STATE ATTORNEY'S OFFICE

EIGHTH JUDICIAL CIRCUIT
WILLIAM P. CERVONE, STATE ATTORNEY

Legal Bulletin 2006-02 **April 2006**
Editor: Rose Mary Treadway

A MESSAGE FROM BILL CERVONE STATE ATTORNEY

This issue of the Legal Bulletin coincides with the current legislative session. Although it is fairly pointless to speculate about what the Legislature might pass during the session until we are much closer to an adjournment date, there are some things already on the table that bear mentioning.

First of all, in case you hear of more new judgeships being created, be aware that that will not impact our Circuit. We did receive a new circuit judgeship last year but this year is really the second part of a two year process during which the needs of other areas of the state will be addressed. As a result, there is no likelihood of matching funding to create new positions for prosecutors in our circuit. This means that workloads and all that go with them will continue to increase. Given the explosive growth in all of our counties, that will continue to stretch resources. Next, I have seen little major legislation proposed this year that would address criminal justice issues. There is no new Jessica Lundsford Act on the horizon, at least for now. There are, of course, many refinements and amendments to existing laws being debated. As we have done for many years, the substance of those will be circulated in our July and October issues after they have been finalized and signed by the Governor. In the meantime, however, if you hear of something that you'd like information about, please let me know and we'll track it down for you.

Because of their own elective agendas, many legislators will be as interested in a short session as anything else. Those who are planning to seek other or higher offices will undoubtedly also be seeking the support of the law enforcement community during the summer and fall. I would urge each of you to be an informed voter and pay attention to who in

Tallahassee supports what we are trying to do, not just this year but historically.

SAO PERSONNEL CHANGES

ASA **KRISANNE RUSSEL** resigned her position in the Alachua County Juvenile Division in February to take a position as Corporate Counsel for Lifesouth Community Blood Centers. Her Juvenile Division position has been filled by **ALAN HAWKINS**, a December 2005 graduate of the University of Florida Law School.

GREG EDWARDS has also joined the SAO to fill a vacant position in the Baker County office. Greg, who is also a December 2005 graduate of the University of Florida Law School, will handle County Court cases in Baker County.

VIK SAINI will fill a vacant position in the Alachua County Traffic Division beginning mid-April. Vik interned with the SAO in 2005 and also graduated from the University of Florida Law School in December.

ASA **JAY WELCH** has assumed outgoing ASA **KEVIN ROBERTSON'S** Felony Traffic position and ASA **RICH CHANG** has assumed Jay's Felony Narcotics caseload.

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CONGRATULATIONS!

The Gainesville Police Department has announced the following officers have been promoted: Sergeants **MIKE SCHIBOULA**, and **DAN STOUT**; Corporals **MARC PLOURDE** and **SAMMY COOPER**.

The Alachua County Sheriff's Office held its annual award ceremony in February and announced the following promotions: Sergeant **ROBERT BEHL**, Lieutenant **ARABELLA BLIZZARD**, Sergeant **ALEXANDRA BRANAMAN**, Lieutenant **WHITNEY BURNETT**, Sergeant **DAVID BUTSCHER**, Captain **MICHAEL FELLOWS**, Sergeant **LAURENCE FREEDMAN**, Sergeant **SHERRY FRENCH**, Colonel **EMORY GAINEY**, Lieutenant **MICHAEL HANSON**, Sergeant **KELVIN JENKINS**, Lieutenant **ALICE LEE**, Captain **DONNIE LOVE**, Lieutenant **MICHAEL JONES**, Major **WAYNE MACK**, Lieutenant **KEVIN OBERLIN**, Sergeant **JOHN RICHMAN**, Sergeant **RICHARD ROONEY**, Sergeant **FRED THOMAS**, and Captain **JAMES TROIANO**.

At this same awards ceremony, Chief ASA **JEANNE SINGER** and her husband, Steve, were recognized for their contributions to Project Harmony, a summer program sponsored by the Alachua County Sheriff's Office and the Florida Sheriffs Youth Ranches for Alachua County youth.

In February, Levy County ASA **BRIAN KRAMER** received a Certificate of Commendation from the Williston Police Department for his assistance to that agency at the Seventh Annual Williston Police and Fire Awards Banquet.

Also in February, ASA **RICH CHANG** was honored as the first African-American prosecutor to work in Levy County by the Ebony Appreciation Awards Committee, Inc. The committee recognizes African-Americans every year during Black History month. Also recognized was former ASA and now Alachua County Judge **WALTER GREEN**, for being the first African-American male

elected to the County Court bench in Alachua County.

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DUI DATA COLLECTION REQUEST

The University of Florida has requested the assistance of the law enforcement community in identifying UF students who are charged with DUI offenses. UF has always monitored and acted upon DUI arrests made on campus by the University of Florida Police Department, and as a part of UF President Machen's increased attention to alcohol abuse, now intends to do so with off campus DUI arrests as well.

Alachua County law enforcement agencies are therefore requested to make an effort to identify UF students charged with DUI at the time of arrest. This can be done by making sure that your mittimus reflects a defendant's status as a UF student. The logical place to note this is in the mittimus space designated for employment even if the defendant, in addition to being a student at UF, holds a part-time job or says he or she is unemployed. The SAO has agreed to provide notification to UF when a student is identified and charged with DUI.

Your assistance in making this kind of inquiry and notation will allow the SAO to more quickly, accurately and easily identify UF students and refer them to the University's Student Judicial Affairs process when they are charged with DUI. Whatever action is ultimately taken by the University will, of course, be separate from and will not affect whatever might happen to the DUI case itself in the court process.

While this is particularly applicable to the Gainesville Police Department, the Alachua County Sheriff's Office and the Florida Highway Patrol, the co-operation of any agency charging a UF student with DUI would be greatly appreciated, even if that is outside of Alachua County or the City of Gainesville.

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JUSTICE FOR ALL: CRIME VICTIMS' RIGHTS ACT RULING

A message from Gwen Ford Roache, Chief of the Bureau of Victim Compensation, Office of the Attorney General.

On January 20, 2006, the United States Court of Appeals for the Ninth Circuit issued an opinion upholding the right of crime victims to speak at the convicted criminal's sentencing hearing. The case involved a father and son who swindled dozens of victims. The two pled guilty to wire fraud and money laundering. Over 60 victims submitted victim impact statements.

At the father's sentencing, several victims spoke about the effects of the crimes—-- retirement savings lost, businesses bankrupted and lives ruined. Unfortunately, at the son's sentencing the judge in the United States District Court for the Central District of California refused to allow the victims to speak. He said, "I listened to the

victims the last time… quite frankly, I don't think there's anything that any victim could say that would have any impact whatsoever." This attitude was shocking. President Bush spoke out against this attitude toward crime victims when he addressed an audience at the Department of Justice in 2002. The President said, "Too often, the financial losses of victims are ignored. And too often, victims are not allowed to address the court at sentencing and explain their suffering…" The President went on to say, "When our criminal justice system treats victims as irrelevant bystanders, they are victimized for a second time."

Fortunately, the Court of Appeals held that the District Judge had made a mistake. In its decision, the Court of Appeals made three important points:

1. In passing the CVRA, it was the intent of Congress to allow crime victims to speak at sentencing hearings, not just submit victim impact statements.

2. Victims have a right to speak even if there is more than one criminal sentencing. This ruling is important in cases with multiple defendants. As the Court of Appeals noted, "The effects of crime aren't fixed forever once the crime is committed- physical injuries sometimes worsen; victim's feelings change; secondary and tertiary effects such as broken families and lost jobs may not manifest themselves until much time has passed. The district court must consider the effects of the crime on the victims at the time it makes its decision with respect to punishment, not as they were at some point in the past."

3. The remedy for a crime victim denied the right to speak at a sentencing hearing is to have the sentence vacated and a new sentencing hearing held in which the victims are allowed to speak.

Again, we can celebrate this decision as an important step in securing the rights of crime victims. This opinion can be found at: caselaw.lp.findlaw.com/data2/circs/9th/0573467.pdf

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CASE LAW UPDATE

US SUPREME COURT'S DUALING CONSENT TO SEARCH DECISION

In March, the U.S. Supreme Court issued an important decision on consent searches, holding that a physically present co-occupant's stated refusal to permit entry renders a warrantless entry and search unreasonable and invalid as to him.

In **Georgia v Randolph** the Defendant's estranged wife gave police permission to search the marital residence for items of drug use after the Defendant, who was also present, had unequivocally refused to give consent. The Defendant was indicted for possession of cocaine and the Georgia trial court denied his motion to suppress the evidence as products of a warrantless search unauthorized by consent. The Georgia Supreme Court reversed the conviction, holding that consent given by one occupant is not valid in the face of the refusal of another physically present occupant, and distinguished **United States v. Matlock**, which recognized the permissibility of an entry made with the consent of one co-occupant in the other's absence.

The United States Supreme Court agreed. The Court held that the Fourth Amendment recognizes a valid warrantless entry and search of a premises when the police obtain the voluntary consent of an occupant who shares, or is reasonably believed to share, common authority over the property. However, it is not prepared to side with one tenant over another when both are present with contrary directions as to search. "…When people living together disagree over the use of their common quarters, a resolution must come through voluntary accommodation, not by appeals to authority. Absent some recognized hierarchy, e.g., parent and child, there is no societal or legal understanding of superior and inferior as between co-tenants."

"Thus, a disputed invitation, without more, gives an officer no better claim to reasonableness in entering than the officer would have absent any consent. Disputed permission is no match for the Fourth Amendment central value of 'respect for the privacy of the home.'"

The Court went on to say that a co-tenant who has an interest in bringing criminal activity to light or in deflecting suspicion from himself, can, for example, tell the police what he knows, for use before a magistrate in getting a warrant. And the Court carved out somewhat of an exception for domestic violence by saying "…This case, which recognizes limits on evidentiary searches, has no bearing on the capacity of the police, at the invitation of one tenant, to enter a dwelling over another tenant's objection in order to protect a resident from domestic violence,…(having) a good reason to believe that violence or threat of violence has just occurred or is about to or soon will occur".

Also, the Court opined that care must be taken by law enforcement not to remove the potentially objecting tenant from the entrance specifically to avoid a possible objection. But the majority held that prior opinions upholding the co-tenant's consent where the other tenant was sleeping or where one tenant had been arrested in front of the house and *then* the police approached the house and received permission from the co-tenant

to search are still valid.

The Dissent, of course, wrote that this majority opinion now alters a great deal of established Fourth Amendment law. Chief Justice Roberts wrote that "The majority considers a police officer's *subjective* motive in asking for consent, which we have otherwise refrained from doing in assessing Fourth Amendment questions and for good reason: The police do not need a particular reason to ask for consent to search, whether for signs of domestic violence or evidence of drug possession. And the majority creates a new exception to the warrant requirement to justify warrantless entry short of exigency in potential domestic abuse situations." "The majority's differentiation between entry focused on discovering whether domestic violence has occurred… and entry focused on searching for evidence of other crime, is equally puzzling…the end result is a complete lack of practical guidance for the police in the field, let alone for the lower courts."

As Justice Roberts ominously observed,"…What does the majority imagine will happen, in a case in which the consenting co-occupant is concerned about the other's criminal activity, once the door clicks shut?"

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STRIP SEARCHES AND "CRACK" IN A PUBLIC PARKING LOT

The Requirements of Section 901.211 subsection (1) and (3) only

(1)As used in this section, the term 'strip search" means having an arrested person remove or arrange some or all of his or her clothing so as to permit a visual or manual inspection of the genitals; buttocks; anus; breasts, in the case of a female; or undergarments of such person.

(3) Each strip search shall be performed by a person of the same gender as the arrested person and on premises where the search cannot be observed by persons not physically conducting or observing the search pursuant to this section. Any observer shall be of the same gender as the arrested person.

Jenkins was detained after being identified by a confidential informant as the person with whom he had arranged a drug transaction. The CI predicted that a vehicle matching the description of Jenkins' vehicle would shortly arrive at a particular Texaco station to deliver narcotics. Law enforcement had monitored a conversation between the CI and Jenkins arranging the buy and thereafter "assisted" Jenkins out of his car at gunpoint and cuffed him. After Jenkins was removed from the car, Officer Bonollo searched the car but did not find anything. He then searched Jenkins but was unable to find anything on him.

Supervising Sergeant Graham then advised Officer Bonollo "…to see if (the cocaine) was

inside (Jenkins') clothing anywhere." Bonollo testified: "I opened up the defendant's boxer shorts and inside his butt crack sticking up was a sandwich bag, like a regular Ziploc type of sandwich bag and it was twisted. The dope, the crack cocaine was at the bottom. It was twisted up, and I could see the top of the plastic about two inches."

Bonello then pulled out the plastic bag containing the cocaine.

Jenkins testified that Bonollo ordered him to pull down his pants and bend over. When he did not comply, officers forced him to comply by grabbing him from each side, pulling him over, and bending him down. Jenkins further testified he was "completely naked in the buttocks area" when the officers "dropped his pants to his knees… and pulled his boxers down."

The trial court ruled that there was probable cause to do a search based on what the court heard from the officers and that there was no strip search, not what is typically called a strip search.

The Second DCA in **Jenkins v State** held that the manner of the search of defendant's person, which involved rearrangement of defendant's clothing to permit an officer to visually inspect the defendant's buttocks, did not violate the Fourth Amendment although it *was* a strip search as defined in Ch 901.211. The court accepted the trial court's findings as to the particulars of the strip search as testified to by the officers.

"The scope of the particular intrusion was limited, and the manner in which it was conducted was restrained. The search was less invasive than a strip search in which some or all of the subject's clothing is removed. The invasion of Jenkins' privacy was significant, but the seriousness of the invasion was not equivalent or similar to the invasion of privacy involved in a typical strip search. No private part of Jenkins' body was exposed to public view."

In addition, the court stated that the officers had a reasonable basis for initiating the search and conducting it in the manner in which it was performed before transporting Jenkins to jail. The officers had probable cause to believe that Jenkins had come to the scene with cocaine to sell. Only after their initial efforts to find the cocaine on Jenkins' person and in his vehicle were unavailing did the officers conduct the further more invasive search of Jenkins' person… they were justified in conducting the further search of Jenkins' person to prevent the disposal of the cocaine by Jenkins.

The court found that there was a proper balance between the need for the particular search against the invasion of personal rights that the search entailed.

Finally, the court held that although there was no violation of the Fourth Amendment, there *was* a

violation of Ch 901.211 in that the strip search was performed in the parking lot beside a service station adjacent to the intersection of two public thoroughfares. "There was no indication in the record that any measures were taken to shield the search of Jenkins from public view… We conclude that the strip search did not meet the requirement of subsection (3) that strip searches be performed only where the search cannot be observed by the public. The fact that Jenkins' unclothed buttocks were not exposed to public view is not sufficient to establish compliance with subsection (3). The statute requires that a strip search be performed out of public view, not merely that the areas of the body enumerated in subsection (1) be shielded from public view."

However, the court found that even though there was a violation of Ch 901.211, suppression of the evidence was not a proper remedy. "We therefore conclude that application of the exclusionary rule for violations of section 901.211 cannot be justified. Given the legislature's specific attention to the issue of remedies, it would be over-reaching to read a remedy into the statutory scheme when that remedy was not recognized or authorized by the legislature."

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MEDICAL RECORDS-NO GOOD FAITH

A trial court correctly excluded medical records indicating a driver's blood alcohol level because a police officer did not act in good faith to obtain the records for trial.

Matthew Kutik was involved in a fatal traffic accident. During Kutik's treatment, hospital personnel tested his blood and determined his blood alcohol level. A police officer obtained Kutik's blood alcohol level from his medical records, but did not get his permission to review the medical records and did not request that blood be drawn and tested pursuant to section 316.1933(1). Kutik's counsel moved to have the records excluded, and the trial court granted the motion. The Fifth DCA affirmed the suppression in **State v Kutik**, concluding that the officer failed to act in good faith to obtain the test results.

"Although (the officer) may not have known the statutory requirements…, that ignorance does not establish good faith," the DCA said. "Here, the exclusionary rule applies because the State failed to establish that (the officer) made a good faith effort to comply with the statute."

SEARCH AND SEIZURE: WITHDRAWAL OF CONSENT

An individual who consents to a search may withdraw that consent through nonverbal actions, but only if the actions are clear and unmistakable such that his

intent can be clearly understood, the Second DCA in **State v Haselier** said in a January opinion.

Robert Haselier was legally stopped by an officer who asked to search his vehicle and person. Haselier consented to the search and complied when the officer asked him to empty his pockets, but then tried to return a breathmint container to his pocket. The officer saw the container and asked Haselier to hand it over. Haselier hesitated and sighed, but then gave the container to the officer, who found methamphetamine inside it. Haselier contended on appeal that his action in putting the container back in his pocket amounted to withdrawal of his consent to be searched, but the DCA concluded that Haselier did not exhibit enough action for someone to conclude he was revoking his consent.

"Mr. Haselier voluntarily removed the container from his pocket, returned it to the pocket, and gave it to the officer upon request. His sigh was just a sigh. His compliance with the officer's request for the (mint) container was not done with the clarity of withdrawal…," the DCA said. "Mr. Haselier consented to the search. He did not physically interfere with the officer's search; he did not attempt to leave; he said nothing to indicate a withdrawal of consent. He willingly complied with the officer's request."

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WARRANTLESS SEARCH AND EXIGENT CIRCUMSTANCES

A warrantless search that turned up drugs and a weapon in a tenant's apartment was valid because the apartment building owner gave officers permission to enter the building common areas and exigent circumstances were present for the apartment search, the Third DCA held in **State v Cartwright**.

Dominique Cartwright was arrested on drug and weapons charges but argued on appeal that his motion to suppress the evidence should have been granted because police officers did not have a warrant to search his apartment. The officers were given permission to enter the building by its owner, Sergio Garcia, because they had information that prostitution was occurring in the building. Cartwright rented an apartment in the building and opened his door to ask officers what was happening.

While talking to Cartwright, an officer saw drugs sitting on a refrigerator, four feet away from the door and told Cartwright to step outside because he was concerned for his safety and feared that the cocaine would be destroyed if someone else was in the apartment. Cartwright was arrested and the officer went inside the apartment to seize the drugs, where he found other items including drug paraphernalia and firearms in plain view.

Cartwright conceded that the owner of the building gave the officers the right to be in

the building, but said the search of his apartment was illegal. The DCA concluded that because the officers had the legal right to be in the building and then voluntarily encountered Cartwright, the search of his apartment was legal after the drugs were seen in open view.

"The cocaine was in 'open view', but not 'plain view' because the officer was outside of a constitutionally protected area, the hallway, and was looking inside of a constitutionally protected area, the defendant's apartment, when he observed the contraband." "In the 'plain view' situation, the officer has a constitutional right to be in the place where the seizure is made. In an 'open view' situation, the officer sees the contraband from a place he or she has a right to be, outside of a constitutionally protected area, but may not have constitutional access to the place the contraband is located when seized. In such cases, there must be a Fourth Amendment exception, such as exigent circumstances, to justify the warrantless entry and seizure."

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UNLAWFUL TRAFFIC STOP AND THE OUTSTANDING WARRANT

An outstanding warrant may overshadow a traffic stop made without proper reason sufficiently to allow the admission of evidence, the Florida Supreme Court held in **State v Frierson** decided in February.

Anthony Frierson was convicted of possession of a firearm by a felon. Frierson was stopped for failing to use his turn signal and having a cracked tail light, and the officer then learned from a dispatcher that there was an outstanding warrant for Frierson. The officer arrested Frierson based on the information he had at the time, even though it was later determined that the warrant was for a different person. Based on the information about the outstanding warrant, the officer searched Frierson's car and found the gun that provided the basis for the firearm possession charged. Frierson challenged the traffic stop, claiming that the officer did not have authority to stop him for the reasons that led to the stop. The Fourth DCA agreed that the initial stop was improper and therefore the subsequent search was invalid. The Supreme Court found that the stop was *not* made in bad faith and in a 5-2 ruling, *reversed* the DCA decision and reinstated Frierson's conviction.

"The outstanding arrest warrant was an intervening circumstance that weighs in favor of the firearm found in a search incident to the outstanding arrest warrant being sufficiently distinguishable from the illegal stop to be purged of the 'primary taint' of the illegal stop. Crucially, the search was incident to the outstanding warrant and not incident to the illegal stop. The outstanding arrest warrant was a judicial order directing the arrest of respondent

whenever the respondent was located," Justice Wells wrote for the court. "The illegality of the stop does not affect the continuing required enforcement of the court's order that respondent be arrested."

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SEARCH AND SEIZURE:AUTOMOBILE and INEVITABLE DISCOVERY

A Broward County deputy stopped driver Ellis and passenger Ziegler when he couldn't read the vehicle's license tag in violation of section 320.13(4). However, upon approaching the vehicle, the deputy could see that the temporary tag was properly displayed. The deputy continued to approach and asked Ellis for identification. Passenger Ziegler then rolled down his window, and almost immediately, the deputy could smell burnt marijuana emanating from the vehicle.

The deputy detained driver Ellis and passenger Zeigler and called for back-up. The deputy obtained consent to search of the vehicle and discovered 50 grams of cocaine, several small bags of marijuana, drug paraphernalia and $676.

Ellis and Zeigler pled *no contest* to trafficking in cocaine and possession of marijuana and preserved their right to appeal the denial of their dispositive motion to suppress. The First DCA in **Zeigler and Ellis v State** affirmed their convictions.

Ellis and Zeigler argued that the contraband should have been suppressed because the deputy was not allowed to ask for their identification once it was established that the license tag was properly displayed. (In the 2003 opinion **State v Diaz**, the Florida Supreme Court had held that continued detention of a driver is improper once the officer fully satisfies the purpose for the initiated stop. However, as the court explained,"…the sheriff's deputies could lawfully make personal contact with Mr. Diaz only to explain to him the reason for the initial stop.")

Thus, the deputy here had the legal authority to make personal contact with Ellis and Zeigler and to be in position to smell the marijuana. An officer may use his sense of smell from a place where he may lawfully be to develop probable cause for a detention.

"Although (the deputy) impermissibly asked for Appellants' identification, …once he smelled the marijuana, he was entitled to detain Appellants."

Under the *inevitable discovery rule*, when evidence is obtained through the result of unconstitutional police procedures, the evidence will still be admissible if it would have been discovered through legal means. Here, if the deputy had immediately explained the reason for the stop when he made personal contact with Appellants, rather than first asking Appellants for their identification, he would have

still smelled marijuana and thus developed probable cause to detain Appellants.

The court further rejected the defense argument that the deputy was constitutionally required to make personal contact with Appellants through a closed vehicle window.

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TRAFFIC: LIMITATIONS ON BACKING

The driver of a vehicle shall not back the same unless such movement can be made with safety and without interfering with other traffic. F.S. 316.1985(1)

Shortly after midnight, Mr. Nelson was in the driver's seat of a rented vehicle that was parked in the parking area of an apartment complex in St. Petersburg. The parking area was connected to an alley that provided access to the street. Officer Rawls had been on patrol when he noticed the vehicle and two men sitting in it.

Officer Rawls testified that as he started to come through the alley, he stopped to see if Mr. Nelson's car was going to come out. He saw Nelson's brake light come on. The vehicle did not move, so Rawls proceeded to go through the alley. Then Nelson's vehicle started to back up.

Rawls testified that he stopped his vehicle suddenly and activated his emergency lights because "he nearly ran into my vehicle—backed into my vehicle. That was the reason for the stop."

Cocaine was found in the Nelson vehicle.

The Second DCA in **Nelson v State** *reversed* the conviction holding that there was no probable cause for the stop.

The DCA said that there was no violation of Ch 316.1985 Limitations on Backing. The officer had stopped his cruiser and then Nelson had backed his car only two feet and stopped immediately when the officer turned on his emergency overhead lights. Mr. Nelson's immediate stop fulfilled the requirement to 'yield to' any automobiles that could be in his way. The officer was not forced out of his path in the alley and he was not required to swerve to avoid Nelson's vehicle. "Considering the totality of the circumstances, we conclude that Mr. Nelson did not 'interfere' with other traffic."

Thus there was no traffic violation and therefore no probable cause for the vehicle stop.

VICTIM RIGHTS WEEK

Local Victim advocates are teaming up again to provide several events during National Victims' Rights Week, April 23-29. Bookmarks are being produced and distributed for all area libraries.

On Thursday, April 27, a candlelight vigil, Hearts of Hope campaign, and Tile project will take place at Victims Memorial Park at 6 p.m. The Victims Park is located at 1601 SW Williston Road in Gainesville.

On Friday, April 28, the annual Civitan Blood Drive will take place all day in the Gainesville SAO parking lot.

All events are free and open to the public.

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ON CALL ATTORNEY

Effective at 5pm on March 31, the On Call Attorney can be reached at 352-281-8010. In the event the cell phone is not answered, please follow the prompts for leaving a message. Note: this is a new telephone number for reaching the ASA on call.

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FOR COPIES OF CASES…

For a copy of the complete text of any of the cases mentioned in this or an earlier issue of the Legal Bulletin, please call ASA Rose Mary Treadway at the SAO at 352-374-3672.

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REMINDER: LEGAL BULLETIN NOW ON-LINE

The Legal Bulletin is now available on-line, including old issues beginning with calendar year 2000. To access the Legal Bulletin go to the SAO website at sawww.co.alachua.fl.us and click on the "legal bulletin" box.

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PARKING ALERT

Law Enforcement officers are reminded to seek parking spaces in those areas designated for "Law Enforcement Only" at the Gainesville SAO in order to free up other spaces for the public.