STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

PARENT SUPPORT, LLC, d/b/a
CARES TREATMENT,

Petitioner,

vs. Case Nos. 18-0230
18-0234

DEPARTMENT OF CHILDREN AND
FAMILIES,

Respondent.
_____/

RECOMMENDED ORDER

Administrative Law Judge D. R. Alexander conducted a hearing in these cases by video teleconference at sites in Orlando and Tallahassee, Florida, on June 25, 2018.

APPEARANCES

For Petitioner: Roberto Torres, Jr., pro se
Suite 254
8297 Champions Gate Boulevard
Champions Gate, Florida 33896-8387

For Respondent: T. Shane DeBoard, Esquire
Department of Children and Families
Suite S-1129
400 West Robinson Street
Orlando, Florida 32801-1707

STATEMENT OF THE ISSUE

The issue is whether Petitioner's applications to renew licenses for two Residential Level II facilities in Davenport, Florida, should be denied and a $2,500.00 fine imposed for the

reasons given in the Department of Children and Families' (Department) Amended Denial of Applications & Imposition of Fines issued on February 8, 2018.

PRELIMINARY STATEMENT

On November 27, 2017, Petitioner filed applications to renew two Residential Level II facility licenses located in Davenport, Florida. On December 1, 2017, the Department issued two letters denying the applications. Petitioner timely requested a hearing for each application, and the matters were referred by the Department to the Division of Administrative Hearings and assigned Case Nos. 18-0230 and 18-0234. The two cases were consolidated on January 22, 2018. On February 16, 2018, the Department was authorized to amend the bases for its denial.

Numerous papers seeking various types of relief were filed by Petitioner and the Department during the course of this proceeding. A resolution of those matters can be found on the docket sheet or in the record of the final hearing. A 207-page Motion to Strike Respondent's Claim for Fraud on the Court, Spoliation, and Discovery Abuse and Alternative Motion for Other Sanctions filed by Petitioner just prior to hearing is denied.

At the hearing, Petitioner was represented by its chief executive officer and manager, Roberto Torres, Jr. Petitioner presented no witnesses. Instead, it relied on Mr. Torres' cross-examination of Department witnesses. Petitioner's Exhibits 1, 2,

16, 17, 18, 73, 74, and 77 were accepted in evidence.[1/] The Department presented the testimony of six witnesses. Department Exhibits 1 through 5, 7 through 10, 12, 13, 15 through 20, and 22 through 27 were accepted in evidence.[2/] Exhibits 25, 26, and 27 are depositions taken in May 2018 and attended by both parties. Finally, official recognition was taken of numerous Florida and Arizona statutes and rules cited in Petitioner's Motion for Official Recognition of Federal and State Laws filed on June 20, 2018.[3/]

A two-volume Transcript of the hearing was filed on August 22, 2018. The Department and Petitioner filed proposed recommended orders (PROs) on September 19 and 21, 2018, respectively, and they been considered in the preparation of this Recommended Order.

FINDINGS OF FACT

A. Background

1. The Department is charged with the responsibility of regulating the licensing and operation of residential treatment facilities pursuant to chapter 397, Florida Statutes (2017).

2. Petitioner is a Delaware limited liability corporation authorized to conduct business in the State of Florida. Subject to the outcome of this proceeding, Petitioner is licensed to operate two Residential Level II facilities in Davenport under the name Cares Treatment. One facility is located at 146 Sunset

View Drive (Case No. 18-0230), the other at 389 Sand Ridge Drive (Case No. 18-0234). The licenses were issued on December 15, 2016, and were to expire on December 14, 2017. Each license authorizes Petitioner to "provide substance abuse services for Adults and/or Children/Adolescents for the following component: Residential Level 2 (6 beds)."[4/] Resp. Ex. 2. The Torres family home is not a licensed facility and services cannot be provided to residents who reside at that location.

3. Petitioner is not licensed to provide services under the Partial Hospitalization Program (PHP), the Outpatient Program (OP), or the Intensive Outpatient Program (IOP).[5/] These services require a separate license from the Department. In December 2017, Petitioner filed with the Department new applications to provide those services. However, the applications were denied and no appeal was taken.

4. According to the renewal applications, Petitioner provides a "residential treatment facility for children and adolescents." Resp. Ex. 3. Each facility "is a free-standing residential facility which provides a structured living environment within a system of care approach for children, adolescents and adult[s] who have a primary diagnosis of mental illness or emotional disturbance and who may also have other disabilities." Id.

5. Petitioner's facilities are a family-run business. Roberto Torres, Jr. (Mr. Torres), is the Chief Executive Officer and manager of the limited liability corporation; Cecilia Torres, his wife, is the Treasurer/Chief Financial Officer; Karla Torres, a daughter, is the Vice President/Chief Administrative Officer; Roberto Torres, III (the son), is the Secretary/Chief Information Officer; and Kristina Torres, a daughter, is the Ambassador/Chief Relationship Officer. Resp. Ex. 4.

6. On November 27, 2017, Petitioner filed its applications for renewal of the two licenses. On December 1, 2017, the Department issued separate, but identical, letters denying both applications on the grounds they were not timely filed and they were incomplete. Resp. Ex. 5. On February 16, 2018, the Department was authorized to amend its letters of denial with a single amended denial document, which combined the original charges in the two letters into Counts I and II and added new Counts III, IV, and V. Resp. Ex. 1. The amended denial letter also seeks to impose a $2,500.00 administrative fine for violating various Class II rules. The specific rules are not identified in the original or amended charging documents, but the Department's PRO cites Florida Administrative Code Rule 65D-30.003(1)(a) and "rules set forth in 65D-30" as the rules on which it relies. Because proper notice of the specific rules was not given, the rule violations have not been considered.

7. The charges in the amended denial letter can be summarized as follows:

> Count I - The application for the facility at 146 Sunset View Drive was not timely filed and was incomplete in violation of sections 397.403 and 397.407(8).
>
> Count II - The application for the facility at 389 Sand Ridge Drive was not timely filed and was incomplete in violation of sections 397.403 and 397.407(8).
>
> Count III - In November 2016, O.G., a 16-year-old female who had been recently discharged from a Baker Act facility, was admitted for treatment of substance abuse and mental health issues. After residing a few months at the Sunset View location, she was moved to the Torres family home, an unlicensed facility, where she remained for one or two months. By providing services at that unlicensed location, Petitioner violated section 397.401(1). She was then moved to the Sand Ridge location for two or three months before being returned to the Torres family home. She continued to receive substance abuse treatment at the family home until her discharge two or three months later. This constitutes a second violation of the same statute. While under the care of Petitioner, O.G. was subjected to actions which resulted in verified abuse reports against Mr. Torres and his son and contributed to the delinquency and exploitation of a child. Such conduct constitutes a threat to the health or safety of O.G. in violation of section 397.415(1)(d).
>
> Count IV - On October 19, 2017, J.W., who transferred from a Baker Act facility, was accepted by Petitioner for care and to receive "partial hospitalization program" services, which Petitioner is not licensed to provide. This constitutes a violation of

> sections 397.401(1) and 397.415(1)(a)2.c. J.W. was later discharged in contravention of his wishes and desires, which resulted in him relapsing and again being Baker Acted. This conduct constitutes a threat to J.W.'s health or safety in violation of section 397.415(1)(d).
>
> Count V - On January 23, 2018, the Department attempted to conduct an onsite inspection at both licensed facilities to review J.W.'s files, but was denied access to the premises. Petitioner later failed to respond to a written request by the Department for records relating to J.W. and O.G. This conduct constitutes a violation of section 397.411.

8. The charging document asserts the conduct in Count III violates four Class II rules (not otherwise identified), for which a $500.00 fine should be imposed for each violation; and the conduct described in Count IV violates "applicable" Class II rules (not otherwise identified), for which a single $500.00 penalty should be imposed. Rule 65D-30.003(1)(a), the only rule cited in the Department's PRO, requires in relevant part that "all substance abuse components" be provided "by persons or entities that are licensed by the department pursuant to Section 397.401, F. S."

B. The Charges

i. Counts I and II

9. Section 397.407(8) provides that "the Department may deny a renewal application submitted fewer than 30 days before the license expires." For Petitioner to meet this deadline,

license renewal applications were due on or before November 15, 2017. An application is not considered filed until an application with the signature of the chief executive officer is submitted by the applicant.

10. Around 3:30 p.m. on November 27, 2017, Mr. Torres spoke by telephone with Ms. Harmon, the Department System of Care Coordinator, regarding three new licensure applications he was filing. During the conversation, he was reminded that renewal applications for his two existing licenses had not been filed. Mr. Torres responded that he "would have to get on that." Properly signed renewal applications were submitted electronically at 5:00 p.m. and 5:42 p.m. that afternoon.

11. In his cross-examination, Mr. Torres attempted to establish that the Department's website, the Provider Licensing and Designation System (PLADS), was periodically inoperative, and this prevented him from filing his on-line applications in a timely manner. However, there is no credible evidence to support this claim. In fact, after Mr. Torres raised this issue early on in the case, Ms. Harmon reviewed the activity log of Mr. Torres' two on-line applications and found that he began the application process in late August or early September 2017, but did nothing further until he hit the submit button after speaking with her on November 27, 2017. Also, during this same period of time, the PLADS program (to which all applicants have access) indicated

that the applications were in "Waiting Approval" status, which meant the applications were "in process" but had never been submitted. Therefore, the applications were not timely filed.[6/]

12. Section 397.403(1)(f) requires license applications to include, among other things, "proof of satisfactory fire, safety, and health inspections." Neither application filed on November 27, 2017, included an updated Treatment Resource Affidavit, a current Fire and Safety Inspection form, and a complete and current Health Facility and Food Inspection form. Therefore, the applications filed on November 27, 2017, were incomplete.

ii. Count III

13. On November 17, 2016, O.G., then a 16-year-old female, was admitted for treatment at the facility. O.G. had a history of bi-polar episodes, depression, and drug abuse. Before seeking treatment at Petitioner's facility, she had been Baker Acted twice. After learning about Petitioner's facility through another provider, O.G.'s family placed her in the facility to address her substance abuse and behavior problems.

14. Upon admission, a treatment plan was devised by a licensed mental health counselor (LMHC), with a target completion date of May 17, 2017. Resp. Ex. 10. The treatment plan listed four staff members overseeing her case: Karla Torres (case manager); the LMHC; and S.F. and K.V., two "caregivers" or

interns. Id. O.G. was discharged from the facility nine months later on August 14, 2017. Petitioner was paid approximately $166,000.00 by O.G.'s parents for her nine-month stay.

15. O.G. was initially placed in the facility located at 146 Sunset Drive, where she remained for approximately three months. She was then moved to the Torres family home at 2347 Victoria Drive in Davenport for two or three months. The Torres home is not a licensed facility. By housing her at an unlicensed location and providing services during that period of time, Petitioner violated section 397.401(1), which makes it unlawful to provide substance abuse services at an unlicensed location. O.G.'s parents were unaware that their daughter was residing in the unlicensed family home.

16. After Mr. Torres and O.G. "got into an argument," she was moved to the facility at 389 Sands Drive for several months. She then returned to the Torres home, where she remained for two or three months until she was discharged. By housing her at an unlicensed location and providing substance abuse services, Petitioner violated section 397.401(1) a second time.

17. During her stay at the Torres home, Mr. Torres discussed "sex" with O.G.; he told her that he cheated on his wife; and he complimented her "quite a few times" for having "a nice body." He also told her that "18" was a special age and if she were 18 years old, things would be different. He added that

her parents were "too strict." These highly inappropriate comments were especially egregious in nature, given the fact that O.G. was a minor with mental health and substance abuse issues, and she was living in the licensee's family home. One photograph of O.G. taken in the home shows Mr. Torres standing in the background donned in his pajamas. Resp. Ex. 16. These actions constitute a violation of section 397.415(1)(d)2., which makes it unlawful to commit an intentional or negligent act materially affecting the health or safety of an individual receiving services from the provider.

18. Mr. Torres occasionally escorted O.G. to two local bars (Miller's Ale House and Marrakesh Hooka Lounge) in Champions Gate. On one visit to Miller's Ale House in April or May 2017, he purchased her a Blue Moon beer, even though she was a minor and in a substance abuse program. She consumed the beer in his presence while the two sat at the bar. Although Mr. Torres attempted (through argument) to deny the incident, O.G. filmed the event on her cell phone. Resp. Ex. 13. This action by him also constitutes a violation of section 397.415(1)(d)2. Petitioner argues in its PRO that the whole incident was a fabrication and the result of a conspiracy by O.G.'s father, the Tampa Police Department, and Department counsel. The contention is rejected.

19. When O.G. was discharged from the residential treatment facility in August 2017, Petitioner enrolled her in another program, IOP, which required her to periodically return to the facility on weekends for further treatment. Her first return visit was the weekend of August 26, 2017. During the weekend visit, the son gave her a cell phone. O.G.'s admission document for the IOP program indicated she would be given IOP services for 60 to 90 days, with a goal of her being substance free at the end of that period. Resp. Ex. 24. There is no record of her being discharged from the program.

20. The Department argues in its PRO that by providing IOP services to O.G., Petitioner was providing a service beyond the scope of its license. However, this allegation was not included in the amended charging document and has not been considered. See, e.g., Trevisani v. Dep't of Health, 908 So. 2d 1108, 1109 (Fla. 1st DCA 2005)(a licensee may not be disciplined for an offense not charged in the complaint).

21. After being discharged from her original treatment plan on August 14, 2017, O.G. returned to her mother's home. Except for one weekend visit to Petitioner's facility for IOP services, she remained at home until September 16, 2017. That day, O.G. ran away from home with Preston, a resident she had met at Petitioner's facility. After leaving home, she went to Melbourne, and then to West Palm Beach. A Missing/Endangered

Runaway Juvenile bulletin was posted by law enforcement on October 5, 2017. Resp. Ex. 11. During this period of time, Petitioner's records show that O.G. was still enrolled in the unlicensed IOP program. Resp. Ex. 24.

22. While in the West Palm Beach area, O.G. contacted the son on the cell phone he had given her and told him she had run away from home. She asked him to send her some money so that she could go to Tampa to work in a strip club. Because O.G. was not old enough to accept a wire money transfer, the son wired $600.00 to a friend of O.G., who gave her the money.

23. Using the money provided by the son, O.G. traveled to Tampa and met the son on September 30, 2017. The two went to Todd Couples Superstore, where he purchased several adult entertainment outfits she could wear to audition for a job in a strip club. Resp. Ex. 12. He also purchased her various personal items at a Walgreens.

24. The son then drove her to several clubs to audition for a job. After several auditions, she was hired by Scores Tampa, a local strip joint where "people take off their clothes for money." O.G., who was only 17 years old at the time, signed an employment contract on September 30, 2017, using a borrowed driver's license of S.F., a 21-year-old female. Resp. Ex. 15. S.F. was a former intern at Petitioner's facility and is listed as a member of the team staff on O.G.'s initial treatment plan.

By that time, S.F. had left Petitioner's facility and moved back to Tampa.

25. That same evening, O.G. began working in Scores Tampa. O.G. says she took off her clothes while performing. The son remained in the club while she worked. After she got off work at 2:00 a.m., he drove her to S.F.'s house. O.G. continued working at the club for the next few days. With the assistance of local law enforcement, O.G. returned to her mother's home on October 7, 2017.

26. After she ran away from home, and even while working in the club, O.G. maintained contact with Mr. Torres through texts and Facetime and asked him not to report her whereabouts to anyone. Although O.G.'s mother spoke to Mr. Torres on several occasions after O.G. went missing in September 2017, neither Mr. Torres nor the son informed her of the daughter's whereabouts.

27. On November 30, 2017, the Department received a report of alleged human trafficking and sexual exploitation of a child. The alleged perpetrator was the son, while the victim was identified as O.G. Because the son was an employee of Petitioner, an institutional investigation was conducted. The investigation was closed on December 26, 2017, with a confirmed report of Human Trafficking-Commercial Exploitation of a Child against the son. Resp. Ex. 17. During the investigation,

Mr. Torres and members of his family declined to be interviewed or answer any questions. Instead, they referred all questions to their attorney.

28. On February 6, 2018, the Department received another report of abuse involving Mr. Torres. The report alleged that in April or May 2017, Mr. Torres transported O.G. to a bar at Miller's Ale House in "Davenport" [sic] and purchased her a beer. After an institutional investigation, the file was closed on March 1, 2018, as verified for Substance Misuse – Alcohol against Mr. Torres. Resp. Ex. 18. See also Finding of Fact 18. Mr. Torres declined to participate in the investigation.

29. By clear and convincing evidence, the Department established that the actions of Mr. Torres and his son presented a threat to the health or safety of O.G. in contravention of section 397.415(1)(d)2.

iii. Count IV

30. J.W., who did not testify, is a 42-year-old male who was discharged from a hospital on October 9, 2017 (after being Baker Acted), and admitted to Petitioner's facility the same day to receive PHP services. He was diagnosed as having mental health and substance abuse issues and a history of suicidality. He voluntarily left the facility on November 9, 2017. In its PRO, Petitioner characterizes J.W. as "a disgruntled addict."

31. While a resident at the facility, J.W. received a few video sessions with a Miami Springs psychiatrist, who was identified on the renewal applications as the facility medical director, and he was given online counseling sessions for two weeks by an LMHC, who resided in Palm Bay and worked as an independent contractor with the facility. Neither professional was told by Mr. Torres that Petitioner was not licensed to provide PHP services. By providing PHP services to J.W., Petitioner violated sections 397.401(1) and 397.415(1)(a)2.c.

32. According to the LMHC, on October 24, 2017, she was directed by Mr. Torres, who is not a licensed clinician, to "discharge" J.W. from the PHP program and place him in a lower level of care, Sober Living. Resp. Ex. 25. This would still allow J.W. to remain a resident at the facility but not receive the PHP services. Although the charging document alleges that J.W. did not wish to be discharged from the PHP program, and this caused him to have a relapse in his condition and later Baker Acted again, there is no competent evidence to establish this string of events.

iv. Count V

33. Section 397.411 requires all licensees to provide Department representatives access to their facilities and to allow the inspection of pertinent records. Based upon information from a provider in Jacksonville that Mr. Torres had

requested its assistance in providing PHP services to J.W., the Department instituted an investigation of Petitioner. In January 2018, the Department attempted to conduct an onsite inspection of Petitioner's facilities and to review the files relating to J.W. The inspectors were denied entry. Thereafter, the Department sent a written request to Petitioner for the records of J.W. and O.G. No records were provided and Petitioner failed to respond to the request. These actions constituted a violation of section 397.411.

34. At hearing, Mr. Torres contended (through argument) that because the Department had already taken preliminary action on December 1, 2017, to deny his applications, there was no requirement that he provide access to the facility or respond to written requests for records. This assertion has been rejected. See § 397.411(1)(c), Fla. Stat. (an application for licensure as a service provider constitutes full permission for an authorized agent of the department to enter and inspect at any time).

CONCLUSIONS OF LAW

35. Because the Department seeks to impose a penalty, it has the burden of proving the alleged violations, and the propriety of the proposed fine, by clear and convincing evidence. Dep't of Banking & Fin. v. Osborne Stern & Co., 670 So. 2d 932, 935 (Fla. 1996). If this burden is satisfied, Petitioner must prove by a preponderance of the evidence that its applications

should be approved, notwithstanding any violations that are proven. Fla. Dep't of Child. & Fam. v. Davis Fam. Day Care Home, 160 So. 3d 854, 857 (Fla. 2015)(Canady, J., dissenting).

36. In this case, notice of specific rules allegedly violated was not given to the licensee. Therefore, only the alleged violations based on statutory grounds have been considered. See, e.g., United Wis. Life Ins. Co. v. Office of Ins. Reg., 849 So. 2d 417, 422 (Fla. 1st DCA 2003)(where licensee is not given reasonable notice of the applicability of a particular rule, a finding of a violation cannot be based on that rule). The undersigned has used the clear and convincing standard in evaluating the evidence.

37. The Department is authorized to deny an application for licensure if it determines that the licensed provider "is not in compliance with all statutory and regulatory requirements." § 397.415(1), Fla. Stat.

38. By clear and convincing evidence, the Department has established that Petitioner's applications were not timely filed, and they were incomplete. §§ 397.407(8) and 397.403(1)(f), Fla. Stat.

39. By clear and convincing evidence, the Department has established that Petitioner twice provided substance abuse services to O.G. from an unlicensed facility (the family home of Mr. Torres) in violation of section 397.401(1).

40. By clear and convincing evidence, the Department has established that the actions of Mr. Torres and his son, both officers of the licensee, presented a threat to the health and safety of O.G. in violation of section 397.415(1)(a)2.c.

41. By clear and convincing evidence, the Department has established that Petitioner rendered services "beyond the scope of [its] license" by providing PHP services to J.W. in violation of section 397.415(1)(a)2.c.

42. In summary, other than the allegation in Count IV that Petitioner's actions presented a threat to the health or safety of J.W., all charges in Counts I through V have been proven. The evidence clearly and convincingly supports the Department's denial of the two renewal applications. However, the request to impose a $2,500.00 administrative fine should be denied.

RECOMMENDATION

Based on the foregoing Findings of Fact and Conclusions of Law, it is

RECOMMENDED that the Department of Children and Families enter a final order denying the applications for renewal of Petitioner's two licenses. An administrative fine should not be imposed.

DONE AND ENTERED this 27th day of September, 2018, in Tallahassee, Leon County, Florida.

D. R. ALEXANDER
Administrative Law Judge
Division of Administrative Hearings
The DeSoto Building
1230 Apalachee Parkway
Tallahassee, Florida 32399-3060
(850) 488-9675
Fax Filing (850) 921-6847
www.doah.state.fl.us

Filed with the Clerk of the
Division of Administrative Hearings
this 27th day of September, 2018.

ENDNOTES

[1/] On June 18, 2018, or seven days before the hearing, Mr. Torres filed his first set of proposed (but not admitted) Exhibits 1 through 42 and 44 through 83. Over the next three days, he submitted revised or supplemental exhibits seven times. In all, the proposed exhibits comprise hundreds of pages, some numbered, others identified by either single or multiple letters, and some on a thumb drive that could not be opened or accessed by the Clerk's Office. Collectively, they present a daunting task to assemble in a coherent manner. Mr. Torres says it was necessary to file them in this manner because he had inadequate time to prepare his exhibits after receiving notice of the amended charges in February 2018, he is not an attorney, and he had to compile documents to fight charges going all the way back to 2005, when he operated a facility in Arizona. Although the proposed exhibits were filed with the Clerk's Office, in most cases they were not provided to Department counsel until the day of the hearing. During his examination of Department witnesses, Mr. Torres referred to a number of his proposed exhibits. However, the exhibits actually received in evidence are listed in the Preliminary Statement. The Department's proposed Exhibits 1 through 20 were pre-filed on April 2, 2018, while Exhibits 22 through 24 were filed on May 11 and June 14, 2018. Exhibits 25 through 27 are three depositions taken in May 2018, and in which

both parties participated. Although Mr. Torres argued that he did not receive all of the Department's pre-filed exhibits, they were sent to him by Federal Express or email.

[2/] Department Exhibit 24, an admission document for resident O.G. to an Intensive Outpatient Program dated August 22, 2017, was inadvertently referred to as Exhibit 26 in the record.

[3/] For the sake of efficiency, Petitioner's motion was granted at hearing, subject to the undersigned determining which, if any, of the statutes and regulations were relevant to these cases. Very few statutes and regulations, if any, have any relevance to the issues, as they were not used as a basis to deny the applications. For example, the motion cites numerous Arizona administrative regulations that were in effect "up until 2012," and various Arizona statutes, presumably for the purpose of allowing Mr. Torres to relitigate in this proceeding two adverse rulings rendered against him by an Arizona Superior Court in 2005 and 2012, when he operated a facility in that state. See Resp. Ex. 7 and 8.

[4/] A more comprehensive description of Level 2 residential programs is found in Florida Administrative Code Rule 65D-30.007(2)(b).

[5/] According to a Department witness, an individual receiving PHP services is provided eight hours of services each day, five days per week. An individual receiving IOP services is provided three hours of services each day, three days per week.

[6/] Prior to the hearing, Mr. Torres arranged a video telephone conference call with a representative of an Arizona company that created the software for PLADS. However, he failed to provide notice to Department counsel so that counsel could participate. His request to have the videotape accepted in evidence was denied.

COPIES FURNISHED:

T. Shane DeBoard, Esquire
Department of Children and Families
Suite S-1129
400 West Robinson Street
Orlando, Florida 32801
(eServed)

Lacey Kantor, Esquire
Department of Children and Families
Building 2, Room 204Z
1317 Winewood Boulevard
Tallahassee, Florida 32399-0700
(eServed)

Roberto Torres, Jr.
8297 Champions Gate Boulevard
Champions Gate, Florida 33896
(eServed)

Takisha Richardson, Esquire
Cohen Milstein Sellers & Toll, PLLC
Suite 200
2925 PGA Boulevard
Palm Beach Gardens, Florida 33410
(eServed)

John Jackson, Acting General Counsel
Department of Children and Families
Building 2, Room 204F
1317 Winewood Boulevard
Tallahassee, Florida 32399-0700
(eServed)

Rebecca Kapusta, Interim Secretary
Department of Children and Families
Building 1, Room 202
1317 Winewood Boulevard
Tallahassee, Florida 32399-0700
(eServed)

NOTICE OF RIGHT TO SUBMIT EXCEPTIONS

All parties have the right to submit written exceptions within 15 days from the date of this Recommended Order. Any exceptions to this Recommended Order should be filed with the agency that will issue the Final Order in this case.