No._____

IN THE SUPREME COURT OF THE UNITED STATES

_____

JAMES BARNES
PETITIONER

VS.

SECRETARY,
FLORIDA DEPARTMENT OF CORRECTIONS

AND

ATTORNEY GENERAL,
STATE OF FLORIDA

RESPONDENTS.

_____

_____

ON PETITION OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
ELEVENTH CIRCUIT

_____

_____

PETITION FOR WRIT OF CERTIORARI

_____

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CAPITAL CASE

QUESTION PRESENTED

Whether Florida's use of "special counsel" to investigate and present mitigation and its requirement of a presentencing investigation report to provide mitigation for the trial court, all contrary to the expressed objection of a *pro se* defendant, violate both *Faretta v. California*, 422 U.S. 806 (1975) and the Sixth Amendment to the United States Constitution.

LIST OF PARTIES

All parties appear in the caption of the case on the cover page.

TABLE OF CONTENTS

INDEX TO THE APPENDICES

APPENDIX A: Opinion of the United States Court of Appeals for the Eleventh Circuit. Reported at *Barnes v. Sec'y, Fla. Dep't of Corr.*, 888 F.3d 1148 (11th Cir. 2018)

APPENDIX B: Order of the United States District Court, Middle District of Florida, Denying Habeas Relief Case, but granting, in part, a Certificate of Appealablity as to ground one. No 6:13-cv-1698-Orl-37DAB, (M.D. Fla. 2016)

APPENDIX C: Postconviction Opinion of the Florida Supreme Court, As Revised on Denial of Rehearing. Reported at *Barnes v. State*, 124 So.3d 904 (Fla. 2013)

APPENDIX D: Opinion of the Florida Supreme Court. Reported at *Barnes v. State*, 29 So.3d 1010 (Fla. 2010)

APPENDIX E: Relevant transcripts from Volume 1 of trial record.

APPENDIX F: Relevant transcripts from Volume 5 of trial record.

APPENDIX G: Relevant transcripts from Volume 7 of trial record.

APPENDIX H: Pre-Sentence Investigation Report.

APPENDIX I: Judgement and Sentence.

TABLE OF AUTHORITIES CITED

Cases **Page**

Other Authorities

IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

The opinion of the United States Court of Appeals for the Eleventh Circuit appears at Appendix A to the petition and is reported at *Barnes v. Secretary, Department of Corrections, Attorney General, State of Florida.*, 888 F.3d 1148 (11th Cir. 2018). Rehearing and Rehearing En Banc were denied on June 20, 2018.

The order of the United States District Court denying relief, but granting a Certificate of Appealability as to ground one, was not reported. It was filed on February 8, 2016. A copy of the order appears at Appendix B to the petition.

The opinion of the Supreme Court of Florida on the merits following direct appeal of Petitioner's Motion to Vacate judgment and Sentence of Death appears at Appendix C to the petition and is reported at *Barnes v. State*, 124 So.3d 904 (Fla. 2013)

The opinion of the Supreme Court of Florida on the merits following appeal of the judgment and sentence of death appears at Appendix D and is reported at *Barnes v. State*, 29 So.3d 1010 (Fla. 2010).

JURISDICTION

The date the United States Court of Appeals for the Eleventh Circuit decided the case was April 25, 2018. (Appendix A). A Petition for Panel Rehearing and Rehearing En Banc of Petitioner-Appellant was filed on May 11, 2018. The United States Court of Appeals for the Eleventh Circuit denied the motion on June 20, 2018. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Sixth Amendment provides in relevant part: "In all criminal prosecutions, the accused shall enjoy the right...to have the Assistance of Counsel for his defence."

The Eighth Amendment provides in relevant part: "[C]ruel and unusual punishments [shall not be] inflicted."

The Fourteenth Amendment provides in relevant part: "No State shall . . . deny to any person within its jurisdiction the equal protection of the laws." "[N]or shall any State deprive any person of life, liberty, or property, without due process of law…"

STATEMENT OF THE CASE

The defendant, James Barnes, is currently incarcerated under a sentence of death at the Union Correctional Institution in Raiford, Florida. On April 18, 2006, the defendant was indicted for the murder of Patricia Miller. On April 27, 2006 at the First Appearance; Mr. Barnes waived counsel and demanded a speedy trial.

On May 2, 2006, the State announced it was seeking the death penalty. Mr. Barnes asserted his right to self-representation. Pursuant to *Faretta v. California,* 422 U.S. 806, 95 S.Ct. 2525 (1975) (1975), a hearing was conducted by the trial court. Mr. Barnes entered a guilty plea as charged and waived an advisory jury recommendation. (Appendix E at 12-62). In preparation for penalty phase proceedings, and pursuant to *Muhammad v. State*, 782 So.2d 343 (Fla. 2001) the trial judge ordered that a presentence investigation report ("PSR") be prepared.

On January 22-26, 2007, a penalty phase proceeding was held. On February 7, 2007, the trial court appointed Sam Baxter Bardwell as court counsel to develop mitigation. On February 9, 2007, Mr. Barnes objected to Mr. Bardwell preparing additional mitigation. (Vol. V R. 847).

On November 16, 2007, a hearing pursuant to *Spencer v. State*, 615 So.2d 688 (Fla. 1993) was held. On December 13, 2007, a sentencing hearing was held and Mr. Barnes was sentenced to death. The trial court found the following aggravators: (1) the murder was committed by a person under sentence of imprisonment (great weight); (2) Defendant was previously convicted of another capital felony or felony involving use or threat of violence (the murder of his wife) (great weight); (3) the murder was committed while Defendant was engaged in commission of a sexual battery and burglary (great weight); (4) the murder was committed for the

purpose of avoiding or preventing lawful arrest (great weight); (5) the murder was especially heinous, atrocious or cruel (great weight); and (6) the murder was cold, calculated and premeditated (great weight).

Regarding the mitigating circumstances, the trial court found one statutory mitigator, Barnes was under the influence of extreme mental or emotional disturbance (slight weight). Regarding nonstatutory mitigation, the court found as follows: (1) Defendant came forward and admitted his involvement in the unsolved crime (little weight); (2) Defendant took responsibility for his acts (little weight); (3) Defendant was under the influence of a mental or emotional disturbance (little weight as a duplicating mitigator); (4) Defendant had experienced prolonged drug use (little weight); (5) Defendant did not have the benefit of a loving relationship with his mother (little weight); (6) Defendant did not have the benefit of a loving relationship with his father (little weight); (7) Defendant was sexually abused as a child (slight weight); (8) Defendant has taken steps to improve himself (little weight); (9) Defendant is a functional and capable person and has demonstrated by his action and participation in this case that he has sufficient intelligence and capabilities to contribute to society (little weight).

On direct appeal, the Florida Supreme Court affirmed the judgment and sentence. *Barnes v. State*, 29 So.3d 1010 (Fla.

2010). (Appendix D). Mr. Barnes' petition for writ of certiorari was denied on October 4, 2010. *Barnes v. Florida*, 563 U.S. 901, 131 S.Ct 234 (2010). On September 21, 2011, Mr. Barnes filed his 3.851 Motion for Post-Conviction Relief.

On October 17, 2011, the post-conviction court appointed two doctors--Dr. Danziger and Dr. Bernstein--to conduct competency evaluations upon motion by counsel for the petitioner. Their evaluations found Mr. Barnes competent to proceed. The post-conviction court subsequently found Mr. Barnes competent to proceed, following a stipulation by all parties. The trial court's order denying the appellant's 3.851 Motion for Post-Conviction Relief was filed on January 23, 2012. A Notice of Appeal was filed on April 25, 2012. The Florida Supreme Court affirmed the denial of relief on June 27, 2013. *Barnes v. State*, 124 So.3d 904 (Fla. 2013). (Appendix C). The Motion for Rehearing was denied on October 17, 2013, along with an issuance of a revised Florida Supreme Court opinion.

Petitioner filed a Petition for Writ of Habeas Corpus. The Respondents filed a Response to the Petition for Writ of Habeas Corpus and Mr. Barnes filed a reply. The United States District Court, Middle District of Florida, Orlando Division, issued an Order dismissing Mr. Barnes' petition with prejudice on February 8, 2016. The district court granted a Certificate of Appealability (COA) for Ground One (whether the state court's appointment of

special counsel violated Petitioner's Sixth Amendment right to self-representation), while denying a COA for Grounds Two through Four. (Appendix B). Mr. Barnes' Petitioner's Motion to Alter or Amend Judgment and Included Memorandum of Law, pursuant to Florida Rule of Civil Procedure 59(e), was filed on March 2, 2016, which the district court denied on March 8, 2016. On April 5, 2016, Mr. Barnes filed an Application for Certificate of Appealability on Remaining Grounds and Memorandum of Law, along with a Notice of Appeal. The district court issued a denial of the Application for Certificate of Appealability on Remaining Grounds and Memorandum of Law, with an Order issued on April 6, 2016.

On April 12, 2016, Mr. Barnes filed a Motion to Expand Certificate of Appealability with the United States Court of Appeals for the Eleventh Circuit. In a *pro se* capacity, Mr. Barnes filed a Motion to Discharge Counsel on July 21, 2016. Undersigned counsel, Mr. Shakoor, filed a Response to Motion to Discharge Counsel on July 25, 2016. After the court issued a letter regarding representation on that same date, Mr. Barnes filed another *pro se* Motion to Discharge Counsel on August 1, 2016. On June 5, 2017, the United States Court of Appeals for the Eleventh Circuit filed an Order granting Mr. Barnes' *Pro se* Motion to Discharge Counsel and denying the Motion to Expand Certificate of Appealability, which undersigned counsel, Mr. Shakoor, filed on Mr. Barnes' behalf. Undersigned counsel was appointed by the court as "standby

counsel.” The Eleventh Circuit issued a briefing schedule for the case on June 20, 2017 and ordered undersigned counsel as “standby counsel,” to file a supplemental brief on Mr. Barnes’ behalf. Mr. Barnes did not file his *pro se* brief due on July 24, 2017, which prompted the court to issue a letter of notification to Mr. Barnes on August 1, 2017. Mr. Barnes did not respond, nor did he file a brief.

Undersigned counsel filed both a supplemental brief and reply to the government’s response. Undersigned counsel presented an oral argument on February 20, 2018. Following oral argument, the United States Court of Appeals for the Eleventh Circuit affirmed the district court’s denial of relief on April 25, 2018. (Appendix A). A Petition for Panel Rehearing and Rehearing En Banc was filed on May 11, 2018 and was later denied on June 20, 2018.

REASONS FOR GRANTING THE WRIT

I. THIS COURT SHOULD GRANT THE WRIT, BECAUSE THE STATE OF FLORIDA’S USE OF “SPECIAL COUNSEL” AND ITS USE OF A PRESENTENCING INVESTIGATION REPORT (PSR) FOR MITIGATION PURPOSES, WHEN AGAINST THE OBJECTION OF A *PRO SE* DEFENDANT, VIOLATES THE SIXTH AMENDMENT TO THE UNITED STATES CONSTITUTION AND PRECEDENT DERIVED FROM THIS COURT’S JURISPRUDENCE CONCERNING THE RIGHT TO SELF-REPRESENTATION

Mr. Barnes' sentence of death should be vacated. He had a Sixth Amendment right under the United States Constitution to represent himself at the trial level. The lower courts’ rulings resulted in decisions that were contrary to, or involved an unreasonable application of clearly established Federal law, as

determined by the Supreme Court of the United States.

After an inquiry pursuant to *Faretta v. California*, 422 U.S. 806, 95 S.Ct. 2525 (1975), conducted by the trial court, Mr. Barnes elected to represent himself while facing the charges of Murder in the First Degree; Burglary of a Dwelling with an Assault or Battery; and Arson of a Dwelling. (Appendix E at 28-37). The trial court found that Mr. Barnes was competent, knowingly and freely exercised the decision to represent himself, understood the advantages and disadvantages of representing himself, and made a knowing, intelligent, waiver of counsel. (Appendix E at 37). Mr. Barnes acknowledged understanding all of his rights, and entered a plea of guilty as charged to all counts. (Appendix E at 38). The trial court determined that Mr. Barnes knowingly and intelligently waived his right to an advisory jury for penalty phase. (Appendix E at 60). Against Mr. Barnes' vehement objections, the trial court ordered the Brevard County Office of the Public Defender to represent Mr. Barnes as standby counsel. (Appendix E at 67-68).

Mr. Barnes stated on the record, that he did not want to have any additional mitigation evidence presented on his behalf. (Appendix F at 809-28, 831-32). Mr. Barnes did provide mitigation on his own behalf, in the form of his confession and acceptance of responsibility. (Appendix E at 57-58) (Appendix F at 813-14). Over the vigorous objections of Mr. Barnes, the trial court appointed special counsel to present mitigation on his behalf. (Appendix F

at 829-32). While citing HIPPA laws, Mr. Barnes objected to the release of any of his medical or mental health records. (Appendix F at 878-79). Also, over Mr. Barnes' objection, the trial court permitted special counsel to direct an investigator to attach prepared mitigation materials to the pre-sentencing report ("PSR") (Appendix G at 1101-1111).

During the defense presentation of the penalty phase, Mr. Barnes had to cross-examine a witness, Dr. William E. Riebsame, called by special counsel over his objection. (Appendix G at 1259-69, 1278-81). The fact that Mr. Barnes had to continuously object on the record during the defense portion of the penalty phase and actually cross-examine a so-called expert witness put forth on his behalf, belies the assertions from the Eleventh Circuit and the State of Florida that the appointment of special counsel allegedly did not conflict with Mr. Barnes' trial strategy.

Most of the information put forward on the record for the trial court's consideration, particularly from the PSR, was very aggravating in nature. (Appendix H). The trial court considered all evidence, testimony presented, and the official court file, among other matters, before rendering its judgment and sentence. (Appendix I at 2026).

Mr. Barnes asserts that the aforementioned background information is aggravating, despite the extrapolation of certain aspects of his life and condition as mitigating by the trial court.

Mr. Barnes' Sixth Amendment right to self-representation has been violated. This claim has been raised and preserved from the trial level and through this current posture. A violation of the right to self-representation is structural and is not subject to a harmless error analysis. *Strozier v. Newsome*, 871 F.2d 995, 997 (11th Cir. 1989).

As Judge Pryor stated in *Morton v. Secretary, Florida Department of Corrections*, 684 F.3d 1157 (11th Cir. 2012), "a diagnosis of antisocial personality disorder has negative characteristics or presents a double-edged sword that renders it uniquely a matter of trial strategy that a defense lawyer may, or may not, decide to present as mitigating evidence." *Id*. at 1168. Mr. Barnes exercised his Sixth Amendment right to represent himself *pro se*. That means he served as his own defense lawyer. Mr. Barnes made a "strategic" decision to not present certain evidence in mitigation; particularly a condition Dr. Riebsame rather pejoratively classified as being a "psychopath." (Appendix G at 1189-1192). As this Court is aware, defense attorneys make strategic decisions all the time, to withhold certain evidence in penalty phase, due to the double-edged sword nature of the evidence at best, and plainly aggravating aspects, at worst.

Petitioner's Sixth Amendment rights under *Faretta*, have been infringed upon. The Court in *Faretta* detailed their analysis in part, as follows:

...

> It is true that when a defendant chooses to have a lawyer manage and present his case, law and tradition may allocate to the counsel the power to make binding decisions of trial strategy in many areas. This allocation can only be justified, however, by the defendant's consent, at the outset, to accept counsel as his representative. An unwanted counsel "represents" the defendant only through tenuous and acceptable legal fiction. Unless the accused has acquiesced in such representation, the defense presented is not the defense guaranteed him by the Constitution, for, in a very real sense, it is not *his* defense.
>
> To force a lawyer on a defendant can only lead him to believe the law contrives against him. Moreover, it is not inconceivable that in some rare instances, the defendant might in fact present his case more effectively by conducting his own defense. Personal liberties are not rooted in the law of averages. The right to defend is personal. The defendant, and not his lawyer or the State, will bear the personal consequences of a conviction. It is the defendant, therefore, who must be free personally to decide whether in his particular case counsel is to his advantage. And although he may conduct his own defense ultimately to his own detriment, his choice must be honored out of "that respect for the individual which is the lifeblood of the law."

Faretta at 833-34; 2540-41 (citations omitted) (footnotes omitted).

By appointing special counsel to aid in mitigation, the trial court violated Mr. Barnes' rights under *Faretta*. Contrary to the assertion of the Eleventh Circuit, that "Petitioner had refused to present any mitigation whatsoever," (Appendix A at 1160) Mr. Barnes did indeed provide mitigation on his own behalf, in the form of his confession and acceptance of responsibility. Confession and

acceptance of responsibility is profound mitigation. Any mitigation beyond that, and particularly the appointment of special counsel, violated Mr. Barnes' constitutional right of self-representation.

In the Eleventh Circuit opinion denying relief, the court cited to the Florida Supreme Court's *Faretta* analysis, in mentioning that the right to self-representation is not "absolute." (Appendix A at 1159, citing Appendix D at 1025-26). The Eleventh Circuit further stated in relevant part, "In particular, and as further recognized by the Florida court, the participation of standby counsel, even over the objection of a *pro se* defendant, is consistent with *Faretta* as long as counsel does not interfere with defendant's opportunity to present his own case." (Appendix A at 1159). However, special counsel did interfere with Petitioner's opportunity to present his own case, in his own way.

Mr. Barnes did not want standby counsel, special counsel, and most particularly, did not want the "mitigation" presented "on his behalf." Mr. Barnes' trial strategy plan was overridden, in violation of his Sixth Amendment right to self-representation, as the content found and presented by special counsel conflicted with Mr. Barnes' *pro se* strategy. The defendant in *McKaskle v. Wiggins,* 465 U.S. 168, 104 S. Ct. 944 (1989) was denied relief for his *Faretta*-based claim, because at trial he was allowed to make his

own appearances as he saw fit and his standby counsel's unsolicited involvement was held within reasonable limits. *Id.* at 175-88, 949-56. The defendant must be given a chance to "present his case in his own way." *Id*. at 177, 950. Mr. Barnes was not afforded such autonomy at the trial level. There was no jury in this case, but the appointment of special counsel did patently interfere with Mr. Barnes' right to present his own case, and the disagreements involving strategy did not resolve in Mr. Barnes' favor. *Id*. at 178, 950. Thus, the lower courts' decisions were contrary to and were an unreasonable application of both *Faretta* and *Wiggins*. Mr. Barnes was not allowed to control the organization and content of his own defense. *Wiggins*, 465 U.S. at 187, 955.

Mr. Barnes had the constitutional right to rely on the fact that he came forward and willingly confessed to the offenses charged, as his mitigation strategy. The trial court appointed special counsel over Mr. Barnes' continuous and vigorous objections; objections that continued throughout the penalty phase process. (Appendix E at 68), (Appendix F at 809-28, 829-32), (Appendix G at 1102, 1111). Mr. Barnes was fighting the predicament that the trial court put him in every step of the way, in an effort to protect his constitutional rights.

On page 7 (Appendix B at *8), of the district court order, which was affirmed by the Eleventh Circuit, the court states "Petitioner had an opportunity to thoroughly cross-examine the

witness presented by special counsel and to object to or refute any evidence presented by special counsel." *Id.* Therein lies a major problem with the trial court's decision to appoint special counsel. The fact that Mr. Barnes had to "cross-examine," "object to," or "refute" during his own defense presentation, presents a problematic violation of Mr. Barnes' Sixth Amendment right to self-representation.

The role of the special counsel essentially and ultimately served as the vehicle for providing extremely aggravating information which was helpful to the State. The fact that some mitigating information was derived from the information provided by special counsel is immaterial. Regardless of the fact that mitigation evidence was found and the errors occurred without a jury, Mr. Barnes' trial suffered from a structural defect. Mr. Barnes' *pro se* trial strategy was undermined. The Eleventh Circuit(Appendix A at 1161), discusses the fact that much of the evidence that Mr. Barnes found objectionable was derived from a PSR, which Florida requires in all capital cases where the defendant waives or refuses to put on mitigation. *Muhammad v. State at* 363. However, to the extent that such evidence in the PSR is put forth as "mitigation," over the *pro se* defendant's objection, it is contrary to *Faretta*. The fact that Mr. Barnes had to fight his own special counsel, who put forth a damaging witness and aggravating evidence, over Mr. Barnes' objection, is contrary to

Faretta.

Reliance by the State of Florida and the lower courts on *Woodson v. North Carolina*, 428 U.S. 280, 304, 96 S.Ct. 2978, 2991 (1976) and *Eddings v. Oklahoma*, 455 U.S. 104, 112, 102 S.Ct 869, 875 (1982), regarding the need for "individualized sentencing," is misplaced to the extent that it is used to justify the denial of Mr. Barnes' *Faretta* rights. The fact that Mr. Barnes provided the compelling mitigation of coming forward to confess to a cold case murder, giving closure for the state and the victim's family, is unique to Mr. Barnes. Any consideration beyond that, conflicted with Mr. Barnes' trial strategy and Sixth Amendment right to self-representation. The opposing side's reliance on and citing of *Indiana v. Edwards*, 554 U.S. 164, 128 S.Ct 2379 (2008) is a distraction and misplaced, as there is nothing in the record indicating that the trial court had concerns regarding Mr. Barnes having alleged severe mental illness or any mental incompetency, in regards to representing himself.

The Eleventh Circuit did cite to and attempted to distinguish *United States v. Davis*, 285 F.3d 378 (5th Cir. 2002), *cert. denied*, 537 U.S. 1066 (2002), as a similar case in which independent counsel was appointed over the defendant's objections. In *Davis*, the *pro se* defendant's strategy was to maintain his innocence through the penalty phase proceedings, but the lower court insisted on appointing independent counsel to develop other mitigation. The

court in *Davis* found:

> We find that the district court's decision to appoint an independent counsel violates Davis's Sixth Amendment right to self-representation. An individual's constitutional right to represent himself is one of great weight and considerable importance in our criminal justice system. This right certainly outweighs an individual judge's limited discretion to appoint amicus counsel when that appointment will yield a presentation to the jury that directly contradicts the approach undertaken by the defendant.
> …
> The district judge appointed the independent counsel because she wants the jury to have a complete picture of all possible traditional mitigating factors. In her view, society's interest in a full and fair capital sentencing proceeding can only be served if all possible aggravating and mitigating factors are presented to the jury. While this notion is certainly noble, it cannot be squared with Davis's self-representation right. *Faretta* teaches us that the right to self-representation is a personal right. It cannot be impinged upon merely because society, or a judge, may have a difference of opinion with the accused as to what type of evidence, if any, should be presented in a penalty trial.

285 F.3d at 381, 384. The defendant in *Davis* prevailed on his *Faretta* claim, but the lower courts in the case at bar have attempted to distinguish *Davis* by emphasizing that Mr. Barnes never had a jury and allegedly did not submit mitigation. However, the lack of a jury does not negate Mr. Barnes' Sixth Amendment right to self-representation under *Faretta*. Also, Mr. Barnes did provide mitigation in the form of his willingness to come willingly forward and confess. The assertion by the Eleventh Circuit, (Appendix A at 1160) that the "presentation by special counsel did not conflict with the Barnes's theory of mitigation," is rebutted by the trial

record that contains numerous *pro se* objections and a cross-examination by Mr. Barnes of a mitigation witness that he passionately did not want in Dr. Riebsame.

The defendant in *Davis* elected to pursue a strategy of continuing to attack the state's guilt phase case, as opposed to presenting any mitigation at all. 285 F.3d at 380. The *Davis* case, as compared to the case at bar, represents a split of opinion among the Circuit Courts of Appeal on the tension between *Faretta* and the rights of *pro se* litigants, versus the trial courts' desire for particularized mitigation over the objection of *pro se* defendants. This Court should grant the writ and resolve this split in favor of wholly preserving a *pro se* defendant's Sixth Amendment right to self-representation.

CONCLUSION

The petition for writ of certiorari should be granted.

Respectfully submitted,

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