

STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

MICHAEL GRASSO,

Petitioner,

vs.

Case No. 20-3036

ST. MARKS STONE CRAB FESTIVAL, INC.,

Respondent.

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RECOMMENDED ORDER

Pursuant to notice, a formal administrative hearing was conducted in Tallahassee, Florida, on August 27 and September 17, 2020, before Administrative Law Judge Garnett W. Chisenhall of the Division of Administrative Hearings (“DOAH”).

APPEARANCES

For Petitioner: Michael Grasso, pro se
2017 Gardenbrook Lane
Tallahassee, Florida 32301

For Respondent: Ronald A. Mowrey, Esquire
Mowrey Law Firm, P.A.
515 North Adams Street
Tallahassee, Florida 32301

STATEMENT OF THE ISSUE

Whether Respondent (“the St. Marks Stone Crab Festival” or “the Festival”) violated the Florida Civil Rights Act, chapter 760, part I, Florida

Statutes (2019),¹ by precluding Petitioner (“Michael Grasso” or “Mr. Grasso”) from bringing his dog onto its premises.

Mr. Grasso filed a Charge of Discrimination with the Florida Commission on Human Relations (“the Commission”) on December 20, 2019, alleging that the St. Marks Stone Crab Festival discriminated against him based on his disability:

I am an individual with a disability. I was discriminated against because of my disability. On October 26, 2019, I attempted to enter the St. Marks Stone Crab Festival. As I approached the table where admissions were being taken, a female who identified herself as Anna Bell told me that there was a no pet policy. I told her that I understood but my dog is a service animal for my disability and is exempt from rules for pets. This individual then asked me to produce an ID card proving he was actually a service animal. I told her that I did not have one and I tried to explain to her that the law did not require me to have one. I also told her that I would not enter if she did not want us to and I then asked her who was in charge so that I could follow up later. When I told her about the law, she proceeded to get the sheriff’s officers who were on site. The officer (Deputy Yarbrough) spoke with me and admitted that they did not know the law as it pertained to service animals and I printed it out for him. Mr. Yarbrough acknowledged that the law said that an ID was not required, but he said that since it was the rules of the Festival, he was there to enforce their rules. Mr. Yarbrough maintained that I was not allowed entrance unless I left my service animal elsewhere. I wrote a letter to Ray Stokes who sits on the city council and I called him, and he was belligerent and questioned whether I had a need for a service

¹ Unless stated otherwise, all statutory references shall be to the 2019 version of the Florida Statutes.

animal. Mr. Stokes refused further contact with me.

On June 5, 2020, the Commission issued a Notice setting forth its determination that reasonable cause existed to believe that an unlawful practice had occurred:

[Mr. Grasso] attempted to enter [the Festival] on October 26, 2019. [Mr. Grasso] alleged that [the Festival] denied him service by refusing to let him enter due to his disability and need for a service animal. The investigation supports his allegations. [Mr. Grasso] provided proof that he is disabled and requires the use of a service animal. [The Festival] acknowledged that it has a policy of requiring disabled guests with service animals to provide identification proving that the animal is a service animal. [The Festival] also acknowledged that since [Mr. Grasso] did not have documentation that his dog is a service animal, he was denied entry into the festival. This is direct evidence of disability discrimination.

Mr. Grasso filed a Petition for Relief on July 6, 2020, and the Commission referred this matter to DOAH on July 7, 2020, for a formal administrative hearing.

The final hearing was commenced as scheduled on August 27, 2020. Due to unforeseen circumstances, the final hearing was continued to September 17, 2020, and completed that day.

Mr. Grasso called himself, Deputy Robert Standeford, and Sergeant Jeffrey Yarbrough as witnesses. Petitioner's Exhibits 1 through 8 were accepted into evidence.

The St. Marks Stone Crab Festival called Paula Bell and William M. Bishop, Jr., as witnesses and did not attempt to move any exhibits into evidence.

The Transcript from the proceeding conducted on August 27, 2020, was filed on September 16, 2020, and the Transcript from the proceeding conducted on September 17, 2020, was filed on October 21, 2020. Both parties filed their proposed recommended orders prior to October 21, 2020, and those pleadings were considered in the preparation of this Recommended Order.

FINDINGS OF FACT

Based on the evidence adduced at the final hearing, the record as a whole, and matters subject to official recognition, the following Findings of Fact are made:

The Parties

1. Mr. Grasso previously worked as the CEO of a multi-million dollar company and served on the board of directors of another entity. The record evidence and testimony persuasively established that Mr. Grasso suffered a severely traumatic episode in 2007 causing him to suffer from post-traumatic stress disorder (“PTSD”) and anxiety. Mr. Grasso also has difficulty with crowds and dealing with strangers.

2. At some point, Mr. Grasso relocated from Las Vegas to the Florida Keys, and a psychiatrist treating him at the time suggested that Mr. Grasso obtain an emotional support animal. Mr. Grasso heeded that advice and rescued Zuco, a large labrador-mastiff mix, from a shelter in May of 2016, when Zuco was one and a half years old.

3. Mr. Grasso trained hundreds of dogs when he owned a pet store in the 1990s, and he utilized a training program he found on the internet to teach Zuco how to be a service animal.

4. Mr. Grasso has spent many hours training Zuco, and the first step in Zuco's training involved vigilance commands such as block and watch. The block command calls for Zuco to act as a barrier between Mr. Grasso and others. The watch command requires Zuco to monitor what is occurring behind Mr. Grasso, and Zuco's movements will alert Mr. Grasso to the presence of potential dangers. Mr. Grasso has also trained Zuco to enter a room prior to Mr. Grasso in order to assess the situation inside. Finally, Zuco is very sensitive to changes in Mr. Grasso's moods and will attempt to remove Mr. Grasso from a stressful situation if he becomes upset.²

5. Mr. Grasso moved to St. Marks, Florida in 2018. He lives on a boat docked at a local marina. Mr. Grasso works part-time doing handyman-type work for the marina owner who allows Zuco to be with Mr. Grasso while he works.

6. Mr. Grasso has been treating with Dr. Joseph Dorn since November of 2018, and Dr. Dorn has diagnosed Mr. Grasso as suffering from PTSD. In addition, the Social Security Administration has diagnosed Mr. Grasso as a disabled individual entitled to monthly payments. According to Mr. Grasso, he can no longer engage in the type of work he performed prior to the 2007 incident because his PTSD and anxiety make it impossible for him to maintain a full-time job.

7. The St. Marks Stone Crab Festival is a not-for-profit Florida corporation. The Festival began as a means to raise funds for the St Marks

² Mr. Grasso described Zuco's training as follows: "And one of the things that I taught him – you asked what I teach him. And what I teach him is vigilance commands such as 'block' and 'watch.' Like if I walk up to – if there's people back here and I walk up to a counter to pay for something, I'll tell him to 'watch.' He'll turn around, he'll pay attention behind me, and if anybody approaches me, his body language will let me know. He'll either start wagging his tail first, it it's just – if somebody's approaching aggressively, he will immediately make – like, either bark or, you know, kind of (nonverbal utterance) like, let me know that something's going on behind you that you need to turn around and watch. And 'block' is a command that you use to keep – to just put him between me and the public. If I'm walking somewhere with him, you'll always notice that he is between me and the public all the time. Whenever somebody's coming to approach me that I don't know, he's between us."

Volunteer Fire Department. Since its inception, the Festival's mission has expanded to encompass other activities such as beautifying the City of St. Marks and funding a substantial portion of the St. Marks Fourth of July celebration. The Festival draws 10 to 12 thousand attendees a year.

8. The Festival admits people who pay an admission fee. During the events described herein, the Festival admitted animals with documentation or vests identifying them as service animals. If the animal did not have documentation or a vest, then the Festival would not admit the animal.

The Events of October 26, 2019

9. The Festival was scheduled to open at 10:00 a.m. on October 26, 2019, and Mr. Grasso arrived at 9:30 a.m. with Zuco in order to assess the crowd size. He had never attended the Festival before and planned to leave if he determined that the crowd would be too large.

10. Zuco was on a leash but not wearing a vest or anything else identifying him as a service animal.

11. When Mr. Grasso attempted to enter the Festival, he encountered Paula Bell, a Festival volunteer who was collecting admission fees from patrons. Ms. Bell relayed to Mr. Grasso that the Festival had a no dog policy and that he could enter the Festival without Zuco. After Mr. Grasso explained that Zuco was a service animal, Ms. Bell requested documentation substantiating that Zuco was a service animal rather than a pet. At that point, the conversation became heated with Mr. Grasso stating that he did not have any documentation substantiating Zuco's service animal status and that requiring him to furnish such documentation was against the law.

12. The Festival had retained multiple off-duty officers from the Wakulla County Sheriff's Office to provide security. After Mr. Grasso asserted that the Festival was violating the law, he and Ms. Bell wanted to get law enforcement involved.

13. Mr. Grasso had walked about a block-and-a-half from the location of his confrontation with Ms. Bell by the time Sergeant Jeffrey Yarbrough

arrived at the scene. Upon Sergeant Yarbrough's arrival, Ms. Bell called to Mr. Grasso, and he returned to engage in further discussions.

14. Mr. Grasso soon left again in order to retrieve a copy of section 413.08, Florida Statutes,³ from his boat and returned within a few minutes.

Mr. Grasso and Sergeant Yarbrough began a heated discussion that caught the attention of Deputy Sheriff Robert Standeford who was patrolling the Festival Grounds. Deputy Standeford intervened because the discussion between Sergeant Yarbrough and Mr. Grasso had become loud and needed to be deescalated. Deputy Standeford tried to calm Mr. Grasso so that Deputy Yarbrough could read section 413.08.

15. After Sergeant Yarbrough read the statute, either he or someone associated with the Festival's management decided that Mr. Grasso could stay but Zuco could not. After forcefully expressing his displeasure with that decision, Mr. Grasso headed back toward his boat.

16. Given that people were yelling at various times during the aforementioned verbal exchanges, Deputy Standeford noticed that Zuco was understandably "a little nervous." Nevertheless, Zuco never became aggressive, and Deputy Standeford had no concerns that Zuco was dangerous.

Ultimate Findings

17. The St. Marks Stone Crab Festival is a "public accommodation" within the meaning of section 760.02(11). The greater weight of the evidence indicates that it is a place of exhibition or entertainment.⁴

³ Section 413.08(3) provides that "[a]n individual with a disability has the right to be accompanied by a service animal in all areas of public accommodation that the public or customers are normally permitted to occupy." Section 413.08(3)(b), specifies that "[d]ocumentation that the service animal is trained is not a precondition for providing service to an individual accompanied by a service animal. A public accommodation may not ask about the nature or extent of an individual's disability. To determine the difference between a service animal and a pet, a public accommodation may ask if an animal is a service animal required because of a disability and what work or tasks the animal has been trained to perform."

⁴ The Festival made no argument that it was not a "public accommodation" within the meaning of section 760.02(11).

18. The greater weight of the evidence demonstrates that PTSD substantially limits Mr. Grasso's ability to work. As a result, he has a "handicap" within the meaning of section 760.08.

19. The greater weight of the evidence demonstrates that Zuco is a "service animal" within the meaning of section 413.08(1)(d). Mr. Grasso has trained Zuco to perform very specific tasks designed to help Mr. Grasso feel secure in unfamiliar surroundings and around people.

20. The greater weight of the evidence demonstrates that the Festival violated section 413.08(2)(b) by conditioning Mr. Grasso's entry on him producing documentation substantiating Zuco's status as a service animal.

21. The greater weight of the evidence demonstrates that the Festival violated section 760.08 by denying Mr. Grasso access to a public accommodation.

CONCLUSIONS OF LAW

22. DOAH has jurisdiction over the parties to this proceeding and the subject matter pursuant to sections 120.569, 120.57(1), and 760.11(1), Florida Statutes.

23. The Florida Civil Rights Act of 1992 ("the Florida Civil Rights Act" or "the Act"), chapter 760, prohibits discrimination in places of public accommodation.

24. Section 760.08 provides that:

[a]ll persons are entitled to the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of any place of public accommodation without discrimination or segregation on the ground of race, color, national origin, sex, pregnancy, handicap, familial status, or religion.

25. Section 760.02(11), defines a “public accommodation” as:

places of public accommodation, lodgings, facilities principally engaged in selling food for consumption on the premises, gasoline stations, places of exhibition or entertainment, and other covered establishments. Each of the following establishments which serves the public is a place of public accommodation within the meaning of this section:

(a) Any inn, hotel, motel, or other establishment which provides lodging to transient guests, other than an establishment located within a building which contains not more than four rooms for rent or hire and which is actually occupied by the proprietor of such establishment as his or her residence.

(b) Any restaurant, cafeteria, lunchroom, lunch counter, soda fountain, or other facility principally engaged in selling food for consumption on the premises, including, but not limited to, any such facility located on the premises of any retail establishment, or any gasoline station.

(c) Any motion picture theater, theater, concert hall, sports arena, stadium, or other place of exhibition or entertainment.

(d) Any establishment which is physically located within the premises of any establishment otherwise covered by this subsection, or within the premises of which is physically located any such covered establishment, and which holds itself out as serving patrons of such covered establishment.

26. Florida provides additional protections for disabled persons who utilize service animals. Section 413.08(2) mandates that:

[a]n individual with a disability is entitled to full and equal accommodations, advantages, facilities, and privileges in all public accommodations. A

public accommodation must modify its policies, practices, and procedures to permit use of a service animal by an individual with a disability. This section does not require any person, firm, business, or corporation, or any agent thereof, to modify or provide any vehicle, premises, facility, or service to a higher degree of accommodation than is required for a person not so disabled.

27. With regard to service animals, section 413.08(3) provides that:

An individual with a disability has the right to be accompanied by a service animal in all areas of a public accommodation that the public or customers are normally permitted to occupy.

(a) The service animal must be under the control of its handler and must have a harness, leash, or other tether, unless either the handler is unable because of a disability to use a harness, leash, or other tether, or the use of a harness, leash, or other tether would interfere with the service animal's safe, effective performance of work or tasks, in which case the service animal must be otherwise under the handler's control by means of voice control, signals, or other effective means.

(b) Documentation that the service animal is trained is not a precondition for providing service to an individual accompanied by a service animal. A public accommodation may not ask about the nature or extent of an individual's disability. To determine the difference between a service animal and a pet, a public accommodation may ask if an animal is a service animal required because of a disability and what work or tasks the animal has been trained to perform.

28. In establishing that one was the victim of discrimination, a petitioner can produce: (a) direct evidence that discrimination motivated disparate treatment in the provision of services; or (b) circumstantial evidence

sufficient to allow the trier of fact to infer that discrimination caused disparate treatment.

29. Direct evidence is evidence that, if believed, would prove the existence of discriminatory intent without resort to inference or presumption. *Denney v. City of Albany*, 247 F.3d 1172, 1182 (11th Cir. 2001); *Holifield v. Reno*, 115 F.3d 1555, 1561 (11th Cir. 1997). As to the nature of the evidence, “only the most blatant remarks, whose intent could be nothing other than to discriminate . . . will constitute direct evidence of discrimination.” *Damon v. Fleming Supermarkets of Fla., Inc.*, 196 F.3d 1354, 1358-59 (11th Cir. 1999) (citations omitted).

30. During the time period relevant to the instant case, the Festival only admitted animals with documentation or vests identifying them as service animals. That policy was directly contrary to the provision in section 413.08(3)(b) stating that “[d]ocumentation that the service animal is trained is not a precondition for providing service to an individual accompanied by a service animal.” Denying Mr. Grasso entry into the festival based on the aforementioned policy is direct evidence of discrimination based on his disability.

31. Moreover, even if it were assumed that there is no direct evidence of discrimination in the instant case, Mr. Grasso presented circumstantial evidence sufficient to allow a trier of fact to infer that discrimination led to the disparate treatment.

32. With regard to evaluating discrimination claims based on circumstantial evidence, Title II of the Civil Rights Act of 1964, 42 U.S.C. § 2000a, prohibits discrimination in places of public accommodation, in language identical to that found in section 760.08. Because of the relatively small number of Title II cases, federal courts routinely find guidance in the law of Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, including the law of the shifting burdens of evidence production. *See Fahim v. Marriott Hotel Serv.*, 551 F.3d 344, 349 (5th Cir. 2008), and cases cited therein. The

United States Supreme Court's model for employment discrimination cases set forth in *McDonnell Douglas Corporation v. Green*, 411 U.S. 792, 93 S. Ct. 1817, 36 L. Ed. 2d 668 (1973), also provides the model for Title II cases. *Fahim*, 551 F.3d at 349-50.

33. Under the *McDonnell* analysis, as modified for cases of discrimination in places of public accommodation, a petitioner has the burden of establishing a *prima facie* case of unlawful discrimination by a preponderance of the evidence. If the *prima facie* case is established, then the burden shifts to the respondent to rebut that preliminary showing by producing evidence that the allegedly discriminatory action was taken for some legitimate, non-discriminatory reason. If the respondent rebuts the *prima facie* case, then the burden shifts back to the petitioner to show by a preponderance of the evidence that the respondent's offered reason was pretextual or that the respondent's reason, if true, was only one reason for its action and that another motivating factor was the petitioner's protected characteristic.

34. In order to prove a *prima facie* case of unlawful public accommodation discrimination under section 760.08, a petitioner must establish that he or she: (a) is a member of a protected class; (b) attempted to contract for the services of a public accommodation; (c) was denied those services; and (d) the services were made available to similarly situated persons outside his or her protected class. *Fahim*, 551 F.3d at 350.

35. The question of whether Mr. Grasso belongs to a protected class turns on whether PTSD is a disability. With regard to disability discrimination, the Act is construed in conformity with the Americans with Disabilities Act ("the ADA") found in 42 U.S.C. § 1201 *et seq.* *Cordoba v. Dillard's, Inc.*, 419 F.3d 1169, 1175 (11th Cir. 2005)(citing *Wimberly v. Secs Tech Grp., Inc.*, 866 So. 2d 146, 147 (Fla. 4th DCA 2004)(noting that "[b]ecause Florida Courts construe the FCRA in conformity with the ADA, a disability discrimination cause of action is analyzed under the ADA."). *See also Holly v. Clairson*

Indus., LLC, 492 F.3d 1247, 1255 (11th Cir. 2007)(noting that FCRA claims are analyzed under the same standards as the ADA).

36. The 11th Circuit has stated that a diagnosis of PTSD by itself does not establish that one is disabled under the ADA. *Haines v. Cherokee Cty*, 2010 WL 2821853, at *12 (N.D. GA 2010). The impairment must substantially limit a major life activity such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. *Id.* When the major life activity at issue is that of working, an alleged victim of discrimination must demonstrate that he or she is unable to work in a broad class of jobs. The inability to perform a single, particular job does not constitute a substantial limitation in the major life activity of working. *See D'Angelo v. ConAgra Foods, Inc.*, 422 F.3d 1220, 1227 (11th Cir. 2005).

37. The greater weight of the evidence demonstrates that Mr. Grasso is disabled within the meaning of the ADA and thus satisfies the first prong of a *prima facie* case of unlawful public accommodation discrimination under section 760.08. As a result of the traumatic incident he experienced in 2007, Mr. Grasso's ability to work has been substantially limited because he has difficulty being around groups of people, especially strangers. As discussed above, Zuco acts as a shield between Mr. Grasso and others. With Mr. Grasso being so uncomfortable around people, he is unable to perform the work he performed prior to the 2007 incident or any sort of work requiring a significant amount of interaction with people. His current work of performing odd jobs around a marina does not require substantial interaction with others.

38. The Festival argues that Mr. Grasso has not proven that he suffers from PTSD. Mr. Grasso moved into evidence a letter from the Social Security Administration indicating he was entitled to monthly payments as a disabled individual and a document signed by Dr. Joseph Dorn stating Mr. Grasso suffers from PTSD. While those documents are hearsay statements being

offered to prove that Mr. Grasso suffers from PTSD, the undersigned can consider them because their contents supplement and/or corroborate Mr. Grasso's testimony about his symptoms and that he has been diagnosed as having PTSD. *See* § 120.57(1)(c), Fla. Stat. (providing that "[h]earsay evidence may be used for the purpose of supplementing or explaining other evidence, but it shall not be sufficient in itself to support a finding unless it would be admissible over objection in civil actions.").

39. There is no dispute that Mr. Grasso attempted to enter the Festival and was denied access because he wanted to bring Zuco onto the Festival grounds. There is also no dispute that the Festival allowed other, non-disabled people to enter. Therefore, Mr. Grasso has established the second, third, and fourth prongs of a *prima facie* case of unlawful public accommodation discrimination under section 760.08.

40. In order to counter Mr. Grasso's *prima facie* case, the Festival argues that Zuco is not a service animal and that it acted appropriately by denying access to Mr. Grasso unless he could produce documentation substantiating Zuco's status as a service animal.

41. Section 413.08(1)(d) defines as service animal as:

an animal that is trained to do work or perform tasks for an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. *The work done or tasks performed must be directly related to the individual's disability and may include, but are not limited to, guiding an individual who is visually impaired or blind, alerting an individual who is deaf or hard of hearing, pulling a wheelchair, assisting with mobility or balance, alerting and protecting an individual who is having a seizure, retrieving objects, alerting an individual to the presence of allergens, providing physical support and assistance with balance and stability to an individual with a mobility disability, helping an individual with a psychiatric or neurological*

disability by preventing or interrupting impulsive or destructive behaviors, reminding an individual with mental illness to take prescribed medications, *calming an individual with posttraumatic stress disorder during an anxiety attack*, or doing other specific work or performing other special tasks. A service animal is not a pet. For purposes of subsections (2), (3), and (4), the term “service animal” is limited to a dog or miniature horse. The crime-deterrent effect of an animal’s presence and the provision of emotional support, well-being, comfort, or companionship do not constitute work or tasks for purposes of this definition.

(emphasis added).

42. The greater weight of the evidence demonstrates that Zuco helps Mr. Grasso control his anxiety when he is in the presence of others. Mr. Grasso has trained Zuco to perform very specific tasks that are intended to help Mr. Grasso feel secure in unfamiliar surroundings and around people. While the Festival argues that Zuco lacks formal training, section 413.08(1)(d) does not require that animals have any sort of certification in order to be considered “service animals.”

43. In sum, Mr. Grasso has established a prima facie case of discrimination, and the burden now shifts to the Festival to rebut that preliminary showing by producing evidence that its decision to deny access to Mr. Grasso and Zuco was based on a legitimate, non-discriminatory reason.

44. The Festival’s decision to condition Mr. Grasso’s entry on him producing documentation substantiating Zuco’s status as a service animal was a violation of section 413.08(2)(b). Florida law only allowed the Festival to inquire if Zuco was a service animal and what tasks he had been trained to perform. As a result, the Festival’s decision to deny access to Mr. Grasso was not based on a legitimate, non-discriminatory reason. *See* § 413.08(2)(b), Fla. Stat. (mandating that “[d]ocumentation that the service animal is trained is not a precondition for providing service to an individual accompanied by a

service animal. A public accommodation may not ask about the nature or extent of an individual's disability. To determine the difference between a service animal and a pet, a public accommodation may ask if an animal is a service animal required because of a disability and what work or tasks the animal has been trained to perform.”).

45. The greater weight of the evidence demonstrates that the Festival violated section 760.08 by denying Mr. Grasso access to a public accommodation.

46. Mr. Grasso has requested that the undersigned recommend that he be awarded damages. However, section 760.11(5) indicates that only a court of law, rather than an administrative tribunal, is authorized to award punitive damages and compensatory damages for mental anguish, loss of dignity, and other intangible injuries in cases such as this. *See generally Broward Cty. v. La Rosa*, 505 So. 2d 422 (Fla. 1987)(holding that an administrative agency cannot award damages for personal injuries).⁵

RECOMMENDATION

Based on the foregoing Findings of Fact and Conclusions of Law, it is RECOMMENDED that the Florida Commission on Human Relations enter a final order: (a) finding that the St. Marks Stone Crab Festival violated the Florida Civil Rights Act by conditioning Mr. Grasso's entry on the production of documentation substantiating that his dog was a "service animal"; and (b) prohibiting the aforementioned practice.

⁵ Section 760.11(7) provides that "[i]n the event the final order issued by [the Commission] determines that a violation of the Florida Civil Rights Act of 1992 has occurred, the aggrieved person may bring, within 1 year of the date of the final order, a civil action under subsection (5) as if there has been a reasonable cause determination or accept the affirmative relief offered by [the Commission], but not both."

DONE AND ENTERED this 10th day of November, 2020, in Tallahassee,
Leon County, Florida.

Garnett Chisenhall

G. W. CHISENHALL
Administrative Law Judge
Division of Administrative Hearings
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Filed with the Clerk of the
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this 10th day of November, 2020.

COPIES FURNISHED:

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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.