



SPRING 2015

## LEGAL BULLETIN

### Can a vehicle be stopped based solely on the observation that its color is inconsistent with the color of the vehicle as identified in its registration record?

In *Van Teamer v. State*, 108 So. 3d 664 (Fla. 1st DCA 2013), *aff'd*, 151 So.3d 421 (Fla. 2014), the court dealt with the question of whether a discrepancy in the color of a vehicle alone was a sufficient basis to establish reasonable suspicion for a traffic stop. The Third District Court of Appeal and the Florida Supreme Court ultimately answered the question in the negative, finding that color, without any other indication of criminal activity, is insufficient to establish the requisite level of reasonable suspicion necessary to conduct a stop.

While on routine patrol, an Escambia County Deputy observed a *bright green* Chevrolet driven by Van Teamer. The Deputy ran the vehicle's license plate and learned the plate was registered to a *blue* Chevrolet. As a result of the color difference, the Deputy conducted a traffic stop. Upon speaking with the occupants of the vehicle, the Deputy learned the Chevrolet had recently been repainted, explaining the change in color. However, the Deputy also smelled the odor of Marijuana emanating from the vehicle. This odor triggered a search that yielded Marijuana, Cocaine, over \$1,000 in currency, and a charge of Trafficking in Cocaine. The Deputy did not have any basis other than the color difference for stopping the vehicle.

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### WELCOME TO OUR NEW MEMBERS

Please join the Office of General Counsel in welcoming Michael Greenberg, Tom Moffett, and Wendy Higdon. Michael is the new legal advisor for Troops C and F and is co-located with FHP at the Bradenton HQ office. Tom is the new legal advisor for Troop K and is co-located with FHP at the Turkey Lake Service Plaza in Ocoee. Wendy is the new paralegal for Troops B and G and is co-located with FHP at the Jacksonville HQ office.

FHP members are encouraged to call our legal advisors to discuss general legal issues related to traffic enforcement, DUI, DWLS, forfeitures, and questions concerning civil litigation.

Legal advisors will be providing on-going training as new issues or procedures warrant. They will also be attending District and Troop meetings and will be available to answer your questions in person at that time.



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The standard for conducting a traffic stop is reasonable suspicion. Therefore, “[a]t the very least, an officer must have an articulable and reasonable suspicion that the driver violated, is violating, or is about to violate” the law. *Id.* at 666-67. As there is no law requiring a person to report a change in vehicle color to DHSMV in Florida, under the above factual circumstances, central to the inquiry is “not whether particular conduct is ‘innocent’ or ‘guilty,’ but the degree of suspicion that attaches to particular types of noncriminal acts.” *Id.* at 667. Or at what point do noncriminal acts create sufficient reasonable suspicion to justify a stop.

While acknowledging that any discrepancy between a license plate and registration may raise a legitimate concern, the court placed little weight on color “in the absence of any other suspicious behavior or circumstances” due to the lack of a requirement that a change be reported to the State. *Id.* In surveying other cases where traffic stops based on color had been upheld, the court found color was usually but one of *a number* of additional factors that generated a sufficient degree of reasonable suspicion. *See U.S. v. Clarke*, 881 F. Supp. 115 (D. Del. 1995) (color discrepancy, out-of-state plates, high crime area, and commonly stolen vehicle sufficient reasonable suspicion for stop); *U.S. v. Cooper*, 431 F. App’x. 399 (6th Cir. 2011) (color discrepancy, location known for auto-theft, and knowledge of frequency of thieves placing tags from the same make and model of vehicle onto other vehicles sufficient for stop).

In sum, “[i]n Florida, it is legal to repaint a vehicle without reporting the change, creating an inconsistency between the vehicle registration and the vehicle” itself, however, this discrepancy alone, does not create a “particularized and objective basis” to support a traffic stop. *Id.* at 670. Additional factors must be present to establish the requisite level of reasonable suspicion necessary to conduct a stop.

By: Tom Moffett

### **A Ruckus or a Right? Can a vehicle be stopped for playing loud music?**

In the case, *State v. Catalano*, 104 So. 3d 1069 (Fla. 2012), Mr. Catalano and Mr. Schermerhorn were cited by law enforcement officers in separate incidents in Pinellas County, Florida, for violating the sound standards of section 316.3045(1)(a), F.S., which states, “It is unlawful for any person operating or occupying a motor vehicle on a street or highway to operate or amplify the sound produced by a radio, tape player, or other mechanical sound making device or instrument from within the motor vehicle so that the sound is: (a) Plainly audible at a distance of 25 feet or more from the motor vehicle.”

Both Catalano and Schermerhorn entered not guilty pleas and moved to dismiss their citations in county court, arguing that section 316.3045, F.S. is unconstitutional on its face. The county court denied their respective motions and Catalano and Schermerhorn both changed their pleas to nolo contendere. Soon after, Catalano and Schermerhorn each appealed to the circuit court of Pinellas County, arguing that section 316.3045, F.S. is unconstitutional on its face because the plainly audible standard is vague, overbroad, invites arbitrary enforcement, and impinges on free speech rights. The circuit court reversed the county court’s orders which denied the motions to dismiss the citations. (Continued on Page 4)

**Can a vehicle be stopped due to the obstruction of an alphanumeric character on its tag?**

Pursuant to Florida Statutes governing the licensing of vehicles, the alphanumeric designation on a car's license plate must be plainly visible at all times. Section 316.605(1), Florida Statutes, provides in pertinent part:

Every vehicle, at all times while driven, stopped, or parked upon any highways, roads, or streets of this state ... shall, ... display the license plate ... in such manner as to prevent the plates from swinging, and all letters, numerals, printing, writing, and other identification marks upon the plates regarding the word "Florida," the registration decal, and the alphanumeric designation shall be clear and distinct and free from defacement, mutilation, grease, and other obscuring matter, so that they will be plainly visible and legible at all times 100 feet from the rear or front. ... A violation of this subsection is a noncriminal traffic infraction, punishable as a nonmoving violation as provided in chapter 318.

Section 316.605(1), Florida Statutes, was recently amended (effective January 1, 2016) to remove "and other identification marks" and "regarding the word 'Florida.'" However, pursuant to section 320.061, Florida Statutes, which is not affected by the recent amendment, not only does the alphanumeric portion of the plate have to be visible but all features of the plate must also be visible including the name of the issuing state:

A person may not apply or attach a substance, reflective matter, illuminated device, spray, coating, covering, or other material onto or around any license plate which interferes with the legibility, angular visibility, or detectability of any feature or detail on the license plate or interferes with the ability to record any feature or detail on the license plate. A person who violates this section commits a noncriminal traffic infraction, punishable as a moving violation as provided in chapter 318.

In *State v. English*, 148 So. 3d 529 (Fla. 5th DCA 2014), the court noted that law enforcement had the authority to conduct a traffic stop because at least one letter on the defendant's license plate was unreadable. *See, also, Wright v. State*, 471 So. 2d 155, 156-57 (Fla. 3d DCA 1985)(officer had duty and authority to investigate why a vehicle parked on the roadway had its tag partially obscured by a rag).

However, if the reason that the tag cannot be read is because of an obstruction such as a trailer hitch, bicycle rack, handicap chair, or U-Haul, the above statutes are inapplicable because the wording of the section 316.605(1) references "obscuring matter" rather than an obscuring object. *See Harris v. State*, 11 So. 3d 462 (Fla. 2d DCA 2009). (*Continued on Page 4*)

### **Can a vehicle be stopped due to the obstruction of an alphanumeric character on its tag?**

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Additionally, the above statutes do not apply to temporary license tags. The Court in *State v. Diaz*, 850 So. 2d 435 (Fla. 2003), noted that the Legislature failed in section 320.131, Florida Statutes, to mandate a distance at which temporary tags must be fully legible and did not require the expiration date on the temporary tag to be legible:

While the Legislature has required that permanent license plates must be “plainly visible and legible at all times 100 feet from the rear or front,” §316.605(1), Fla. Stat. (2000), the Legislature has failed to mandate a distance at which temporary tags must be fully legible. Notably, the temporary tag statute does not specifically require that the expiration date be legible, and it is the State itself which creates and issues the temporary license tag. See §320.131 (1), (4), Fla. Stat. (2000).

In sum, a review of case law from the District Courts reveals that a vehicle can be stopped if from 100 feet only one alphanumeric character is not legible, or if the state issuing the tag is not readable, but only if the obstruction is caused by some obscuring matter such as grease or dirt, and not by an object such as a trailer hitch or bicycle rack. However, the statute which sets forth the 100 foot visibility requirement is inapplicable to temporary tags as noted by the Florida Supreme Court in *Diaz*.

*By: Michael Greenberg*

### **A Ruckus or a Right? Can a vehicle be stopped for playing loud music?**

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The State filed a petition for writ of certiorari in the Second DCA, which was denied, so the State in turn appealed to the Supreme Court of Florida, which held that section 316.3045, F.S., is unconstitutionally overbroad and affirmed the Second DCA’s declaration that the statute is invalid. The Supreme Court of Florida held that “section 316.3045(1)(a) F.S., is an unreasonable restriction on the freedom of expression and is unconstitutionally overbroad.”

Furthermore, the court stated, “Accordingly, we find that the statute is an unreasonable restriction on First Amendment rights. Likewise, the restriction of the constitutionally protected right to amplify sound, despite the State’s acknowledgement that this level of noise is tolerable and safe if the source is a commercial or political vehicle, is not narrowly tailored to achieve the government’s interests in improving traffic safety and protecting the citizenry from excessive noise. Thus we also find that the statute is unconstitutionally overbroad because it restricts the freedom of expression in a manner more intrusive than necessary.”

Therefore, according to the Supreme Court of Florida, law enforcement does not have the authority to pull a driver over and/or issue a citation for a violation of section 316.3045(1) (a), F.S. The Court held that citing a driver for a noise violation, under section 316.3045(1)(a), F.S., would infringe on his or her First Amendment right of freedom of speech.

*By: Danielle Roth*

**Can reasonable suspicion, as required for a traffic stop or an investigatory stop, rest on a reasonable mistake of law?**

*Heien v. North Carolina*, 135 S. Ct. 530 (U.S. Dec. 15, 2014), is a recent decision involving Fourth Amendment traffic stops of which employees of the Department should be aware. The full opinion is posted on the website of the United States Supreme Court.

While following behind a vehicle on the highway, a police officer noticed that only one of the vehicle's brake lights was working and pulled the vehicle over. There were two occupants in the vehicle – the driver, Maynor Javier Vasquez, and the defendant, Nicholas Brady Heien, who was lying across the rear seat. While issuing a warning ticket for the broken brake light, the officer became suspicious of the actions of the occupants and their answers to his questions. Vasquez appeared nervous, Heien remained lying down the entire time, and the two gave inconsistent answers about their destination.

The officer asked Vasquez if he would be willing to answer some questions, and Vasquez assented. The officer asked whether the men were transporting various types of contraband, and Vasquez said, “no.” The officer then asked whether he could search the vehicle. Vasquez said he had no objection, but told the officer to ask Heien, because Heien owned the car. Heien, who was the car's owner, gave the officer consent to search the vehicle. The officer found cocaine in the side compartment of a duffle bag, and Heien was arrested and charged with attempted trafficking, which resulted in a motion to suppress the evidence.

In this case, driving with only one working brake light was not actually a violation of North Carolina state law. However, the officer could have reasonably, even if mistakenly, read the vehicle code to require that both brake lights be in good working order based on nearby code provisions.

The U.S. Supreme Court noted that a traffic stop for a suspected violation of law is a “seizure” of the occupants of the vehicle and therefore must be conducted in accordance with the Fourth Amendment. The touchstone of the Fourth Amendment is reasonableness, and reasonable suspicion can rest on a reasonable mistake of law.

“The Fourth Amendment tolerates only *reasonable* mistakes, and those mistakes—whether of fact or of law—must be *objectively* reasonable. We do not examine the subjective understanding of the particular officer involved.” The U.S. Supreme Court further noted that “the inquiry is not as forgiving as the one employed in the distinct context of deciding whether an officer is entitled to qualified immunity for a constitutional or statutory violation. Thus, an officer can *gain no Fourth Amendment advantage* through *a sloppy study of the laws* he is duty-bound to enforce.”

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**Can reasonable suspicion, as required for a traffic stop or an investigatory stop, rest on a reasonable mistake of law?**

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The U.S. Supreme Court had “little difficulty in concluding that the officer’s error of law was reasonable.” While the law in this case referred to “a stop lamp,” suggesting the need for only a single working brake light, the statute also provided that the stop lamp may be incorporated into a unit with one or more *other* rear lamps. The Court noted that “[t]he use of ‘other’ suggests to the everyday reader of English that a ‘stop lamp’ is a type of ‘rear lamp.’ And another subsection of the same provision requires that vehicles ‘have all originally equipped rear lamps or the equivalent in good working order,’ arguably indicating that if a vehicle has multiple ‘stop lamp[s],’ all must be functional.” (citation omitted).

The U.S. Supreme Court concluded that it was objectively reasonable for an officer in that position to think that the defendant’s faulty right brake light was a violation of state law. And because the mistake of law was reasonable, there was reasonable suspicion justifying the stop.

As such, the *Heien* decision explains that reasonable suspicion, as required for a traffic stop or an investigatory stop, can rest on a reasonable mistake of law. While the Fourth Amendment tolerates mistakes, the mistakes must be reasonable. Moreover, mistakes – whether of fact or of law – must be objectively reasonable.

*Heien* is significant for a number of reasons. Although *Heien* involved a North Carolina statute, the U.S. Supreme Court has now clearly stated that a traffic stop or an investigatory stop can be based on a mistake of law.

In prior Legal Bulletins, the General Counsel’s Office has noted that there are cases from Florida which hold that a mistake of law does not provide a basis for stopping a vehicle. In *Hilton v. State*, 961 So. 2d 284 (Fla. 2007), for example, the Florida Supreme Court discussed a situation in which police officers stopped a motorist for a cracked windshield. During the stop, the officers checked the defendant’s identification, which revealed that the defendant was on probation for previously committing a felony. An officer on scene saw what initially appeared to be a rifle on the floor of the backseat of the car. While escorting the defendant to the curb for purposes of taking him into custody, an officer smelled marijuana. A pat-down search revealed forty-two bags of marijuana.

The question in *Hilton* involved an alleged violation of the State Uniform Traffic Control law which authorizes vehicle stops for equipment that is not in proper adjustment or repair. There, the Court held that a stop for a cracked windshield is permissible but only where an officer reasonably believes that the crack renders the vehicle “in such unsafe condition as to endanger any person or property.” However, there was virtually no testimony about the location or nature of the crack, and the only testimony with regard to any safety aspect of the windshield was offered by an officer who testified that there was no glass falling out of the crack, and that he was not sure whether the crack would obstruct the driver’s view.

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**LEGISLATIVE NEWS****Legislature Begins Considering Body Camera Implications**

The recent tragic events in Missouri and other states involving law enforcement agency-citizen confrontations has facilitated many robust dialogues across the country on identifying measures to avoid events of that nature in the future. As part of the on-going dialogue between law enforcement agencies at all government levels and the overall public, new approaches to achieving effective community policing are now being assessed and considered for implementation.

One of the community policing tools that is at the forefront of the discussion is the use of body camera technology by law enforcement officers. Body camera technologies are rapidly evolving and have been touted by some to be a promising strategy to achieve improved relations and accountability between the citizenry and law enforcement agencies. Body camera devices are typically designed to be clipped onto a law enforcement officer's uniform or special eyeglasses. Implementation of this new and evolving body camera technology will present some additional concerns that will need further consideration. Such concerns include costs of the cameras, including the necessary operation and maintenance, the cost of the infrastructure to store the vast amount of data that is recorded, law enforcement officer training, the scope of the public's right to request such stored data through public records requests, retention standards, privacy issues related to both law enforcement and members of the public which may be recorded by such devices .

As in many places throughout the country, the Florida Legislature has begun to consider how body camera technology can best be implemented by law enforcement agencies while giving careful consideration to other issues that come with it. With the March 3rd session fast-approaching the Legislature will have several bills pending before it to consider.

**Committee Substitute for House Bill 57**

A proposed Committee Substitute replaced the original version of the bill and was approved by House Criminal Justice Subcommittee on February 11th. The next committee of reference will be the House Appropriations Committee. This bill would require that law enforcement agencies (LEAs) who permit their officers to wear body cameras establish policies and procedures to address the proper use, maintenance, and storage of body cameras and the data recorded by them.

The policies and procedures are to include: General guidelines for the proper use, maintenance, and storage of body cameras; Any limitations on which law enforcement officers (LEOs) are permitted to wear body cameras; Any limitations on the situations in which LEOs are permitted to wear body cameras; and General guidelines for the proper storage, retention, and release of audio and video data recorded by the body cameras.

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The bill further requires that LEAs that permit its LEOs to wear body cameras shall:

- Ensure all personnel who wear, use, maintain, or store body cameras are trained in the LEA's policies and procedures;
- Ensure that all personnel who use, maintain, store, or release audio or video data recorded by body cameras are trained in the LEA's policies and procedures;
- Retain audio and video data recorded in accordance with the public record custodial requirements of s. 119.021, F.S., except as otherwise provided by law; and
- Perform periodic review of actual agency body camera practices to ensure conformity to the LEA's policies and procedures.

The bill also provides that Chapter 934 requirements (recording of communication which is consented to) are not applicable to body camera recordings made by LEAs that choose to use them.

### **Committee Substitute for SB 248**

A Committee Substitute was approved by the Senate Criminal Justice Committee on February 16th. The next committee of reference for this bill is the Governmental Oversight and Accountability Committee. This bill establishes a public records exemption for audio and video recordings made by a LEO in the course of performing official duties. The exemption includes recordings of the following:

- Recordings taken within the interior of a private residence;
- Recordings taken on the property of a facility that offers health care, mental health care, or social services;
- Recordings taken at the scene of a medical emergency;
- Recordings taken in a place where a person recorded or depicted in the recording has a reasonable expectation of privacy; or
- Recordings showing a child younger than 18 years old inside a school or on school property, or showing a child younger than 14 years of age at any location.

The bill provides that if the audio or video recording or a portion of such recording is exempt or confidential and exempt pursuant to another exemption in section 119.071, F.S., then that exemption applies and determines under which circumstances, if any, the recording or a portion of the recording may be disclosed to the public.

Under the bill a LEA having custody of an audio or video recording may disclose the recording to another LEA in furtherance of that LEA's official duties and responsibilities.

This bill directs that a LEA must have a retention policy of no longer than 90 days for the audio or video recordings unless the recordings are part of an active criminal investigation or criminal intelligence operation or a court orders a longer retention. The bill further requires that a LEA must disclose its record retention policy for recordings under this new exemption.

*By: Todd Sumner*

**HOW TO PROVE YOUR CASE IN COURT**

Even the most seasoned law enforcement officer might unintentionally forget to mention the city or county where an offense or crime occurred when presenting a case. While it may not appear to be a major error when compared to presenting other details of the case, the failure to provide city or county information prohibits a court from taking jurisdiction of the case. So, when preparing a case for a hearing or trial, every trooper should use a checklist to ensure that s/he has all the information needed to present the case. Then, prior to walking up to the podium in the courtroom, the checklist should be used to ensure that all of the information needed by the judge has been provided. A suggested checklist is provided below.

**CHECKLIST FOR COURT**

At a minimum, the following information should be provided to the Court:

- \_\_\_\_\_ Date offense occurred
- \_\_\_\_\_ Time offense occurred
- \_\_\_\_\_ Place offense occurred (be specific--to invoke jurisdiction of court)
  - \_\_\_\_\_ Street
  - \_\_\_\_\_ City
  - \_\_\_\_\_ County
  - \_\_\_\_\_ State of Florida
- \_\_\_\_\_ Name of violator/defendant
  - \_\_\_\_\_ Identifying information [DL, ID, Student ID, DAVID, etc.]
  - \_\_\_\_\_ Address of violator/defendant  
[especially if the person has a common name]
  - \_\_\_\_\_ Description of violator/defendant
- \_\_\_\_\_ Reason for the contact/stop
- \_\_\_\_\_ Any statement of the violator/defendant
- \_\_\_\_\_ Offense(s) charged
  - \_\_\_\_\_ Offense 1      \_\_\_\_\_ Offense 2      \_\_\_\_\_ Offense 3      \_\_\_\_\_ Offense 4
- \_\_\_\_\_ Correct Florida Statute reference for each offense
  - \_\_\_\_\_ Offense 1      \_\_\_\_\_ Offense 2      \_\_\_\_\_ Offense 3      \_\_\_\_\_ Offense 4
- \_\_\_\_\_ Elements of each offense charged
  - \_\_\_\_\_ Offense 1      \_\_\_\_\_ Offense 2      \_\_\_\_\_ Offense 3      \_\_\_\_\_ Offense 4
- \_\_\_\_\_ Names of any passengers/persons present at stop or arrest, if necessary, including other Troopers
- \_\_\_\_\_ If and why a search occurred
- \_\_\_\_\_ Results of any search [contraband obtained]
- \_\_\_\_\_ Any other information needed to establish probable cause for the arrest of the violator/defendant for each offense charged

*By: Sandee Coulter*

**Can reasonable suspicion, as required for a traffic stop or an investigatory stop, rest on a reasonable mistake of law?**

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The *Hilton* Court noted that a number of federal courts had determined that a mistake of law, no matter how reasonable, could not provide objectively reasonable grounds for reasonable suspicion. The Court explained that the stop may have been valid if the crack as it existed and as it was observed by the officers would have created an objectively reasonable suspicion that the defendant's vehicle was unsafe. However, the Court clarified that "[t]he misconception that a vehicle may be stopped for *any* windshield crack or imperfection constitutes a mistake of law, and such a mistake *cannot* provide objective grounds for reasonable suspicion."

Florida's district courts, relying on *Hilton*, have held that a mistake of law does not establish grounds for stopping a vehicle. *See, e.g., Langelo v. State*, 970 So. 2d 491, 492 (Fla. 2d DCA 2007) (noting that a police officer's belief that defendant's vehicle had an equipment violation because only one tag light was working was a mistake of law that did not establish probable cause to stop the vehicle); *Leslie v. State*, 108 So. 3d 722, 722-23 (Fla. 5th DCA 2013) (noting that a police officer's mistaken belief that the absence of a center rearview mirror on defendant's belief did not provide a basis to initiate traffic stop). Those cases pre-dated *Heien*.

Florida courts are bound to follow Fourth Amendment case law and precedent, of which *Heien* is now a part. In light of that decision, further review is necessary before the impact of its holding in this state becomes known.

*By: Nicholas Merlin*

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**NEWS AND NOTES**

Welcome to our new BAR Bureau Chief, Felecia Ford, and her Administrative Assistant, Candace Cushing. Candace has worked for the Department for three and a half years in the manufactured housing section. We are glad to have her on our team! Felecia has been with the Department for nearly 31 years, 28 years of which were in the Division of Driver License. Felecia started as an examiner in 1984 and has promoted through the ranks. Felecia graduated from FAMU with a Master's Degree in Public Administration and Policy. She was most recently Program Manager for Dealer Licensing. Now, BAR is thrilled to have her as Bureau Chief.

Kudos to Tom Moffett for hitting the ground running. Tom's previous experience as a prosecutor in the Orlando area and as an attorney with the Seminole County Sheriff's Office has been put to good use since his arrival in February 2015. Tom has handled nearly all new forfeitures in North Florida during the past two months.

Kudos to Michael Greenberg for handling all forfeitures in South Florida during the past few months and also for helping with appeals from administrative driver license suspensions. Michael joined the Office of General Counsel in October 2014. He was previously with the Attorney General's Office and Florida Department of Law Enforcement.

Kudos to Peter Stoumbelis for all his hard work during this legislative session and to his paralegal, Wendy Higdon, for holding down the fort in Jacksonville while Peter has been at headquarters in Tallahassee. Additionally, Peter recently became engaged. Best Wishes, Peter and Donna!

Congratulations to Nick Merlin on his recent engagement. Nick has been with the Office of General Counsel since February 2014. He came to us from the Attorney General's Office. Nick is legal advisor for Motorist Services, specializing in driver license matters, and he also advises FHP Troop A. Best Wishes, Nick and Theresa!

Congratulations to Judy Medina on her recent engagement. Judy has been a paralegal with the Office of General Counsel for fifteen years and is co-located with FHP Troop E. She recently became engaged to her fiancé J.C. Best Wishes, Judy and J.C.!

Congratulations to our former paralegal Cyndi Hunt Crum. Cyndi and husband, Kameron, recently welcomed their first baby, Leland Nathaniel, on Saturday, March 14, 2015.

Birthday Wishes are in order for Sandee Coulter (4/20) and Danielle Roth (4/21). Sandee requires no introduction. She is well known to FHP. Sandee continues to teach all new recruits at the FHP Academy and serves as legal advisor to the Office of Professional Compliance, the Office of the Inspector General, and Troop H. Danielle has been with the Office of General Counsel since June 2014. She came to us from the Department of Children and Families in Jacksonville. Danielle is legal advisor to the Bureau of Motorist Support Services. She also handles CVE foreclosures and appeals from administrative driver license suspensions. Birthday Wishes to you both!