IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA

CASE NO. 4:09-cv-00193-RH-WCS

Eva Locke, Patricia Anne Levenson, Barbara Banderkolk Gardner, National Federation of Independent Business,

Plaintiffs,

v.

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.
_____/

DEFENDANTS' MEMORANDUM IN RESPONSE TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs have moved for summary judgment on claims One (First Amendment related to the Title Act), Two (First Amendment related to the Practice Act) and Seven (Interstate Commerce Clause) of their Complaint in this action. Defendants hereby file this response. Defendants' own summary judgment

motion addresses many of the arguments in Plaintiffs' Motion and those arguments will not be repeated here.

Plaintiffs begin with background material which is immaterial to this case. How the present law came into being is not relevant to its constitutionality. The law stands or falls on its face. And this is a facial challenge, so outside the First Amendment context, Plaintiff must show that it is unconstitutional in all its applications. *DA Mortg., Inc. v. City of Miami Beach*, 486 F.3d 1254, 1262 (11th Cir. 2007) ("[W]hen a plaintiff mounts a facial challenge to a statute or regulation, the plaintiff bears the burden of proving that the law could never be applied in a constitutional manner.") Plaintiffs argue that the law sweeps in too much conduct, but they make no showing that it cannot be applied within the core meaning of the statutes in a constitutional manner.

Plaintiffs then go on to give an overview of the statute which they portray as having "extraordinary breadth" which then becomes part of their argument for its unconstitutionality. This characterization by Plaintiffs, created by their extreme and unreasonable reading of the statute, infects their motion and, as shown below, Plaintiffs' arguments become nothing more than knocking down the proverbial strawman without actually addressing the true meaning and intent of the law. Plaintiffs' motion is without merit and should be denied.

The law in question can be broken down into two basic parts: the Practice Act which requires a license for the practice of interior design with exceptions including residential spaces, and the Title Act which restricts the use of the term interior design and other words to that effect only to those holding a license.

Taken in the order presented in Plaintiffs' Motion:

COUNT II – First Amendment related to the Practice Act

In Count II, Plaintiffs assert that the Practice Act violates their First Amendment rights because it restricts protected speech, is overbroad and vague. Plaintiffs' arguments fail for two basic reasons. First, there is no abridgement of first amendment rights and second, the statute, properly read, is not nearly as broad or vague as asserted.

As to the first argument, the various portions of Chapter 481 challenged in this suit are professional regulatory measures. Therefore, any perceived infringement is merely the incidental effect of an otherwise valid regulatory law. *Wilson v. State Bar of Ga.*, 132 F.3d 1422, 1429 -1430 (11th Cir. 1998)(holding, "the amendments govern occupational conduct, and not a substantial amount of protected speech. 'Any abridgement of the right to free speech is merely the incidental effect of observing an otherwise legitimate [occupational] regulation.'") In *Ohralik v. Ohio State Bar Ass'n,* 436 U.S. 447, 456 (1978), the Supreme Court

held that, "the State does not lose its power to regulate commercial activity deemed harmful to the public whenever speech is a component of that activity." Plaintiffs cannot invoke the First Amendment here just because the practice of interior design contains components of speech or communication. Generally all professions involve some amount of communication.

We can recognize the creative aspects of many professions but that does not trigger First Amendment protections as to the technical aspects of them. Architects design beautiful buildings and communicate with their clients, but their beauty does not mitigate the need for structural integrity or that they not fall down. Engineers build beautiful bridges and communicate with their clients, but those bridges also should not fall down. Likewise, interior designers can design aesthetically pleasing interiors and communicate with their clients, but they still must assure compliance with state and local building codes, accessibility guidelines and other life safety codes which relate to the protection of the public health safety and welfare. All of these professions use written, oral, and graphic communications to do their jobs and they are all properly regulated for the public safety.

As to the second issue, Plaintiffs overbreadth[1] and vagueness claims are

[1] Overbreadth is an issue restricted to First Amendment claims. As set forth above, there is no First Amendment claim here.

based on their attempt to take words out of context and give them meanings never intended by the Legislature. They then create hypotheticals that technically come within those out of context definitions to achieve results that no one could expect. Plaintiffs' declarations in support of their motion contain several statements to the effect that the witness was shocked to hear that what they had been doing for years was prohibited by the law. In fact, in almost all circumstances, what the witnesses had been doing was not prohibited by the law.

We begin, as did Plaintiffs, with the definition of interior design from the statute:

> "Interior design" means designs, consultations, studies, drawings, specifications, and administration of construction contracts relating to nonstructural interior elements of a building or structure. "Interior design" includes, but is not limited to, reflected ceiling plans, space planning, furnishings, and the fabrication of nonstructural interior elements within and surrounding interior spaces of buildings.

Plaintiffs focus on three of the words that describe the types of things an interior designer might do. Because there are no statutory definitions of these terms, Plaintiffs look to the dictionary and choose the most basic definitions of "drawings," "consultations," and "studies" to make the statute look like it includes a wedding planner's sketch showing how the reception will look, a casual conversation about chairs, and studies in the dissertation of a doctoral student.

Basic principles of statutory construction require us to look at the statute as a whole. *U.S. v. Dodge*, 554 F.3d 1357, 1366 (11th Cir. 2009) ("Statutory construction is a holistic endeavor," and we cannot read a single word or provision of the statute in isolation. *Smith v. United States*, 508 U.S. 223, 233, 113 S.Ct. 2050, 124 L.Ed.2d 138 (1993)) We cannot, as Plaintiffs have, pluck words out of sentences, sentences out of sections, sections out of statutes or statutes out of the law as a whole. The definition of interior design has to be considered in light of the purpose of the statute. This law was passed to regulate the practice of interior design. Interior designers do many things and the practice can be called many things. The use of several words like "designs, consultations, studies, drawings, specifications" provides certainty, rather than uncertainty, for the practitioner. If the statute merely said designs, then a contract for interior design services, called a consulting contract rather than a service contract, would evade the requirements of the law. While undefined words in a law should be given their ordinary meaning, that is not necessarily the first, most basic meaning in the dictionary. If the context dictates, different meanings can be assigned. So for example, a consultation is not merely a casual conversation but can be defined as: "the work or business of providing expert advice or services in a particular field."[2] Similarly, "drawings" in

[2] http://encarta.msn.com/encnet/features/dictionary/DictionaryResults.aspx?lextype=3&search=consultation

the statute does not mean anything where pencil is put to paper to create a graphic. Artistic drawings and sketches on the back of an envelope are not covered. In context, it must refer to a technical drawing that can or is intended for use in conveying to clients the product of the interior design services requested. These would include drawings with technical specifications but not artistic renderings. It also cannot be interpreted to include the sketch of a student learning interior design by "studying" existing spaces.

Because we are outside the First Amendment analysis, overbreadth is not a consideration. Plaintiffs' vagueness challenge must also fail.

> To find a civil statute void for vagueness, the statute must be "so vague and indefinite as really to be no rule or standard at all." *Boutilier v. INS*, 387 U.S. 118, 123, 87 S.Ct. 1563, 1566, 18 L.Ed.2d 661 (1967). Plaintiffs try to overcome this civil-statute standard by arguing that the Act imposes quasi-criminal penalties. But "even if construed as a penal statute, a non-criminal statute is not unconstitutionally vague 'if persons of reasonable intelligence can derive a core meaning from the statute.' " *Cotton States Mutual Ins. Co. v. Anderson*, 749 F.2d 663, 669 n. 9 (11th Cir.1984).

Seniors Civil Liberties Ass'n, Inc. v. Kemp, 965 F.2d 1030, 1036 (11th Cir. 1992) These words do convey a core meaning to the reader. When viewed in context, they describe the practice of interior design and the hypotheticals presented by Plaintiffs are not reasonably within these definitions.

Finally, Plaintiffs' many declarations regarding these definitions are not material to this court's deliberations. "The issue of whether a statute is void for vagueness is a question of law for the judge, and not the jury, to determine." *Konikov v. Orange County, Fla.*, 410 F.3d 1317, 1330 (11th Cir. 2005). This is the only sensible way for the court to address this issue. If not, then no statute could survive because any lawyer can get declarations claiming that the declarant cannot understand the prohibitions on the law. How then would the state counter – declarations that the law is clear? In that situation, it would be left to the court in any event, so the declarations cannot carry any probative weight.

NO GENUINE THREAT

Plaintiffs assert that the law is unconstitutional because there is no genuine threat to the public health safety or welfare from the unlicensed practice of interior design. This argument only has traction as a First Amendment claim which, as set forth above and in Defendants' Motion, is inappropriate in the context of a challenge to a professional regulatory measure. Plaintiffs argue this way because of the fatal nature of a rational basis argument for them. If an interior designer can design the entire floor plan of an office in an office tower, then it is rational to require a license. In fact, the presence of a licensed interior designer can do away with the need for an architect and save the client money. The licensed designer

can seal the plans and obtain the permits thereby actually saving money by obviating the need for an architect.[3] Plaintiffs' argument that the interior designer doesn't need a license because of all the checks in place goes too far. Why do any of the professionals need licenses if the building official is the ultimate backstop to prevent errors? Or, if there is a licensed architect, why is there a need for licensed trade professionals – the architect and building official can assure codes are met and the building is safe. In her deposition, Plaintiffs' expert made a convincing case for the licensing of interior designers by comparing what they do to what the other licensed professionals on a design team do. They are the same – beginning at page 18, she testified as follows:

> Q Now the interior designer depends on certain types of codes as well in doing his or her job; is that right?
>
> A Correct.

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[3] See Florida Building Code (2007, with 2009 supplement) § 106.1:
Submittal documents: Construction documents, a statement of special inspections and other data shall be submitted in one or more sets with each application for a permit. The construction documents shall be prepared by a registered design professional where required by Chapter 471, Florida Statutes or Chapter 481, Florida Statutes. Where special conditions exist, the building official is authorized to require additional construction documents to be prepared by a registered design professional

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> Q There are life safety codes, accessibility codes, those types of things?
>
> A Right. And each area is different. Each state is different.
>
> Q Each geographic area.
>
> A Correct.
>
> Q Right. Just like you said, each electrical code is different, each [building] code in every jurisdiction is different. And the interior designer is responsible for making sure whatever he or she is doing is compliant with those codes as well.
>
> A And there are a number of factors that they have to be sure that if it's a commercial space, for example, however many number of people. There are all types of rules and regulations about if it's less than 50 people it falls into this category. If it's more than 200 people it is this category. If it's a church it has to have its own bubble of things that you can and cannot do. If it's a hospitality hotel environment, a lobby, it has its own requirements and those are noted. It's in writing already, there is a box within which the interior designer choses for each of those kinds of specifics. Those codes of fabrics and furnishings and flammable and combustible materials are noted.

And, finally, Plaintiffs are wrong to assert that they cannot work on such a project – they can work, licensed or not, under the certificate of authorization of the architect or another licensed interior designer.

As explained in Defendants' Motion for Summary Judgment, no evidence is necessary to establish a rational basis. As to the decisions of other states, they are immaterial. States are the laboratories of democracy and, in the evolution of a new profession, some state will be first. What we have here is the differentiation of a

subspecialty of architecture into a new, separate profession. In the past, architects did the interior design. Now professionals that specialize in this area have broken free. This has happened in other professions. For example, in the past, there were only doctors and nurses. Now we also have nurse practitioners, physician's assistants and other related professionals with separate licensing and credentialing requirements. Finally, as to the rational basis, Bowden's opinion is not probative. She may be a skilled interior designer, but she has no qualifications to make pronouncements about the public health and safety. And, her testimony is not unrebutted, it is contradicted by Dr. Waxman. [Waxman depo at 117] Again, as set forth in our motion, it is the province of the legislature to make this policy decision and the court must presume that it is valid if rational. If there is a valid rational basis for the law, it is not invalid because it may be overinclusive.

The Plaintiffs also ignore the definition in the statute of interior decorator services in § 481.203(15), Fla. Stat., which provides:

> "Interior decorator services" includes the selection or assistance in selection of surface materials, window treatments, wallcoverings, paint, floor coverings, surface-mounted lighting, surface-mounted fixtures, and loose furnishings not subject to regulation under applicable building codes.

Provision of these services by unlicensed individuals is not prohibited by the statute. Section 481.223(1)(b), Fla. Stat., provides that, "A person may not

knowingly . . . Practice **interior design** unless the person is a registered interior designer." (e.a.) Much of the activity that Plaintiffs submit as being prohibited by the Act actually comes within the definition of "interior decorating services" and therefore is not restricted.[4] Examples from Plaintiffs' motion include: a wedding planner's sketch showing how the reception will look, the seating plan of a law office; a web page from a hotel showing how it can configure one of its meeting rooms, a prop manager of a theater drawing the setup of a stage for a play. All of these activities involve the placement of moveable furniture and other objects. The definition of interior design includes only fixed items, including "furnishings." In contrast, the definition of interior decorating services includes surface treatments and "loose furnishings." We are required to read all of the sections of the statute and give meaning to all. *Burlison v. McDonald's Corp*., 455 F.3d 1242, 1247 (11th Cir. 2006)(Courts must not interpret one provision of a statute to render another provision meaningless.) Plaintiffs' interpretation reads the definition of interior decorating services out of the statute and attempts to place all of the activities included in that definition in the definition of interior design. The statute makes a distinction between interior design and interior decorating and that includes the difference between furnishings and loose furnishings. Simply arranging furniture

[4] Plaintiffs cite the case of Sheryl Braxton to attempt to show the unreasonableness of the law. They neglect to inform the court that the case was dismissed by stipulation of the parties after an investigation. Final order attached as exhibit 14 to the Neily declaration at ¶ 4.

or making drawings to plan such arrangements is not interior design and is not prohibited by the statute to non-licensees.

This understanding makes sense, does not create absurd results, and is consistent with the plain words of the statute. As to furniture, proof that such drawings are not interior design and not intended to be captured by the statute is that a) under the definition of interior decorating these are loose furnishings the placement of which does not require a building permit, and b) furniture like this can be moved around by anyone. If a lawyer had someone select and arrange moveable furniture for his or her office, he or she could then move it anywhere he or she wanted making the need for the initial licensing nonsensical because any advantage of such licensing would be lost the moment the designer walked out of the room.

By taking the words of the statute apart and out of context and ignoring other parts of the statute that lend meaning to the whole, Plaintiffs have constructed an interpretation of the statute that is admittedly absurd. By Plaintiffs interpretation, an interior design student would have to have an interior design license in order to do the "studies" and "drawings" necessary for his or her education. The court should not use such an absurd reading of the statute in to find it unconstitutional. *U.S. v. Velez*, 586 F.3d 875, 879 (11th Cir. 2009) ("We do not

believe Congress intended such an absurd result, which nullifies the provision and divorces it from its statutory context, thereby violating basic canons of statutory construction.") *U.S. v. Nelson,* 334 Fed.Appx. 209, 211, 2009 WL 1636812, 1 (11th Cir. 2009) ("We avoid interpreting statutory language in a manner that produces an absurd result"). Properly read, the statute only reaches the actual practice of interior design – a reach that members of the design community can easily understand. It is therefore valid and Plaintiffs motion should be denied.

COUNT VII - INTERSTATE COMMERCE

Plaintiffs also move for summary judgment on their claim that the statute violates the interstate commerce clause. Defendants have addressed this claim in their motion for summary judgment and will not repeat arguments made in that motion. Plaintiffs suppose a "massive burden" on interstate commerce; but that statement is only made by ignoring again the proper reading of the statute. Plaintiffs' expert testified that she was prevented from working in Florida. However, she is not prevented from doing residential work. § 481.229(6)(a), Fla. Stat. And, she can work for a licensed architect or interior designer with a certificate of authorization.[5] To the extent she is prevented from accepting any work in Florida, it is not because she lives in Georgia. It is because she lacks a

[5] "Certificate of authorization" means a certificate issued by the department to a corporation or partnership to practice architecture or interior design. § 481.203(5), Fla. Stat. See also § 481.219, Fla. Stat.

license. It is the same restriction with which a Florida resident would have to comply.

Plaintiffs' reference to the three office supply companies is also unavailing. Investigations were opened regarding these three entities at the behest of the Plaintiffs.[6] These were never considered to be violations because of the provisions of § 481.229, Fla. Stat., which provides:

> (6) This part shall not apply to:
> (b) An employee of a retail establishment providing "interior decorator services" on the premises of the retail establishment or in the furtherance of a retail sale or prospective retail sale, provided that such employee does not advertise as, or represent himself or herself as, an interior designer.

Selling furniture from an office supply store clearly comes within this exemption.[7] It is a retail sale (that is, to the ultimate consumer) and it involves interior decorating services (loose furnishings). The same can be said of carpet, tile, wallpaper, paint and other retail sellers of decorating materials. Contrary to the Plaintiffs' argument, the employees of Home Depot are safe.

In addition, no one is prohibited from working in Florida. Ms. Bowden describes commercial interior design work as a team concept headed by an architect and including any number of trade professionals. [Bowden depo at 10,

[6] See Plaintiffs' Second Set of Interrogatories and Minacci depo at 147-148.
[7] See also Board of Architecture and Interior Design declaratory statement 2008-82

18-27] In that situation, she can lawfully work in Florida provided that she works for the architect or licensed interior designer rather than directly for the owner. This is no different than any other licensed professional from out of state. A lawyer licensed in a state other than Florida can work here as long as it is under the supervision of a Florida licensed lawyer. The same would be true of an architect. If that were not the case, then all employees of an architect or lawyer's office would have to be fully licensed. As stated in our motion, this licensing scheme does not impede interstate commerce any more than any other professional license and is valid.[8]

COUNT I – First Amendment relating to the Title Act

Finally, Plaintiffs assert that the Title Act violates their First Amendment rights because it unconstitutionally censors truthful commercial speech and it is vague. As to the censorship, Plaintiffs' argument fails because we are not dealing with truthful commercial speech. As non-licensees, Plaintiffs cannot practice interior design except in residential space or under the responsible supervision of a licensed design professional. Using the unrestricted term "interior designer" misleads the public by implying no limitation when there is a significant one. If

[8] Plaintiffs' "lesser impact" argument does not apply here. Such an analysis only applies where the court has found a discriminatory impact . The *Diamond* Waste court cites *Dean Milk Co. v. City of Madison*, 340 U.S. 349 (1951), both courts finding a discriminatory burden on interstate commerce before embarking in the lesser impact discussion. Here there is no discrimination. The statute is facially evenhanded – everyone is treated the same and anyone can work in Florida if they chose.

non-licensees referred to themselves as interior decorators (which is what they really are based on their own declarations) or residential interior designers which is accurate speech, then there would be no problem. See proposed rule 61G1-11.103(5), F.A.C. Even identifying themselves as decorators with a degree in interior design (if that is what they have) would be permissible.

Plaintiffs' citation to the *Byrum, Abramson* and *Roberts* cases are inapposite. All of these cases involved title acts which provided no restriction on practice. The take away from these cases is that if everyone can practice a profession, the state cannot prevent the truthful use of the recognized title. Here there is a practice act which has a significant limitation on the practice of interior design, and therefore the State can restrict the use of the terms implying licensure.

Plaintiffs also assert that the statute is vague because of the term "words to that effect." They claim no one can know what terms are restricted. As set forth above, whether a statute is vague is a legal question for the court. Disputes over what statutory terms mean do not necessarily prove that a statute is vague or ambiguous.

> First, statutory ambiguity cannot be determined by referring to the parties' interpretations of the statute. Of course their interpretations differ. That is why they are in court. *See Bank of America NT & SA v. 203 North LaSalle Street P'ship*, 526 U.S. 434, 461, 119 S.Ct. 1411, 143 L.Ed.2d 607 (1999) (Thomas, J., concurring) ("A

> mere disagreement among litigants over the meaning of a statute does not prove ambiguity; it usually means that one of the litigants is simply wrong."). Whether a statute is ambiguous is a pure question of law to be determined by the courts, however, not by the parties or by an administrative agency. *See Chandris, Inc. v. Latsis*, 515 U.S. 347, 369, 115 S.Ct. 2172, 132 L.Ed.2d 314 (1995) (finding that interpretation of statutory terms is a question of law and is therefore the court's duty); *1042 *Cardoza-Fonseca*, 480 U.S. at 446, 107 S.Ct. 1207 (holding that courts must decide "pure question[s] of statutory construction").

John v. U.S., 247 F.3d 1032, 1041 -1042 (9th Cir. 2001)

The definition of the prohibited terms is not vague or ambiguous when the statute is taken as a whole. Prohibited terms are either obvious – like "interior design consultant" – or refer directly back to the definitions in the statute – like "space planner."[9] [Neily declaration, exh 3.] In contrast, house staging[10] is not found anywhere in the statute and cannot be construed as anything other than a species of interior decorating. Therefore it is not reasonable for someone to fear using that term. Although there may be some close calls, the core of what is prohibited is clear and any reasonable person in this industry should know what is prohibited. In *State v. Pavon*, 792 So.2d 665, 667 (Fla. 4th DCA 2001), addressing

[9] The definition of interior design includes space planning. § 481.203(8), Fla. Stat.

[10] Home staging is the process of preparing a home (and everything within the home) for sale, with a particular focus on presentation. . . . To stage a home for the market, you will be focusing on things of an aesthetic nature, such as the home's organization, design and general appearance (as opposed to functional or mechanical improvements).

http://www.stagingbug.com/blog/2008/03/definition-of-home-staging-what-is-it.html (visited 1/4/10)

the identical provisions of the statutes, the District Court of Appeal held, "There is nothing in the statutes in question which are confusing or renders the statutes unconstitutionally vague as applied to appellee." Although expressed in somewhat different language, the standard applied by the state court is substantially the same as that to be applied here:

> The standard for testing vagueness under Florida law is whether the statute gives a person of ordinary intelligence fair notice of what constitutes forbidden conduct. *See Brown v. State*, 629 So.2d 841, 842 (Fla.1994). The test to determine whether a statute is unconstitutionally vague is "whether the language conveys a sufficiently definite warning as to the proscribed conduct when measured by common understanding and purpose." *Reynolds v. State*, 383 So.2d 228, 229 (Fla.1980); *see also Whitaker v. Dep't of Ins. & Treasurer*, 680 So.2d 528, 531 (Fla. 1st DCA 1996)(the test for vagueness is whether the statutory language is sufficiently explicit to inform those who are subject to its provisions what conduct on their part will render them liable to its penalties and conveys a sufficiently definite warning of the proscribed conduct when measured by common understanding and practice).

Id. at 666.

Without the "words to that effect" restriction, there would be no meaningful, enforceable restriction. The statute cannot list every combination that is prohibited and for any list put in the statute, someone could figure out a way around it. There is a core meaning and the statute is not unconstitutional.

CONCLUSION

Plaintiffs' claims in their motion for summary judgment are based on methods of statutory construction that are inconsistent with well established norms. They isolate words and give them meanings that take the reader through the looking glass into the realm of the absurd. Reading the statute as a whole and in context reveals a rational and reasonable regulatory measure that does not violate any of Plaintiffs' constitutional rights. Plaintiffs' motion should be denied; Defendants' Motion for Summary Judgment should be granted and this case should be dismissed.

Respectfully submitted this 4th day of January, 2010.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was served by filing with this courts CM/ECF system this 4th Day of January, 2010, on:

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