IN THE COUNTY COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
IN AND FOR SEMINOLE COUNTY, FLORIDA

STATE OF FLORIDA,
Plaintiff,
vs.

CASE NO.: 2014-MM-011100

OVIDIU PAUNA,
Defendant.
_____/

MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS

Defendant, OVIDIU PAUNA, by and through the undersigned attorneys, submits unto the Court this Memorandum of Law in support of Defendant's Motion to Dismiss, and states as follows:

I. THE UNDISPUTED MATERIAL FACTS ESTABLISH AS A MATTER OF LAW THAT OFFICER O'CONNOR'S ENCOUNTER WITH DEFENDANT PRIOR TO THE ALLEGED RESISTANCE CONSTITUTES AN INVESTIGATIVE DETENTION.

At the time of the alleged incident, Officer O'Connor subjected Defendant to an investigative detention, which required probable cause or reasonable suspicion of a substantive criminal act.

There are essentially three levels of police-citizen encounters. The first level is considered a consensual encounter and involves only minimal police contact. During a consensual encounter a citizen may either voluntarily comply with a police officer's requests or choose to ignore them. Because the citizen is free to leave during a consensual encounter, constitutional safeguards are not invoked. United States v. Mendenhall, 446 U.S. 544 (1980).

The second level of police-citizen encounters involves an investigatory stop as enunciated in Terry v. Ohio, 392 U.S. 1 (1968). At this level, a police officer may reasonably detain a citizen temporarily if the officer has a reasonable suspicion that a person has committed, is committing, or is about to commit a crime. See Davis v. State, 973 So.2d 1277, 1279 (Fla. 2d DCA 2008); Popple v. State, 626 So.2d 185, 186 (Fla. 1993). In order not to violate a citizen's Fourth Amendment rights, an investigatory stop requires a well-founded, articulable suspicion of criminal

activity. Mere suspicion is not enough to support a stop. Carter v. State, 454 So.2d 739 (Fla. 2d DCA 1984); State v. R.H., 900 So.2d 689 (Fla. 4th DCA 2005). Reasonable or 'founded' suspicion requires a factual foundation based on the observations of and information in the possession of the law enforcement officer. State v. Allen, 994 So.2d 1192 (Fla. 5th DCA 2008).

While not at issue in the instant Motion, the third level of police-citizen encounters involves an arrest which must be supported by probable cause that a crime has been or is being committed. Henry v. United States, 361 U.S. 98 (1959).

Although there is no litmus test for distinguishing a consensual encounter from a seizure, a significant identifying characteristic of a consensual encounter is that the officer cannot hinder or restrict the person's freedom to leave or freedom to refuse to answer inquiries, and the person may not be detained without a well-founded and articulable suspicion of criminal activity. State v. Simons, 549 So.2d 785 (Fla. 2d DCA 1989). The Florida Supreme Court "has consistently held that a person is seized if, under the circumstances, a reasonable person would conclude that he or she is not free to end the encounter and depart." Popple v. State, 626 So. 2d 185 (Fla. 1993) (citing Jacobson v. State, 476 So.2d 1282 (Fla.1985)).

It is well established that once an officer directs a defendant to exit a vehicle, the encounter becomes an investigatory stop requiring reasonable suspicion or probable cause that a crime has been or is being committed. Hilgeman v. State, 790 So.2d 485 (Fla. 5th DCA 2001) (citing Jackson v. State, 579 So.2d 871, 872 (Fla. 5th DCA 1991)).

In Popple v. State, 626 So. 2d 185 (Fla. 1993), a defendant was sitting in a parked car in a desolate area when a sheriff's deputy approached from the rear. After the deputy noticed the defendant making "furtive" movements, appearing nervous and surprised, reaching under the seat, and "flipping about" in the car, the deputy asked the defendant to exit the vehicle. Id. at 186. Upon exiting, a cocaine pipe became visible on the floorboard of the car. The defendant was arrested and charged with possession of cocaine. Id.

On these facts, the Florida Supreme Court held that the actions of the officer constituted an investigatory detention requiring reasonable suspicion of criminal wrongdoing. Id. at 188. Even if the defendant was deemed to have made 'furtive' movements and suspicious behaviors in the officer's presence, and even if the initial contact with the defendant was considered a consensual encounter,

> Deputy Wilmoth's direction for [the defendant] to exit his vehicle constituted a show of authority which restrained [the defendant's] freedom of movement because a reasonable person under the circumstances would believe that he should comply.

Id.

In Jackson v. State, 579 So.2d 871 (Fla. 5th DCA 1991), a defendant was similarly asked by a police officer to exit his vehicle. When the defendant complied with the instruction, the officer observed cocaine in the car. Id. at 872. The trial court denied appellant's motion to suppress on the ground that appellant's compliance with the officer's instruction to exit the vehicle in which he was sitting was a consensual encounter. Id. The Fifth District Court of Appeal reversed, holding that, "once the officer directed the defendant to exit the car, the encounter became a stop." Id.

In the instant case, the undisputed material facts establish that Officer O'Connor approached Defendant's vehicle and instructed Defendant to produce identification. Under such circumstances, no reasonable person would feel free to disregard the police and go about his business. O.A. v. State, 754 So.2d 717, 720 (Fla. 4th DCA 1998).

Even assuming, *arguendo*, that the directive to produce identification was a 'consensual encounter,' Officer O'Connor's subsequent instruction for Defendant to exit the vehicle converted the encounter into an investigative detention as a matter of law. See Popple v. State, 626 So. 2d 185 (Fla. 1993); Hilgeman v. State, 790 So.2d 485 (Fla. 5th DCA 2001); Jackson v. State, 579 So.2d 871, 872 (Fla. 5th DCA 1991). Officer O'Connor's actions therefore required founded suspicion that Defendant had committed or was about to commit a crime. Jordan v. State, 544 So.2d 1073 (Fla. 2d DCA 1989).

II. THE UNDISPUTED MATERIAL FACTS ESTABLISH THAT OFFICER O'CONNOR LACKED REASONABLE SUSPICION OR PROBABLE CAUSE TO DETAIN DEFENDANT FOR PURPOSES OF PRODUCING IDENTIFICATION OR EXITING THE SUBJECT VEHICLE.

The undisputed material facts of the present case demonstrate that Officer O'Connor lacked founded suspicion or probable cause of any substantive criminal offense so as to justify the detention of Defendant.

Under Florida law, the crime of Loitering or Prowling consists of two elements: (1) the accused was loitering and prowling in a manner not usual for law abiding citizens; and (2) the loitering and prowling was under circumstances that warranted a justifiable and reasonable alarm or immediate concern for the safety of persons or property located in the vicinity." Stephens v. State, 987 So. 2d 182, 184 (Fla. 2d DCA 2008) (citing C.H.S. v. State, 795 So.2d 1087, 1090 (Fla. 2d DCA 2001)).

With respect to the first element, the State must establish that the defendant engaged in incipient criminal behavior which law-abiding people do not usually engage in due to the time, place, or manner of the conduct involved. Hunter v. State, 32 So. 3d 170, 173 (Fla. 4th DCA 2010) (citing D.A. v. State, 471 So.2d 147, 151 (Fla. 3d DCA 1985)). The gist of this element is conduct which comes close to, but falls short of, the actual commission or attempted commission of a substantive crime, and which must be alarming in nature, pointing toward an imminent breach of the peace or threat to public safety. Id. The statute is not directed at mere idling. State v. Ecker, 311 So.2d 104, 110 (Fla.1975); D.A., 471 So.2d at 152.

As to the second element, it must be established that the defendant engaged in conduct that warranted a justifiable or reasonable alarm or immediate concern for the safety of persons or property in the vicinity. D.A. v. State, 471 So.2d 147, 152 (Fla. 3d DCA 1985). It is not enough that the subject criminal behavior point towards the commission or attempted commission of any type of substantive crime. It must "amount to an imminent breach of the peace or an imminent threat to public safety." Id.

Florida's Loitering and Prowling statute does not criminalize idleness or vagrancy, and does not empower police to detain citizens to explain their unusual presence or status. State v. Ecker, 311 So. 2d 104, 107-10 (Fla. 1975). A police officer must have more than a vague suspicion about the accused's presence to detain or arrest a suspect. D.S.D. v. State, 997 So. 2d 1191, 1194 (Fla. 5th DCA 2008); Hunter v. State, 32 So. 3d 170 (Fla. 4th DCA 2010).

A detention or arrest by police for Loitering or Prowling requires that the conduct of the accused suggest that a breach of peace is imminent. Mills v. State, 58 So. 3d 936, 939 (Fla. 2d DCA 2011). If there is no imminent breach of peace or imminent threat to persons or property, a detention or arrest is unlawful and a conviction cannot be sustained. Id.; E.B. v. State, 537 So. 2d 148 (Fla. 2d DCA 1989). Moreover, both elements of the offense of loitering and prowling must occur in the officer's presence and must be completed before the officer is permitted to take action. Mills, 58 So. 3d at 939; Stephens v. State, 987 So. 2d 182 (Fla. 2d DCA 2008) (citing Bowser v. State, 937 So.2d 1270, 1272 (Fla. 2d DCA 2006)).

Thus, merely being present in the area of closed businesses, standing in a dark alley behind a closed church, being present late at night in an area of recent burglaries, and standing on railroad tracks late at night near the site of an attempted car break-in are all insufficient grounds to sustain a conviction for Loitering or Prowling. See D.S.D. v. State, 997 So.2d 1191, 1193 (Fla. 5th DCA 2008) (stating that "standing around behind a closed business late at night or early in the morning in an area noted for burglaries does not, without more, amount to the crime of loitering and prowling"); Hollingsworth v. State, 991 So. 2d 990, 992 (Fla. 4th DCA 2008) (finding that a defendant's suspicious presence around closed businesses in an area known for drug activity, and subsequent flight from police was insufficient to support a charge of Loitering or Prowling); Hunter v. State, 32 So. 3d 170, 175 (Fla. 4th DCA 2010) (finding that a defendant did not engage in Loitering or Prowling when found behind a closed church at an unusual hour, and stating that "mere presence close to closed businesses in the late evening is insufficient to justify alarm of imminent criminal activity"); J.S.B. v. State, 729 So. 2d 456 (Fla. 2d DCA 1999) (finding insufficient

evidence of loitering and prowling where an officer responded to report of a burglary in progress and found an empty vehicle in a parking lot and a juvenile with three men walking around dirt pasture immediately behind the building); KRR v. State, 629 So. 2d 1068 (Fla. 2d DCA 1994) (holding that a defendant's nighttime presence on non-public railroad tracks near the site of an attempted car theft was insufficient to support a charge of Loitering or Prowling); Stephens v. State, 987 So. 2d 182 (Fla. 2d DCA 2008) (finding that the defendant's "mere presence in the parking lot [of a closed business] was insufficient to raise an *immediate* concern for the safety of persons or property" (emphasis in original)); V.E. v. State, 539 So. 2d 1170 (Fla. 3d DCA 1989) (finding that the suspicious presence of juveniles in a residential neighborhood where they had reportedly been looking into windows was insufficient to establish the second element of Loitering and Prowling).

Florida Appellate Courts have consistently held that a defendant's mere suspicious presence on or around the property of a closed business is insufficient to support a charge of Loitering or Prowling. D.S.D. v. State, 997 So.2d 1191, 1193 (Fla. 5th DCA 2008) (stating that "standing around behind a closed business late at night or early in the morning in an area noted for burglaries does not, without more, amount to the crime of loitering and prowling"); Hunter v. State, 32 So. 3d 170, 175 (Fla. 4th DCA 2010) (stating that "mere presence close to closed businesses in the late evening is insufficient to justify alarm of imminent criminal activity").

In L.C. v. State, 516 So. 2d 95 (Fla. 3d DCA 1987), a police officer stopped a juvenile who was present at 10:00 p.m. in a shopping center parking lot looking into store windows. The juvenile was also observed pushing on the door to a closed business. On these facts, the Third District Court of Appeal held that there was insufficient evidence of an imminent threat to persons or property to sustain a Loitering and Prowling conviction. Id. at 96.

In Stephens v. State, 987 So. 2d 182, 184 (Fla. 2d DCA 2008) the defendant was observed in the parking lot adjacent to a closed grocery store in the early morning hours, and when he saw the patrol car he moved into the shadows and crouched behind a car. On these facts, the Second

District Court of Appeal held that the defendant's mere presence in the parking lot of a closed business was insufficient to raise an immediate concern for the safety of persons or property Id.

In Bowser v. State, 937 So.2d 1270, 1271 (Fla. 2d DCA 2006), a police officer observed a defendant and three other people walking in a parking lot of a business at around 2:00 in the morning. At the defendant's violation of probation hearing, the officer testified that he had watched the defendant and his companions for twenty minutes. Id. He observed them walking down the street looking into unoccupied vehicles and walk into a dark parking lot continuing to look inside vehicles. Id. The officer did not observe the defendant or the defendant's companions try to open any vehicle doors. Id.

On these facts, the Second District Court of Appeal reversed the trial court's finding of a violation of probation, stating:

> The record reflects no evidence of the required *imminent* threat to the peace, public safety, or property. The possibly suspicious circumstances of four people looking into cars in a dark parking lot was not sufficient to raise justifiable alarm of an immediate threat [emphasis in original]. Id.

In T.W. v. State, 675 So.2d 1018 (Fla. 2d DCA 1996), a sheriff's deputy was patrolling the Fort Myers Beach area around 4 a.m. At the intersection of two streets, he noticed the defendant walking in a westerly direction from the side of a building next door to a closed pawn shop. Id. The defendant was carrying a black chain saw case. He was about one foot from the closed building when the deputy first observed him. The defendant then proceeded north, away from the building. Id.

On these facts, the Second District Court of Appeal held that the State failed to establish the second element of Loitering and Prowling, explaining:

> Even if we assume the state proved the first element, it did not prove the second element of loitering and prowling. The evidence only reveals that an officer saw T.W., then age 17, walking next to a pawn shop at 4 a.m. carrying a case which the officer recognized as containing a chain saw. T.W. did not attempt to flee, conceal himself, or hide the case [. . .] Even though T.W. carried a chain saw, the state presented no evidence that T.W.'s conduct immediately threatened persons or property in the area. The officer thought that T.W. may have stolen the chain saw, but his investigation of the pawn shop revealed that it had not been entered. Further, "loitering and prowling 'is not directed at suspicious

> after-the-fact criminal behavior which solely indicates involvement in a prior, already completed substantive criminal act. Id. at 1019

In Hunter vs. State, 32 So. 3d 170, 172 (Fla. 4th DCA 2010), two police officers were working a burglary deterrence action plan on an August evening. At around midnight, they received a dispatch call regarding "a couple of black males standing behind a closed church in a dark alleyway." Id. The officers drove to the area and stopped, and one of them exited the vehicle and saw two black males sitting under a tree behind the closed church. Id.

The officers observed the men sitting and rummaging into their pockets. He believed that they were in an area "where normal people wouldn't be," in the dark behind closed businesses and a church. Id. The officer approached and announced his presence, at which point the suspects stood up and ran away. The defendant was later apprehended and charged with Resisting without Violence and Possession of Cocaine.

Based upon the totality of circumstances, the trial court found that the officers had reasonable suspicion of loitering and prowling, and denied the defendant's Motion to Suppress Evidence. The Fourth District Court of Appeal reversed the trial court's order, stating:

> Because the facts do not show that the officers had any more than a bare suspicion of any incipient criminal conduct when they approached the seated Hunter, the trial court should have granted the motion to suppress the evidence seized as a result of the stop and seizure. Therefore, we reverse appellant's conviction for possession of cocaine. Because the cocaine must be suppressed, appellant is entitled to discharge on the charge of possession of cocaine. Id. at 175.

The Court also reversed the defendant's conviction for Resisting Arrest without Violence, holding that the officers lacked reasonable suspicion of Loitering or Prowling and therefore "were not engaged in the lawful execution of a legal duty." Id.

In Hollingsworth v. State, 991 So.2d 990 (Fla. 4th DCA 2008), the Fourth District Court of Appeal reversed an order denying a motion to suppress because the officers had not observed any conduct which would satisfy the elements of loitering prior to attempting a stop of the defendant. The officers had been called in the evening to an area of closed businesses because

of prior drug activity. Id. at 191. While parked along the street, the officers observed the defendant walking along the street near the businesses and then walk briskly in the opposite direction upon seeing police. Id. The officers pursued her and saw her ducking behind a vehicle. She continued to flee, and the officers detained her. Id. They arrested her for loitering and prowling, and a search revealed drugs.

Because the officers observed no conduct which raised a justifiable and reasonable alarm that a breach of the peace or threat to public safety was imminent, the Fourth District held that:

> [T]he officers did not have reasonable suspicion to stop [the defendant]. Mere presence in an area of closed businesses at a late hour was insufficient to raise an alarm of immediate threat to public safety.

Hunter v. State, 32 So. 3d 170, 174 (Fla. 4th DCA 2010) (citing Hollingsworth, 991 So.2d at 992)).

In the instant case, Officer O'Connor conducted an investigatory detention on grounds that Defendant had allegedly committed the substantive crime of Loitering or Prowling. As stated in the Arrest and Booking Report:

> Pauna's actions of being parked in a dark parking lot near the side of a closed business are not usual for law-abiding individuals, and warranted an immediate concern for the safety of property in the area. Additionally, Pauna's actions of manifestly attempting to conceal an unknown object in the front seat of his vehicle while being asked to produce identification and step from the vehicle is not usual for law abiding citizens.

Thus, the validity of the subject detention turns on whether or not Officer O'Connor had a well-founded, articulable suspicion that Defendant had engaged in Loitering or Prowling. Here, the undisputed material facts are that Officer O'Connor saw a blue Ford van parked on the north side of a Lowe's parking lot at around 3:30 a.m. Inside the van was a white male who allegedly stated that he was present "just because." When Defendant attempted to produce identification, Officer O'Connor became concerned about alleged 'furtive' movements and ordered Defendant to exit the vehicle.

As a matter of law, the undisputed facts fail to demonstrate a well-founded and articulable suspicion that Defendant posed an imminent threat to property or public safety (i.e. committed

Loitering or Prowling). There is no contention that Defendant was seen outside of his car, or that he attempted to flee, attempted to conceal himself, wielded or carried any object, approached the store, or cased the store.

In short, there is nothing about Defendant's conduct, aside from mere presence in a parking lot at an arguably unusual time, to justify an immediate concern that a breach of peace was imminent. Both elements of the offense of loitering and prowling must have occurred in Officer O'Connor's presence and must have been completed before he was permitted to take any action with regard to detaining or arresting Defendant. See Mills, 58 So. 3d at 939; Stephens v. State, 987 So. 2d 182 (Fla. 2d DCA 2008); Bowser v. State, 937 So.2d 1270, 1272 (Fla. 2d DCA 2006). Here, the material facts constituting the second element of the offense are utterly absent, and Officer O'Connor acted without reasonable suspicion of Loitering and Prowling.

Similarly, the detention of Defendant cannot be justified on grounds of an alleged criminal trespass. Officer O'Connor made no observations and had no information indicating that Defendant had previously been trespassed from the subject property, or that an actual communication not to be present or to leave had been made. Moreover, no signs were present within or along the boundaries of the Lowe's parking lot that would qualify the property as "posted" land. The property was not fenced, and was not cultivated. Thus, Officer O'Connor did not have an articulable, well-founded suspicion of criminal trespass to justify Defendant's detention.

III. THE UNDISPUTED MATERIAL FACTS CANNOT LEGALLY JUSTIFY THE SUBJECT DETENTION ON GROUNDS OF OFFICER SAFETY.

The detention by Officer O'Connor is not salvaged by the fact that he expressed concerns about the alleged "furtive movements" of Defendant. An almost identical factual scenario was addressed by the Florida Supreme Court in Popple, where a suspect engaged in "furtive movements," and, additionally, appeared nervous, appeared surprised, reached under the seat, and "flipped about" in the car. On those facts (which are far more egregious or concerning than

those presented in the instant case) the Florida Supreme Court explicitly declined to validate the subject detention on grounds of officer safety. Popple, 626 So. 2d at 188, n. 1.

The justification for the detention on grounds of officer safety also fails for the simple reason that, under the undisputed material facts, Officer O'Connor indicated nothing more than a bare suspicion or hunch that that Defendant might have been attempting to "either produce a weapon or conceal an illicit item." Numerous Florida appellate courts have held that a "furtive" motion, with no other specific, articulable facts to support the suspicion that the defendant has a weapon, does not constitute founded suspicion for a weapons search or investigatory stop. See Dees v. State, 564 So. 2d 1166 (Fla. 1st DCA 1990) (an officer's statement that she observed a vehicle passenger put something into the glove compartment and that the officer was unsure whether the object was a weapon was insufficient to support a finding of reasonable suspicion); Baggett v. State, 531 So.2d 1028, 1030 (Fla. 1st DCA 1988) ("the fact that appellant placed his hand in his jacket after seeing Officer Nye did not give rise to a founded suspicion"); Ruddack v. State, 537 So.2d 701, 701 (Fla. 4th DCA 1989) (that appellant moved his hand behind his back did not reasonably raise suspicion of criminal activity or pose threat to officer's safety); Jenkins v. State, 524 So.2d 1108, 1109 (Fla. 3d DCA 1988) (that appellant put his hand behind back when officers were checking the area was not enough to justify stop and pat-down); Walker v. State, 514 So.2d 1149, 1150 (Fla. 2d DCA 1987) (appellant's quick movement, " 'as if to conceal something' " behind his leg, was not enough to raise founded suspicion); G.J.P. v. State, 469 So.2d 826, 827-28 (Fla. 2d DCA 1985) (bare suspicion was not elevated to founded suspicion by virtue of appellant making quick movement when officers approached vehicle); R.B. v. State, 429 So.2d 815, 817 (Fla. 2d DCA 1983) (fact that appellant quickly placed his hand in jacket pocket after seeing officers did not give rise to more than bare suspicion); Currens v. State, 363 So.2d 1116, 1117 (Fla. 4th DCA 1978) (appellant quickly moving hand between his legs when officers approached did not constitute founded suspicion or threat).

IV. IN THE ABSENCE OF PROBABLE CAUSE OR REASONABLE SUSPICION, OFFICER O'CONNOR WAS NOT ACTING IN THE LAWFUL EXECUTION OF A LEGAL DUTY, AND THE CHARGE OF RESISTING WITHOUT VIOLENCE MUST BE DISMISSED.

In cases involving the charge of Resisting without Violence, the element of lawful execution of a legal duty requires an officer to have either a founded suspicion to stop the person or probable cause to make a warrantless arrest. EAB v. State, 851 So.2d 308, 311 (Fla. 2d DCA 2003); I.Y.D. v. State, 711 So.2d 202, 203 (Fla. 2d DCA 1998); S.G.K. v. State, 657 So.2d 1246, 1247 (Fla. 1st DCA 1995). The crime of resisting an officer without violence does not take place if the officer lacked an articulable well-founded suspicion of criminal activity to justify the attempt to detain the defendant. Harris v. State, 647 So.2d 206 (Fla. 1st DCA 1994); S.G.K. v. State, 657 So.2d 1246, 1247 (Fla. 1st DCA 1995). Moreover, where a police officer conducts an unlawful arrest or detention, an individual has a recognized right to resist those unlawful actions without violence. Hadley v. State, 846 So.2d 1236, 1238 (Fla. 1st DCA 2003).

In the instant, Officer O'Connor lacked probable cause or reasonable suspicion of criminal wrongdoing to justify the detention of Defendant. The undisputed material facts do not remotely meet the elements of loitering and prowling, or of criminal trespass. Moreover, as demonstrated in Popple and the innumerable Florida appellate court decisions invalidating investigative detentions conducted on the basis of alleged "furtive" movements, the subject detention cannot legally be justified on grounds of officer safety. Defendant is therefore entitled to a dismissal as a matter of law.

WHEREFORE, Defendant respectfully requests that this Court enter an Order dismissing the charges filed in the instant case.

Respectfully Submitted,

HUSSEIN & WEBBER, P.L.

/s/ Troy J. Webber
Troy J. Webber
Florida Bar No. 79105
twebber@husseinandwebber.com
Sarah S. Hussein
Florida Bar No.: 34974
shussein@husseinandwebber.com
630 West Adams Street, Suite 401
Jacksonville, Florida 32204
Tel: (904) 444-3952
Fax: (904) 458-8714
Web: www.husseinandwebber.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing has been furnished to the Office of the State Attorney, Sanford, Seminole County, Florida, by electronic mail and/or e-filing portal on this this 17th day of February, 2015.

HUSSEIN & WEBBER, P.L.

/s/ Troy J. Webber
Troy J. Webber
Florida Bar No. 79105
twebber@husseinandwebber.com
Sarah S. Hussein
Florida Bar No.: 34974
shussein@husseinandwebber.com
630 West Adams Street, Suite 401
Jacksonville, Florida 32204
Tel: (904) 444-3952
Fax: (904) 458-8714
Web: www.husseinandwebber.com
Attorneys for Defendant