

Module 19: Delegation And Enumerated Power

Administrative Expansion, Progressive Theory, and the Drift from Limited Government to Open-Ended Authority

Section 1: Module Summary & History

Core Overview

The central theme of this module concerns the structural origin of governmental power and the subsequent historical drift from strictly enumerated delegations to open-ended administrative authority. At its inception, the American constitutional system established that government possesses no original political authority; instead, it operates as an agent of the People, who delegate specific, listed powers for limited purposes. Every lawful governmental act must therefore be traceable through a clear chain of custody—from the individual officer to the agency, through a statute, and finally back to a constitutional provision ratified by the People. The module identifies a profound structural friction between these foundational principles and modern institutional practices. While the original framework requires the government to demonstrate a written grant of authority for every action, contemporary governance often operates on the presumption that power exists by virtue of institutional existence, long-standing practice, or administrative necessity. This tension is encapsulated in the module's "Firewall Question": **Was the power lawfully delegated, or merely assumed through institutional expansion?**

The Timeline of Drift (1776 to Present)

The shift from the 1776 procedural baseline of limited delegation to the modern administrative state is characterized by a sequence of incremental expansions. Each phase represents a structural break that altered the original procedural sequence.

- **Phase 1: The Original Baseline (Delegated Power):** Established that the People are the source of power. The government is a recipient of enumerated (listed) powers, and silence in the text indicates a withholding of authority.
- **Phase 2: Implied Means:** Introduced the concept that government must possess tools reasonably connected to executing express powers (e.g., mail trucks for post offices). Initially, means remained subordinate to the original grant.
- **Phase 3: Implied Power:** A critical shift where implied means began functioning as independent governmental ends. Institutions began identifying desired results first and then searching for constitutional language broad enough to justify them.
- **Phase 4: Inherent Power:** The source of inquiry moved from the People's delegation to the institution's own asserted needs. Power was claimed as "essential" to the function of the office, allowing the institution to define its own unwritten authority.
- **Phase 5: Progressive Administrative Theory:** Modern governance needs were prioritized over fixed constitutional limits. It was increasingly assumed that if government was expected to solve a problem, it possessed the inherent authority to manage it.

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- **Phase 6: Broad Statutory Delegation:** Legislatures began transferring lawmaking (rulemaking) authority to executive agencies, challenging the maxim *delegata potestas non potest delegari*. This blurred the line between executing law and creating it.
- **Phase 7: Combined Functions:** Administrative agencies began consolidating legislative, executive, and judicial powers—creating, enforcing, and adjudicating their own rules—violating the separation of powers established in provisions like Article XXX of the Massachusetts Declaration of Rights.
- **Phase 8: Agency Self-Expansion:** Power began expanding through internal layers: statutes supported regulations, which supported guidance, which supported internal policy manuals. Institutional practice became its own justification.
- **Phase 9: Presumed Authority:** The burden of proof reversed. Instead of demonstrating a lawful source, government treated the existence of an agency or the continuity of a program as sufficient evidence of its authority.
- **Phase 10: Institutional Circularity:** The final stage where the system became a closed loop. Power is justified by procedure, and procedure is justified by long-standing practice, treating repetition as a substitute for a lawful source.

Core Operational Concepts

- **The Burden Shift:** In the original constitutional structure, the institution claiming authority bears the burden of identifying the written grant and the lawful chain connecting it to the act. In modern practice, this has been reversed: the citizen is increasingly expected to prove that the government's claimed power does *not* exist.
- **The Operational Mechanism:** Administration normalizes drift through "Institutional Circularity." By validating power through its own internal procedures—where the agency interprets the statute, creates the rule, and then adjudicates violations of that rule—the system creates a loop that avoids returning to the original constitutional delegation for legitimacy.

Glossary of Key Terms

- **Casus Omissus:** A legal doctrine (full: *casus omissus pro omisso habendus est*) meaning "a case omitted is to be treated as intentionally omitted." Government may not supply powers the People chose to exclude.
- **Certiorari:** A writ used to bring the record of a completed proceeding before a reviewing court to examine for legal defects or jurisdictional excesses.
- **Delegata Potestas Non Potest Delegari:** A governing maxim stating that a delegated power cannot be further delegated; an agent (like the legislature) cannot transfer its entrusted power to another body.
- **Enumerated Power:** Powers specifically listed and identified in a written constitution, which simultaneously grant authority and withhold all powers not listed.
- **Habeas Corpus:** A writ used to test the legality of a person's restraint, custody, or confinement.
- **Mandamus:** A writ used to compel a public official or body to perform a clear, non-discretionary legal duty.

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- **Prohibition:** A preventive writ used to stop a lower tribunal or agency from acting beyond its lawful jurisdiction while a proceeding is still pending.
- **Quo Warranto:** A writ challenging the authority or "title" by which a person exercises a public office or franchise.
- **Writ:** A formal judicial instrument used to place a defined legal defect before a court for review.

Section 2: Assessment and Review

Multiple-Choice Quiz

1. **According to the original rule of delegated power, where does government get its engine's power?** A) Institutional practice B) Legislative necessity C) The People D) Administrative expertise
2. **The doctrine of *casus omissus* suggests that if a power is omitted from the Constitution:** A) It can be supplied by the legislature through necessity. B) It is treated as intentionally withheld by the People. C) It is automatically granted to the Executive branch. D) It is an implied means for an existing power.
3. **What is the "First Drift" identified in the module's historical analysis?** A) The shift from implied means to implied power. B) The creation of the first administrative agency. C) The rejection of the Tenth Amendment. D) The transition from monarchy to democracy.
4. **The maxim *delegata potestas non potest delegari* most directly limits which of the following?** A) The Executive's power to enforce laws. B) The Judiciary's power to review statutes. C) The Legislature's power to redelegate lawmaking authority. D) The People's power to amend the Constitution.
5. **Under Article XXX of the Massachusetts Declaration of Rights, what is expressly prohibited?** A) The regulation of interstate commerce. B) The exercise of legislative or judicial power by the executive. C) The collection of taxes without representation. D) The use of implied means to execute express powers.
6. **"Institutional Circularity" occurs when a system validates its authority by:** A) Referring back to the original constitutional delegation. B) Passing a new statute to clarify old powers. C) Pointing to the fact that it has already been exercising the power. D) Obtaining a vote of confidence from the People.
7. **Which writ is appropriate if a student needs to stop an unauthorized administrative proceeding before it reaches a final order?** A) Mandamus B) Certiorari C) Quo Warranto D) Prohibition
8. **The "Constitutional Audit" sequence moves from the modern act backward to the source. What is the final step in this sequence?** A) Regulation or Order B) Statute C) Constitutional Delegation D) The Agency
9. **What is the central distinction between Mandamus and Prohibition?** A) Mandamus is for state courts; Prohibition is for federal agencies. B) Mandamus compels a duty; Prohibition prevents an excess of jurisdiction. C) Mandamus reviews the past; Prohibition tests the legality of custody. D) Mandamus addresses public office; Prohibition addresses rulemaking.

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10. In the context of the Florida Bar exemplar, what was the primary source identified for the court's jurisdiction over attorney discipline? A) The Florida Bar's internal bylaws. B) Article V, section 15 of the Florida Constitution. C) A 1926 federal statute. D) The Rules of Civil Procedure.

Answer Key and Explanations Table

Question Answer Explanation

1	C	The American system begins with the People; government possesses no original authority.
2	B	<i>Casus omissus</i> mandates that omissions are intentional and cannot be supplied by the government.
3	A	The first break occurs when tools (means) are treated as independent powers (ends).
4	C	This maxim prevents an agent (the legislature) from delegating the power it was entrusted with.
5	B	This article reinforces the separation of powers by prohibiting departments from exercising others' roles.
6	C	Circularity relies on repetition and practice rather than a lawful external source.
7	D	Prohibition is an "emergency brake" used to stop an unauthorized proceeding while it is pending.
8	C	All lawful acts must trace back to the original grant provided by the People in the Constitution.
9	B	Mandamus is used for failure to act (duty); Prohibition is used for acting too much (jurisdiction).
10	B	The response cited the state constitution as the specific jurisdictional grant for that function.

Essay Format Questions

1. **Analyze the transition from "Implied Means" to "Inherent Power."** Explain how the reversal of the constitutional sequence—moving from preferred result to inferred authority—weakens the limiting force of enumeration.
2. **Evaluate the impact of Progressive Administrative Theory on the Burden of Proof.** Contrast the original requirement for government to identify a written grant of authority with the modern presumption of validity based on institutional continuity.
3. **Synthesize the concept of "Combined Functions" with the definition of tyranny provided by Madison.** How does the consolidation of rulemaking, enforcement, and adjudication within a single agency bypass the structural safeguards of the Constitution?

Section 3: Exemplars Summary and Relevance

Exemplar	Summary	Relevance to Material
Enumerated Powers Notice	A formal notice requiring an institution to identify the specific constitutional grant for its actions.	Demonstrates the practical method of placing the "source question" into the record to challenge assumed authority.
Statutory Citation Audit	A review process that follows a citation (e.g., U.S. Code) back to the legislative act and its constitutional basis.	Illustrates the difference between a rule (the code) and its source (the delegation), proving a citation is not a final answer.
CPS Authority Tracing	An audit of child welfare interventions, tracing the power from the specific employee back to the legislature.	Highlights the issue of "Redelegation" and the requirement that even emergency authority must have a traceable link and defined limits.
Florida Bar Authority Record	A documentary inquiry into the authority for mandatory bar dues and distribution of funds.	Teaches how to compare the authority requested with the authority produced, identifying gaps where general jurisdiction fails to support specific acts.

Section 4: Expanded Homework Assignment and Practical Application Exercise

Case File / Background

An administrative agency has initiated an enforcement action against a citizen based on a "Policy Manual" directive. The citizen has requested the underlying authority for the action. The agency responded by citing its own internal "Rules of Procedure" and a general statute that established the agency thirty years ago. The agency is currently moving toward a final hearing where it will act as the investigator, prosecutor, and judge.

Procedural Review Assignment

Apply the module's review standard to the scenario above using the following steps:

1. **Identify/Document:** Record the specific act being performed and the specific officer/actor involved.
2. **Trace the Citation:** Locate the statute cited. Does it expressly grant the power to create the "Policy Manual" directive being enforced?
3. **Identify the Breach:** Determine where the "Drift" occurred. Is the agency relying on *Presumed Authority* or *Institutional Circularity*?
4. **Check for Combined Functions:** Document if the agency is violating Article XXX principles by combining legislative (rulemaking) and judicial (hearing) functions.
5. **Preserve Chronology:** Create a timeline showing the sequence from the Constitutional grant to the current enforcement act.

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Required Document Preparation

Draft a formal **Enumerated Powers Notice**. The document must record:

- The specific governmental act under review.
- The exact officer and agency claiming authority.
- A formal demand for the government to produce the written "chain of custody" for the power, starting from a constitutional provision.
- A notice regarding the limits of redelegation (*delegata potestas non potest delegari*).

Final Review Question Upon completion of this audit, the student must answer:

Does the record demonstrate a clear, unbroken chain of express delegation, or is the agency's authority a product of self-reinforcing institutional practice?

Practical Classification for Module 19

For the handout, here are the most important writs:

Defect	Principal Writ
Clear legal duty not performed	Mandamus
Tribunal preparing to exceed jurisdiction	Prohibition
Completed lower record requires review	Certiorari
Unlawful custody or restraint	Habeas Corpus
Unauthorized exercise of public office or franchise	Quo Warranto
Lower court refuses to proceed	Procedendo
Fundamental defect in an existing judgment	Coram Nobis
Later-arising defense to enforcement	Audita Querela
Specific property wrongfully detained	Replevin
Judgment requires enforcement	Execution
Departure must be prevented pending review	Supersedeas or stay
Person may leave jurisdiction and defeat relief	Ne Exeat

Lawful Notification to the Massachusetts State Legislature Instructing Them to Prevent Maladministration and Cease Further Usurpations, Repugnant to the Constitution.

Notice to Agent is Notice to Principal and Notice to Principal is Notice to Agent

I, Kevin Thomas Cannon one of the People (as seen in the 50 State Constitutions), Republican in Form, Sui Juris, do present you with this notice that you and your agents may provide due care;

Please take notice that the people have taken the time to do the proper study to be able to come together in mass across the Commonwealth and have assembled, in an orderly and peaceful manner, to give instructions to their representatives and deal with matters of the common good. This is a formal notice requiring the trustees of the people to observe fundamental principles and to stop usurping authority, oppressing the people, and waging war on the Constitution. You are also instructed to stop attempting to introduce and pass any further pretended acts of legislation, which clearly violate your oaths of office are repugnant to the Constitution, and interfere with our fundamental liberty interests of protecting ourselves from all manner of threats to our liberty. The failure of attorneys to understand and present information to any government official or worker, will not excuse the duty of government official or worker to research and better understand the following facts:

Please take notice that all political power in our republican form of government resides originally in the people and is derived from them, and we are endowed by our Creator with certain natural, essential, inherent, indefeasible, and unalienable rights. *(The following authorities are cited below:)*

Maxim of Law 51o *"All Political Power is inherent in the people by decree of God, thus none can exist except it be derived from them."* **American Maxim**

Maxim of Law 59o. *"Law is a rule of right, and whatever is contrary to the rule of right is an injury."* **3 Bulst. 313.**

"The people have a right, in an orderly and peaceable manner, to assemble to consult upon the common good; give instructions to their representatives, and to request of the legislative body, by the way of addresses, petitions, or remonstrances, redress of the wrongs done them, and of the grievances they suffer."
Massachusetts Constitution, Part the First, Article XIX

Please be aware that we have instituted government to secure our rights as its sole and only legitimate function and every act of usurpation in the government, and consequently treason against the sovereignty of the people, occurs when public officials in a limited government go beyond the bounds that the constitution sets for their powers. *(The following authorities are cited below:)*

"Objective of government. *That the sole object and only legitimate end of government is to protect the citizen in the enjoyment of life, liberty, and property, and when the government assumes other functions, it is usurpation and oppression."* **Alabama Constitution, Article I, § 35**

"To secure these rights government is instituted among men deriving their just powers from the consent of the governed." **-Declaration of Independence**

Maxim of Law 51p. *"The main object of government is the protection and preservation of personal rights, private property, and public liberties, and upholding the law of God."* **American Maxim.**

Tucker Blackstone Vol. 1 Appendix Note B [Section 3] 1803 *"If in a limited government, the public functionaries exceed the limits which the constitution prescribes to their powers, every act is an act of usurpation in the government, and, as such, treason against the sovereignty of the people."*

Maxim of Law 51r. *"As usurpation is the exercise of power, which another has a right to; so, tyranny is the exercise of power beyond right, which nobody can have a right to."* **Locke, Treat. 2, 18, 199.**

Please take note that every member of the government, whether they are appointed or elected, is a trustee and servant of the people and is, by implied or expressed contract, obligated by oath or affirmation to defend the Constitutions of the United States and their State in a manner that is most consistent with and binding on their conscience from enemies of the republic, both domestic and foreign. *(The following authorities are cited below:)*

Maxim of Law *“There is no stronger link or bond between men than an oath.”* **Jenk. Cent. Cas. 126; Id. P. 126, case 54.**

Please take notice that the bill referred to as HD4420, as well as others, is null and void for any effect. To guard against transgressions of the high powers, we the people, in whom all political power is inherent, affirm and declare that everything in the Bills and Declarations of Rights is excepted out of the general powers of government, and shall forever remain inviolate, and all laws contrary thereto, or contrary to the Federal or State Constitutions shall be void. (The following authorities are cited below:)

Second Amendment *A well-regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.* **U.S. Bill of Rights, Amendment 2.**

“The people have a right to keep and to bear arms for the common defence. And as, in time of peace, armies are dangerous to liberty, they ought not to be maintained without the consent of the legislature; and the military power shall always be held in an exact subordination to the civil authority, and be governed by it.”
Massachusetts Constitution, Part the First Article XVII.

Militia defined.

“I ask who are the militia? They consist now of the whole people, except a few public officers.” – **George Mason, Address to the Virginia Ratifying Convention, June 4, 1788**

“A militia when properly formed are in fact the people themselves...and include, according to the past and general usage of the states, all men capable of bearing arms... “To preserve liberty, it is essential that the whole body of the people always possess arms, and be taught alike, especially when young, how to use them.” – **Richard Henry Lee, Federal Farmer No. 18, January 25, 1788**

The Intent of the 2nd Amendment *“As civil rulers, not having their duty to the people before them, may attempt to tyrannize, and as the military forces which must be occasionally raised to defend our country, might pervert their power to the injury of their fellow citizens, the people are confirmed by the article in their right to keep and bear their private arms.”* – **Tench Coxe, Philadelphia Federal Gazette, June 18, 1789**

“The Constitution of most of our states (and of the United States) assert that all power is inherent in the people; that they may exercise it by themselves; that it is their right and duty to be at all times armed.” – **Thomas Jefferson, letter to John Cartwright, 5 June 1824**

Marbury v Madison 5 U.S. (Cranch) 137,174,176 (1803) *“All laws, rules and practices which are repugnant to the Constitution are null and void.”*

Notice of Liability

Please take notice that the essence and union of society consists of having one will; government, when once established by the majority, has the declaring, and as it were the keeping of that will. When the government acts contrary to the trust reposed in them by making themselves masters or arbitrary disposers of the lives, liberties, or fortunes of the people, that government is therefore dissolved; For the society can never, by the fault of another, lose the native and original right it has to preserve itself. The state of mankind is not so miserable that they are not capable of using this remedy till it is too late to look for any. You must, at once, cease and desist any further acts of maladministration and treason. The failure to correct these issues will be considered a willful trespass with full knowledge, intent, and malice. (The following authorities are cited below:)

John Locke, “Two Treatises of Government” Section 220. *In these, and the like cases, when the government is dissolved, the people are at liberty to provide for themselves by erecting a new legislative differing from the other by the change of persons, or form, or both, as they shall find it most for their safety and good. For the society can never, by the fault of another, lose the native and original right it has to preserve itself, which can only be done by a settled legislative and a fair and impartial execution of the laws made by it. But the state of mankind is not so miserable that they are not capable of using this remedy till it be too late to look for any. To tell people they may provide for themselves by erecting a new legislative, when, by oppression, artifice, or being delivered over to a foreign power, their old one is gone, is only to tell them they may expect relief when it is too late, and the evil is past cure. This is, in effect, no more than to bid them first be slaves, and then to take care of their liberty, and, when their chains are on, tell them they may act like free men. This, if barely so, is rather mockery than relief, and men can never be secure from tyranny if there be no means to escape it till they are perfectly under it; and, therefore, it is that they have not only a right to get out of it but to prevent it.”*

Maxim 51c. *The government is to be subject to the law, for the law makes the government.* **C.L.M.**

Miranda v. Arizona, 384 U.S. 436 (1966) page 491 “Where rights secured by the Constitution are involved, there can be no rulemaking or legislation which would abrogate them.

Maxim 86b. No man can forfeit another’s right. **Fleta, lib. 1, c. 28, s. 11**

Furthermore, if you disagree and believe any of these claims are untrue, please respond by affidavit, sworn under penalty of perjury, with Constitutional provisions granting you the authority to ignore our instructions and infringe upon, or, do anything other than secure the rights of the people, within fourteen (14) business days, or you agree that all herein be true and continued transgressions by ambition, fear, folly or corruption over the lives and liberties of the people constitutes a breach of trust and forfeiture of the power the people had delegated and therefore you are relieved of duty and shall be personally liable for \$5,000 per incident. I reserve the right to have this issue resolved by an arbitrator of my choice.

This Notice is sent to you in peace and with the love of Christ, so that you may provide immediate due care to those in whom all political power is inherent, the People.



Signed at:
2023-10-22 04:30:40

10-22-2023

kevincannonsag@gmail.com

**United States Government Accountability Commission
Government Accountability Commission Law Review**

30 N. Gould Street, Suite R

Sheridan, Wyoming 82801

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Thursday, May 21, 2026



c/o Paul Carnie

Research Division

United States Government Accountability Commission

Via Certified Mail and Electronic Mail

Office of the General Counsel

The Florida Bar

651 E. Jefferson Street

Tallahassee, Florida 32399-2300

and

Clerk of Court

Supreme Court of Florida

500 South Duval Street

Tallahassee, Florida 32399

**RE: Public Records Request Concerning Authority to License the Practice of
Law, Rulemaking Authority, Definitions of Law, Administrative Jurisdiction,
Fees, Waivers, and Enforcement Structures**

To the Custodian of Records:

Pursuant to Article I, Section 24 of the Florida Constitution, Chapter 119, Florida Statutes, and all other applicable public records provisions governing public access to governmental records, the United States Government Accountability Commission respectfully requests copies of records concerning the authority, jurisdiction, rulemaking structure, administrative framework, financial structure, and procedural governance relating to the licensing and regulation of the practice of law within the State of Florida.

This request is submitted as part of an ongoing constitutional and historical examination concerning delegated authority, administrative licensing structures, procedural governance, and the operational regulation of legal practice within the American judicial system.

This request is made for purposes of:

- lawful authority review,
- constitutional examination,
- public accountability,
- historical inquiry,
- and preservation of the public record.

The Commission respectfully requests production of the following records:

I. Source Authority and Delegation

1. All constitutional provisions, statutes, judicial opinions, administrative authorities, court orders, rules, or formally enacted instruments relied upon as authority for licensing and regulating the practice of law within the State of Florida.
2. All records identifying the claimed constitutional or jurisdictional authority of the Supreme Court of Florida to:
 - a. Regulate the practice of law;
 - b. Define the practice of law;
 - c. Impose licensing requirements;
 - d. Discipline attorneys;
 - e. Prohibit unauthorized practice of law;
 - f. Promulgate rules governing admission to practice;
 - g. Impose continuing obligations upon licensed attorneys.
3. All records identifying the delegation chain through which authority to regulate legal practice is claimed to arise.
4. All records identifying whether the authority claimed by the Florida Supreme Court is understood as:
 - a. Inherent authority;
 - b. Delegated constitutional authority;
 - c. Administrative authority;
 - d. Supervisory authority;
 - e. Common-law authority;
 - f. Judicially implied authority.

II. Definitions of Law and Legal Practice

5. All records identifying the legal or operational definition currently relied upon for:
 - a. “Law”;
 - b. “Practice of law”;

- c. “Legal advice”;
 - d. “Legal representation”;
 - e. “Unauthorized practice of law”;
 - f. “Legal services.”
- 6. All records identifying whether “law” is defined or operationally understood within the licensing structure as:
 - a. Constitutional law;
 - b. Statutory law;
 - c. Common law;
 - d. Judicial precedent;
 - e. Administrative regulation;
 - f. Procedural rulemaking;
 - g. Court-created rules;
 - h. Natural law;
 - i. Institutional policy.
- 7. All records identifying the authority relied upon for determining what activities constitute the unauthorized practice of law.

III. Structure of The Florida Bar

- 8. All records identifying whether The Florida Bar is considered:
 - a. A governmental entity;
 - b. A quasi-governmental entity;
 - c. A private corporation;
 - d. An integrated bar association;
 - e. An administrative arm of the Court;
 - f. A mandatory membership organization;
 - g. A professional association.
- 9. All records identifying the authority relied upon to require mandatory membership in The Florida Bar as a condition for engaging in the licensed practice of law.

10. All records identifying the relationship between:

- a. The Florida Supreme Court;
- b. The Florida Bar;
- c. Disciplinary boards;
- d. Grievance committees;
- e. Referees;
- f. And unauthorized practice enforcement divisions.

IV. Rulemaking, Discipline, and Procedure

11. All records identifying the source of authority for promulgation of:

- a. Bar Rules;
- b. Disciplinary procedures;
- c. Admission standards;
- d. Continuing education requirements;
- e. Trust account regulations;
- f. Unauthorized practice enforcement procedures.

12. All records identifying the procedural mechanisms governing:

- a. Attorney discipline;
- b. Suspension;
- c. Disbarment;
- d. Grievance proceedings;
- e. Investigations;
- f. Unauthorized practice proceedings;
- g. Reinstatement proceedings.

13. All records identifying whether unauthorized practice proceedings are classified as:

- a. Civil;
- b. Criminal;
- c. Quasi-criminal;

- d.** Administrative;
 - e.** Disciplinary;
 - f.** Equitable.
- 14. All records identifying the procedural rights available to individuals subject to disciplinary or unauthorized practice proceedings, including:
 - a.** Notice;
 - b.** Hearing rights;
 - c.** Evidentiary standards;
 - d.** Burden of proof;
 - e.** Appeal rights;
 - f.** Judicial review mechanisms.

V. Fees, Dues, Costs, and Financial Structure

- 15. All records identifying:
 - a.** Licensing fees;
 - b.** Admission fees;
 - c.** Annual dues;
 - d.** Reinstatement fees;
 - e.** Disciplinary assessment fees;
 - f.** Continuing education fees;
 - g.** Trust account fees;
 - h.** Administrative costs;
 - i.** And all other mandatory financial obligations associated with the licensed practice of law within the State of Florida.
- 16. All records identifying the legal authority relied upon for assessing mandatory dues, fees, or financial obligations.
- 17. All records identifying whether such fees are classified as:
 - a.** Taxes;
 - b.** Assessments;

- c.** Dues;
 - d.** Licensing costs;
 - e.** Administrative fees;
 - f.** Regulatory obligations;
 - g.** Or professional membership obligations.
- 18. All records identifying how collected funds are allocated, distributed, appropriated, or expended.
- 19. All records identifying whether collected funds are used for:
 - a.** Disciplinary enforcement;
 - b.** Investigations;
 - c.** Litigation;
 - d.** Administrative operations;
 - e.** Lobbying activity;
 - f.** Public relations activity;
 - g.** Educational programming;
 - h.** Institutional expansion;
 - i.** Or unauthorized practice enforcement.

VI. Waivers, Exemptions, and Public Interest Exceptions

- 20. All records identifying:
 - a.** Fee waiver procedures;
 - b.** Indigency waivers;
 - c.** Hardship waivers;
 - d.** Military accommodations;
 - e.** Emeritus status;
 - f.** Legal aid exemptions;
 - g.** Public service exceptions;
 - h.** Nonprofit practice exceptions;

- i. Judicial exemptions;
 - j. Reduced-fee categories;
 - k. Temporary authorizations;
 - l. Reciprocity exceptions.
- 21. All records identifying the legal authority relied upon for creating exemptions or waivers from otherwise mandatory licensing or financial requirements.
- 22. All records identifying whether inability to pay may result in:
 - a. Suspension;
 - b. Disbarment;
 - c. Denial of admission;
 - d. Denial of reinstatement;
 - e. Restriction of legal practice;
 - f. Disciplinary action.

VII. Immunity, Accountability, and Review

- 23. All records identifying any immunity protections, liability limitations, or procedural protections applicable to:
 - a. Bar officials;
 - b. Disciplinary personnel;
 - c. Grievance committees;
 - d. Referees;
 - e. Hearing officers;
 - f. Court-appointed disciplinary actors.
- 24. All records identifying whether members of the public may challenge:
 - a. Jurisdiction;
 - b. Licensing authority;
 - c. Disciplinary authority;
 - d. Unauthorized practice determinations;
 - e. Rulemaking authority;

- f.** Integrated bar authority.
- 25. All records identifying oversight, auditing, review, or accountability mechanisms governing:
 - a.** The Florida Bar;
 - b.** Disciplinary systems;
 - c.** Unauthorized practice enforcement;
 - d.** Licensing administration;
 - e.** And Bar financial operations.

VIII. Record Retention

- 26. All records retention schedules applicable to:
 - a.** Disciplinary records;
 - b.** Licensing records;
 - c.** Unauthorized practice proceedings;
 - d.** Grievance proceedings;
 - e.** Bar rulemaking records;
 - f.** Fee and dues records;
 - g.** And administrative adjudication records.

Request for Denial Basis

If any portion of this request is denied, please provide:

- The specific legal basis for denial;
- The specific exemption relied upon;
- The name and title of the individual responsible for the denial;
- And whether segregable portions may still be produced.

Electronic production is preferred where reasonably available.

Closing

This request is submitted in good faith for purposes of constitutional examination, historical inquiry, public accountability, lawful authority review, and preservation of the public record.

Respectfully,

/s/ Paul Carnie

Research Division

United States Government Accountability Commission (USGAC)

Paul Carnie - General/Multiple Requests Records :: W016439-060226

From The Florida Bar Public Records <noreplyfloridabar@mycusthelp.net>
To paul.carnie@proton.me
Date Tuesday, June 2nd, 2026 at 3:06 PM

--- Please respond above this line ---

The Florida Bar



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June 2, 2026

Paul Carnie

Public Records Request: W016439-060226 of 6/2/2026

Record Type: General/Multiple Requests Records

Request Description: Copies of records concerning the authority, jurisdiction, rulemaking structure, administrative framework, financial structure, and procedural governance relating to the licensing and regulation of the practice of law within the State of Florida.

Paul Carnie:

The Florida Bar acknowledges receipt of your public record request dated June 02, 2026, and I am responding in accordance with Rule 2.420, Florida Rules of General Procedure & Judicial Administration, and applicable law. Please send all communication regarding this request to my attention.

Article I, section 24 of the Florida Constitution and chapter 119, Florida Statutes, provide access to existing public records maintained by an agency. However, public records laws do not require an agency to conduct legal research, answer questions, create explanatory records, prepare compilations, or provide legal analysis in response to a request.

Much of your correspondence seeks legal conclusions, interpretations, explanations of constitutional authority, and generalized research concerning the authority of the Supreme Court of Florida and The Florida Bar. To the extent your request seeks existing public records that are publicly available, many such materials may already be accessed through publicly available sources, including:

- The Florida Constitution;

- The Rules Regulating The Florida Bar;
- The Rules of the Supreme Court Relating to Admissions to the Bar;
- Opinions of the Supreme Court of Florida; and
- Other publicly available court rules and administrative materials.

These materials are available through the Florida Supreme Court's website and The Florida Bar's website.

To the extent you seek specifically identifiable existing public records not otherwise publicly available, please provide a more narrowly tailored request identifying the particular records sought with reasonable specificity.

If you have any further questions, please feel free to contact me at your earliest convenience.

Sincerely,

Rick Courtemanche

Deputy General Counsel

rcourtemanche@floridabar.org

850-561-5788

Please note: Florida has very broad public records laws. Many written communications to or from The Florida Bar regarding Bar business may be considered public records, which must be made available to anyone upon request. Your e-mail communications may therefore be subject to public disclosure.

Re: Public Records Request Concerning Authority to License the Practice of Law, Rulemaking Authority...

From paul.carnie <paul.carnie@proton.me>
To John Tomasino <tomasino@flcourts.gov>
Date Thursday, June 25th, 2026 at 4:31 PM

Dear Clerk Tomasino:

This letter responds to your office's reply to the public records request submitted by Paul Carnie / United States Government Accountability Commission on May 21, 2026, which sought, among other things, the documentary basis for the authority exercised by the Florida Supreme Court and The Florida Bar over mandatory attorney dues collection and the distribution of those funds to third-party organizations.

Your response directed Relator to the Florida Constitution, the Rules Regulating The Florida Bar, Florida Rules of General Procedure and Judicial Administration, and Opinions of the Florida Supreme Court as the sources of applicable law and authority. Relator has reviewed those publicly available materials. None of them is a **legislative act** — an act of the Florida Legislature enacted through the constitutional lawmaking process. They are, in their entirety, acts of the Court itself.

This letter presents a single, narrowly tailored request for the one document that has not yet been identified.

THE NARROWED REQUEST

Pursuant to Article I, Section 24 of the Florida Constitution, Chapter 119, Florida Statutes, and Rule 2.420 of the Florida Rules of General Procedure and Judicial Administration, the following single, specifically identifiable record is requested:

REQUEST NO. 1

Produce any document — including but not limited to any statute, legislative act, appropriations bill, joint resolution, or provision of the Florida Constitution enacted or ratified by the People of Florida

through their Legislature — that specifically authorizes the Florida Supreme Court, The Florida Bar, or any entity acting under the authority of either, to:

- (a) require licensed Florida attorneys to pay mandatory dues, assessments, or fees as a condition of the right to practice law in this State; and
- (b) collect, hold, and distribute those mandatory payments to third-party organizations — including but not limited to the Florida Bar Foundation and Funding Florida Legal Aid, Inc. — for purposes not directly limited to the regulation of the individual attorney's license.

If no such document exists within the custody, possession, or control of the Office of the Clerk of the Florida Supreme Court, please confirm that fact in writing. A written confirmation of non-existence is a responsive public record. Court opinions, court rules, and administrative orders are not responsive to this request; this request seeks the act of the Legislature or the People — not the act of the Court regarding its own authority.

WHY COURT-CREATED DOCUMENTS ARE NOT RESPONSIVE

The documents identified in your prior response — the Florida Constitution (as interpreted by the Court), Bar rules, and Court opinions — establish what the Court has *said* about its authority. This request asks for something different: what the *People*, acting through their Legislature, have *authorized*. These are not the same thing. A court opinion asserting authority is not a legislative delegation of that authority. This distinction is fundamental to constitutional government.

If the Florida Supreme Court's authority to require mandatory dues and direct their distribution rests solely on the Court's own rules and opinions — with no underlying act of the Legislature — this request will have established that fact through the absence of any responsive document. That fact is itself material to proceedings in which Relator is involved and is sought for legitimate public accountability purposes.

RESPONSE DEADLINE

Please provide a written response within **ten (10) business days** of receipt of this letter. If production will require additional time, please provide written notice of the anticipated production date within ten business days.

If any portion of this request is denied, please specify: (a) the legal basis for denial; (b) the specific exemption relied upon under Rule 2.420 or Chapter 119; (c) the name and title of the individual responsible for the denial; and (d) whether any segregable portions may still be produced.

Respectfully submitted,

/s/ Paul Carnie

Paul Carnie

United States Government Accountability Commission

Paul.Carnie@proton.me

Sent with [Proton Mail](#) secure email.

On Monday, June 1st, 2026 at 9:33 AM, John Tomasino <tomasino@flcourts.gov> wrote:

This acknowledges receipt of your correspondence dated May 21, 2026, styled as a public records request concerning the regulation of the practice of law in Florida.

Article I, section 24 of the Florida Constitution and chapter 119, Florida Statutes, provide access to existing public records maintained by an agency. However, public records laws do not require an agency to conduct legal research, answer questions, create explanatory records, prepare compilations, or provide legal analysis in response to a request.

Much of your correspondence seeks legal conclusions, interpretations, explanations of constitutional authority, and generalized research concerning the authority of the Supreme Court of Florida and The Florida Bar. To the extent your request seeks existing public records that are publicly available, many such materials may already be accessed through publicly available sources, including:

- The Florida Constitution;
- The Rules Regulating The Florida Bar;
- The Rules of the Supreme Court Relating to Admissions to the Bar;
- Opinions of the Supreme Court of Florida; and
- Other publicly available court rules and administrative materials.

These materials are available through the Florida Supreme Court's website and The Florida Bar's website.

To the extent you seek specifically identifiable existing public records not otherwise publicly available, please provide a more narrowly tailored request identifying the particular records sought with reasonable specificity.

Sincerely,

John Tomasino

Clerk of Court

Paul Carnie

c/o United States Government Accountability Commission
30 N. Gould Street, Suite R
Sheridan, Wyoming 82801
Paul.Carnie@proton.me

June 25, 2026

Via Certified Mail — Return Receipt Requested

John Tomasino, Clerk of Court

Supreme Court of Florida
500 South Duval Street
Tallahassee, Florida 32399-1925

RE: Narrowed Public Records Request — Single Identifiable Record

In Response to Your Response to the May 21, 2026, Public Records Request
Re: Authority for Florida Bar Mandatory Dues and Third-Party Distribution

Dear Clerk Tomasino:

This letter responds to your office's reply to the public records request submitted by Paul Carnie / United States Government Accountability Commission on May 21, 2026, which sought, among other things, the documentary basis for the authority exercised by the Florida Supreme Court and The Florida Bar over mandatory attorney dues collection and the distribution of those funds to third-party organizations.

Your response directed Relator to the Florida Constitution, the Rules Regulating The Florida Bar, Florida Rules of General Procedure and Judicial Administration, and Opinions of the Florida Supreme Court as the sources of applicable law and authority. Relator has reviewed those publicly

available materials. None of them is a **legislative act** — an act of the Florida Legislature enacted through the constitutional lawmaking process. They are, in their entirety, acts of the Court itself.

This letter presents a single, narrowly tailored request for the one document that has not yet been identified.

THE NARROWED REQUEST

Pursuant to Article I, Section 24 of the Florida Constitution, Chapter 119, Florida Statutes, and Rule 2.420 of the Florida Rules of General Procedure and Judicial Administration, the following single, specifically identifiable record is requested:

REQUEST NO. 1

Produce any document — including but not limited to any statute, legislative act, appropriations bill, joint resolution, or provision of the Florida Constitution enacted or ratified by the People of Florida through their Legislature — that specifically authorizes the Florida Supreme Court, The Florida Bar, or any entity acting under the authority of either, to:

- (a) require licensed Florida attorneys to pay mandatory dues, assessments, or fees as a condition of the right to practice law in this State; and
- (b) collect, hold, and distribute those mandatory payments to third-party organizations — including but not limited to the Florida Bar Foundation and Funding Florida Legal Aid, Inc. — for purposes not directly limited to the regulation of the individual attorney's license.

If no such document exists within the custody, possession, or control of the Office of the Clerk of the Florida Supreme Court, please confirm that fact in writing. A written confirmation of non-existence is a responsive public record. Court opinions, court rules, and administrative orders are not responsive to this request; this request seeks the act of the Legislature or the People — not the act of the Court regarding its own authority.

WHY COURT-CREATED DOCUMENTS ARE NOT RESPONSIVE

The documents identified in your prior response — the Florida Constitution (as interpreted by the Court), Bar rules, and Court opinions — establish what the Court has *said* about its authority. This request asks for something different: what the *People*, acting through their Legislature, have *authorized*. These are not the same thing. A court opinion asserting authority is not a legislative delegation of that authority. This distinction is fundamental to constitutional government.

If the Florida Supreme Court's authority to require mandatory dues and direct their distribution rests solely on the Court's own rules and opinions — with no underlying act of the Legislature — this request will have established that fact through the absence of any responsive document. That fact is itself material to proceedings in which Relator is involved and is sought for legitimate public accountability purposes.

RESPONSE DEADLINE

Please provide a written response within **ten (10) business days** of receipt of this letter. If production will require additional time, please provide written notice of the anticipated production date within ten business days.

If any portion of this request is denied, please specify: (a) the legal basis for denial; (b) the specific exemption relied upon under Rule 2.420 or Chapter 119; (c) the name and title of the individual responsible for the denial; and (d) whether any segregable portions may still be produced.

Respectfully submitted,

/s/ Paul Carnie
Paul Carnie
United States Government Accountability Commission
Paul.Carnie@proton.me

RE: Narrowed Public Records Request — Single Identifiable Record

From paul.carnie <paul.carnie@proton.me>

To rcourtemanche@floridabar.org

Date Thursday, June 25th, 2026 at 4:30 PM

Dear Deputy General Counsel Courtemanche:

This letter is submitted in direct response to your June 2, 2026, letter acknowledging receipt of Relator's May 21, 2026, public records request and inviting a "more narrowly tailored request identifying the particular records sought with reasonable specificity." This is that request.

As a preliminary matter, Relator notes that your response invoked **Rule 2.420 of the Florida Rules of General Procedure and Judicial Administration** as the governing public records framework. Rule 2.420 applies to the *judicial branch* of the State of Florida. Relator does not concede that Rule 2.420 displaces Chapter 119, Florida Statutes, or Article I, Section 24 of the Florida Constitution as applied to The Florida Bar. This invocation is noted, preserved for the record, and will be addressed in separate proceedings. This request is submitted under both frameworks without waiver of any right under either.

THE NARROWED REQUEST

Pursuant to Article I, Section 24 of the Florida Constitution, Chapter 119, Florida Statutes, and Rule 2.420 as cited in your response, the following single, specifically identifiable record is requested:

REQUEST NO. 1

Produce any document — including but not limited to any statute, legislative act, appropriations bill, joint resolution, or provision of the Florida Constitution enacted or ratified by the People of Florida through their Legislature — that specifically authorizes The Florida Bar, as distinguished from the Florida Supreme Court, to:

- (a) collect mandatory dues, assessments, or fees from licensed Florida attorneys as a condition of the right to practice law in this State; and
- (b) distribute, transfer, or direct those collected funds to third-party organizations, including but not limited to legal aid organizations, the Florida Bar Foundation, and Funding Florida Legal Aid, Inc.

If no such document exists within the custody, possession, or control of The Florida Bar, please confirm that fact in writing. A written confirmation of non-existence is itself a public record required to be produced. Court rules, court opinions, and internal Bar regulations are not responsive to this request; this request seeks the act of the Legislature or the People, not the act of the Court.

-

THIS REQUEST DOES NOT SEEK LEGAL ANALYSIS

Your June 2, 2026, response noted that public records law does not require an agency to conduct legal research, answer questions, or provide legal analysis. This request does not ask for any of those things. Either a legislative act authorizing these specific financial operations exists, or it does not. If it exists, produce it. If it does not exist, confirm that in writing. No legal analysis is required to perform a records search and report the result.

RESPONSE DEADLINE

Please provide a written response within **ten (10) business days** of receipt. If production will require additional time, provide written notice of the anticipated production date within ten business days.

If any portion of this request is denied, please specify: (a) the legal basis for denial; (b) the exemption relied upon; (c) the name and title of the individual responsible; and (d) whether segregable portions may still be produced.

Respectfully submitted,

/s/ Paul Carnie

Paul Carnie

United States Government Accountability Commission

Paul.Carnie@proton.me

Sent with [Proton Mail](#) secure email.

Re: Public Records Request Concerning Authority to License the Practice of Law, Rulemaking Authority...

From paul.carnie <paul.carnie@proton.me>
To John Tomasino <tomasino@flcourts.gov>
Date Thursday, June 25th, 2026 at 4:31 PM

Dear Clerk Tomasino:

This letter responds to your office's reply to the public records request submitted by Paul Carnie / United States Government Accountability Commission on May 21, 2026, which sought, among other things, the documentary basis for the authority exercised by the Florida Supreme Court and The Florida Bar over mandatory attorney dues collection and the distribution of those funds to third-party organizations.

Your response directed Relator to the Florida Constitution, the Rules Regulating The Florida Bar, Florida Rules of General Procedure and Judicial Administration, and Opinions of the Florida Supreme Court as the sources of applicable law and authority. Relator has reviewed those publicly available materials. None of them is a **legislative act** — an act of the Florida Legislature enacted through the constitutional lawmaking process. They are, in their entirety, acts of the Court itself.

This letter presents a single, narrowly tailored request for the one document that has not yet been identified.

THE NARROWED REQUEST

Pursuant to Article I, Section 24 of the Florida Constitution, Chapter 119, Florida Statutes, and Rule 2.420 of the Florida Rules of General Procedure and Judicial Administration, the following single, specifically identifiable record is requested:

REQUEST NO. 1

Produce any document — including but not limited to any statute, legislative act, appropriations bill, joint resolution, or provision of the Florida Constitution enacted or ratified by the People of Florida

through their Legislature — that specifically authorizes the Florida Supreme Court, The Florida Bar, or any entity acting under the authority of either, to:

- (a) require licensed Florida attorneys to pay mandatory dues, assessments, or fees as a condition of the right to practice law in this State; and
- (b) collect, hold, and distribute those mandatory payments to third-party organizations — including but not limited to the Florida Bar Foundation and Funding Florida Legal Aid, Inc. — for purposes not directly limited to the regulation of the individual attorney's license.

If no such document exists within the custody, possession, or control of the Office of the Clerk of the Florida Supreme Court, please confirm that fact in writing. A written confirmation of non-existence is a responsive public record. Court opinions, court rules, and administrative orders are not responsive to this request; this request seeks the act of the Legislature or the People — not the act of the Court regarding its own authority.

WHY COURT-CREATED DOCUMENTS ARE NOT RESPONSIVE

The documents identified in your prior response — the Florida Constitution (as interpreted by the Court), Bar rules, and Court opinions — establish what the Court has *said* about its authority. This request asks for something different: what the *People*, acting through their Legislature, have *authorized*. These are not the same thing. A court opinion asserting authority is not a legislative delegation of that authority. This distinction is fundamental to constitutional government.

If the Florida Supreme Court's authority to require mandatory dues and direct their distribution rests solely on the Court's own rules and opinions — with no underlying act of the Legislature — this request will have established that fact through the absence of any responsive document. That fact is itself material to proceedings in which Relator is involved and is sought for legitimate public accountability purposes.

RESPONSE DEADLINE

Please provide a written response within **ten (10) business days** of receipt of this letter. If production will require additional time, please provide written notice of the anticipated production date within ten business days.

If any portion of this request is denied, please specify: (a) the legal basis for denial; (b) the specific exemption relied upon under Rule 2.420 or Chapter 119; (c) the name and title of the individual responsible for the denial; and (d) whether any segregable portions may still be produced.

Respectfully submitted,

/s/ Paul Carnie

Paul Carnie

United States Government Accountability Commission

Paul.Carnie@proton.me

Sent with [Proton Mail](#) secure email.

On Monday, June 1st, 2026 at 9:33 AM, John Tomasino <tomasino@flcourts.gov> wrote:

This acknowledges receipt of your correspondence dated May 21, 2026, styled as a public records request concerning the regulation of the practice of law in Florida.

Article I, section 24 of the Florida Constitution and chapter 119, Florida Statutes, provide access to existing public records maintained by an agency. However, public records laws do not require an agency to conduct legal research, answer questions, create explanatory records, prepare compilations, or provide legal analysis in response to a request.

Much of your correspondence seeks legal conclusions, interpretations, explanations of constitutional authority, and generalized research concerning the authority of the Supreme Court of Florida and The Florida Bar. To the extent your request seeks existing public records that are publicly available, many such materials may already be accessed through publicly available sources, including:

- The Florida Constitution;
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- Opinions of the Supreme Court of Florida; and
- Other publicly available court rules and administrative materials.

These materials are available through the Florida Supreme Court's website and The Florida Bar's website.

To the extent you seek specifically identifiable existing public records not otherwise publicly available, please provide a more narrowly tailored request identifying the particular records sought with reasonable specificity.

Sincerely,

John Tomasino

Clerk of Court

Paul Carnie - General/Multiple Requests Records :: W016439-060226

From The Florida Bar Public Records <noreplyfloridabar@mycusthelp.net>

To paul.carnie@proton.me

Date Friday, June 26th, 2026 at 9:02 AM

--- Please respond above this line ---

The Florida Bar



JOSHUA E. DOYLE
EXECUTIVE DIRECTOR

651 EAST JEFFERSON STREET
TALLAHASSEE, FLORIDA 32399-2300

850/561-5600
www.FLORIDABAR.ORG

June 26, 2026

Paul Carnie

Public Records Request: W016439-060226 of 6/2/2026

Record Type: General/Multiple Requests Records

Request Description: Copies of records concerning the authority, jurisdiction, rulemaking structure, administrative framework, financial structure, and procedural governance relating to the licensing and regulation of the practice of law within the State of Florida.

Paul Carnie:

First, Art. V, section 15 of the Florida Constitution states that "The supreme court shall have exclusive jurisdiction to regulate the admission of persons to the practice of law and the discipline of persons admitted." This is further codified in the Introduction, Rules Regulating the Florida Bar: "The Supreme Court of Florida by these rules establishes the authority and responsibilities of The Florida Bar, an official arm of the court."

Second, relying on separation of powers principles, the courts have consistently held that the judiciary is not an "agency" for purposes of Ch. 119, F.S., commonly known as the Florida Public Records Law. See, e.g., *Times Publishing Company v. Ake*, 660 So. 2d 255 (Fla. 1995) (the judiciary, as a coequal branch of government, is not an "agency" subject to supervision or control by another coequal branch of government); and *Locke v. Hawkes*, 595 So. 2d 32 (Fla. 1992). Cf. s. 119.0714(1), F.S., stating that "[n]othing in this chapter shall be construed to exempt from [s. 119.07(1), F.S.] a public record that was made a part of a court file and that is not specifically closed by order of court . . ." (e.s.) And see *Tampa Television, Inc. v. Dugger*, 559 So. 2d 397 (Fla. 1st DCA 1990) (Legislature has recognized the

distinction between documents sealed under court order and those not so sealed, and has provided for disclosure of the latter only).

Access to records of the judicial branch is governed by Florida Rule of General Practice & Judicial Administration 2.420:

(a) Scope and Purpose. Subject to the rulemaking power of the Florida Supreme Court provided by article V, section 2, Florida Constitution, the following rule shall govern public access to and the protection of the records of the judicial branch of government. The public shall have access to all records of the judicial branch of government, except as provided below...

(b) Definitions.

(1) "Records of the judicial branch" are all records, regardless of physical form, characteristics, or means of transmission, made or received in connection with the transaction of official business by any judicial branch entity and consist of:

....

(B) "administrative records," which are all other records made or received pursuant to court rule, law, or ordinance, or in connection with the transaction of official business by any judicial branch entity.

*(2) "Judicial branch" means the judicial branch of government, which includes the state courts system, the clerk of court when acting as an arm of the court, **The Florida Bar**, the Florida Board of Bar Examiners, the Judicial Qualifications Commission, and all other entities established by or operating under the authority of the supreme court or the chief justice.*

In 1949 the Florida Supreme Court granted a petition to integrate the Florida Bar. To review your request or download any associated files; please login to the [Public Records System](#) using this email address.

If you have any further questions, please feel free to contact me at your earliest convenience.

Sincerely,

Rick Courtemanche
Deputy General Counsel

rcourtemanche@floridabar.org
850-561-5788

Please note: Florida has very broad public records laws. Many written communications to or from The Florida Bar regarding Bar business may be considered public records, which must be made available to anyone upon request. Your e-mail communications may therefore be subject to public disclosure.
