the Court has previously heard and rejected this argument. *In re Russell*, 236 So. 2d 767, 768 (Fla. 1970). In *In re Russell*, a member of the Massachusetts bar sought to amend the Rules Relating to Admission to The Florida Bar "so as to exempt from written examination, under certain conditions, applicants previously admitted to the practice of law in other jurisdictions." *Id.* at 767-68. The Court explained that even where an applicant has been found to be qualified to practice in another state, "it does not follow that she should, therefore, be admitted into practice here without examination." *Id.* at 768. The Court reiterated that "[w]e see it clearly as our duty to admit to this special position of obligation and trust only those applicants, whether from Florida schools or elsewhere, who can satisfactorily demonstrate their credentials through a test of competence given under our supervision and control." *Id.* at 769.

The Court has consistently required applicants to pass the General Bar Examination in much more pressing circumstances. In 2020, when the COVID-19 pandemic created significant obstacles to administering the exam, more than 50 members of The Florida Bar petitioned the Court to adopt emergency rules to waive the requirement of passing the General Bar

Examination and instead allow for admission of applicants based upon graduation from an ABA-accredited law school after demonstrating good moral character. *In re Petition to Amend Rules of Supreme Ct. of Relating to Admissions to Bar & Rules Regulating Fla. Bar*, 301 So. 3d 854 (Fla. 2020). Under the rule proposed during the COVID-19 pandemic, applicants in line to take the July Bar exam would have been admitted immediately, but subject to supervision by a Florida attorney in good standing for a 6-month period. If the supervising attorney attested to the completion of the period of supervised practice, the newly admitted lawyer would "enjoy the privileges of unrestricted practice enjoyed by all other members in good standing of The Florida Bar." *Id.*

In its opinion declining to adopt the requested rule changes, the Court emphasized that it took the obligation to regulate the admission of persons to the practice of law seriously. 301 So. 3d at 855 (Fla. 2020). The Court specifically recognized that:

> In a nation whose freedoms are secured by the rule of law and in which civil and criminal justice are largely entrusted to the legal profession, it is essential for this Court to ensure that those seeking to practice law in this state possess "knowledge of the fundamental principles of law and their application," an "ability to reason logically," and the preparedness to "accurately analyze legal problems," before they are allowed to offer their services to the public. See Fla. Bar Admiss. R. 3-

> 10.1(a)-(b). Unfortunately, this Court regularly sees the extreme harm done to individual members of the public by lawyers who, in practice, fall short of these "essential" requirements. *Id.* That harm, when it occurs, undermines confidence in our entire system of justice and, consequently, undermines the foundation for our system of justice itself.

Id.

The rule currently being proposed by Petitioner likewise asks this Court to relax its standards for admission to The Florida Bar by, among other things, waiving the requirement to pass both portions of Florida's General Bar Examination. Such diminished standards could most assuredly result in harm to the public and undermine confidence in the judicial system.

B. <u>The Board's application process ensures applicants have good moral character.</u>

The Court, through the Board, ensures applicants for admission to The Florida Bar have good moral character by requiring the Board to conduct a character and fitness investigation of every applicant. Fla. Bar Admiss. R. 1-14.1 ("The primary purposes of the character and fitness investigation before admission to The Florida Bar are to protect the public and safeguard the judicial system."). Through the background investigation, all applicants seeking admission to The Florida Bar "must produce satisfactory evidence of good moral character, an adequate knowledge of the standards and ideals of the profession, and proof that the applicant is otherwise fit to take the oath

and to perform the obligations and responsibilities of an attorney." Fla. Bar Admiss. R. 2-12.

The proposed rule's discussion provides that the "principal officers" who would employ the government attorneys admitted under the rule "will undoubtedly believe that they satisfy the competency and character standards required of Florida Bar members." Petition at 3-4. However, this is presumably true of all employers—government and private alike. Yet, this "trust me" approach has never been sufficient for admission to the bar in this State. Instead, the Court charged the Board with investigating and determining that candidates have the necessary character and fitness for admission through the application of rigorous and well-tested standards.

First, the Board requires applicants to complete an extensive application designed to gather information about whether an applicant has met the requirements of the Rules of The Supreme Court Relating to Admissions to The Bar. Fla. Bar Admiss. R. 1-14.2. Second, the Board has employees whose primary responsibilities include reviewing those applications and conducting extensive background investigations. Finally, the Board routinely reviews and analyzes robust, court-approved rules to evaluate the character standards for attorneys (Fla. Bar Admiss. R. 3-10), the essential eligibility requirements for admission to the bar (Fla. Bar

Admiss. R. 3-10.1), disqualifying past conduct (Fla. Bar Admiss. R. 3-11), the determination of present character (Fla. Bar Admiss. R. 3-12), and the elements applicants must prove to show rehabilitation from prior disqualifying conduct (Fla. Bar Admiss. R. 3-13).

The Board's rules also provide for a well-developed process to conduct hearings to investigate character and fitness issues (Fla. Bar Admiss. R. 3-22, *et seq.*) and provide due process to applicants in those cases where the Board's investigation raises concerns that the applicant or registrant is not qualified for admission to The Florida Bar (Fla. Bar Admiss. R. 3-23, *et seq.*). The proposed rule does not provide any comparable standards or processes to ensure that attorneys admitted under the rule have the requisite character and fitness for admission.

C. Exempting attorneys from the Board's application process could result in harm to the public.

The proposed rule seeks to eschew the Court's processes for ensuring that attorneys admitted to The Florida Bar have legal proficiency and good moral character.

The proposed rule's discussion provides that Florida attorneys admitted under the rule "would represent sophisticated government clients, not the private clients that the Bar's practice regulations have historically existed to protect." Petition at 4. However, government attorneys lacking

good moral character or proficiency in Florida law could pose an even greater danger to the public due to their positions implementing statewide policy and their power and discretion in enforcing Florida law through prosecutions in both civil and criminal matters. The Office of the Attorney General, in particular, is a public trust endowed with large discretion in matters of public concern. *Bondi v. Tucker*, 93 So. 3d 1106, 1109 (Fla. 1st DCA 2012).

Additionally, and contrary to the Petitioner's assertion that the proposed rule would not reach "private clients," the rule would explicitly apply to attorneys employed by a Public Defender directly representing individuals, not "government clients." The Florida indigent population availing themselves of public defenders are among the most vulnerable of individuals in need of attorneys. And, not only do they have little say in actually choosing their attorney, but they also face life-changing consequences. Any safeguards to ensure the character or fitness of these entrusted attorneys will be eliminated by the adoption of the proposed rule.

The proposed rule also provides that the "Office of the Attorney General is particularly eager to find experienced, talented, and high-character attorneys from other states to perform excellent legal work on behalf of the State." Petition at 3. The best way to ensure attorneys from other states are high-character is to have them establish their character

through the Board's background investigation like every other member of The Florida Bar. The best way to ensure candidates can perform excellent legal work on behalf of the State is to have them demonstrate minimum technical competence in Florida law by passing the General Bar Examination. Removing those requirements for a select group of attorneys employed by the government would not serve the Court's interest in protecting the public, safeguarding the judicial system, or sustaining public confidence in the courts.

III. The proposed rule is substantially different from the Military Spouse Rule and, therefore, is not comparable.

The proposed rule's discussion provides that it is modeled after Chapter 21 of the Rules Regulating The Florida Bar, titled Military Spouse Authorization to Engage in the Practice of Law in Florida (the "Military Spouse Rule"), which allows military spouses to engage in the practice of law in Florida for up to five years. However, the proposed rule is significantly different than the Military Spouse Rule.

First, the public policy reasons for enacting the Military Spouse Rule are significantly different than, and do not apply to, the proposed rule. The Court approved the Military Spouse Rule "due to the unique mobility requirements of military families who support the defense of the United

States." R. Regulating Fla. Bar 21-1.1. In approving the narrow rule,[1] the Court explained:

> Service members are frequently required to relocate to duty locations around the globe based on the needs of the particular service to which they belong, with little regard to how the relocation may affect the service member's family. As a result, the assignment of a service member to a duty location in Florida may place the service member's spouse in the untenable position of having to choose between giving up the practice of law to relocate with the service member and continuing to practice law in the jurisdiction where he or she is already licensed.
> …
>
> It is our hope that the adoption of these new rules will assuage some of the hardships associated with service in the U.S. Armed Services. At a minimum, our adoption of these new rules gives form to the abiding gratitude we all share for the men and women who voluntarily serve in the U.S. Armed Services and the sacrifices endured by their families.

In re Amends. to Rules Regulating The Fla. Bar & Rules of Supreme Ct. Relating to Admissions to Bar-Mil. Spouse Rules, 249 So. 3d 1256 (Fla. 2018).

To be eligible for certification under the Military Spouse Rule, the non-Florida attorney must be the spouse of a full-time active service member "who is ordered to extended active duty . . . and transferred from outside Florida." *See* R. Regulating Fla. Bar 21-2.1(a). By its terms, spouses can

[1] Indeed, over the last ten years only 46 attorneys have been admitted under the Military Spouse Rule.

only avail themselves of this rule if the active service member has received transfer orders requiring their relocation. This rule is not available to out-of-state attorneys who voluntarily relocate.

It is in explicitly recognizing the hardship that these families face in being required to relocate at the behest of the government in service to our country that the Military Spouse Rule was enacted. In contrast, the proposed rule does not seek to alleviate any hardship similar to that faced by the families of active service members.

Second, although attorneys certified under the Military Spouse Rule do not have to pass the General Bar Examination, they must still submit an application to the Board and establish the requisite character and fitness to be admitted. R. Regulating Fla. Bar 21-2(l). In contrast, the proposed rule would not require the eligible government attorneys to submit an application to the Board or in any way establish their character and fitness to be admitted to the practice of law in Florida.

The Military Spouse Rule was enacted specifically to "assuage some of the hardships associated with service in the U.S. Armed Services." *See In re Amends. to Rules Regulating The Fla. Bar & Rules of Supreme Ct. Relating to Admissions to Bar-Mil. Spouse Rules*, 249 So. 3d at 1256. The proposed rule on the other hand serves no similar purpose or laudable goal,

does not contain the same character and fitness safeguards to which even displaced military families are subjected, and is not substantively "modeled after" the Military Spouse Rule. Therefore, it is not comparable in spirit, policy, or substance to the rule currently being proposed.

IV. Any concerns sought to be alleviated by the proposed rule can be addressed by the current Rules.

The proposed rule is advanced purportedly to address staffing concerns. However, the current Rules and membership adequately address those concerns.

As to the Petitioner's purported need to fill attorney positions, as of August 1, 2025, The Florida Bar has over 96,000 members in good standing who are eligible to practice. The Florida Bar, Frequently Asked Questions, https://www.floridabar.org/about/faq/#members (last visited August 22, 2025). Furthermore, with two bar exams administered each year, *thousands* of new attorneys become eligible to practice law in this state each year.

Additionally, to the extent there is any staffing urgency, existing Rule 11-1.9 provides a route to temporary authorized practice, including specifically for the Office of the Attorney General. Pursuant to Rule 11-1.9:

> (a) Persons Authorized to Appear. A member of an out-of-state bar may practice law in Florida under this chapter if the member of the out-of-state bar:

> (1) is an employee of the attorney general, a state attorney, a public defender, or the capital collateral representative;
>
> (2) has applied for admission to The Florida Bar;
>
> (3) submits to the jurisdiction of the Supreme Court of Florida for disciplinary purposes; and
>
> (4) is in good standing with that bar, is eligible to practice law in that jurisdiction, and is not currently the subject of disciplinary proceedings.

This Rule allows certification for a period of 12 months, which may be extended if the individual has passed the Florida bar exam and is awaiting results of the character and fitness evaluation. R. Regulating Fla. Bar 11-1.9(b). Therefore, a rule already exists to provide for any exigent staffing needs, and provides these out-of-state attorneys with sufficient time to take the Florida bar exam and submit to the character and fitness evaluation, while also maintaining employment and practicing law in Florida.

As such, the concerns raised by the Petitioner can be addressed by already existing Rules.

CONCLUSION

The proposed rule should not be adopted. The Court has mandatory exclusive jurisdiction over bar admissions, applicants should be required to satisfy the established and well-reasoned requirements of competency, character, and fitness to practice law in Florida, the proposed rule is not

similar in policy or substance to the Military Spouse Rule, and the current bar membership and bar Rules adequately address any concern raised by the Petitioner.

In considering the significant safeguards the proposed rule would forfeit to address a purported problem lacking any articulated exigency, the board must oppose the proposed rule.

DATED this 3rd day of September, 2025.

Respectfully submitted,

FLORIDA BOARD OF BAR EXAMINERS
TIMOTHY S. DANNINGER, CHAIR

Michele A. Gavagni
Executive Director

By: /s/ William G. Pafford

William G. Pafford
General Counsel
Florida Bar #99594
Florida Board of Bar Examiners
1891 Eider Court
Tallahassee, FL 32399-1750
(850) 487-1292
paffordw@flcourts.org

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing comment was filed electronically on September 3, 2025, via the Court's E-Filing Portal, and served by email on the following:

James Uthmeier
jenna.hodges@myfloridalegal.com

David Arthmann
davidarthmann@flhsmv.gov

David Axelman
david.axelman@eog.myflorida.com

John James Bajger
john.bajger@myfloridalegal.com

Samantha-Josephine Baker
sammy-jo.baker@fdc.myflorida.com

Rosalyn Sia Baker-Barnes
rsb@searcylaw.com

Christopher John Baum
christopher.baum@myfloridalegal.com

C Suzanne Bechard
carlasuzanne.bechard@myfloridalegal.com

Andrew Joseph Benard
andrew.benard@fdva.fl.gov

Judy Bone
judy.bone@fldoe.org

Alysson Hall Bradley
alysson.bradley@flhealth.gov

Lizabeth A Brady
liz.brady@myfloridalegal.com

David William Bundy
david.bundy@myfloridalegal.com

William David Chappell
david.chappell@fldoe.org

Kristen Krueger Clemons
kristen.clemons@fdc.myflorida.com

David Matthew Costello
dcostello@bsfllp.com

Rebekah Ann Davis
rebekah.davis@dot.state.fl.us

Jeffrey Paul DeSousa
jeffrey.desousa@myfloridalegal.com

Timothy E. Dennis

George Espy Doty III
gedoty@gmail.com

timothy.dennis@myfloridalegal.com

Joshua E Doyle
jdoyle@floridabar.org

Dane Morris Dunson
dmd8e@virginia.edu

Samuel Francis Elliott
samuel.elliott@myfloridalegal.com

Brian Lee Fernandes
brian.fernandes@myfloridalegal.com

Andrew Rubin Fier
andrew.fier@myfloridalicense.com

Nathan Andrew Forrester
nateforrester@yahoo.com

Laura Lee Gallagher
laura.gallagher@ahca.myflorida.com

Sonia Garcia-Solis
sonia.garciasolis@myfloridalegal.com

Kevin Andrew Golembiewski
kevin.golembiewski@myfloridalegal.com

Robert Edward Gregg
robert.gregg@myfloridalegal.com

John Matthew Guard
johnmguard@hotmail.com

Mark Sean Hamilton
mark.hamilton@floridarevenue.com

Paula Harrigan
paula.harrigan@fldoe.org

Joseph E. Hart
joe.hart@floir.com

Joseph Monroe Helton Jr.
joseph.helton@ahca.myflorida.com

Sonya Roebuck Horbelt
sonya.horbelt@myfloridalegal.com

Allen Liang Huang
allen.huang@myfloridalegal.com

Nicole Hults
nicole.hults@dot.state.fl.us

Daniel Andrew Johnson
dan.johnson@fdc.myflorida.com

Christopher Gilman Krampert
christopher.krampert@fdva.fl.gov

Kristen Grace Larson
kristen.larson@dms.fl.gov

Zachary Scott Loyed
zachary.loyed@eog.myflorida.com

Darya Daniela Massoudi

John Lewis Milla

daryamassoudi@gmail.com

Brande Lynne Miller
brande.miller@myfloridalicense.com

Michael Fox Orr
morr@orrcook.com

James Leigh Richmond
james.richmond@fldoe.org

Tonja Vickers Rook
tonja.rook@myfloridalegal.com

Robert Lewis Schenk II
rob@schenkfirm.com

Andrew Taylor Sheeran
andrew.sheeran@ahca.myflorida.com

Kelly Noel Smith
ksmith@floridabar.org

Elizabeth Clark Tarbert
etarbert@floridabar.org

Edward Alexander Tellechea
ed.tellechea@myfloridalegal.com

Rajan Kumar Vasisht
rajankvasisht@gmail.com

Nicholas J Weilhammer
nicholas.weilhammer@myfloridalegal.com

Joseph Yauger Whealdon III
john.milla@fldjj.gov

Ryan Dean Newman
ryan.newman@eog.myflorida.com

Christine Kimberly Pratt
christine.pratt@myfloridalegal.com

Ivy Pereira Rollins
ivy.rollins@myfloridalegal.com

Erik Louis Sayler
saylere@elderaffairs.org

Jeremy B Scott
jeremy.scott@myfloridalegal.com

Gregory Scott Slemp
greg.slemp@myfloridalegal.com

Foster Hartmann Swartz
foster.swartz@myfloridalegal.com

Elizabeth Ann Teegen
elizabeth.teegen@myfloridalegal.com

Matthew Aaron Toplak
matttoplak@gmail.com

Rana Marie Wallace
ranawallace@fcor.state.fl.us

W. Joseph Werner Jr.
joewerner1978@gmail.com

Bonnie Ann Wilmot

jwhealdon@jimersonfirm.com bonnie.wilmot@fldoe.org

Justin George Wolfe
justin.g.wolfe@dep.state.fl.us

/s/ William G. Pafford

CERTIFICATE OF TYPE SIZE AND STYLE

I certify that the size and style of type used in this comment is Arial 14.

/s/ William G. Pafford