

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.

**DEFENDANTS' ANSWER**

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.

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Defendants hereby answer Plaintiffs' Complaint as follows:

1. Admit the first sentence as a characterization of this cause, deny all other  
allegations.

2. Admit as a characterization of this cause, deny all other allegations.
3. Admit.
4. Admit.
5. Without knowledge.
6. Admit the first sentence; without knowledge as to the last; deny all other allegations.
7. Without knowledge.
8. Without knowledge.
9. Without knowledge as to all but the last sentence which is denied.
10. Without knowledge.
11. Without knowledge.
12. Admit the letter was sent; the letter and the statute both speak for themselves; all other allegations are denied.
13. Without knowledge.
14. Without knowledge.
15. Without knowledge.
16. Without knowledge.
17. Admit.
18. Without knowledge.

19. Admit that Florida requires a licence for interior design with enumerated exceptions.

20. The statute speaks for itself, deny all other allegations.

21. The statute speaks for itself, deny all other allegations.

22. The statute speaks for itself, deny all other allegations.

23. Admit.

24. Admit, although such is irrelevant.

25. Admit, although such is irrelevant.

26. Deny.

27. Admit statutes were passed in 1988 and 1994 and that in 2002 a private firm was contracted to provide services related to enforcement of these laws. Deny all other allegations.

28. Without knowledge.

29. Deny.

30. The statute speaks for itself, deny all other allegations.

31. The statute speaks for itself, deny all other allegations.

32. Without knowledge.

33. Without knowledge.

34. The statute speaks for itself, deny all other allegations.

35. Admit a Declaratory Statement was issued which speaks for itself; deny all other allegations.

36. Without knowledge.

37. Deny.

38. The statute speaks for itself, deny all other allegations.

39. Deny.

40. Deny.

41. Deny.

42. Deny.

43. Deny.

44. Defendants incorporate previous answers.

45. The Constitution speaks for itself.

46. The statute speaks for itself, deny all other allegations.

47. Deny.

48. Defendants incorporate previous answers.

49. Deny.

50. Deny.

51. Deny.

52. Defendants incorporate previous answers.

53. Deny.

54. Defendants incorporate previous answers.

55. Deny.

56. Defendants incorporate previous answers.

57. Deny.

58. Defendants incorporate previous answers.

59. Deny.

60. Defendants incorporate previous answers.

61. The Constitution speaks for itself.

62. Deny.

63. Deny.

Respectfully submitted this 9<sup>th</sup> Day of June, 2009.

BILL McCOLLUM  
ATTORNEY GENERAL

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was served by filing with this Court's CM/ECF system this 30<sup>th</sup> Day of June, 2009, on:

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