

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
OF THE STATE OF FLORIDA IN AND FOR PASCO COUNTY
CRC14-00216CFAES

STATE OF FLORIDA

V.

CURTIS J. REEVES

**STATE'S RESPONSE TO DEFENDANT'S MOTION TO CHIEF JUDGE
REQUESTING AUTHORIZATION TO NOT FILE DEPOSITION TRANSCRIPTS**

COMES NOW BERNIE McCABE, State Attorney for the Sixth Judicial Circuit in and for Pasco County, Florida by and through the undersigned Assistant State Attorney hereby respectfully requests this Honorable Court to deny the Defendant's request to not file discovery deposition transcripts with the Pasco County Clerk of Court as contemplated by Administrative Order PA/PI-CIR-99-35 and as good cause shows as follows:

Summary of State's Argument

The trial court judge, at the request of the Defendant, having accepted jurisdiction to hear this matter and having ruled on this matter, is the only judge in the Sixth Judicial Circuit with jurisdiction over the matter. The trial court judge's prior ruling has precluded other courts of equal, competent jurisdiction to hear and rule on this matter.

Because the Chief Judge is a judge with equal, competent jurisdiction to the trial judge, there is no jurisdiction before the Chief Judge to hear this matter. Thus, this court should enter its order summarily denying the Defendant's request to hear this matter and directing the Defendant to return to the trial court and to comply with the order in affect relating to this matter.

The Defendant has no other remedies available because he has exhausted or waived all available remedies and must now follow the trial judge's prior order.

History of the Case

1. On January 31, 2014, Curtis J. Reeves (Defendant) was charged with Murder in the Second Degree alleging that, on January 13, 2014, he unlawfully killed Chad Oulson. (State Ex. #1)

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2. The Defendant elected to participate in discovery by filing a Notice of Discovery and taking discovery depositions. To date the Defendant has taken over 100 discovery depositions, the great majority of which have been transcribed. (State's Ex. #2)

3. None of the deposition transcripts taken by the Defendant during the discovery process were filed with the Pasco Clerk of Court as contemplated by Administrative Order No. PA/PI-Cir-99-35. (State's Ex. #3)

4. On August 5, 2015, the State filed its *Motion to Compel The Filing of Original Deposition Transcripts And To Regulate Discovery* to compel the Defendant to file all deposition transcripts with the Pasco Clerk of Court as contemplated by Administrative Order No. PA/PI-Cir-99-35. (State's Ex. #4)

5. On August 7, 2015, the Defendant filed his *Response To State's Motion to Compel The Filing of Original Deposition Transcripts And To Regulate Discovery* to the State's motion. (State's Ex. # 5)

6. On August 10, 2015, a hearing was held on the State's motion before the trial court judge assigned to this case, Judge Susan Barthle Circuit Court Judge, Sixth Judicial Circuit, Pasco County, Criminal Division. Judge Barthle made an oral pronouncement of her ruling and requested the State prepare the order. (State's Ex. # 6)

7. On August 26, 2015, prior to the scheduled hearing, Judge Barthle entered her Order Granting In Part and Denying In Part State's Motion To Compel The Filing Of Original Deposition Transcripts And To Regulate Discovery consistent with her oral pronouncement on August 10, 2015. Within this order, the trial judge ordered the Defendant to file depositions with the Pasco Clerk of Court, but did not order the immediate filing to allow the Defendant time to go to the Chief Judge to request authorization not to file deposition transcripts. (State's Ex. #7)

8. The Defendant did not seek authorization for the Chief Judge to not file deposition transcripts taken in this case.

9. After the Defendant chose not to appear before the Chief Judge, On August 20, 2015 the State filed its *Motion To Compel The Immediate Filing Of Original Deposition Transcripts and To Regulate Discovery*. (State's Ex. #8)

10. On August 26, 2015, a hearing was held on the State's motion before Judge Susan Barthle, Circuit Court Judge, Sixth Judicial Circuit, Pasco County, Criminal Division, the trial court judge assigned to this case (State's Ex. #9) At the conclusion of the hearing Judge Barthle granted the *State's Motion To Compel The Immediate Filing Of Original Deposition Transcripts and To Regulate Discovery*. (State's Ex. #8) and denied the State's request that the Defendant immediately file the deposition transcripts with the Pasco Clerk of Court. Judge Barthle ruled that the party who wished to have the deposition transcripts filed must seek prior approval from the Administrative Judge Shawn Crane, Sixth Judicial Circuit in and for Pasco County. The court requested the State prepare the order for her review. (State's Ex. #9, pg. 46)

11. Before the State could provide the trial judge with the requested proposed order from the August 26, 2015 hearing, Judge Susan Barthle sua sponte, reconsidered her oral ruling of August 26, 2015 and on September 8, 2015 entered a written Order Granting State's Motion To Compel ruling "... all depositions that have been transcribed in this case be filed forthright, in keeping with the rules of discovery and the customary practice in this circuit". (State's Ex. #10) This order now estopped the Defendant from being able to have any issues heard before the Chief Judge because the deposition transcripts needed to be filed without delay.

12. On September 10, 2015, the Defendant filed his *Emergency Motion To Stay Order Granting State's Motion To Compel* (State's Ex. #11)

13. On September 22, 2015, the State filed its *State's Response To Defendant's Emergency Motion To Stay Order Granting State's Motion To Compel* (State's Ex. #12)

14. On September 22, 2015 a hearing was held before Judge Susan Barthle on the *Defendant's Emergency Motion To Stay Order Granting State's Motion To Compel*. (State's Ex. #13) After hearing arguments from the parties, the trial judge granted the Defendant's motion to stay. (State Ex. #14)

15. On September 25, 2015, the Defendant filed in the Second District Court of Appeal a Petition for Writ of Certiorari challenging the court's order on numerous grounds.

16. On February 26, 2016 the Second District Court of Appeal dismissed the Defendant's Petition for Writ of Certiorari PER CURIAM. By entering the order dismissing the case, the Second District Court of Appeal found that the trial judge, in signing the order compelling the Defendant to file the transcripts of all criminal discovery depositions, did not depart from the essential requirements of the law. (State's Ex. #15)

17. On March 14, 2016, the Defendant filed in the Second District Court of Appeal a *Motion For Rehearing, For Rehearing en Banc, Requesting Written Opinion, and for Certificate of a Question of Great Public Importance and/or Direct Conflict*.

18. On March 18, 2016 a Status Conference was held before the trial judge. (State's Ex. #16) The trial judge told defense counsel that because the Second District Court of Appeal dismissed the Defendant's Petition for Writ of Certiorari her order of September 8, 2015 would have to be complied with. (State's Ex. #16, pg. 8) Defense counsel told the trial judge that he would be seeking relief from the Chief Judge. (State's Ex. #16, pg. 8) In response the trial judge stated "Oh, that's correct". (State's Ex. #16, pg. 8, Ln. 14)

19. On April 19, 2016, the Second District Court of Appeal denied the Defendant's motion for rehearing, rehearing en banc, issuance of a written opinion and for certification of a question of great public importance and/or direct conflict. (State's Ex. #17)

20. On April 29, 2016, the State filed its *Motion To Enforce The Court's Order Of September 8th, 2015 To Forthright File All Defense Discovery Deposition Transcripts With The Pasco County Clerk Of Court* (State's Ex. #18) Along with said motion the State filed *State's*

Argument And Memorandum In Support Of Its Motion To Enforce The Court's Order Of September 8th, 2015 To Forthright File All Defense Discovery Deposition Transcripts With The Pasco County Clerk Of Court (State's Ex. #19) and State's Appendix In Support Of Its Motion To Enforce The Court's Order Of September 8th, 2015 To Forthright File All Defense Discovery Deposition Transcripts With The Pasco County Clerk Of Court. (State's Ex. #20)

21. On April 29, 2016, the Defendant filed his *Motion To Chief Judge Requesting Authorization To Not File Deposition Transcripts*. (State's Ex. #21)

22. On May 6, 2016 the Defendant filed his *Response To State's Motion To Enforce The Court's Order Of September 8th, 2015 To Forthright File All Defense Discovery Deposition Transcripts With The Pasco County Clerk Of Court*. (State's Ex. #22)

State Argument

On January 31, 2014, Curtis J. Reeves (Defendant) was charged by Information with Murder In The Second Degree (Count 1) and Aggravated Battery (Count 2) (State's Ex. #1) On January 22, 2014, the Defendant filed his Notice of Discovery. (State's Ex. #2) The Defendant has taken over 100 depositions of which the great majority has been transcribed. The original deposition transcripts have not been filed with the Pasco Clerk of Court pursuant to Administrative Order No. PA/PI-Cir-99-35. (State's Ex. #3)

On August 5, 2015, the State filed its *Motion To Compel The Filing Of Original Deposition Transcripts and To Regulate Discovery* requesting the trial judge to direct the Defendant to file all discovery deposition transcripts with the clerk of court. (State's Ex. #4) On August 7, 2015, in response, the Defendant sought authorization from the trial judge not to file the deposition transcripts, claiming among other things, that the Administrative Order did not apply to a Defendant with private counsel who was using private, not public funds to pay the cost of the criminal depositions and that having the deposition transcripts in the public domain would be prejudicial to the Defendant. (State's Ex. #5) The Defendant did not seek authorization from the Chief Judge, not to file criminal discovery depositions with the Pasco Clerk of Court until 8 months later, when, on April 29, 2016, after fully arguing the issue before the trial judge and requesting a Writ of Certiorari from the Second District Court of Appeal, he filed his *Motion To Chief Judge Requesting Authorization To Not File Deposition Transcripts*. (State's Ex. #21) Instead, The Defendant invoked the jurisdiction of the trial judge and sought authorization to not file the deposition transcripts by requesting rulings by the trial judge, which included that Administrative Order No. PA/PI-Cir-99-35 did not apply to him and the filing would be prejudicial to the Defendant. (State's Ex. #3, pg. 2)

The Defendant by adopting the tactic of seeking an authorization not to file deposition transcripts from the trial judge, instead of the Chief Judge of the circuit, is now bound by the decision of the trial judge, subject only to his right of direct appeal at the close of the case. The chief judge of the circuit does not have the authority or the jurisdiction to issue an order that reverses an order issued by a judge of equal, competent jurisdiction. An order from the chief

judge does not trump an order from the trial judge on the same issue. The logic of this concept is sound. A party cannot continue to litigate a matter until a favorable ruling is obtained. The litigation has to stop at some point in time. By choosing to litigate his objection to the filing of criminal discovery deposition transcripts with the trial judge, the Defendant has impliedly waived his right to now seek an exemption from the Chief Judge. The Defendant has fully litigated this matter with a judge of competent jurisdiction, (State's Ex. #6, pgs. 15 - 29) (State's Ex. #9, pgs. 9-16, pgs. 23-26) i.e., the trial judge, who subsequently ordered defense counsel to forthright file all deposition transcripts in this case pursuant to Administrative Order No. PA/PI-Cir-99-35. (State's Ex. #10)

Prior to the trial judge issuing its final order of September 8, 2015, directing the Defendant to file the deposition transcripts forthright, the trial judge gave the Defendant the option to seek authorization from the Chief Judge to not file the deposition transcripts. (State's Ex. #6, pg. 32) (State's Ex. #9, pgs. 13-14) The trial judge's order dated August 26, 2015, memorializing her ruling at the August 10, 2015 hearing, did not originally set a time frame in which the transcripts had to be filed with the Pasco Clerk of Court. (State's Ex. #6, pg. 32) (State's Ex. #10) At the August 10, 2015 hearing, the trial judge gave the Defendant an opportunity to seek authorization from the Chief Judge not to file the deposition transcripts. (State's Ex. #6, pg. 32) By not seeking authorization from the Chief Judge, the Defendant continued with his choice to litigate this matter with the trial judge. (State's Ex. #9, pgs. 13-14)

On August 20, 2015 the State filed its *Motion To Compel The Immediate Filing of Original Deposition Transcripts and To Regulate Discovery* in response to the Defendant's failure to file the deposition transcripts or bring this before the Chief Judge. (State's Ex. #8)

On August 26, 2015, a hearing was held before the trial judge regarding the State's *Motion To Compel The Immediate Filing of Original Deposition Transcripts and To Regulate Discovery*. (State's Ex. #9) At the August 26, 2015, hearing the Defendant continued to take the position that Administrative Order No. PA/PI-Cir-99-35 did not apply to him. (State's Ex. #9, pgs. 14, and 32) and that the filing of the deposition transcripts will be prejudicial to the Defendant. (State's Ex. #9, pg. 15) Defense counsel explained to the trial court judge that, instead, he was going to apply for a Writ of Certiorari alleging the trial court judge erred in issuing her order dated August 26, 2015 granting the *State's Motion To Compel The Filing Of Original Deposition Transcripts and To Regulate Discovery*. (State's Ex. #9, pgs. 15 - 16)

On September 8, 2015 the trial judge issued her final order on this matter. (State's Ex. #10) By ruling the deposition transcripts in this case have to be filed forthright, the trial judge denied the Defendant authorization not to file the deposition transcripts based on the claim that the administrative order did not apply to him and the filing of the deposition transcripts would be prejudicial to the Defendant. The Defendant chose to fully litigate this matter before the trial judge instead of the Chief Judge. The resulting final order has the effect of res judicata divesting a judge of equal, competent from hearing the same matter.

The Petition For Writ of Certiorari to the Second District Court of Appeal, which found that the trial judge did not depart from the essential requirements of the law, is of no matter to the concept that the Defendant has waived the ability to litigate this issue before the Chief Judge

because the concept of res judicata applies to the trial judge's ruling in and of itself. The certiorari denial stands for the proposition that the trial judge's ruling did not depart from the essential requirements of the law. Although not important to determine if res judicata applies, the Second District Court of Appeal's order is important in an analysis of manifest injustice, a concept similar to in both the burden and legal analysis applied as the concept of a "departure from the essential requirements of the law."

The trial judge and the Chief Judge have equal, competent jurisdiction over cases in the Sixth Circuit. Both are circuit court judges within the same circuit, with the same inherent powers and jurisdiction to hear matters that come before them. The chief judge of the circuit has accepted the additional responsibility of administrative duties to ensure the circuit court judges have all the funds and tools necessary to effectively disburse justice. To relieve the individual circuit judges of some of their inherent responsibilities, this circuit has established the practice of having the chief judge hear matters that are purely administrative in nature. This assignment of responsibility to the Chief Judge does not divest the trial judges of the jurisdiction to hear administrative matters if a party so chooses. The acceptance by a trial judge of the responsibility for administrative duties of the Chief Judge does not result in rulings and orders issued by the trial judge on purely administrative matter null & void.

Once the trial judge has agreed to hear an administrative issue and subsequently issues a lawful order on the matter, the Defendant, not liking the ruling, cannot take the matter to the chief judge hoping for an order that would override the trial judge's order on the same issue. The Chief Judge of the circuit does not have appellate review of the trial judge's decision in this matter. Nor can the trial judge bestow appellate jurisdiction to another judge of equal, competent jurisdiction by acquiescing to the defense counsel's belief he has a right to have the same issue heard before the chief judge after an unfavorable ruling by the court of appeal. At the Status Conference on March 18, 2016 (State's Ex. #16) the trial judge told defense counsel that because the Second District Court of Appeal denied the Defendant's Petition for Writ of Certiorari her order of September 8, 2016 "would have to be complied with". (State's Ex. #16. Pg. 8, Ln. 4-5) Defense counsel mistakenly believed that the denial of the Defendant's Petition for Writ of Certiorari stood for the proposition that the Administrative Order is still a valid order. ". (State's Ex. #16. Pg. 8, Ln. 10) The denial of the Defendant's Petition for Writ of Certiorari means that the trial judge's order of September 8, 2015 is in full force and affect and must be complied with. The litigation in this matter is over until the Defendant has an opportunity to file a direct appeal after the final orders in this case are issued. That fact that defense counsel mistakenly believed his recourse now would be to go before the Chief Judge (State's Ex. #16. Pg. 8, Ln. 11) and the trial judge responding "that's correct" (State's Ex. #16. Pg. 8, Ln. 14) does not remove the effect of res judicata on this matter. Once the Defendant chose to litigate this matter via the trial judge, he cannot now pick another avenue of litigation to argue the same issues comprising his objection to this matter.

The Defendant cannot forum shop hoping at some point in time to obtain a favorable ruling. The court's order of September 8, 2015, commanding defense counsel to forthright file all discovery deposition transcripts with the clerk of court, is now, after the Second District Court of Appeal dismissed the Writ of Certiorari, an order the Defendant must follow. The Defendant cannot now try to "unring the bell" by arguing the same issues in an attempt to seek

an exemption from the Chief Judge of the circuit. The Defendant has already rung the bell by virtue of the Defendant litigating the matter before the trial judge. Having elected to invoke the jurisdiction of the trial judge to seek an exemption to said Administrative Order, he has deemed to have acquiesced that the matter shall be considered and disposed of by the trial judge and not the Chief Judge of the circuit. The Defendant's action of litigating the matter with the trial judge amounts to an implied waiver of his right to seek an exemption from the Chief Judge, pursuant to Administrative Order No. PA/PI-Cir-99-35.

Even if the Defendant had sought authorization from the Chief Judge to not file the deposition transcripts after the trial judge ruled on August 10, 2015 and signed her order on August 26, 2015, the State would have argued the effect of res judicata divested the Chief Judge of jurisdiction to hear the matter because the issue had already been litigated by the trial judge. Instead, the Defendant chose to go to the Second District Court of Appeal, and the net result of the Defendant's litigation is that the dismissal of the Defendant's Petition for Writ of Certiorari left the trial judge's order of September 8th, 2015 in full force and affect. At this point in the litigation of this case, the Defendant has no other remedies until he can file an appeal upon the final order of the trial judge (i.e., the judgment and sentence order).

The Defendant's strategy of litigating this matter before the trial judge instead of the Chief Judge has divested the Chief Judge of the jurisdiction to hear this matter. The Defendant, having exhausted or waived all available remedies available at this point in time, must now follow the trial judge's prior order.

MEMORANDUM OF LAW

The Defendant, by adopting the tactic of seeking an authorization not to file deposition transcripts from the trial judge, instead of the Chief Judge of the circuit, he is now bound by the decision of the trial judge, subject only to his right of direct appeal at the close of the case. This is based on the legal concept of res judicata.

In State v. McBride, the Florida Supreme Court explained **the principle of res judicata** means "a judgment on the merits rendered in a former suit between the same parties or their privies, upon the same cause of action, by a court of competent jurisdiction, is conclusive not only as to every matter which was offered and received to sustain or defeat the claim, but as to every other matter which might with propriety have been litigated and determined in that action." State v. McBride, 848 So. 2d 287, 289 (Fla. 2003) (citations omitted). Res judicata prohibits not only relitigation of claims raised but also the litigation of claims that could have been raised in the prior action. Id. at 290. Here, the Defendant is not only precluded from raising all arguments on the filing of deposition transcripts that he has previously raised before the trial judge, he cannot "sandbag" the court and argue that he wants to raise issues that he did not previously raise because those issues were ripe for litigation at the time the Defendant invoked the jurisdiction of the trial judge instead of the Chief Judge of the circuit.

In Atlantic Shores Corporation, the complainant in a mortgage foreclosure proceeding invoked the jurisdiction of the equity court asking for a personal judgment for deficiency. The Florida Supreme Court held that the complainant “was not compelled to submit the adjudication of this question to the court of equity, but, if he did so, he would have been bound by its decision, subject only to his right of appeal where such discretion was abused”. Atlantic Shores Corporation v. Zetterlund, 138 So. 50, 54 (Fla. 1931). The Florida Supreme Court in Atlantic Shores Corporation found,

“But, where the chancellor does not just merely refuse to entertain the prayer for deficiency by refusing to enter upon the legal aspects of the case at all, and, on the contrary, does entertain such prayer and hears and considers pleadings and evidence for and against the entry of such a decree, or concerning the amount of it, if one is to be entered, the decision of the chancellor... then becomes the equivalent of a judgment in a common-law action and is res judicata, and whatever error may have been committed in the decree rendered is subject to redress and correction only by a direct appeal in the pending cause.”

Id. at 54 (citation omitted). The Florida Supreme Court further determined,

“He [the complainant] was not compelled to submit the adjudication of this question to the court of equity, but, if he did so, he would have been bound by its decision, subject only to his right of appeal where such discretion was abused. The discretion so vested is not an absolute and unbridled discretion, but a ‘sound judicial discretion,’ which must be supported by established equitable principles as applied to the facts of the case, and the exercise of which is subject to review on appeal.”

Id. (quoting “Cragin v. Ocean & Lake Realty Co., (Fla.) 133 So. 569, also Id. (Fla.) 135 So. 795”, [797]).

In Johnson v. Johnson, the wife moved to set aside final judgment of dissolution of marriage and settlement agreement. The lower court held the wife’s prior waiver of claim that mediation settlement agreement was product of duress had res judicata effect on refiled motion arguing the same grounds. Johnson v. Johnson, 738 So. 2d 508, 509 (Fla. 1st DCA 1999).

The First District Court of Appeal found

“The trial court correctly dismissed appellant’s motion in so far as appellant relied upon the claim of duress. The record reflects, and the trial court found, that prior to the entry of final judgment, appellant filed a motion with an identical claim of duress in an effort to set aside the mediation settlement agreement. Appellant later withdrew the motion and filed a waiver with the court which

stated that appellant had no objections to the entry of final judgment upon the settlement agreement. By raising the same claim of duress again in her motion to set aside the final judgment, appellant simply refiled a motion she previously withdrew and waived on the record nearly a year earlier. Rule 1.540(b) does not empower a trial court to upset the finality of a judgment in cases where a voluntary dismissal is based upon a party's "tactical error" and not upon "grounds set out in the rule."... Were we to allow, on these facts, a repeat claim of duress, we would exceed the limits of Rule 1.540(b) relief, violate the doctrine of res judicata and upset the finality of the judgment.

Id. (citations omitted).

Likewise in McBride, the Florida Supreme Court explained the **principle of collateral estoppel** "prevents identical parties from relitigating the same issues that have already been decided". McBride, 848 So. 2d at 290. "In addition, the particular matter must be fully litigated and determined in a contest that results in a final decision of a court of competent jurisdiction. Id. 291. The principle precludes relitigation of an issue in a subsequent but separate cause of action thereby preventing parties from rearguing the same issues that have been decided between them by a court of competent jurisdiction. Id. In McBride, the Florida Supreme Court further explained that the principles of res judicata and collateral estoppel will not be invoked where it would defeat the ends of justice. McBride, 848 So. 2d at 291. "Manifest injustice", the standard used to deny a Petition for Writ of Certiorari is a similar standard and was used by the Second District Court of Appeal to deny the Defendant's Petition for Writ of Certiorari.

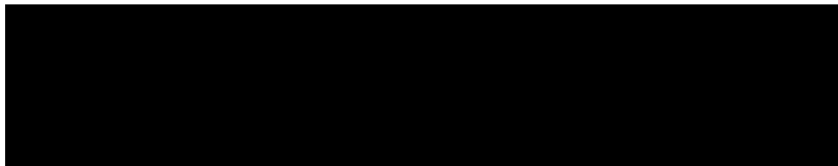
There is no constitutional or legislative "right" associated with the matter at bar. But, just as a defendant has a right to waive constitutional and legislative due process rights, the Defendant here can waive his ability to seek an exemption from the Chief Judge of the circuit by instead seeking exemption from the trial judge, by arguing that said administrative order does not apply to him and the Defendant will be prejudiced by the filing of the deposition transcripts. In this way, waiver occurs by the Defendant's actions. This type of waiver by action occurs in issues of venue, for example. Venue, "the geographical subdivision in which a court of competent jurisdiction may determine the case[.]" can be waived by a defendant. Tucker v. State, 417 So. 2d 1006, 1009 (Fla. 3d DCA 1982). By electing to have his case tried in a specific county, the defendant cannot then object because he is not being tried in the county where the crimes were committed. See Bundy v. State, 455 So. 2d 330, 339 (Fla. 1984); § 910.03, Fla. Stat ("By his election, the accused waives the right to trial in the county in which the crime was committed."). By asking for a change of venue, a defendant waives his right to be tried in the county the crimes were committed. Bundy, 455 So. 2d at 339. This is true even if the defendant claims he had to request the original change of venue because of error by the trial court. Id. Likewise, the Defendant in the present case has waived the ability to take this matter before the Chief Judge because he has fully litigated this matter before the trial judge.

WHEREFORE, the State of Florida respectfully asks this court to enter its order finding that it does not have jurisdiction to hear this motion as it was previously heard and decided by the trial judge.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the *State's Response To Defendant's Motion To Chief Judge Requesting Authorization To Not File Deposition Transcripts* was furnished to Richard Escobar, Esq., Escobar & Associates, P.A., 2917 West Kennedy Blvd., Ste 100, Tampa, FL 33609, Attorney for the Defendant by U.S. Mail / Hand / Facsimile this 13th day of May, 2016.

BERNIE McCABE, State Attorney
Sixth Judicial Circuit of Florida



Assistant State Attorney