

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

INTERBLOCK USA, LLC,)
)
 Petitioner,)
)
 and)
)
 SHUFFLE MASTER, INC,)
)
 Intervenor,)
)
 vs.) Case No. 11-1075RX
)
)
 DEPARTMENT OF BUSINESS AND)
 PROFESSIONAL REGULATION,)
 DIVISION OF PARI-MUTUEL)
 WAGERING,)
)
 Respondent.)
)
 _____)

ORDER ON PETITIONER'S MOTION FOR SUMMARY FINAL ORDER AND MOTION
FOR PROTECTIVE ORDER

This is a rule challenge to Florida Administrative Code Rule 61D-14.041.

On March 7, 2011, Petitioner filed a Motion for Summary Final Order. On March 14, 2011, Respondent filed a response and an amended answer. The response mostly argues that the standing of Petitioner is a question of fact as to which material issues remain for adjudication, although it also argues that Petitioner's claim that the rule is arbitrary is essentially a fact question, which is also in dispute.

On March 18, 2011, the Administrative Law Judge conducted a telephone conference call concerning the motion and issues in the case. In the conference, Intervenor joined in Petitioner's motion, and Petitioner and Intervenor reduced the issues in two respects. First, they reduced the challenge to a single word within rule 61D-14.041(1), as identified below. Second, they reduced the grounds for the rule challenge to two, also as identified below.

On March 18, 2011, Petitioner also filed a Motion for Protective Order. The issues raised in the motion go to the scope of the hearing in terms of what Petitioner must show to demonstrate that it is substantially affected by the portion of the rule that it has challenged. The discovery sought by Respondent is consistent with its theory that Petitioner must show that its slot machines are ready for certification, but for the issue about the location of random number generators.

The final hearing is set for April 1, 2011.

Section 120.57(1)(h), Florida Statutes, authorizes an Administrative Law Judge to issue a summary final order:

if the administrative law judge determines from the pleadings, depositions, answers to interrogatories, and admissions on file, together with affidavits, if any, that no genuine issue as to any material fact exists and that the moving party is entitled as a matter of law to the entry of a final order.

This statute is similar to rule 1.510(a), (b), and (d), Florida Rules of Civil Procedure, except that the rule of procedure explicitly authorizes motions for partial summary judgment and orders for partial summary judgment. An Administrative Law Judge may enter an order granting some, but not all, of the relief sought in a motion for final summary order, pursuant to the authority of section 120.57(1)(h) and two rules. Florida Administrative Code Rule 28-106.204(1) provides in part: "The [Administrative Law Judge] shall conduct such proceedings and enter such orders as are deemed necessary to dispose of issues raised by the motion." Florida Administrative Code Rule 28-106.211 provides: "The presiding officer before whom a case is pending may issue any orders necessary to effectuate discovery, to prevent delay, and to promote the just, speedy, and inexpensive determination of all aspects of the case, including bifurcating the proceeding."

STATEMENT OF ISSUE

By Joint Case Stipulation filed March 18, 2011 (Stipulation), Petitioner and Intervenor have identified the sole issue for determination in this Order as whether the word, "internal" in Florida Administrative Code Rule 16D-14.041(1) is an invalid exercise of delegated legislative authority. According to the Stipulation, Petitioner and Intervenor are slot-machine manufacturers that want to ship into Florida slot

machines with external random number generators that are shared by more than one machine. Petitioner and Intervenor challenge the rule that requires each slot machine to contain an internal random number generator.

The Stipulation asserts that the rule's requirement of an internal random number generator is an invalid exercise of delegated legislative authority under sections 120.56(1)(a) and (3)(a) and 120.52(8). The Stipulation asserts that, in adopting the requirement of an internal random number generator, Respondent has exceeded its grant of rulemaking authority, in violation of section 120.52(8)(b), and the rule's requirement of an internal random number generator enlarges, modifies, or contravenes the specific provisions of law implemented, as prohibited by section 120.52(8)(c).

PRELIMINARY STATEMENT

In its answer, Respondent argued that material issues of fact exist concerning whether Petitioner is substantially affected by rule 61D-14.041. In general, Respondent contests whether any of Petitioner's gaming machines could ever be licensed in Florida. Among other things, Respondent notes that Petitioner has failed to allege that its machines contain one or more microprocessors (as distinct from random number generators) located in each machine, that its machines lock up if the sum of awards from the single play of a game equals or exceeds \$1200,

and that the random number generators serving its machines continuously cycle in the background during games and between play--all allegedly requirements of rules unchallenged by Petitioner and Intervenor in this case.

The Motion for Protective Order seeks to block discovery sought by Respondent that would generally uncover facts that might support Respondent's argument that Petitioner's machines are not eligible for licensing in Florida for various reasons unrelated to the location of the random number generator.

The Stipulation describes the certification process for slot machines shipped into Florida, as provided by Florida Administrative Code Rules 61D-14.016(1)(b) and 61D-14.022(4); the procedural requirements for shipping slot machines into Florida, as provided by Florida Administrative Code Rule 61D-14.096; and the various other requirements imposed upon slot machines, as provided by Florida Administrative Code Rule 61D-14.041. Respondent did not join in the Stipulation, so the Stipulation binds Petitioner and Intervenor, but not Respondent. However, the Stipulation confirms that Petitioner and Intervenor are not challenging any of these rules in the present case.

Although omitted from the Stipulation, during the conference, Petitioner and Intervenor conceded that they were not challenging any provisions of Florida Administrative Code Rule 61D-14.022. Likewise, Petitioner and Intervenor confirmed

during the conference that their challenge to the requirement of an internal random number generator in no way challenges other rules concerning slot machine security, nor is it an attempt to circumvent legal restrictions on the number of permitted slot machines that may be shipped into, or operated in, Florida.

STATEMENT OF UNDISPUTED MATERIAL FACTS

1. Petitioner and Intervenor hold current licenses issued by Respondent pursuant to chapter 551, Florida Statutes. At the present stage of the pleadings and other materials of record, it is not established that there is no factual dispute concerning the status of Petitioner and Intervenor as manufacturers of slot machines. In amending its answer, Respondent withdrew its admission that Petitioner is a manufacturer of slot machines and instead placed this allegation in dispute, although it is impossible to determine whether Respondent has done so to dispute Petitioner's status as a slot machine manufacturer or to underscore its argument that Petitioner's machines are not licensure-ready.

2. However, Respondent describes the license of each party as a "slots business" license and the license type as "slot machine business," as confirmed by a licensee search conducted by the undersigned on March 20, 2011, at Respondent's official website: [https://www.myfloridalicense.com/wl11.asp?mode=0&SID=.](https://www.myfloridalicense.com/wl11.asp?mode=0&SID=)

3. With the challenged word underlined, Florida Administrative Code Rule 61D-14.041 provides:

(1) Each slot machine shall use an internal random number generator (RNG). The RNG shall:

(a) Be statistically independent from any other device;

(b) Conform to the random distribution values specified in the slot machine's PAR sheet;

(c) Pass statistical tests such as the chi-squared test or random distribution analysis test;

(d) Cycle continuously in the background between games and during game play;

(e) Randomly determine the first seed number;

(f) Use a method of re-scaling that permits all numbers within the lower range to be equally probable if a function of a slot machine requires a random number to be generated with a smaller range than that provided by the slot machine's RNG; and

(g) Re-scale values using a method such as discarding that random number and selecting the next in sequence if a particular random number selected is outside the range of equal distribution of re-scaling values.

(2) A slot machine shall use communication protocols to protect the RNG and random selection process from influence by associated equipment.

(3) Each possible permutation or combination of game elements that produces a winning or losing game outcome shall be available for random selection at the initiation of each play.

(4) The laboratory shall include a copy of each of the certifications required under this rule as part of the formal approval

documentation certifying the machine and/or game for play in Florida to the division.

(5) Any misstatements, omissions or errors in the required certification provided by either the laboratory or the manufacturer and/or distributor is a violation of rules governing slot machine gaming.

4. Rule 61D-14.041 cites sections 551.103(1) and 551.122, Florida Statutes, as the rulemaking authority, and section 551.103(1)(c), (e), (g), as the law implemented.

CONCLUSIONS OF LAW

5. The jurisdiction of the Division of Administrative Hearings is derived from sections 120.56(1)(c), 120.569, and 120.57(1), Florida Statutes. The parties do not contest that the Division of Administrative Hearings has jurisdiction over rule challenges, but they do contest that the Division of Administrative Hearings has jurisdiction over this rule challenge. Respondent contests whether Petitioner and Intervenor are substantially affected by the presence of the word, "internal" in rule 61D-14.041(1). The parties state this issue as whether Petitioner and Intervenor have standing to challenge this rule.

6. For the most part, Respondent argues that Petitioner and Intervenor are not substantially affected because it is unclear whether they manufacture machines that can satisfy other requirements of Florida law. During the conference, Petitioner

and Intervenor argued that this is not an issue because they concede that their machines must meet all other provisions of Florida law, except the requirement of an internal random number generator. Petitioner and Intervenor argued that Respondent was trying to transform this rule challenge into a proceeding for the certification of their machines.

7. Respondent's standing argument appears to confuse the issue of whether a party is substantially affected with the issue of whether the party can prevail on the merits. Peace River/Manasota Reg'l Water Supply Auth. v. IMC Phosphates Co., 18 So. 3d 1079, 1082-85 (Fla. 2d DCA 2009); Palm Beach Cnty. Env'tl. Coal. v. Dep't of Env'tl. Prot., 14 So. 3d 1076 (2009). The teachings of these cases is that a person's substantial interests are determined by an agency, under section 120.569(1), if its substantial interests "could be affected," 18 So. 3d at 1084, or "could reasonably be affected," 14 So. 3d at 1078, by the proposed agency action. The cases agree that the standing requirement of a substantial interest is a "forward-looking concept [that] cannot 'disappear' based on the ultimate outcome of the proceeding." 18 So. 3d at 1083; 14 So. 3d at 1078. Respondent's standing argument seems to treat the manufacturers of slot machines the same as it would the manufacturers of boats or furniture--the ultimate question in all cases being whether

the would-be rule challenger has a machine certification-ready, but for the requirement of an internal random number generator.

8. The question of whether Petitioner or Intervenor is substantially affected by the challenged rule reduces to whether the impact of the rule's requirement of an internal random number generator is different in kind upon them than the impact of this requirement on all of Florida's citizens. NAACP v. Fla. Bd. of Regents, 863 So. 2d 294, 299 (Fla. 2003). Substantial affect does not require "immediate and actual harm." 863 So. 2d at 300. In NAACP, it was not necessary for any rule challenger to show that he or she had been rejected for admission to a state university due to the adoption of rules eliminating certain affirmative action policies of state universities; prospective candidates for admission were also substantially affected. Id.

9. Due to Respondent's amended answer and the failure of Petitioner and Intervenor to file affidavits, the record fails to establish that there is no dispute about the status of Petitioner and Intervenor as slot machine manufacturers. Their licensure in Florida seems to suggest as much, but Respondent argued during the conference that this licensure might be shared by persons or entities clearly not in the business of the manufacturing of slot machines.

10. Section 120.56 provides in relevant part:

(1) (a) Any person substantially affected by a rule or a proposed rule may seek an administrative determination of the invalidity of the rule on the ground that the rule is an invalid exercise of delegated legislative authority.

* * *

(3) (a) A substantially affected person may seek an administrative determination of the invalidity of an existing rule at any time during the existence of the rule. The petitioner has a burden of proving by a preponderance of the evidence that the existing rule is an invalid exercise of delegated legislative authority as to the objections raised.

* * *

11. Section 120.52(8) provides in relevant part:

"Invalid exercise of delegated legislative authority" means action that goes beyond the powers, functions, and duties delegated by the Legislature. A proposed or existing rule is an invalid exercise of delegated legislative authority if any one of the following applies:

(a) The agency has materially failed to follow the applicable rulemaking procedures or requirements set forth in this chapter;

(b) The agency has exceeded its grant of rulemaking authority, citation to which is required by s. 120.54(3)(a)1.[.]

* * *

A grant of rulemaking authority is necessary but not sufficient to allow an agency to adopt a rule; a specific law to be implemented is also required. An agency may adopt only rules that implement or interpret the specific powers and duties granted by

the enabling statute. No agency shall have authority to adopt a rule only because it is reasonably related to the purpose of the enabling legislation and is not arbitrary and capricious or is within the agency's class of powers and duties, nor shall an agency have the authority to implement statutory provisions setting forth general legislative intent or policy. Statutory language granting rulemaking authority or generally describing the powers and functions of an agency shall be construed to extend no further than implementing or interpreting the specific powers and duties conferred by the enabling statute.

12. In 2008, the legislature added a definition of rulemaking authority. Section 120.52(17) provides:

"Rulemaking authority' means statutory language that explicitly authorizes or requires an agency to adopt, develop, establish, or otherwise create any statement coming within the definition of the term 'rule.'" This definition does not add new restrictions to agency rulemaking authority, but re-emphasizes the existing restrictions cited immediately above. Fla. Elec. Comm'n v. Blair, 52 So. 3d 9 (Fla. 1st DCA 2010).

13. Section 555.103(1), Florida Statutes, provides:

The division shall adopt, pursuant to the provisions of ss. 120.536(1) and 120.54, all rules necessary to implement, administer, and regulate slot machine gaming as authorized in this chapter. Such rules must include:

(a) Procedures for applying for a slot machine license and renewal of a slot machine license.

(b) Technical requirements and the qualifications contained in this chapter

that are necessary to receive a slot machine license or slot machine occupational license.

(c) Procedures to scientifically test and technically evaluate slot machines for compliance with this chapter. The division may contract with an independent testing laboratory to conduct any necessary testing under this section. The independent testing laboratory must have a national reputation which is demonstrably competent and qualified to scientifically test and evaluate slot machines for compliance with this chapter and to otherwise perform the functions assigned to it in this chapter. An independent testing laboratory shall not be owned or controlled by a licensee. The use of an independent testing laboratory for any purpose related to the conduct of slot machine gaming by a licensee under this chapter shall be made from a list of one or more laboratories approved by the division.

(d) Procedures relating to slot machine revenues, including verifying and accounting for such revenues, auditing, and collecting taxes and fees consistent with this chapter.

(e) Procedures for regulating, managing, and auditing the operation, financial data, and program information relating to slot machine gaming that allow the division and the Department of Law Enforcement to audit the operation, financial data, and program information of a slot machine licensee, as required by the division or the Department of Law Enforcement, and provide the division and the Department of Law Enforcement with the ability to monitor, at any time on a real-time basis, wagering patterns, payouts, tax collection, and compliance with any rules adopted by the division for the regulation and control of slot machines operated under this chapter. Such continuous and complete access, at any time on a real-time basis, shall include the ability of either the division or the Department of Law Enforcement to suspend play immediately on particular slot machines

if monitoring of the facilities-based computer system indicates possible tampering or manipulation of those slot machines or the ability to suspend play immediately of the entire operation if the tampering or manipulation is of the computer system itself. The division shall notify the Department of Law Enforcement or the Department of Law Enforcement shall notify the division, as appropriate, whenever there is a suspension of play under this paragraph. The division and the Department of Law Enforcement shall exchange such information necessary for and cooperate in the investigation of the circumstances requiring suspension of play under this paragraph.

(f) Procedures for requiring each licensee at his or her own cost and expense to supply the division with a bond having the penal sum of \$2 million payable to the Governor and his or her successors in office for each year of the licensee's slot machine operations. Any bond shall be issued by a surety or sureties approved by the division and the Chief Financial Officer, conditioned to faithfully make the payments to the Chief Financial Officer in his or her capacity as treasurer of the division. The licensee shall be required to keep its books and records and make reports as provided in this chapter and to conduct its slot machine operations in conformity with this chapter and all other provisions of law. Such bond shall be separate and distinct from the bond required in s. 550.125.

(g) Procedures for requiring licensees to maintain specified records and submit any data, information, record, or report, including financial and income records, required by this chapter or determined by the division to be necessary to the proper implementation and enforcement of this chapter.

(h) A requirement that the payout percentage of a slot machine be no less than 85 percent.

(i) Minimum standards for security of the facilities, including floor plans, security cameras, and other security equipment.

(j) Procedures for requiring slot machine licensees to implement and establish drug-testing programs for all slot machine occupational licensees.

14. Section 551.122, Florida Statutes, provides: "The division may adopt rules pursuant to ss. 120.536(1) and 120.54 to administer the provisions of this chapter."

15. As sources of rulemaking authority, section 551.122 and the first sentence of section 551.103(1) fall within the scope of the final sentence of the flush-left language of section 120.52(8) as general descriptions of the powers and functions of Respondent. These statutory provisions are therefore of no particular value in determining Respondent's specific rulemaking authority.

16. However, the remainder of section 551.103(1) confers specific powers and duties upon Respondent with respect to rulemaking. The question is whether any of these provisions explicitly authorize Respondent to require an internal random number generator. Most of the provisions obviously do not authorize such a requirement, but four subsections warrant discussion.

17. Section 555.103(1)(b) authorizes Respondent to adopt rules concerning "[t]echnical requirements and . . .

qualifications," but of the licensee, not of the devices themselves.

18. Applicable to the devices, section 555.103(1)(c) authorizes Respondent to adopt rules concerning "[p]rocedures to scientifically test and technically evaluate slot machines," but only to determine compliance with chapter 551. This statute does not authorize rulemaking of substantive requirements to be imposed upon slot machines, unless these substantive requirements are elsewhere found within chapter 551. Section 551.103(8) defines "slot machines," although more inclusively than exclusively, and section 555.121 adds important restrictions on slot machines. However, nothing in either of these sections or anywhere else in chapter 551 dictates that each slot machine contain an internal random number generator.

19. Also applicable to devices, section 555.103(1)(e) authorizes Respondent to adopt rules concerning:

[p]rocedures for regulating, managing, and auditing the operation, financial data, and program information relating to slot machine gaming that allow the division and the Department of Law Enforcement to audit the operation, financial data, and program information of a slot machine licensee, as required by the division or the Department of Law Enforcement, and provide the division and the Department of Law Enforcement with the ability to monitor, at any time on a real-time basis, wagering patterns, payouts, tax collection, and compliance with any rules adopted by the division for the

regulation and control of slot machines operated under this chapter.

20. Although an internal random number generator involves the operation of a slot machine, this statute concerns procedures. Procedures are not components of slot machines, such as random number generators.

21. Even ignoring the distinction between procedures and random number generators, this statute does not serve to authorize the adoption of a rule requiring an internal random number generator. The procedures fall into two categories. The first set of procedures must allow Respondent to audit the operation and program information of a slot machine licensee, not a slot machine. This authority thus does not involve the devices themselves.

22. The second set of procedures must provide Respondent with the ability to monitor, in real time, wagering patterns, payouts, tax collection, and compliance with the rules. This authority involves the devices themselves, but provides no authority for differentiating between internal and external random number generators. There does not appear to be a relationship between the requirement of an internal random number generator and procedures to monitor, in real time, wagering patterns, payouts, tax collection, and compliance with the rules.

23. Section 555.103(1)(g) authorizes Respondent to adopt rules concerning "[p]rocedures for requiring licensees to maintain specified records and submit any data, information, record, or report, including financial and income records, required by this chapter or determined by the division to be necessary" This statute pertains also to procedures and financial records; as such, it provides no authority for differentiating between internal and external random number generators.

24. During the conference, Respondent cited PPI, Inc. v. Department of Business and Professional Regulation, 698 So. 2d 306 (Fla. 3d DCA 1996). Among the holdings in this opinion is a reversal of an Administrative Law Judge, who had invalidated a rule requiring pari-mutuel wagering permit holders that elected to install cardrooms to install electronic surveillance devices. Noting, under then-current law, that "[w]here an agency is granted rule-making authority, it is granted wide discretion in exercising that authority," the court identified statutory authority extended to Respondent to adopt rules for the operation of cardrooms, to monitor the operation of cardrooms, and to insure the implementation of internal controls and the collection of fees and taxes. Much has changed in the law of rulemaking since 1996. See, e.g., Sw. Fla. Water Mgmt. Dist. v. Save the Manatee Club, Inc., 773 So. 2d 594 (Fla. 1st DCA 2000).

Regardless of these changes, a statute authorizing an agency to adopt rules for the operation of cardrooms, for the monitoring of the operations of cardrooms, and for the assurance of the implementation of internal controls and the collection of fees and taxes provides firmer administrative footing for a rule requiring security cameras than the above-quoted statutes provide for a rule requiring internal random number generators.

25. During the conference, Respondent also argued that the role of internal random number generators in providing security is of vital interest to the regulation of slot machines. Thus, Respondent reasoned, it would be necessary to receive evidence, even on the two claims--lack of rulemaking authority and lack of law implemented--addressed in this Order. Perhaps the evidence would have showed that the location of a random number generator--within each machine or externally--is an important factor in ensuring the security of the slot-machine gaming experience. And perhaps this is why the legislature did not delegate this matter to Respondent. Or evidence might have showed that the location of the random number generator does not affect the security of the slot-machine gaming experience, so that the rule addresses a minor matter. Either way, evidence of the role of internal random number generators--regardless how important they are to the security of the slot-machine gaming

experience--does not help address the legal issues presented by these two claims.

26. Perhaps a more interesting issue arises in the lone case that cites the PPI decision, St. Petersburg Kennel Club v. Department of Business and Professional Regulation, 719 So. 2d 1210 (Fla. 2d DCA 1998) (per curiam). In this case, the court considered the statute authorizing pari-mutuel wagering permit holders to operate cardrooms and whether Respondent had the authority to adopt a rule defining the game of poker. Reviewing a list of statutes that authorized Respondent to adopt rules for the issuance of cardroom licenses, the operation of a cardroom, recordkeeping and reporting requirements, and the collection of all fees and taxes, the court concluded that Respondent lacked the specific authority to adopt rules defining poker, even though the substantive statute cross-referenced another statute that included poker among a list of approved games.

27. A more recent case allowing an agency to adopt a definitional rule is Blair, supra. Here, the agency adopted a rule defining a statutory term, "willful," in determining the existence of campaign finance violations. Listing the statutes empowering the agency to "investigate and determine" violations of the law, the court reasoned that the agency had to "interpret and apply" the meaning of "willful" to discharge its clear statutory duties. Similarly, the Blair court determined that

the definitional rule properly implemented the law because a statute predicated liability on a willful violation of the law.

28. The Blair holding is necessitated by the close relationship between the object of agency regulation--the definition of "willful"--and the clear statutory assignment of duties to the agency in terms of determining willful violations of campaign finance laws. Without determining the meaning of "willful," the agency could not discharge any of these duties. The relationship between the object of agency regulation--the definition of poker--and the clear statutory assignment of duties to Respondent was more attenuated in St. Petersburg Kennel Club. In the present case, there is no relationship between the object of agency regulation--internal random number generators--and the statutory assignment of duties listed above; Respondent can meaningfully discharge each of these duties without dictating to slot machine manufacturers that they must include a random number generator in each slot machine.

29. For the reasons immediately set forth above, Respondent lacks the rulemaking authority to adopt the requirement of an internal random number generator in rule 61D-14.041(1).

30. For the reasons immediately set forth above, the rule's requirement of an internal random number generator also fails to implement section 551.103(1)(c), (e), and (g).

ORDER

Based on the foregoing,

It is

ORDERED that the Motion for Summary Final Order is granted to the extent that Petitioner and Intervenor have proved by a preponderance of the evidence that the word, "internal," in Florida Administrative Code Rule 61D-14.041(1) is an invalid exercise of delegated legislative authority because of a lack of rulemaking authority, in the cited statutes, to adopt a rule imposing this requirement and a lack of law to be implemented, in the cited statute, by a rule imposing this requirement.

It is

ORDERED that the sole purpose of the evidentiary hearing set for April 1, 2011, is to determine whether Petitioner or Intervenor is a person substantially affected by this rule requirement.

As ruled during the conference, it is

ORDERED that Intervenor may satisfy the jurisdictional requirement of a person substantially affected by this rule requirement, even if Petitioner fails to satisfy the jurisdictional requirement. As provided by Florida Administrative Code Rule 28-106.205: "The [Administrative Law Judge] may impose terms and conditions on the intervenor to limit prejudice to other parties." In this case, Intervenor

could have filed his own challenge to this existing rule requirement. No deadline had expired prior to Intervenor's filing its petition. Likely, the Administrative Law Judge lacks the authority to limit Intervenor's participation, under the principle that an intervenor takes a case as it finds the case. Cf. Bancroft v. Allen, 128 Fla. 14, 20-21, 174 So. 749, 751-52 (1937). Even if the Administrative Law Judge has any such discretion in this case, he declines to exercise it to restrict Intervenor's participation in any respect relative to Petitioner's participation.

Lastly, it is

ORDERED that the motion for protective order is granted.

DONE AND ORDERED this 22nd day of March, 2011, in Tallahassee, Leon County, Florida.



ROBERT E. MEALE
Administrative Law Judge
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