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23-333

Case No. (Not Yet Assigned)

**In the Supreme Court of the United States**

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EVAN S. GUTMAN, JD, CPA  
Petitioner

v

CITIBANK, N.A.  
Respondent

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On Petition for a Writ of Certiorari  
to the 4th District Court of Appeals of the State of Florida

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PETITION FOR A WRIT OF CERTIORARI

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ORIGINAL

( i )

**QUESTION PRESENTED**

1. Does a State Supreme Court infringe upon the Due Process and Equal Protection Clause Rights of a Litigant in both the Civil and Criminal Context in every single case in the State, by expressly holding in written terms that any Illegal Tortious Act committed within the context of a judicial proceeding is entitled to Absolute Immunity under the doctrine of Litigation Privilege ?

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## **JURISDICTION**

The jurisdiction of this Court is invoked under 28 USC 1257(a). On July 20, 2023 the Fourth District Court of Appeal in Florida issued a "PER CURIAM. Affirmed." decision without a written opinion. (See App-1) On August 11, 2023, the Fourth District Court of Appeal issued its Final MANDATE (See App-2). Under Florida law, a per curiam affirmance without a written opinion cannot be appealed to the State Supreme Court. See Fla.Rule App. 9.030(a)(2).

Jurisdiction and review by Petition for Writ of Certiorari filed with the U.S. Supreme Court is therefore available and this Court has exercised such Jurisdiction in the past. See Hobbie v Unemployment Appeals Commission of Florida, 480 U.S. 136, Footnote 4 (1987) where this Court granted Certiorari and directly Reversed Florida's Fifth District Court of Appeal, writing as follows in Footnote 4 on the jurisdiction issue.

"The Fifth District Court of Appeal issued an order stating: "PER CURIAM. AFFIRMED." App.6. See 475 So.2d 711 (1985). Under Florida law, a per curiam affirmance issued without opinion cannot be appealed to the State Supreme Court. See Fla.Rule App.Proc. 9.030(a)(2)(A)(i-iv). Hobbie therefore sought review directly in this Court."

Accordingly, this Court has Jurisdiction pursuant to 28 USC 1257(a) to directly review the Fourth DCA Per Curiam decision.

**CONSTITUTIONAL AND STATUTORY**  
**PROVISIONS INVOLVED**

The Fourteenth Amendment to the U.S. Constitution provides:

"No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

The First Amendment to the U.S. Constitution provides in relevant part:

"Congress shall make no law . . . prohibiting . . . the right of the people . . . to petition the Government for a redress of grievances."



## STATEMENT OF THE CASE

### A. GENERAL SUMMARY and FACTS

The fundamental question in this case is whether a State Supreme Court infringes upon the Due Process and Equal Protection Clause Rights of a Litigant in every single case in the State, by expressly holding in no uncertain written terms that any Illegal Tortious Act committed within the context of a judicial proceeding is entitled to Absolute Immunity. Such a premise is precisely what the Florida Supreme held in the case of Echevarria, McCalla, Raymer, Barrett & Frappier v Cole, 950 So.2d 380 (Fla. 2007). And the case remains as binding precedential law in Florida Courts, notwithstanding its repudiation by the Federal Eleventh Circuit Court of Appeals in Sun Life Assurance Company of Canada v Imperial Premium Finance, LLC, 904 F.3d 1197 (2018). So far as Petitioner knows, no State other than Florida in this Nation has adopted a holding regarding litigation privilege as egregious to basic human values and decency as the Florida Supreme Court in Echevarria.

Echevarria is directly inimical to the U.S. Supreme Court's holding in Chambers v Baltimore & Ohio Railroad Company, 207 U.S. 142, 148-149 (1907), where this Court held the right to sue and defend in the court is the alternative of force and lies at the foundation of orderly government in an organized society. Echevarria irrationally eliminates that right to the extent of all illegal tortious conduct engaged in within the context of a judicial proceeding. Put simply, it gives attorneys absolute

immunity to engage in any illegal tortious conduct within the context of a judicial proceeding.

The facts of this case and how Echevarria impacted upon it are as follows. Citibank filed a lawsuit against Petitioner on July 8, 2020 pertaining to an alleged credit card debt for \$ 11,292.15. Petitioner filed a Counterclaim asserting Citibank was filing meritless unjust enrichment lawsuits against multitudes of citizens, precluded by law because they know a written contract exists. Thus, Citibank was filing thousands of lawsuits against impoverished citizens even though they had full and complete knowledge the suits were meritless.

Citibank filed a Motion to Dismiss the Counterclaim primarily asserting it was barred by litigation privilege in Florida, predicated upon Echevarria. On January 28, 2022 after hearing argument, Judge April Bristow issued an Order granting Citibank's Motion to Dismiss primarily on the ground of litigation privilege (App-3). Petitioner filed a Motion for Reconsideration and on March 17, 2022 Judge Bristow issued an Order Granting the Motion in Part, but also Denying it in part (App-4). Particularly, she maintained the ground litigation privilege barred the Counterclaim. Notwithstanding, during hearings, she seemed to be developing a sensitivity and appreciation for points Petitioner presented. Shortly after she made her sensitive and supportive statements, Chief Judge Kelley of the Palm Beach Court, transferred Judge Bristow out of the Civil Division and thus she was off the case. <sup>FN 1</sup>

FN 1 - In a companion case, Discover Bank, N.A. v Evan Gutman, Palm Beach Judge Cymonie Rowe rendered a key ruling in favor of Petitioner on his Counterclaim. She was then

promptly transferred out of the Civil Division, by Chief Judge Karla Marx (Chief Judge Kelley's predecessor). It was then assigned to Judge G. Joseph Curley, Jr. who excluded Petitioner from a key ZOOM hearing (even though Petitioner was present) resulting in dismissal of his Counterclaim. Petitioner filed a Motion to Disqualify Judge Curley who granted such, but the Counterclaim has not yet been reinstated.

During the litigation, as well as the companion cases of Discover Bank, N.A. v Evan Gutman; and also Calvary SPV I, LLC as Assignee of Citibank, N.A. v Evan Gutman, Petitioner was pitted against five prominent Florida law firms. The five law firms combined had about 25 - 30 attorneys working against Petitioner who took them all on single-handedly, as they committed a wide variety of illegal tortious acts. However, since the illegal tortious acts they committed were within the context of the litigation, the attorneys were determined to be "Absolutely Immune" for their illegal conduct. It would be impossible to delineate the multiplicity of violations of the law the debt collector attorneys committed, without detracting from the main issue challenged herein, which is Florida's litigation privilege itself. That said, much of their illegal conduct is published on Petitioner's two websites at **[www.gutmanvaluations.com](http://www.gutmanvaluations.com)** and **[www.heavensadmissions.com](http://www.heavensadmissions.com)**.

Judge James Sherman was then assigned to the case and Petitioner's research indicated his experience focused on supporting creditor rights. Accordingly, Petitioner moved to disqualify Judge Sherman before he ruled on a single motion. Judge Sherman granted the Motion and recused himself.

Judge Edward Garrison was then assigned to the case. Significant friction developed between Petitioner and Judge Garrison and Petitioner filed a Motion to Disqualify, which was Denied. Judge Garrison proceeded to have an illegally scheduled trial in violation of FRCP 1.440, since the case was not even "At Issue" as required under Florida law. Accordingly, Petitioner did not attend the trial and instead opted to take the matter up on appeal.

Judge Garrison entered Judgment against Petitioner, who appealed. Citibank then filed a Motion for Attorney Fees and Petitioner filed a Second Motion to Disqualify Judge Garrison, which was also denied. Ultimately, Judge Garrison entered a Judgment for Legal Fees and Costs in the amount of \$ 31,315.50, in addition to the alleged credit card debt of \$ 11,292.15.

On appeal, Petitioner's appellate brief focused on 4 grounds. One was judicial disqualification; one was the illegal setting of the trial since the case was not even "At Issue" as required by FRCP 1.440; one was the unconstitutionality of Palm Beach County Rule 4; and one was the issue of litigation privilege, the sole matter challenged herein. It is the most important of all because it affects every single case in Florida, thereby depriving litigants of fair and impartial adjudications on a massive widescale basis.

On July 20, 2023 the Fourth District Court of Appeal of Florida issued a "PER CURIAM. Affirmed" decision without rendering a comment or written opinion on any issue. (App-1). Petitioner had repeatedly pointed out in multiple pleadings (consistently citing In Re Oliver, 333 U.S. 257, 271

(1948) ) that appeals are often a "**Cloak**" rather than a "**Check**" upon illegal trial court behavior.

Petitioner declined to Request a Rehearing opting instead to Petition this Court since it involves a matter of public importance affecting every case in Florida and now likely the entire Nation. On August 11, 2023 the 4th DCA issued the Final MANDATE for the "PER CURIAM" decision (App-2).

## **B. ARGUMENT**

**A STATE SUPREME COURT INFRINGES UPON THE DUE PROCESS AND EQUAL PROTECTION CLAUSE RIGHTS OF A LITIGANT IN BOTH THE CIVIL AND CRIMINAL CONTEXT IN EVERY SINGLE CASE IN THE STATE BY EXPRESSLY HOLDING IN WRITTEN TERMS THAT ANY ILLEGAL TORTIOUS ACT COMMITTED WITHIN THE CONTEXT OF A JUDICIAL PROCEEDING IS ENTITLED TO ABSOLUTE IMMUNITY UNDER THE DOCTRINE OF LITIGATION PRIVILEGE.**

In Echevarria, McCalla, Raymer, Barrett & Frappier v Cole, 950 So.2d 380 (Fla. 2007) the Florida Supreme Court held in no uncertain express written terms the commission of any illegal tortious act occurring within the context of a judicial proceeding is entitled to "Absolute Immunity." Specifically, the Court wrote as follows:

"The litigation privilege applies across the board to actions in Florida, both to common-law causes of action, those initiated pursuant to a statute, or of some other origin. "Absolute immunity must be afforded to any act occurring during the course of a judicial proceeding . . . so long as the act has some relation to the proceeding."

Ecchevarria, McCalla, Raymer, Barrett & Frappier v Cole, 950 So.2d 380, 384-385 (Fla. 2007)

Ecchevarria violates one of this Court's most important legal principles, which is that peaceful litigation is the alternative to "Force." By doing so, Ecchevarria deprives litigants of due process, equal protection and fair and impartial adjudications in violation of the 14th Amendment. Specifically, this Court wrote in the time-honored case of Chambers v Baltimore & Ohio Railroad Company, 207 U.S. 142 (1907) as follows (emphasis added) :

"The right to sue and defend in the courts is the **alternative of force**. In an organized society **it is the right conservative of all other rights**, and lies at the foundation of orderly government."

Chambers v Baltimore & Ohio Railroad Company, 207 U.S. 142, 148-149 (1907)

Ecchevarria, substantively eliminates the right of a citizen to seek redress by peaceful litigation for commission of any illegal tortious act occurring within the context of litigation. Once that right to peacefully obtain redress by litigation is eliminated by the Judiciary; then pursuant to Chambers, the uncivilized alternative is what remains. Thus, by Echevarria, the Florida Supreme Court places at risk the physical safety of citizens in Florida. It simply can not be allowed to remain as binding law and should be overturned to sustain a civilized society.

So far as Petitioner knows, there is no other State in this nation with a scope of "litigation privilege" as far -reaching as Echevarria. Typically, litigation privilege is limited to defamation and nothing more. While some States may have gone beyond defamation, the concept in Florida that litigation privilege and absolute immunity apply to every single illegal tortious act committed during the course of a judicial proceeding is irrational.

In Sun Life Assurance Company of Canada v Imperial Premium Finance, LLC, 904 F.3d 1197 (2018), the Federal Eleventh Circuit Court of Appeals wrote extensively about Florida's litigation privilege. Specifically, the Federal Court asserted the Florida Supreme Court had retreated from its view of litigation privilege in Echevarria. However, Echevarria, continues to remain as binding law in Florida State Courts. Notwithstanding Sun Life, the Florida Supreme Court has refused to Overrule Echevarria. It is consistently followed by State trial court and appellate judges. Since the Federal Eleventh Circuit's opinion is predicated upon Federal law, it is only persuasive and not binding authority

in State Courts. The Florida State Courts continue to rely upon and consistently apply the morally atrocious holding of Ecchevaria.

In the instant case, Petitioner's Counterclaim asserted illegal acts by debt collector attorneys including the filing of massive numbers of meritless lawsuits against impoverished individuals. It was dismissed on the basis of litigation privilege in reliance on Echevarria. Essentially, the Court's concept was even if all their lawsuits were meritless, it doesn't really matter since that type of illegal conduct is entitled to absolute immunity. Thus, the debt collector attorneys are utilizing litigation privilege as promulgated in Echevarria, as a "SWORD," rather than as "SHIELD." In the seminal case of Myers v Hodges, 44 So. 357 (1907), litigation privilege was intended to function only as a "Shield," with respect to defamation actions.

With the foregoing in mind, it is appropriate to examine exactly what Absolute Judicial Immunity or its extension to Non-Judicial individuals pursuant to "Litigation Privilege" really is. Under Florida law and Federal law, Judges are entitled to Absolute Immunity for commission of intentional malicious acts. In the case of Laura M. Watson v Florida Judicial Qualifications Commission, No. 17-13940 (11th Cir. Federal Court of Appeals, August 15, 2018) the Eleventh Circuit described Absolute Immunity as follows (emphasis added):

"Absolute immunity can cover even wrongful or **malicious** acts. . . ."



Black's Law Dictionary defines the term "Malicious" as follows (emphasis added):

**"Malicious.** Characterized by, or involving, malice, having, or done with **wicked, evil** or mischievous intentions or motives. . . ."

Thus, absolute immunity by definition provides immunity for one to commit "Wicked" and "Evil" acts. While such is well-established for Judges, it becomes problematic when that absolute immunity is "Shared" with people who are not Judges. In the instant case, that includes particularly debt collector attorneys committing illegal acts within the context of litigation.

Providing anyone with an exemption from the law is a "Dicey" public relations endeavor. The concept may work well when buried in an Appellate opinion, because few people read appellate opinions. But, the concept falls apart when publicized and the citizenry starts understanding what Judges are really doing. If and when Nonattorneys realize that Judges allow themselves to commit "Wicked" and "Evil," acts, and then also "Share" that ability with others who aren't even Judges, they probably won't be too pleased. It unavoidably diminishes faith and confidence in the Judiciary.

The dilemma becomes more complex when those same Judges extend immunity to commit illegal acts, in the form of a "Litigation Privilege" to all debt collector attorneys. By "Sharing" their Absolute Immunity with selected individuals, the Judiciary jeopardizes the legitimacy upon which they themselves are entitled to such immunity.

It is said Judicial Power is at a ZENITH when judging others, but at a NADIR when Judging itself. Whether titled as "Absolute Immunity" or its variant of "Litigation Privilege" as provided to debt collector attorneys, the immunity was intended to function as a "SHIELD." It was never intended to function as the "SWORD" by which debt collector attorneys have turned it into a blank check to file frivolous lawsuits on a massive scale against impoverished individuals.

In the instant case, Petitioner's counterclaim alleged Plaintiff engaged in illegal conduct on a massive scale by filing lawsuits they know are meritless. Accordingly, Citibank and its attorneys were not acting in good faith, they are hindering justice, insulting the dignity of the court, unnecessarily burdening limited judicial resources, and seek to nullify legitimate statutory rights.

This Court is now vested with authority to legitimately hold the Florida Supreme Court Justices relinquished their own absolute judicial immunity by "Sharing" it with all attorneys, including debt collector attorneys. The conception of Absolute Immunity in Echevarria, places the Florida Judiciary in a position where it is promoting and condoning illegal conduct on a broad-sweeping basis by its own express, written words.

It is also a legitimate argument that Florida Supreme Court Justices are no longer entitled to absolute judicial immunity themselves for the following reason. By "Sharing" their Absolute Immunity with Non-Judicial individuals, the Justices substantively abandoned their position as Judges. Having abandoned their position, they lost their own absolute judicial immunity.

Another reason Echevarria is so morally and legally reprehensible is because its' holding is an express abandonment of the State Supreme Court's sworn duty to uphold the law. More specifically, the Court expressly stated they will support absolute immunity for Non-Judicial individuals to commit any illegal tortious act within the context of a judicial proceeding. So far as Petitioner knows, there is no precedent in any other State asserting Courts should overtly decline to apply the law to illegal conduct within the context of litigation. Litigation privilege has historically been applied to defamation actions, and that's it. Not all illegal tortious acts.

The impact is that in Florida the appellate process is largely a mere Sham, similar to the "Shell Game" the Connivers on 42nd Street in New York played in the 1970s. It is a "Cloak" and not a "Check" upon illegal trial court behavior just as this Court stated in In Re Oliver, 333 U.S. 257, 271 (1948) writing (emphasis added):

**"Without publicity, all other checks are insufficient, in comparison of publicity, all other checks are of small account. Recordation, appeal, whatever other institutions might present themselves in the character of checks, would be found to operate as cloaks rather than checks. . . as checks only in appearances."**

In Re Oliver, 333 U.S. 257, 271 (1948)

### REASONS FOR GRANTING THE WRIT

Pursuant to Rule 10(c ) of this court, a state court of last resort has decided an important question of federal law that has not been, but should be settled by this court. The Florida Supreme Court decided attorneys are entitled to absolute immunity for any illegal tortious act committed within the context of a judicial proceeding. The effect is judicial absolute immunity is being "Shared" with Non-Judicial individuals selected by the State Supreme Court Justices pursuant to an artificially created judicial doctrine known as "Litigation Privilege."

Effectively, this creates two classes of Non-Judicial citizens as follows. The first class consists of citizens who are not Judges and who are bound by the law. The second class consists of citizens who are also not Judges, but who are exempt from obeying the law. The impact is the Florida Supreme Court has expressly abandoned in no uncertain terms, its duty and obligation to uphold the law.

The average Nonattorney does not know about legal doctrines pertaining to Jurisdiction; Statutory Construction; Civil Procedure; Criminal Procedure; the Rooker-Feldman doctrine; Younger Abstention; principles of Federalism; Judicial Disqualification; Indirect Civil Contempt versus Direct Contempt; Strict construction versus Liberal construction; the Anti-Injunction Act; Unauthorized Practice of Law, State Bar Moral Character Standards; or other legal doctrines. **But, there is one thing they do all know.** People know when they are getting "SCREWED" to state the matter bluntly. It's an innate type of legal knowledge everyone is born with

and requires no legal training. Every ghetto kid, impoverished family, homeless person, abused spouse, abused child, disabled person, streetwalker, drug addict, crime victim, police officer or defendant in a jail cell for a crime they didn't commit has that legal knowledge. It's a unique type of legal knowledge everyone has. And when people realize they must obey the written law, while debt collector attorneys are granted "Absolute Immunity" pursuant to "Litigation Privilege" every one of them will know they are getting "Screwed" by the Judiciary, which falsely purported disengenuously to protect them.

Petitioner asserts Echevarria contravenes this Court's opinion in Chambers, by eliminating the option to seek redress thru peaceful litigation. Instead, Echevarria favors the alternative option presented in Chambers, and thus diminishes the probability of sustenance of a civilized society. It also encroaches upon the ability of Prosecutors and Police Officers to fulfill their legal duties of upholding the law. One must think it would be rather frustrating to be a Prosecutor or Police Officer seeking to enforce the law, only to be told by a Judge that while Police Officers have only "Qualified Immunity," ; Debt Collector Attorneys have "Absolute Immunity" with respect to All Illegal Tortious Acts they commit within a litigation. Petitioner believes such irrationality would tend to set law enforcement officials against the Judiciary.

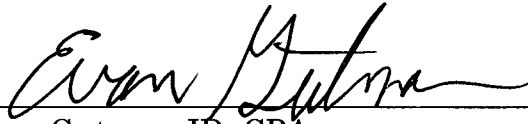
Petitioner notes he has been a CPA for about 38 years dating back to his initial licensure in Arizona; and a licensed Attorney for about 28 years dating back to his licensure in Pennsylvania in 1995. Petitioner has never been convicted of any crime in

his life, has never been subjected to any ethical discipline by any licensing agency, and has never even had a single ethical complaint ever filed against him to a licensing agency in either his capacity as a CPA or Attorney. This Petition will be made available on Petitioner's websites at **www.gutmanvaluations.com** and at **www.heavensadmissions.com** as soon possible.

This case presents an exceptional opportunity for this Court to Unite the Conservative Right with the Liberal Left of the Nation. It also presents a fantastic opportunity for this Court to reestablish its' own Supremacy over all State Supreme Courts, rather than being viewed as a mere Philosophical Advisory Board as many State Supreme Courts have historically given "Short Shrift" to its opinions.

For the foregoing reason, Petitioner requests the Writ of Certiorari be granted.

Submitted this 8th day of September, 2023.




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