

BEST PRACTICES

COMPLIANCE SERVICES (COLLECTIONS)

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Background	 1
Primary Resources	2
Recommended Processes	
Appendix	
Best Practices Committee Members and Workg	

Background

In 1998, voters passed Revision 7 to Article V, which allocated additional costs of the court system to be paid out of state funds. As a result of this revision, Clerks became the collection agent for court costs and fines and are required to report on their collections performance. Florida's Legislature has enacted several laws since 1998 to direct this collection.

In 2003, the legislature created the Florida Clerks of Court Operations Corporation (CCOC). See Chapter 2003-402. CCOC was created to support, monitor, and report on the budget-related activities of Clerks across the state. CCOC is required to develop a uniform system of workload measures and standards related to the effective collection of fines, fees, service charges, and court costs. Each quarter, CCOC must collect and report to the legislature on the effectiveness of Clerks' collection activities. Clerks not meeting standards must provide an explanation and identify corrective actions they will take to bring them up to standard. See s. 28.35(2)(d), F.S.

Under the same bill that created CCOC, the legislature also gave Clerks several tools they could use in the collection and enforcement of fines, fees, and costs. With the creation of s. 28.246, F.S., Clerks are authorized to collect partial payments, enter into payment plans, and refer delinquent cases to an attorney or collection agent. Additionally, the bill gave Clerks the authority to compromise, settle, subordinate, release, or otherwise dispose of any criminal debts or liens. *See* s. 938.30, F.S. (Note: similar language is contained in s. 938.29, F.S., which addresses the authority for Clerks to settle, compromise, etc., debts related to indigent application fees and attorney fees).

Since 2003, the legislature has amended s. 28.246, F.S., several times to clarify the manner in which Clerks must collect fines, fees, and costs. For example, Chapter 2021-116 created a requirement for an individual to contact the Clerk within 30 days after release from incarceration. (*See also* s. 775.083, F.S., for similar language for individuals who are not incarcerated). One year later, Chapter 2022-201 updated s. 28.246, F.S., to include calculations for down payments and monthly payment plan amounts.

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Clerks have several mechanisms under statute to enforce financial obligations, including, but not limited to, license suspensions under ss. 322.245 and 318.15, F.S.; entry into uniform payment plans under s. 28.42, F.S.; and the imposition of civil liens pursuant to s. 938.30, F.S. Additionally, in 2019, the legislature created the Driver License Reinstatement Days program (i.e., Operation Green Light) to encourage the reinstatement of driver licenses upon entry into a payment plan or payment of financial obligations in full. *See* s. 322.75, F.S.

While the legislature sets the amounts for court costs and fines and the courts impose them, Clerks play a unique role in complying with these laws, enforcing court orders, and utilizing all tools granted to them consistently. See s. 28.246(3), F.S. While maximizing collections is an important goal, it must be balanced against the Clerk's duty to collect as much as is practicable in consideration of the customer's ability to pay. See s. 28.246(4)(b), F.S.

This best practice is intended to provide guidance on a consistent approach to collections.

Primary Resources

Section 27.52(1), (2), F.S.	Determination of criminal indigent status.
Section 28.24(5)(a), F.S.	Service charges. (5)(a) Verification of any instrument
Section 28.24(27)(a), (b), (c), F.S.	Service charges. (27)(a) Collection for restitution fee (\$3.50); (27)(b) Partial payments other than restitution (\$5.00 per month); (27)(c) Setting up a payment plan; one-time administrative fee of \$25.00
Section 28.243(1), (2), F.S.	Personal liability for accepting checks. (1) Clerk is personally liable for returned checks unless forwarded to state attorney's office; Per s. 832.05(9), F.S., the state attorney's office is responsible for providing a form for reporting these violations; (2) No personal liability of the clerk for accepting personal checks for traffic fines and related court costs. Clerk <i>may</i> forward to state attorney's office. Clerk is not subject to s. 832.07(2), F.S.
Section 28.246(2), (4), (5), (6), F.S.	Payment of court-related fines or other monetary penalties, fees, charges, and costs; partial payments; distribution of funds. (2) Clerk shall establish accounts receivable system for court-related fees, charges, and costs; (4) Clerk acceptance of partial payments in accordance with terms of established payment plans; (5) Clerk distribution of funds; (6) Clerk pursuit of collections.
Section 28.35, F.S.	Florida Clerks of Court Operations Corporation. (Collection performance report, clerk budget, and identification of clerk court-related functions for funding)
Section 28.42(2), (3), F.S.	Manual of filing fees, charges, costs, and fines; payment plan form. (2) Development and; (3) Use of a uniform payment plan form

Section 57.082, F.S.	Determination of civil indigent status.	
Section 116.21, F.S.	Unclaimed moneys; limitation. (Maintain a retention system for money not in the registry of the court, but which otherwise comes into the possession of the clerk; or not payable, distributable, or reportable under Chapter 717 (Non-	
Section 45.032(3)(c), F.S.	Ordered Registry Funds, s. 717.113, F.S.) Disbursement of surplus funds after judicial sale. (Surplus funds of anything less than \$10.00 escheats to the clerk.)	
Section 142.01, F.S.	Fine and forfeiture fund; disposition of revenue; clerk of the circuit court.	
Section 318.15(1)(b), F.S.	Failure to comply with civil penalty or to appear; penalty. (1)(b) Collection of service fees for failure to complete driver improvement school	
Section 318.18(8)(a), (b), F.S.	Amount of penalties. (8)(a) FCCC contracted to establish and maintain an automated statewide Uniform Traffic Citation Accounting System; (8)(b) Community service in lieu of payments	
Section 322.245(5), F.S.	Suspension of license upon failure to comply with directives ordered by traffic court or upon failure to pay any financial obligation in any other criminal case. (5) Financial obligations subject to driver license suspension	
Section 322.75, F.S.	Driver License Reinstatement Days.	
Section 775.083(3), F.S.	Fines. (3) Requirement to pay clerk in full or go on payment plan	
Section 903.26, F.S.	Forfeiture of the bond; when and how directed; discharge; how and when made; effect of payment.	
Section 903.27, F.S.	Forfeiture to judgment.	
Section 903.28, F.S.	Remission of forfeiture; conditions.	
Section 903.286, F.S.	Return of cash bond; requirement to withhold unpaid fines, fees, court costs; cash bond forms.	
Section 938.01, F.S.	Clerks should collect \$3 from every bond estreature or forfeited bail bond to be remitted to DOR.	
Section 938.15, F.S.	If authorized by local ordinance, Clerks should collect \$2 from every bond estreature or forfeited bail bond for criminal justice education degree programs and training courses.	
Section 938.29, F.S.	Legal assistance; lien for payment of attorney's fees or costs. (Assessment of indigent application fee under s. 27.52, F.S.; authority to settle, compromise, etc. those debts.)	
Section 938.30(6), (8), (9), (12), F.S.	Financial obligations in criminal cases; supplementary proceedings. (6), (8) Record criminal judgment creating civil lien; s.55.10, F.S. Applies except for the second recording. (9) Clerk shall enforce, satisfy, compromise, settle, subordinate, release, or otherwise dispose of any debts or liens (12) Administrative costs for compliance	
Florida Rules of Criminal Procedure 3.670	Rendition of Judgment	

Recommended Processes

A. Coordinate with All Parties Involved in Collections

- 1. Law enforcement/sheriff's office/Florida Highway Patrol
 - a. To communicate with individuals who are cited for a violation on their payment options (e.g., supplying informational handouts or brochures to customers, placing a QR code on eCitations with a link to a payment site, providing payment envelopes).
 - b. To communicate with individuals who are released from custody on their obligation to visit the Clerk's Office within 30 days to set up a payment plan or pay their fines in full under s. 28.246(4)(b), F.S.

2. Judiciary -

- a. To encourage imposition of mandatory costs.
- b. For referral to Clerks for payment programs and collections processes.
- c. To coordinate efforts to maximize collection of court costs and fines.
- d. To encourage criminal judges at sentencing to communicate to customers that:
 - i. Court costs and fines are part of their sentence.
 - ii. Court costs and fines can be paid off at the statutorily delineated rate via community service under s. 318.18(8)(b), F.S.¹
 - iii. The Clerk will actively enforce payment plans and assess additional penalties for non-timely payments or non-payment.
- e. Clerks should consider discussing the following issues with the judiciary:
 - i. Theft-related criminal judgment and sentences that may order customers to pay restitution before any other court costs and fines, so this can be weighed against the statutory requirements of ss. 27.52 and 28.246(5), F.S.
 - ii. Consistency in the assessment of court costs and fines between judges/divisions/case types (encourage local administrative order if not already in effect).
 - iii. The use of "civil judgments" by the judiciary, as they do not dismiss court costs and fines, may be recorded in the Official Records to create a lien, and can accrue statutory interest per ss. 938.29(2) and 938.30(8), F.S.
 - iv. The Clerk's settlement authority as provided per s. 938.30(9), F.S.
- 3. Private collections agencies and law firms, as used by Clerks under s. 28.246(6), F.S.
 - a. To set guidelines for collections to help Clerks meet compliance standards set by the CCOC pursuant to s. 28.35(2)(d), F.S.
 - b. To regularly meet with Clerks on compliance rates and opportunities for improvement.
 - c. To establish terms in collections contracts to allow for Clerks to recall cases from collections as needed.
 - d. To ensure the collection agencies are meeting regulations provided by the Fair Debt Collection Practices Act.
 - e. To collaborate with Clerks who choose to allow collection agencies to negotiate or settle on their behalf, in accordance with ss. 938.29 and 938.30, F.S. Clerks should consider developing policies to guide the settlement process (some examples include requiring customers to pay the settlement amount in full or offering a certain settlement amount based upon the age of the case, etc.)

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¹ It should be noted paying off fines and costs through community service is a different statutory rate than the rate used to pay off community service hours. While court costs and fines can be paid off at the wage rate is specified in s. 318.18(8)(b), F.S., the payoff of community service hours ordered for driving under the influence pursuant to s. 316.193(6)(a), F.S. is \$10.00 per hour.

- f. To collaborate with Clerks to determine whether to allow customers to make payments through the Clerk's office, even when cases have already been referred to the collection agency.
- g. To refer cases to collection agencies/firms after accounts are delinquent for 90 days or more. In complying with s. 28.246(6), F.S., Clerks may consider:
 - i. Using multiple collection agencies/firms.
 - ii. Moving cases from one collection agency/firm to others used by the Clerk's office, within a specified period of time after referral when no payment has been received.

4. Local attorneys/bar association/public defender's office -

a. To notify clients regarding payment options and collections processes.

5. Department of Corrections (FDC) -

- a. To notify customers being released from prison or being placed on felony probation about outstanding court costs and fines (FDC's Offender Information Search webpage can also be utilized). Under s. 28.246(4)(b), F.S., it is the "responsibility of an individual who is released from incarceration and has outstanding court obligations to contact the clerk within 30 days after release to pay fees, service charges, court costs, and fines in full, or to apply for enrollment in a payment plan."
- b. To collaborate on FDC's collection of payments from customers on probation or parole. Fla. Admin. Code R. 33-302.111 requires a correctional probation officer ensure the payment in full of fines and court costs prior to recommending early termination of supervision.
- c. To address alternatives to s. 948.09(7), F.S., that requires FDC to create payment plans for customers on circuit probation and distribute those collections differently than s. 28.246(5), F.S., requires.
- d. To provide offender release information to Clerks so Clerks can use this information to assist in compliance efforts. Please note, it is the defendant's responsibility to contact the Clerk to make payment arrangements, as provided by s. 28.246(4)(b), F.S.

6. Circuit and county probation departments -

- a. To communicate with individuals who are on supervision regarding their options for paying back financial obligations before their supervision ends and the penalties for non-compliance under s. 948.06, F.S.
- b. To coordinate the collection/receipt of fines, fees, and court costs, regardless of whether the payment of court costs and fines is a condition of probation.
- c. For coordination with county governments that may have entered into contracts with private companies to privatize county probation services. Some of these companies offer the collection of court costs and fines as part of the services they provide to the county and may not follow the required distribution of ss. 27.52 and 28.246(5), F.S., which may affect Clerk reporting and performance standards. Further, to ensure collections performance measures are not adversely affected, Clerks should be involved in establishing weekly transmissions from such companies.

7. State attorney's office -

a. For customer notification of payments as required through plea agreements.

8. County attorney's office and other city and county agencies -

a. For notification if the county is involved in the monitoring, collecting, and/or enforcing of local ordinance assessments. *See* s. 939.185, F.S.

9. Pro se defendants -

a. To provide information on Clerk websites and via handouts at sentencing and payment concerning Clerk collection processes.

b. To remind customers to contact the Clerk's office immediately after sentencing, or within 30 days after release, to pay fees, service charges, court costs, and fines in full, or to apply for enrollment in a payment plan pursuant to ss. 28.246(4)(b) and 775.083(3), F.S.

B. <u>Develop Payment Programs</u>

- 1. Understand statutory responsibility for Clerks to provide a payment program to collect and remit payments, and to negotiate balances on assessed fines, fees, service charges, and court costs. The program should accept partial payments as required by s. 28.246(4), F.S.
- 2. Establish dedicated staff for collection and compliance efforts.
- 3. Understand the effectiveness of collections may be contingent on the amount of time that passes after the imposition of court costs and fines and release from incarceration.
- 4. Provide payment information to customers in various formats (e.g., brochures, QR codes, handouts, flyers, website, etc.), including electronic communication and in multiple languages.
- 5. Develop policies for administering payment plans, including fees in s. 28.24(27), F.S.
- 6. Maintain, follow, and update written procedures for compliance services.
- 7. Evaluate the effectiveness of compliance practices on a regular basis.

C. Establish Payment Plans

- 1. The court type will determine the timeframe for payment plan initiation.
 - a. Per s. 28.246(4)(b), F.S., "It is the responsibility of an individual who is released from incarceration and has outstanding court obligations to contact the clerk within 30 days after release to pay fees, service charges, court costs, and fines in full, or to apply for enrollment in a payment plan."
 - b. Per s. 775.083(3), F.S., "a person who has been ordered to pay court obligations under [s. 775.083] shall immediately contact the clerk to pay fines, fees, service charges, and court costs in full or to apply for enrollment in a payment plan pursuant to s. 28.246(4)."
- 2. Communicate with the courts, county, jail, and state probation departments to establish a payment plan expeditiously for customers with court obligations pursuant to applicable statutes. *See* s. 948.09(6), F.S.
- 3. Work with customers who are eligible and authorized by the judiciary to convert court costs and fines into community service.
- 4. Use the CCOC Uniform Payment Plan form as directed by s. 28.24(2), F.S.
- 5. Follow the statutory calculation for down payments and monthly payment amounts in s. 28.246, F.S.

D. Maintain and Modify Payment Plans

- 1. Offer several forms of payment options to customers, including cash, checks, electronic forms of payment, and recurring ACH electronic fund transfers.
- 2. Offer flexible payment opportunities such as in-person, mail, online, third-party vendors, etc.
- 3. Work with customers when there is a change in circumstances to modify or amend the payment plan, taking into account any indigency determinations.
- 4. Communicate proactively with customers prior to the payment due date to improve overall compliance. Communication methods may include letters, postcards, emails, text messages, IVR (interactive voice response), phone calls, etc.

E. Use All Enforcement Tools

1. Clerks should record all criminal judgments and sentences in Official Records to create liens.

- 2. Clerks should refer to ss. 322.245 and 318.15, F.S., for timely referral of suspensions of driver licenses to the Florida Department of Highway Safety and Motor Vehicles (FLHSMV).²
 - a. For civil and criminal traffic cases, the Clerk must submit a failure to pay within 10 days of the missed payment per ss. 318.15(1)(a) and 322.245(3), F.S., respectively.
 - b. For non-traffic cases, the Clerk has the discretion to submit a failure to pay to FLHSMV and there is no statutorily-defined timeframe per s. 322.245(5)(a), F.S.³
- 3. Clerks should consider attending violation of probation hearings and/or working with the judiciary to provide payment histories.
- 4. In circuit civil and county civil mortgage foreclosure cases, Clerks should consider filing answers to complaints that identify criminal court costs and fines judgments, to note the Clerk/state interest in collecting on these liens.
- 5. Pertaining to bonds, Clerks should ensure compliance with the FCCC Bail Bonds best practice.
- 6. Collection of civil fees and service charges from litigants who do not pay at the time of filing.

F. <u>Improve Customer Communication</u>

Clerks should consider expanding communications with customers including:

- 1. Sending late letters/postcards, text reminders, etc.
- 2. Using automated phone reminders to customers.
- 3. Using online and IVR payment systems to remind customers to pay timely.
- 4. Using an outbound call process. For example, during a certain timeframe, i.e., if the office is closed to customers from 4:00- 5:00 p.m. each day, make calls to customers who have missed payments on established payment plans reminding them to pay timely to prevent late and collection fees from being assessed.
- 5. Using address verification software. Note: Receiving an updated address through such software does not supersede any legal requirement as it relates to notices, service of process, or change of address. Each Clerk should work with their legal counsel to determine the process for updating a party's address to ensure compliance with applicable laws and rules.

G. Compromise Amounts Owed

Sections 938.29(3) and 938.30(9), F.S., provide Clerks with the authority to "enforce, satisfy, compromise, settle, subordinate, release, or otherwise dispose of any debts or liens imposed and collected." In using this authority, Clerks should consider developing a policy that documents the conditions under which the compromise authority can be exercised. Some examples of compromise efforts are as follows:

- 1. Attempting to collect the entire amount owed before settling, as the goal is to maximize collections.
- 2. Before initiating negotiations for settlement, Clerks should consider the individual's current circumstances, the genesis and amount of debt (trafficking fines for \$10,000 v. 2nd degree misdemeanor fine of \$500); the payment or non-payment history; license suspensions currently in effect; and the age of the case.

REVISED: 05/06/2024 | PAGE 7 OF 11

² It should be noted a driver license suspension for failure to pay is only an available tool in adult case proceedings. A "delinquent act" is distinct from a "criminal offense" and suspensions under ss. 322.245 and 318.15, F.S., are inapplicable in juvenile delinquency cases. *See for reference* Art. I, Sec. 15(b) of the Florida Constitution, *V.K.E. v. State* (934 So. 2d 1276), and s. 985.455(1)(c), F.S.

³ Section 322.245(5)(a), F.S., allows for the Clerk to suspend an individual's driver license in two circumstances: (1) failure to pay a financial obligation in full, or (2) failure to pay a financial obligation in part under the terms of a payment plan.

- 3. Negotiating the collection agency fee first, if it is owed on cases. Clerks may also consider negotiating any interest owed on cases.
- 4. Keeping a record of the amounts negotiated and recording the basis for these decisions. Consider using a negotiation form in reaching a settlement so the decision can be documented. These actions protect Clerks from claims of special treatment and provide documentation for audits.
- 5. If a customer has multiple cases, consider consolidation of the cases to permit and promote settlement on the total owed on all of the customer's cases.
- 6. Considering whether to allow s. 28.246(6), F.S., collections firms to use the settlement authority granted to Clerks. Clerks should provide clear guidelines and include in their contracts with these firms the specific settlement authority the Clerks are permitting, i.e., grant the firms specific authority to negotiate interest. Clerks must have a "recall" clause in the agreement with a collection agency, so Clerks can perform, unfettered, under ss. 938.29 and 938.30, F.S.

Note: Case disposition and file destruction rules should not govern Clerk practices concerning amounts owed. For example, Clerks should not use Rule 6.575, Florida Rules of Traffic Court, to write off amounts owed. This rule speaks only to the disposition of the file after seven years, and not to the amounts owed.

H. <u>Use Accounts Receivable Systems</u>

- 1. Consider the use of an in-house collection software program.
- 2. Consider controlling the collection inventory by regular review of the number of payment plans, e.g., percentage of payment plans regularly paying; percentage of payment plans paid in 30, 60, and 90 days; and percentage of payment plans paid on time, in default, and paid in full.
- 3. Reporting capabilities should allow for date ranges and include:
 - a. Collection rate percentage of money collected.
 - b. Compliance rate percentage of cases paid under a payment plan.
 - c. Outstanding amounts due.
 - d. Collection rates from specific case types CF, CT, CJ, and MM.

I. Appropriately Distribute Court Costs and Fines

- 1. Distribution should be reviewed to ensure compliance with s. 27.52, F.S., and s. 28.246(5), F.S., concerning the statutory priority distribution of court costs and fines; and s. 28.245, F.S.
- 2. Pursuant to s. 775.089(11)(a), F.S., the court may order the Clerk to collect restitution payments.

J. Improve Collection Goals and Measure Achievements

- 1. Evaluate the cost and benefits of each of the collection tools (collection agencies, suspension of driver license, collection letters, phone calls, collection court, etc.) and emphasize those that have the greatest net benefit.
- 2. Review collection/payment programs regularly to ensure the maximum in collections.
- 3. Consider setting collection goals.
- 4. Consider providing collection education and training for Clerk staff and court partners.
- 5. Follow the statutory requirements for Operation Greenlight (driver license reinstatement events). *See* s. 322.75, F.S.
- 6. Request CCOC technical assistance and education services.

Note: The following practices are statutorily allowed but were omitted as they are not considered to result in the most effective outcomes for the practitioners and the customers involved:

- 1. Wage garnishment pursuant to Chapter 77, F.S.
- 2. Working with FDC to help obtain withdrawals from inmate trust fund accounts pursuant to s. 57.085(5), F.S. An inmate on work release is required to deposit the entire amount of his or her paycheck into the Inmate Trust Fund, in accordance with Fla. Admin. Code R. 33-601(11)(a). Pursuant to subs. (11)(h) and (j), while in "paid employment status" an inmate is responsible to pay costs in the following order: (1) costs for the inmate's care, (2) child support payments, (3) payment of restitution, fines, and court costs, and (4) other costs noted in the administrative rule language.



Appendix

External Resources

WEB LINK: CCOC Compliance Corner

QUICK LINK: Compliance Best Practices
QUICK LINK: Compliance Research

WEB LINK: CCOC Driver License Reinstatement Days

QUICK LINK: Information for Clerk Offices

WEB LINK: CCOC Forms & Instructions

QUICK LINK: Quarterly Forms – Collections Performance Measure Reporting

WEB LINK: CCOC Other Information

QUICK LINK: Uniform Payment Plan

QUICK LINK: Indigent Applications

WEB LINK: FCCC Assessments and Collections (A&C) Report

WEB LINK: FCCC Public Information

BEST PRACTICE: Compliance Services (Collections)

(Includes links to the Distribution Schedule of Fees, Charges, Costs and Fines)

WEB LINK: FDC Corrections Offender Network

(To utilize the offender search engine to optimize collections for those being released or placed on

probation.)

WEB LINK: Legal Opinion- Clerk Compromise Authority

FCCC can provide Word versions of appendices upon request, as applicable.

REVISED: 05/06/2024 | PAGE 10 OF 11

Best Practices Committee Members: 2023-2024

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