IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
Tallahassee Division

EVA LOCKE, PATRICIA ANNE LEVENSON, BARBARA VANDERKOLK GARDNER, NATIONAL FEDERATION OF INDEPENDENT BUSINESS,

Plaintiffs,

v. Civil Action No._____

JOYCE SHORE, in her official capacity as Chair of the Florida Board of Architecture and Interior Design; JOHN P. EHRIG, in his official capacity as Vice-Chair of the Florida Board of Architecture and Interior Design; and AIDA BAO-GARCIGA, ROASSANA DOLAN, WANDA GOZDZ, MARY JANE GRIGSBY, GARRICK GUSTAFSON, E. WENDELL HALL, ERIC KURITSKY, ROYMI MEMBIELA, and LOURDES SOLERA in their official capacities as members of the Florida Board of Architecture and Interior Design,

Defendants.

COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

INTRODUCTION

1. This civil rights lawsuit seeks to vindicate the Plaintiffs' right to earn an honest living and communicate truthfully about interior design services they lawfully perform in Florida. Those rights have been violated by the state's enforcement of an interior design licensing law that imposes an unconstitutional prior restraint on truthful commercial speech, that improperly restricts substantial amounts of constitutionally protected expression, that violates the Plaintiffs' rights to due process and equal

protection under the Fourteenth Amendment, and that improperly burdens and discriminates against interstate commerce. Because it fails to advance any genuine public purpose while substantially burdening the exercise of constitutionally protected rights, Florida's interior design law cannot stand.

JURISDICTION AND VENUE

2. Plaintiffs bring this civil rights lawsuit pursuant to Article I, section 8 and the First and Fourteenth Amendments to the United States Constitution; the Civil Rights Act of 1871, 42 U.S.C. § 1983; and the Declaratory Judgments Act, 28 U.S.C. § 2201. Plaintiffs seek injunctive and declaratory relief against the enforcement of Florida's interior design law, Fla. Stat. § 481.201 *et seq.*, along with its implementing rules and regulations and the practices and policies of the Florida Board of Architecture and Interior Design (hereafter "Board" or "State Board") in enforcing those provisions, which facially and as applied violate the Plaintiffs' constitutional right to earn an honest living and to speak truthfully about interior design and other services they lawfully provide.

3. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1343.

4. Venue lies in this Court pursuant to 28 U.S.C. § 1391(b).

PARTIES

5. Plaintiff Eva Locke is an interior designer from Gulf Stream, Florida who wishes to offer both residential and commercial interior design services to her clients, and to truthfully and accurately advertise interior design services she lawfully provides. She is not licensed in Florida as an interior designer. Locke has a Bachelor of Arts degree

from Tulane University and an Associate's Interior Design degree from Palm Beach Community College. After completing her degree at Palm Beach Community College, Locke worked for a licensed interior designer in Florida, completing eighteen months of a state-mandated four-year apprenticeship, which must be completed before she is eligible to be licensed as an interior designer in Florida. Locke learned very little about the actual practice of interior design during her eighteen-month apprenticeship and concluded that, other than satisfying the statutorily mandated "diversified interior design experience," there was no practical benefit to her in completing it.

6. Besides an apprenticeship, Florida law requires applicants to pass the National Council for Interior Design Qualification ("NCIDQ") examination. The NCIDQ exam is expensive, largely irrelevant to the work that many interior designers perform, and is only one of several national examinations that test interior design subject matter. Moreover, NCIDQ was created by the American Institute of Interior Designers and the National Society of Interior Designers, two national organizations that were then preparing to merge into what became the American Society of Interior Designers (ASID), an industry group that has lobbied for decades to enact its own membership requirements—including specifically passage of the NCIDQ exam—into law and to impose a single-entry system on an industry notable for the variety, diversity, and creativity of its practitioners. Locke has no desire to take the NCIDQ exam and does not believe that doing so would make her a better interior designer or otherwise benefit her or her clients in any way.

7. But for the challenged interior design restrictions, Locke would now be working for herself as a full-service interior designer, offering both residential and commercial interior design services to her clients and advertising herself as an "interior designer."

8. Plaintiff Patricia Anne Levenson, from Lake Worth, Florida, was a classmate of Eva Locke's in the interior design program at Palm Beach Community College. She is not licensed in Florida as an interior designer. Levenson first attended Palm Beach Community College in pursuit of a computer science degree, which she obtained in 1991. Through her career in computer services, Levenson learned computer-aided design ("CAD") and eventually decided to supplement her computer and graphic design skills with an interior design degree so she could perform residential and commercial interior design services. Levenson recently obtained an Associate's Interior Design degree from Palm Beach Community College and would like to begin work immediately, offering a full range of interior design services to potential clients.

9. From her background in web development, Levenson knows how important the particular terms used on a given website are to its success in attracting web traffic. She believes that in order to successfully market her interior design services she would need to truthfully and accurately describe herself as an "interior designer" offering "interior design" services. However, because Florida law forbids nonlicensees from using the terms "interior designer" or "words to that effect"—even when they are factually accurate and relate to lawfully performed services—Levenson cannot accurately advertise the residential interior design services that she may lawfully perform in Florida

as a nonlicensee. The ambiguity of the term "words to that effect," also leaves Levenson to guess what terms she may use in advertising those interior-design-related services she may lawfully perform as a nonlicensee and that she wishes to offer.

10. Levenson is skeptical about her ability to secure an apprenticeship with a government-approved interior designer and considers that requirement unreasonable in any event. She feels the same way about the state-mandated NCIDQ exam. But for the challenged laws, Ms. Levenson would advertise herself, accurately, as an "interior designer" seeking to perform "interior design" and "space planning" services, and she would both advertise for and accept commercial interior design jobs, which are currently forbidden to her because she is not a state-licensed interior designer.

11. Barbara Vanderkolk Gardner is an interior designer who resides in Princeton, New Jersey, and performs residential interior design work in New Jersey, New York, Pennsylvania, and Florida. She maintains offices for her business, "Collins Interiors, LLC" in Princeton and in Sarasota, Florida. Gardner's website and other advertising materials state, accurately, that she is an interior designer who offers various residential interior design and related services that she is legally authorized to perform in Florida as a nonlicensee, given the statutory exemption for residential interior design.

12. In March 2009, Gardner received a cease-and-desist letter from the law firm of Smith, Thompson, Shaw & Manausa, ordering her to "[i]mmediately refrain from offering interior design and commercial interior design services" and demanding that she change her website "to delete all references to such services." But it is perfectly legal for Gardner to perform interior design services in Florida so long as they are residential

services, because the law specifically exempts "interior design services . . . for any residential application." Fla. Stat. § 481.229(6)(a). As a result of the cease-and-desist letter, and because she reasonably fears further enforcement action from the State Board if she continues to exercise her right to speak truthfully about interior design services she lawfully provides, Gardner has ceased advertising her business in several different publications in Florida with whom she advertised in the past and which have featured her interior design projects.

13. Gardner already has a college degree and has years of experience working as an interior designer, both in Florida and elsewhere, and she has neither the time nor the inclination to go back to school, complete an interior design course at a government-approved institution, study for and pass the NCIDQ examination, and then—after all that—complete an apprenticeship under a state-licensed interior designer who would, in all probability, have less experience and perhaps also less talent and ability than she has and who might well view her as a potential competitor.

14. The National Federation of Independent Business (NFIB) is the nation's leading small business association, with offices in Washington, D.C. and all 50 state capitals. Founded in 1943 as a nonprofit, nonpartisan organization, NFIB's mission is to promote and protect the right of its members to own, operate, and grow their businesses. NFIB represents approximately 350,000 member-businesses nationwide, including 11,000 in Florida.

15. NFIB and its affected members are extremely concerned about the existence, scope, and enforcement of Florida's interior design law. The statute's broad

definition of "interior design"—which purports to criminalize unlicensed "consultations," "studies," and "drawings" regarding the "nonstructural interior elements of a building or structure"—encompasses a wide variety of activities and services routinely performed by NFIB members, including NFIB members who are not interior designers and who neither intend nor wish to provide what they understand to be standard interior design services. Affected or potentially affected businesses include, for example, office furniture retailers and wholesalers; food service equipment suppliers; retail business consultants; businesses that provide commercial filing, shelving and other storage systems; businesses that sell carpets, drapes, and/or blinds (to the extent those products are regulated by applicable building codes); and even corporate art consultants who advise clients about what pictures to hang on the walls of their offices.

16. Given the broad scope and zealous enforcement of Florida's interior design law, many NFIB members who engage in various activities that fall within the statutory definition of "interior design" reasonably fear adverse action from the State Board if they are identified by name in these proceedings.

17. Defendant Joyce Shore is the Chair of the Florida Board of Architecture and Interior Design (the "Board"). Defendant John P. Ehrig is the Vice-Chair of the Board. Defendants Aida Bao-Garciga, Roassana Dolan, Wanda Gozdz, Mary Jane Grigsby, Garrick Gustafson, E. Wendell Hall, Eric Kuritsky, Roymi Membiela, and Lourdes Solera are members of the Board. Pursuant to sections 481.205 and 481.2055 of the Florida Statutes, the Board is responsible for prescribing rules and regulations to carry

out the provisions of Florida's interior design laws. Plaintiffs sue the Defendants in their official capacities.

STATEMENT OF FACTS

Interior Design Licensing

18. Only three states limit the practice of interior design in any way. Thus, throughout most of the country, including New York, California, Texas, Georgia, and dozens of other states, consumers may hire whomever they wish to perform interior design services, and there is no requirement that interior designers be licensed, certified, or otherwise approved by the government in order to do their work.

19. Florida, Louisiana, and Nevada are the only states in the country that require government permission to perform interior design services, and even in those three states there are exemptions that allow people to perform at least some types of interior design services without a license.

20. Florida law defines "interior design" as "designs, consultations, studies, drawings, specifications, and administration of design construction contracts relating to nonstructural interior elements of a building or structure" and includes, but is not limited to, "space planning" and "furnishings." Fla. Stat. § 481.203(8). The terms "designs," "consultations," "studies," "drawings," and "specifications" are not defined.

21. Florida law generally forbids people who are not state-licensed (or registered—the statute uses both terms) interior designers from practicing interior design, Fla. Stat. § 481.223(1)(a), but exempts from that restriction "[a] person who performs interior design services . . . for any residential application, provided that such person does

not advertise as, or represent himself or herself as, an interior designer." Fla. Stat. § 481.229(6). As a result, anyone may perform residential interior design services in Florida with no license, registration, or other government approval required.

22. Even though they are specifically authorized to *perform* residential interior design services, however, nonlicensees are forbidden from *using* "the name or title . . . 'interior designer' . . . or words to that effect," Fla. Stat. § 481.223(1)(c)—even if the terms used accurately describe services the nonlicensees lawfully provide.

23. The Board has interpreted "words to that effect" in Fla. Stat. section 481.223(c)(1) to include a variety of terms not specifically restricted by statute, including "interior design," "interior design services," "space planning," "space planning designer," and "space planning services," and has ordered people to stop using those terms simply because they were not licensed to do so.

24. On information and belief, neither the State Board nor the State have any evidence that the unregulated practice of interior design—which is the norm in this country since 47 states do not restrict the practice of interior design in any way—presents any bona fide public welfare concerns.

25. Likewise, on information and belief, neither the State Board nor the State are aware of any evidence from the three states that do license the practice of interior design that those regulations have led to better job performance by interior designers, greater safety, fewer building code violations, or otherwise benefited the public in any demonstrable way.

26. Interior design laws impose substantial costs on the public, including increasing the cost of interior design services, reducing the variety of services available, and disproportionately excluding minorities and older mid-career-switchers from the interior design industry.

Enforcement of Florida's Interior Design Restrictions

27. Florida began regulating the use of the term "interior designer" in 1988 and the practice of interior design in 1994. In 2002, amid complaints from certain industry members that the Board's enforcement of the interior design law was too lax, the Board contracted with the Tallahassee law firm Smith, Thompson, Shaw & Manausa to provide investigative and prosecutorial services related to Chapters 455 and 481, Florida Statutes, including the interior design restrictions at issue here. The services provided by Smith Thompson include receiving and reviewing complaints about the unlicensed or improper practice of interior design, issuing cease-and-desist letters on behalf of the Board, presenting cases to the Board's probable cause panel, and prosecuting complaints at disciplinary hearings.

28. Smith Thompson attorney David Minacci describes himself as the "prosecuting attorney" for the Board of Architecture and Interior Design. According to Mr. Minacci, Smith Thompson is "definitely more aggressive" than the State Board had been concerning investigation and enforcement of Florida's interior design law.

29. Most of the Board's interior-design-related enforcement actions relate to people using the term "interior designer" (or other "words to that effect") without being licensed to do so. Acting on behalf of the Board, Smith Thompson has sent letters to

hundreds of individuals and businesses, both inside and outside the state, ordering them to stop using various terms including "interior designer," "interior design," and other "words to that effect." In all or substantially all of those cases there was no allegation or finding that the subject's use of the forbidden terms was *factually* inaccurate, but simply that it was forbidden by statute by virtue of the subject's unlicensed status.

30. According to the Board's interpretation of Florida law, a nonlicensee may not use the terms "interior design" or "interior designer" even if that person is lawfully performing residential interior design services under the statutory exemption set forth in Fla. Stat. section 481.229(6)(a). The same is true of the terms "space planning" and "space planning services"—the Board has interpreted Florida law to prohibit the use of those terms by nonlicensees even if the nonlicensee is lawfully performing space planning services, e.g., for residential applications.

31. The precise meaning of the term "interior design" under Florida law—and thus exactly which activities it does or does not restrict—has caused substantial confusion among citizens and businesses, both in Florida and outside the state. For example, sellers of commercial office furniture routinely provide customers with drawings that reflect both the type and proposed location of furniture they wish to sell. That conduct plainly falls within the statutory definition of "interior design," as it involves both a "consultation" and a "drawing" (and perhaps also a "study" and "specifications") "relating to nonstructural interior elements of a building," which specifically includes "furnishings." Fla. Stat. § 481.203(8).

32. Other businesses that routinely engage in activities that fall within the broad statutory definition of "interior design" in Florida—but whose practitioners do not typically consider themselves to be interior designers or their vocation to be interior design—include food service equipment suppliers, retail business consultants, corporate art consultants, and businesses that provide commercial filing, shelving and other storage systems, to name just a few.

33. By way of example only, Florida's interior design law is so sweeping that even the state-sponsored, nonprofit corporation created by the state under Chapter 946, Florida Statutes to provide vocational training and employment to state prison inmates is in violation of the law by offering statutorily forbidden "space planning" services. *See* http://www.prideestore.com/Pridestore/PrivacyPolicy.aspx. On information and belief, PRIDE Enterprises does not possess a certificate of authorization to practice interior design in Florida, nor are the individuals who perform the advertised "space planning" services for PRIDE Enterprises state-licensed interior designers.

34. It is illegal under Florida's interior design law for a company that does not possess a certificate of authorization to offer "space planning" services. It is also illegal for a company that does not possess a certificate of authorization to perform "space planning" services, and it is illegal to employ unlicensed persons to practice interior design, which, under Florida law, includes "space planning."

35. The Board has not been consistent in its interpretation of Florida's interior design law. For example, the Board recently issued a Declaratory Statement that interpreted Florida's interior design law as not requiring a license to sell "furnishings" for

non-residential uses, even when the transaction includes the preparation of a "diagram reflecting the placement of the furnishings." But that conduct is plainly covered by the literal language of the Florida interior design law, *see* Fla. Stat. § 481.203(8) & (12), and the Board's contrary interpretation was not supported by any specific textual analysis of the statute or citation to legal authority. Upon information and belief, that position represented a change from the Board's previous interpretation of the interior design law as forbidding nonlicensees from preparing drawings or diagrams representing the placement of furniture in commercial settings.

36. There is substantial confusion among members of the public and businesspersons about which activities and services are covered by Florida's interior design law and which are not.

37. Both the inherent vagueness of the interior design law and the Board's inconsistent interpretation and enforcement of the law make it impossible for people of ordinary intelligence to understand what conduct is permitted and what is forbidden under that law.

38. The Florida Legislature recently passed a bill amending Florida's interior design law to exempt manufacturers and dealers of "commercial food service equipment" in order to allow them to prepare "designs, specifications, or layouts for the sale or installation of such equipment" without an interior design license, provided the drawings are not used for construction or installation "that may affect" various building systems and provided the designs are stamped with a notice that they are not architectural, interior design, or engineering drawings designs. The result, if the governor signs that bill, will

be to single out purveyors of commercial food service equipment for favorable treatment, leaving a large number of other, functionally identical businesses—purveyors of commercial office equipment, for example—still subject to the interior design law's licensing requirements.

Injury to Plaintiffs

39. The challenged law harms the Plaintiffs in a variety of ways. First, those Plaintiffs who lawfully perform residential interior design work in Florida are injured by virtue of being prohibited from accurately describing and advertising services they lawfully perform as "interior design" and from referring to themselves, again accurately, as "interior designers." Fla. Stat. 481.223(1)(c). Plaintiffs are also forbidden from using other terms that accurately describe work they lawfully perform, such as "space planning."

40. The Plaintiffs are also injured by the law's prohibition against performing statutorily defined "interior design" services in any nonresidential setting, including office buildings, stores, hotels, banks, law firms, and the common areas of condominiums. Given the broad statutory definition of "interior design," this would prohibit someone who is not licensed as an interior designer in Florida from simply offering advice about what paintings a person should hang on the wall of his or her office, what color carpeting or wallpaper to use in a doctor's waiting room, what furniture to use in a conference room and where to put it, or how to arrange the product displays in a consumer electronics store. Prohibiting people from making suggestions about such harmless and often purely aesthetic subjects as color schemes and product placements,

41. The Plaintiffs are also harmed by the interior design law's unjustified interference with their right to earn a living in the occupation of their choice free from arbitrary or unreasonable government regulation.

42. The Plaintiffs and others have also been harmed by the improper administration of the interior design law, including the State Board's arbitrary interpretation and application of the law and the outsourcing of its enforcement to a private law firm without adequate supervision, which has resulted in significant violations of the Plaintiffs' and others' procedural due process rights.

43. The nonresident Plaintiffs, including nonresident members of NFIB who wish to advertise and perform restricted (or potentially restricted) services in Florida, are injured by the challenged law because it unduly burdens their ability to do business in Florida and to participate in Florida's interior design market. The law also discriminates against interior designers from other states by imposing burdensome and unreasonable licensing requirements that virtually no other state maintains and that make it economically inefficient for many nonresident interior designers to accept interior design jobs in Florida.

CONSTITUTIONAL VIOLATIONS

First Claim for Relief

(First Amendment—Censorship of Truthful Commercial Speech)

44. Plaintiffs reallege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 43 above.

45. The First Amendment to the U.S. Constitution guarantees Plaintiffs the right to speak truthfully about services they lawfully provide.

46. Section 481.223(c) of the Florida Statutes prohibits nonlicensees like the Plaintiffs who lawfully perform residential interior design services in Florida from using the term "interior designer" and other, unspecified "words to that effect" to describe themselves and the services they provide.

47. By prohibiting the Plaintiffs from accurately describing themselves as "interior designers"—and from using related terms like "interior design" and "space planning" that accurately describe work they lawfully perform—the Defendants and their agents and employees, acting under color of state law, violate Plaintiffs' right to free speech as guaranteed by the First and Fourteenth Amendments to the United States Constitution and 42 U.S.C. § 1983. Plaintiffs have no adequate legal, administrative, or other remedy by which to prevent or minimize the continuing irreparable harm to their constitutional rights.

Second Claim for Relief

(First Amendment—Free Expression, Vagueness, and Overbreadth)

48. Plaintiffs reallege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 43 above.

49. Section 481.223(a) of the Florida Statutes generally prohibits people from practicing "interior design" in Florida without a license. But the statutory definition of "interior design" set forth in section 481.203(8) is so vague and ill-defined that it fails to give people of ordinary intelligence reasonable notice about what expression and/or conduct is permitted and what is forbidden. That lack of clarity also places in the hands of enforcement officials an unacceptable level of discretion in interpreting the law, leading to arbitrary and selective enforcement.

50. Besides its vagueness, the statutory definition of interior design is impermissibly overbroad because it imposes a prior restraint upon and threatens to punish a substantial amount of protected speech that the government has no legitimate interest in regulating. For example, "consultations" about the selection and placement of artwork or the use of color schemes in commercial spaces are plainly covered by the challenged law, as are many routine business consulting services such as the placement and composition of product displays in stores, the configuration of check-out, shelving, and storage areas, and the selection and location of furniture in business offices. The government has no valid interest in suppressing speech about purely aesthetic subjects and other harmless matters simply because they happen to pertain to the interior of a building.

51. Finally, section 481.223(c) of the Florida Statutes is unconstitutionally vague because it forbids nonlicensees from using not only the term "interior designer" but also "words to that effect," leaving people to guess exactly which terms constitute "words to that effect" such that nonlicensees may not use them, even if the terms accurately describe services the nonlicensees lawfully provide.

Third Claim for Relief

(Fourteenth Amendment—Equal Protection)

52. Plaintiffs reallege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 43 above.

53. Arbitrarily preventing some people from providing consultations, studies, or drawings regarding the "interior elements of building" without an interior design license, while allowing other similarly situated nonlicensees to engage in that same conduct, denies equal protection to the persons against whom the law has been enforced.

Fourth Claim for Relief

(Fourteenth Amendment—Substantive Due Process)

54. Plaintiffs reallege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 43 above.

55. The Due Process Clause of the Fourteenth Amendment protects people's right to earn a living in the occupation of their choice subject only to reasonable government regulation. Florida's regulation of interior designers violates that right because it is arbitrary, unreasonable, and unrelated to the advancement of any legitimate government interest.

Fifth Claim for Relief

(Fourteenth Amendment—Procedural Due Process/Delegation)

56. Plaintiffs reallege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 43 above.

57. The administration and enforcement of Florida's interior design law has been fraught with procedural due process problems, many of which flow from the state's decision to outsource substantial investigative and enforcement responsibilities to a private law firm with minimal oversight from the State Board of Architecture and Interior Design and no oversight whatsoever from the Department of Business and Professional Regulation, which oversees that State Board. Among the consequences have been persistent misapplications of the law, skewed enforcement priorities, and conflicts of interest.

Sixth Claim for Relief

(Fourteenth Amendment—Privileges or Immunities)

58. Plaintiffs reallege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 43 above.

59. The Privileges or Immunities Clause of the Fourteenth Amendment protects citizens' right to earn a living in the occupation of their choice subject only to reasonable government regulation. Florida's regulation of interior designers violates that right because it is arbitrary, unreasonable, and unrelated to the advancement of any legitimate government interest.

Seventh Claim for Relief

(Article 1, § 8—Commerce Clause)

60. Plaintiffs reallege and incorporate by reference each and every allegation set forth in ¶¶ 1 through 43 above.

61. States are forbidden by the Commerce Clause from enacting laws that discriminate against nonresidents or unduly burden their ability to participate in local markets such as Florida's interior design industry.

62. Florida's interior design law has both the purpose and effect of discriminating against out-of-state interior designers, making it harder and more costly for them to work in Florida and otherwise discouraging competition from nonresidents.

63. Florida's interior design law also violates the Commerce Clause by imposing an undue burden on interstate commerce while providing no demonstrable local benefits.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs respectfully request relief as follows:

1. For entry of judgment declaring that Florida Statute § 481.223 *et seq.* and the rules and regulations promulgated thereunder are unconstitutional on their face and as applied to the Plaintiffs in this case.

2. For entry of preliminary and permanent injunctions against the Defendants and their agents prohibiting enforcement of the challenged laws, regulations, and policies;

3. For an award of attorney's fees, costs, and expenses in this action pursuant to 42 U.S.C. § 1988; and

4. For such further legal and equitable relief as the Court may deem just and proper.

Dated: May 26, 2009

Respectfully submitted,

INSTITUTE FOR JUSTICE

By: /s/ Clark M. Neily III
William H. Mellor
District of Columbia Bar No. 462072
Clark M. Neily III
District of Columbia Bar No. 475926
901 North Glebe Road, Suite 900
Arlington, VA 22203-1854
Tel: (703) 682-9320
Fax: (703) 682-9321
Email: wmellor@ij.org, cneily@ij.org

Jennifer M. Perkins*
Arizona Bar No. 023087
398 South Mill Ave., Suite 301
Tempe, AZ 85281
Tel: (480) 557-8300
Fax: (480) 557-8305
Email: jperkins@ij.org
*Application for admission to be filed
Attorneys for Plaintiffs

WOODRING LAW FIRM
Daniel J. Woodring
Florida Bar No. 86850
3030 Stillwood Court
Tallahassee, FL 32308-0520
Tel: (850) 567-8445
Fax: (850) 254-2939
Email: Daniel@woodringlawfirm.com
Local Counsel for Plaintiffs