

UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 04-22572-CIV-KING/O'SULLIVAN

EMMA YAIZA DIAZ, et al.

Plaintiffs,

v.

SUE M. COBB, Secretary of State of Florida,
et al.

Defendants.

**DEFENDANT BRENDA C. SNIPES, BROWARD COUNTY SUPERVISOR OF
ELECTIONS, ANSWER AND AFFIRMATIVE DEFENSES**

COMES NOW the Defendant, DR. BRENDA C. SNIPES, BROWARD COUNTY SUPERVISOR OF ELECTIONS (“Defendant Snipes”), by and through its undersigned attorney, pursuant to this Court’s February 27, 2007 Order and files this Answer and Affirmative Defense, and states as follows:

ANSWER

1. Defendant denies the allegations in this paragraph of the Third Amended Complaint.
2. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
3. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
4. Defendant Snipes denies the allegation in this paragraph of the Third Amended Complaint.
5. Defendant Snipes denies the allegations as they pertain to Broward County and is without sufficient knowledge of the allegations as pertaining to all other Defendant Supervisors.
6. Defendant Snipes denies the allegations in this paragraph of the Third Amended Complaint.
7. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, denies this paragraph.

8. Denied.
9. Denied. Defendant Supervisors have the duty to ensure that voter registration applications are complete.
10. Denied.
11. Defendant Snipes denies the allegations in this paragraph relating to corrections after the close of books. Defendant does not respond to the remaining allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
12. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
13. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
14. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
15. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
16. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
17. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
18. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
19. Denied.
20. Denied.
21. Denied.
22. Denied.
23. Denied.
24. Defendant Snipes admits that Plaintiffs attempt to allege a cause of action under 28 USC §§ 1331, 1343(a)(4) and 1367, and that this court would have subject matter jurisdiction over a claim under these statutes.
25. Admitted.

26. Admitted.
27. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
28. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
29. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
30. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
31. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
32. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
33. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
34. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
35. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
36. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
37. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
38. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
39. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
40. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
41. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
42. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.

43. Defendant Snipes is without sufficient knowledge, and therefore, denies the allegations in this paragraph.
44. Defendant Snipes admits that Defendant Snipes Cobb was Secretary of State from January 2006 through the date of filing of the Third Amended Complaint. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
45. Defendant Snipes admits the content of the state and federal statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statutes.
46. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
47. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
48. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
49. Admitted.
50. Defendant Snipes admits that she is Supervisor of Elections in Broward County, Florida, and that the other individuals named in this paragraph are Supervisors of Elections in their respective counties, with the exception of Jerry Holland (Duval County). Defendant Snipes admits she has been sued in this lawsuit, but is without sufficient knowledge as to the Plaintiffs' reasons for suing her.
51. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
52. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
53. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
54. Defendant Snipes admits the content of the First, Fifth and Fourteenth Amendments to the United States Constitution, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited Constitutional provisions.

55. Admitted.
56. Admitted.
57. Defendant Snipes admits the content of the state and federal statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statutes.
58. Defendant Snipes is without sufficient knowledge and therefore, denies the allegations in this paragraph.
59. Denied.
60. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
61. Defendant Snipes admits the allegation in the first sentence of this paragraph. Defendant denies the remaining allegations in this paragraph.
62. Denied.
63. Defendant Snipes denies that she could have taken any action other than that permitted by law.
64. Defendant Snipes is without sufficient knowledge and therefore, denies the allegations in this paragraph.
65. Defendant Snipes is without sufficient knowledge and therefore, denies the allegations in this paragraph.
66. Defendant Snipes is without sufficient knowledge and therefore, denies the allegations in this paragraph.
67. Defendant Snipes is without sufficient knowledge and therefore, denies the allegations in this paragraph.
68. Denied.
69. Denied.
70. Admitted.
71. Admitted
72. Defendant Snipes admits that the Florida election code was amended effective January 1, 2006, and the content of the state statute cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.

73. Defendant Snipes admits the content of the state statute cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
74. Defendant Snipes reincorporates her responses to paragraphs 72 and 73, as the allegations in this paragraph are a summation of the Plaintiffs' allegations in paragraphs 72 and 73 of the Third Amended Complaint.
75. Defendant Snipes admits that there were changes to the Florida election law effective January 1, 2006, but denies the allegations in this paragraph to the extent that they are inconsistent with the changes in such law.
76. Defendant Snipes admits the content of the state statute cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statute.
77. Defendant Snipes reincorporates her responses to paragraphs 75 and 76, as the allegations in this paragraph are a summation of the Plaintiffs' allegations in paragraphs 75 and 76 of the Third Amended Complaint.
78. Defendant Snipes admits the content of the state statutes cited in this paragraph, but denies the allegations in this paragraph to the extent that they are inconsistent with the language in the cited statutes.
79. Denied.
80. Defendant Snipes admits the content of the Florida Division of Elections' Guide to FVRS, dated September 5, 2005, but denies the allegations in this paragraph to the extent that they are inconsistent with the Florida Division of Elections' Guide to FVRS, dated September 5, 2005.
81. Defendant Snipes reincorporates her responses to paragraph 80, as the allegations in this paragraph are a summation of the Plaintiffs' allegations in paragraph 80 of the Third Amended Complaint.
82. Denied.
83. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
84. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
85. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
86. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.

87. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
88. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
89. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
90. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
91. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
92. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
93. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
94. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
95. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
96. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
97. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
98. Defendant Snipes admits that changes to Florida's election laws came into effect on January 1, 2006.
99. Admitted to the extent that the allegations in this paragraph are consistent with the amendments in Florida law referenced therein; otherwise, Defendant denies the allegations in this paragraph.
100. Denied as the allegations in this paragraph pertain to the "grace period" that remains pending. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.
101. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.

102. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
103. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court's February 27, 2007 Order.
104. Defendant Snipes is without sufficient knowledge, and therefore, denies, the allegations in this paragraph.
105. Defendant Snipes is without sufficient knowledge, and therefore, denies, the allegations in this paragraph.
106. Defendant Snipes denies the allegations in this paragraph as they pertain to the "grace period" claim remaining against Defendant Snipes. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.
107. Denied.
108. Denied.
109. Defendant Snipes is without sufficient knowledge as to the allegation in this paragraph and therefore denies same. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.
110. Defendant Snipes is without knowledge of the allegations in this paragraph therefore denies same. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.
111. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph and therefore denies same. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.
112. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, must deny same, in this paragraph as they pertain to the "grace period" claim remaining against the Defendant Snipes, must deny same. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.
113. Defendant Snipes is without knowledge of the allegations contained within this paragraph and therefore, denies same. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.
114. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, must deny same, as they pertain to the "grace period" claim remaining against the Defendant Snipes. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court's February 27, 2007 Order.

115. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, must deny same, as they pertain to the “grace period” claim remaining against the Defendant Snipes. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court’s February 27, 2007 Order.
116. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, must deny same, as they pertain to the “grace period” claim remaining against the Defendant Snipes. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court’s February 27, 2007 Order.
117. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, must deny same, as they pertain to the “grace period” claim remaining against the Defendant Snipes. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court’s February 27, 2007 Order.
118. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, must deny same, as they pertain to the “grace period” claim remaining against the Defendant Snipes. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court’s February 27, 2007 Order.
119. Defendant Snipes is without sufficient knowledge as to the allegations in this paragraph, and therefore, must deny same, as they pertain to the “grace period” claim remaining against the Defendant Snipes. Defendant Snipes does not respond to the extent that this paragraph pertains to any other claim pursuant to this Court’s February 27, 2007 Order.
120. Denied
121. Denied
122. Denied.
123. Denied.
124. Denied.
125. Denied.
126. Denied.
127. Denied.
128. Denied.
129. Defendant Snipes restates her responses to paragraphs 1-128 above as if fully set forth herein.
130. Defendant Snipes admits the content of the First and Fourteenth Amendments of the United States Constitution, but denies the remaining allegations in this paragraph to the extent that they are inconsistent with those Constitutional provisions.

131. Defendant Snipes denies the allegations in this paragraph to the extent that they relate to the remaining “grace period” claim. Defendant Snipes does not respond to the allegations in this paragraph relating to any other claim as such have been dismissed through this Court’s February 27, 2007 Order.
132. Denied.
133. Denied.
134. Denied.
135. Defendant Snipes restates its responses to paragraphs 1-128 above as if fully set forth herein.
136. Defendant Snipes admits the content of the First and Fourteenth Amendments of the United States Constitution, but denies the remaining allegations in this paragraph to the extent that they are inconsistent with those Constitutional provisions.
137. Defendant Snipes admits the content of Florida state law.
138. Denied. Defendant Supervisors are permitted to ensure that voter applications are complete.
139. Denied.
140. Denied.
141. Denied.
142. Denied.
143. Denied.
144. Defendant Snipes restates its responses to paragraphs 1-128 above as if fully set forth herein.
145. Defendant Snipes admits the content of the First and Fourteenth Amendments of the United States Constitution, but denies the remaining allegations in this paragraph to the extent that they are inconsistent with those Constitutional provisions.
146. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
147. Defendant Snipes denies the allegations in this paragraph to the extent that they relate to the remaining “grace period” claim. Defendant Snipes does not respond to the allegations in this paragraph relating to any other claim as such have been dismissed through this Court’s February 27, 2007 Order.

148. Defendant Snipes denies the allegations in this paragraph to the extent that they relate to the remaining “grace period” claim. Defendant Snipes does not respond to the allegations in this paragraph relating to any other claim as such have been dismissed through this Court’s February 27, 2007 Order.
149. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
150. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
151. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
152. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
153. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
154. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.
155. Defendant Snipes does not respond to the allegations in this paragraph as Defendant Snipes is not subject to this claim pursuant to this Court’s February 27, 2007 Order.

AFFIRMATIVE DEFENSES

1. As and for her First Affirmative Defense, Defendant Snipes states that Plaintiffs have failed to state a claim under Rules 12(b)(6) and 12(c) of the Federal Rules of Civil Procedure. As found by this Court in its February 27, 2007 Order, “Under state and federal law, Defendant Supervisors have no discretion and cannot be held liable [for failure to provide a grace period].”

2. As and for her Second Affirmative Defense, Defendant Snipes asserts that Plaintiffs failed to mitigate their damages so their claims are barred or must be reduced accordingly.

3. As and for her Third Affirmative Defense, Defendant Snipes asserts that Plaintiffs injuries, if any, were caused by their own negligence or wrongdoing. Accordingly, any claim against Defendant Snipes is barred or reducible to the full extent of Plaintiffs’ negligence or wrongdoing.

4. As and for her Fourth Affirmative Defense, Defendant Snipes asserts that Plaintiffs' injuries, if any, were caused by the negligence or wrongdoing of third parties. Accordingly, any claim against Defendant Snipes is barred or reducible to the full extent of negligence or wrongdoing of third parties.

5. As and for her Fifth Affirmative Defense, Defendant Snipes asserts that she is entitled to a set-off for any proceeds received by Plaintiffs for any injuries or damages alleged against Defendant Snipes.

6. As and for her Sixth Affirmative Defense, Defendant Snipes asserts that as an arm of the state for the State of Florida with regard to the administration of statewide general elections and the processing of voter registration applications, Defendant Snipes is immune for suit for damages pursuant to the 11th Amendment of the United States Constitution.

7. As and for her Seventh Affirmative Defense, Defendant Snipes asserts that those voters who signed (the citizenship oath) on the voter registration application, but failed to check the U.S. citizenship box, were deemed to have submitted a complete voter registration applications consistent with 97.053(5)(a), Florida Statutes (2004).

WHEREFORE, Defendant Brenda Snipes, Broward County Supervisor of Elections, requests this Court to enter judgment in her favor, with Plaintiffs to bear Defendant Snipes' costs of suit, including attorney's fees pursuant to 42 U.S.C. § 1988.

Dated this ___ day of March, 2007.

Respectfully submitted,

Burnadette Norris-Weeks, P.A.
On Behalf of Defendant, Dr. Brenda C. Snipes
Broward County Supervisor of Elections
100 SE 6th Street
Fort Lauderdale, FL 33301
Telephone: (954) 768-9770 / Fax: (954) 768-9790

BY: _____
BURNADETTE NORRIS-WEEKS
Florida Bar No. 949930
E-mail: bnorris199@aol.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing has been furnished via U.S. Mail this day of March, 2007, to the persons on the attached service list.

BY: _____
BURNADETTE NORRIS-WEEKS

SERVICE LIST

Diaz, et al. v. Hood, et al., Case Number 04-22572-CIV-King O'Sullivan

Mary Jill Hanson
Hanson, Perry & Jensen, P.A.
400 Executive Center Drive, Suite 207
West Palm Beach, Florida 33401
Phone: 561-686-6550
Fax: 561-686-2802
Email: mjhanson@hpjlaw.com

Michael Halberstam, Esq.
Paul, Weiss, Rifkind, Wharton,
Garrison, LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Phone: 212-373-3000
Fax: 202-492-0111
E-mail: mhalberstam@paulweiss.com

Jonathan P. Hiatt
AFL-CIO
815 Sixteenth Street, NW
Washington, DC 20006
Phone: 202-637-5053
Fax: 202-637-5323
Email: jhiatt@afleo.org

Manny Anon, Jr.
Florida Public Employees Council
AFSCME 79
99 N.W. 183 Street, Suite 224
N. Miami, FL 33169
Phone: 305 651 6617
Fax: 305 651-1740
Email: m_anon@afscmefl.org

Elliot Mincberg
People for the American Way Foundation
2000 M. Street, Suite 400
Washington, DC 20036
Phone: 202-467-2392
Fax: 202-293-2672
Email: emincberg@pfaw.org

Judith A. Browne
Sheila Y. Thomas & Elizabeth Westfall
Advancement Project
1730 M. Street, NW, Suite 910
Washington, DC 20036
Phone: 202-728-9557
Fax: 202-728-9558
Email: ewestfall@advancementproject.org

Judith A. Scott
John J. Sullivan
SEIU, 1313 L. Street, NW
Washington, DC 20005
Phone: 202-898-3453
Fax: 202-898-3323
Email: sullivanj@seiu.org

Tracey I. Arpen, Jr.,
Deputy General Counsel
Duval County
City Hall, St. James Building
117 West Duval Street, Suite 480
Jacksonville, Florida 32202
Phone: 904-630-1700
Fax: 904-630-2388
Email: tarpen@coj.net

Ernst Mueller
Office of the City Attorney
Duval County
City Hall, St. James Building
117 West Duval Street, Suite 480
Jacksonville, Florida 32202-3700
Phone: 904-630-1700
Fax: 904-630-1316
Email: emueller@coj.net

Jeffrey P. Ehrlich
Oren Rosenthal
Assistant County Attorneys
Miami-Dade County Attorney's Office
111 N.W. First Street, Suite 2810
Miami, Florida 33128
Phone: 305-375-5744 – (305) 375-5151
Fax: 305-375-5611 375-5634
Email: ehrlich@miamidade.gov

Peter Antonacci
Gray-Robinson, P.A.
Post Office Box 11189
Tallahassee, Florida 32302-1189
Tel: (850) 577-9090
Fax: (850) 577-3311
Email: pva@gray-robinson.com
Attorneys for Sue M. Cobb
Secretary of State

Ronald A. Labasky, Esq.
Young Van Assenderp, P.A.
225 S. Adams Street, Suite 200
Tallahassee, FL 32301
P.O. Box 1833
Tallahassee, FL 32302
Phone: 850-222-7206
Fax: 850-561-6834
Email: rlabasky@yvlaw.net

Michael D. Cirullo, Jr.,
Goren, Cherof, Doody & Ezrol, P.A.
Fort Lauderdale, FL 33308
Telephone: (954) 771-4500
Fax: (954) 771-4923
Email: mcirullo@cityatty.com