

**IN THE CIRCUIT COURT OF THE EIGHTH JUDICIAL CIRCUIT
ALACHUA COUNTY, FLORIDA
CIVIL ACTION**

US RIGHT TO KNOW,

Plaintiff,

v.

CASE NO:

THE UNIVERSITY OF FLORIDA
BOARD OF TRUSTEES,

Defendant.

COMPLAINT FOR WRIT OF MANDAMUS

Plaintiff, US Right to Know, through undersigned counsel and pursuant to Rule 1.630 of the Florida Rules of Civil Procedure and Chapter 119, Florida Statutes, petitions the Court for an immediate hearing and the entry of a Writ of Mandamus directing the Defendant to produce public records requested by Plaintiff. In support hereof, Plaintiff states:

FACTS ON WHICH PLAINTIFF RELIES FOR RELIEF

1. Plaintiff US Right to Know (“USRTK”) is a California nonprofit corporation working for transparency and accountability in our nation’s food system.
2. Defendant The University of Florida Board of Trustees administers the University of Florida, a public state university, and is subject to Chapter 119, Florida Statutes, and Article I, Section 24 of the Florida Constitution.

The AgBioChatter Emails

3. By letter dated September 3, 2015 to Sandra Mitchell, University of Florida, Office of the General Counsel, USRTK requested records pertaining to University of Florida Professor Kevin M. Folta, professor of horticulture, specifically: “all email to or from Professor

Folta that is to, from, CC or BCC to the email address AgBioChatter@yahoogroups.com . . . from July 1, 2012 to the present.” (Exhibit A)

4. The Defendant requested payment of \$1,233.88 to process this public record request, which USRTK paid.

5. On March 7, 2016, the Defendant provided 24 pages of records responsive to USRTK’s request. These records included only emails *sent from* Professor Folta to AgBioChatter@yahoogroups.com, but no emails *received by* Professor Folta from AgBioChatter@yahoogroups.com. The produced emails showed that Professor Folta participated in the group chats using his university email address, kfolta@uf.edu, and often included his complete professional signature block identifying himself as “Professor and Chairman, Horticultural Services Department University of Florida.” An excerpt of the records produced are attached as Exhibit B.

6. When USRTK inquired why the fee was \$1,233.88 for only 24 pages, the Defendant offered to and did refund the \$1,233.88 to USRTK. Defendant stated that “the overestimate included some records that are unrelated to official university business and consequently are not public records.”

7. Following additional communications to Defendant from Plaintiff’s counsel, on June 17, 2016, Defendant produced an additional 57 pages of records. Again, these records included only of emails *sent from* Professor Folta to AgBioChatter@yahoogroups.com; no emails *received by* Professor Folta from AgBioChatter@yahoogroups.com were produced.

8. At no time has Defendant asserted that any of the requested records are exempt from disclosure in accordance with Section 119.07(1)(e), Florida Statutes.

9. Pursuant to Chapter 119, Florida Statutes, Defendant is obligated to permit public records in its custody to be inspected and copied within a reasonable time and upon payment of a lawfully permissible fee.

10. Defendant has unlawfully refused to comply with this obligation by failing to produce any email records received by its employee Professor Folta from AgBioChatter@yahoogroups.com.

11. On June 16, 2017, Plaintiff made a separate request to Defendant for all emails to or from Professor Folta to the email address AgBioChatter@yahoogroups.com from January 1, 2011 to the present. In the event Defendant does not produce all requested emails for the updated time period, Plaintiff will seek leave to amend this complaint to incorporate this additional violation.

The Payne Emails

12. By letter dated October 27, 2015 to Sandra Mitchell, University of Florida, Office of the General Counsel, USRTK requested records pertaining to University of Florida Professor Jack Payne, senior vice president for agriculture and natural resources at the University of Florida, specifically:

- (a) “all email correspondence between Mr. Payne and any staff or employees of any of the following organizations or persons . . . [listing 15 entities and one individual]” and
- (b) “all email correspondence between Mr. Payne and any staff or employees of the University of Florida Foundation that includes any of the following keywords: [listing 13 entities].”

The time period for these requests was January 1, 2013 to the present. (Exhibit C)

13. On December 15, 2015, the Defendant produced 42 pages of documents responsive to the request described in Paragraph 11.

14. Of the documents produced by the Defendant, only five (5) pages were responsive to the request in Paragraph 11(b). The Defendant asserted that “Redactions were made pursuant to . . . FS 1004.28 (DSO exemption).” (*See* Exhibit D; *see also* Exhibit E (“the University withheld some potentially responsive records as confidential and exempt pursuant to FS 1004.28(5)”).

15. Paragraph 1004.28(5)(b), Florida Statutes, provides that “All records of [a University direct-support organization] other than the auditor’s report, management letter, and any supplemental data requested by the Board of Governors, the university board of trustees, the Auditor General, and the Office of Program Policy Analysis and Governmental Accountability shall be confidential and exempt from s. 119.07(1).”

16. Defendant has not stated with particularity the reasons for its apparent position that all emails exchanged between Professor Payne and employees of the University of Florida Foundation (“Foundation”) are “records of” the Foundation, when Professor Payne is *not* an employee of the University of Florida Foundation and his emails are public records under Chapter 119.

17. Pursuant to Chapter 119, Florida Statutes, Defendant is obligated to permit public records in its custody to be inspected and copied within a reasonable time and upon payment of a lawfully permissible fee.

18. Defendant has unlawfully refused to comply with this obligation by failing to produce any email records between Professor Payne and the University of Florida Foundation.

COUNT FOR WRIT OF MANDAMUS

19. Paragraphs 1 through 18 are realleged as if fully set forth herein.

20. USRTK has a clear legal right to the documents requested in Exhibits A and B.

21. Defendant has breached its indisputable duty to provide the requested documents to Plaintiff USRTK.

22. No other effective legal remedy is available to Plaintiff USRTK.

23. Because Defendant has unlawfully refused to permit public records to be inspected or copied, Plaintiff is entitled to recover the reasonable costs incurred in enforcement, including reasonable attorney's fees pursuant to Section 119.12, Florida Statutes.

ARGUMENT

24. "Public records" include "all documents . . . regardless of the physical form . . . made or received . . . in connection with the transaction of official business by any agency." § 119.011(12), Fla. Stat. This includes any material made or received in connection with official agency business "which is intended to perpetuate, communicate, or formalize knowledge of some type." *Shevin v. Byron, Harless, Schaffer, Reid and Associates, Inc.*, 379 So. 2d 633, 640 (Fla. 1980). "Inter-office memoranda and intra-office memoranda communicating information from one public employee to another . . . even though not a part of an agency's later, formal public product, would nonetheless constitute public records inasmuch as they supply the final evidence of knowledge obtained in connection with the transaction of official business." *Id.*

25. Plaintiff has a clear legal right to access public records. Article I, Section 24(a), of the Florida Constitution grants "[e]very person . . . the right to inspect or copy any public record made or received in connection with the official business of any public body, officer, or

employee of the state, or persons acting on their behalf." The right is enforced through the Public Records Law, Chapter 119 of the Florida Statutes.

26. Florida's public records law "is to be construed liberally in favor of openness, and all exemptions from disclosure are to be construed narrowly and limited in their designated purpose." *Board of Trustees, Jacksonville Police & Fire Pension Fund*, 189 So. 3d 120, 125 (Fla. 2016) (internal citations omitted).

27. To be entitled to mandamus, a party must allege a violation of a clear legal right and the breach of an indisputable legal duty. *E.g., Polley v. Gardner*, 98 So. 3d 648, 649 (Fla. 1st DCA 2012). A public official's disclosure of public records in compliance with Chapter 119 is a ministerial duty and mandamus is an appropriate means of compelling compliance. *Weeks v. Golden*, 764 So. 2d 633, 634 (Fla. 1st DCA 2000).

28. All emails received by Professor Folta from AgBioChatter@yahoo.com are public records, because they are received in connection with the transaction of official business. This includes any emails Professor Folta received from AgBioChatter@yahoo.com through a personal or non-university email address. Defendant had a ministerial duty to produce them to Plaintiff.

29. Emails from Professor Payne to the University of Florida Foundation and emails from employees of the UFF Foundation to Professor Payne do not *ipso facto* constitute "records of" the UFF Foundation such that they qualify for the exemption provided in Paragraph 1004.28(5)(b), Florida Statutes. The burden is on Defendant to demonstrate its entitlement to an exemption. *Weeks v. Golden*, 764 So. 2d 633, 635 (Fla. 1st DCA 2000). Professor Payne is not an employee of the Foundation, and email communications sent or received by him in the course of official business are public records.

30. Even the Court finds that some of the documents requested may fall within the exemption provided in Paragraph 1004.28(5)(b), Florida Statutes, the proper procedure would be to require Defendant to furnish the documents to the Court for an *in camera* inspection. *Walton v. Dugger*, 634 So. 2d 1059, 1061-62 (Fla. 1993).

31. When an agency fails to produce public records as required in Chapter 119, a writ of mandamus is proper. *City of Gainesville v. State ex rel. Int'l Ass'n of Fire Fighters*, 298 So. 2d 478 (Fla. 1st DCA 1974).

32. Upon a finding by the trial court that a public agency violated a provision of the Public Records Act in failing to permit a public record to be inspected or copied, the plaintiff is entitled to an award of reasonable attorney's fees and costs. § 119.12, Fla. Stat.; *Board of Trustees, Jacksonville Police & Fire Pension Fund*, 189 So. 3d 120, 128 (Fla. 2016).

RELIEF REQUESTED

Wherefore, Plaintiff respectfully requests an immediate hearing pursuant to Section 119.11, Florida Statutes, following which Plaintiff requests the Court enter a Writ of Mandamus:

- A. Directing the Defendant to produce the records requested by Plaintiff USRTK;
- B. Awarding Plaintiff its reasonable attorney's fees and costs; and
- C. Granting such other and further relief as the Court deems appropriate.

[Signature on following page]

Respectfully submitted this 11th day of July, 2017.



LYNN C. HEARN

Florida Bar No.: 0123633

Email: lhearn@meyerbrookslaw.com

RONALD G. MEYER

Florida Bar No.: 0148248

Email: rmeyer@meyerbrookslaw.com

MEYER, BROOKS, DEMMA AND BLOHM, P.A.

131 North Gadsden Street (32301)

Post Office Box 1547

Tallahassee, Florida 32302-1547

(850) 878-5212

(850) 656-6750 – Facsimile

JOSEPH E. SANDLER

Email: sandler@sandlerreiff.com

District of Columbia Bar No. 255919

SANDLER, REIFF, LAMB, ROSENSTEIN &

BIRKENSTOCK PC

1025 Vermont Ave., N.W. Suite 300

Washington, D.C. 20005

(202) 479 -1111

(202) 479-1115 – Facsimile

Motion to Appear Pro Hac Vice Pending

Attorneys for Plaintiff US Right to Know



September 3, 2015

Sandra L. Mitchell
University of Florida
Office of the General Counsel
123 Tigert Hall
P.O. Box 113125
Gainesville, FL 32611-3125

RE: Florida Sunshine Law Request Regarding Professor Kevin M. Folta

Dear Ms. Mitchell:

This is a request under the Florida Sunshine Law seeking expedited processing for the production of documents. I request a complete and thorough search of all filing systems and locations for all records maintained by the University of Florida pertaining to Professor Kevin M. Folta, professor of horticulture at the University of Florida.

This FOIA request seeks all email to or from Professor Folta that is to, from, CC or BCC to the email address AgBioChatter@yahoogroups.com.

The time period covered by this request is from July 1, 2012 to the present.

I request that you disclose these documents and materials as they become available to you, without waiting until all the documents have been assembled.

If documents are denied in whole or in part, please specify which exemption(s) is (are) claimed for each passage or whole document denied. Give the number of pages in each document and the total number of pages pertaining to this request and the dates of documents withheld. I request that excised material be "blacked out" rather than "whited out" or cut out and that the remaining non-exempt portions of documents be released as provided under the Florida Sunshine Law. Please send a memo (with a copy or copies to me) to the appropriate unit(s) in your office to assure that no records related to this request are destroyed.

Please advise of any destruction of records and include the date of and authority for such destruction. As I expect to appeal any denials, please specify the office and address to which an appeal should be directed.

I am making this request on behalf of U.S. Right to Know, a 501(c)(3) nonprofit food research organization. The records disclosed pursuant to this request will be used in the preparation of articles for dissemination to the public. Accordingly, I request that you waive all fees in the public interest because furnishing of the information sought by this request will primarily benefit the

Exposing what the food industry *doesn't* want us to know

USRTK.ORG • 6026A HARWOOD AVE. • OAKLAND, CA 94618 • (415) 944-7350


Exhibit A

public. Please send the documents to me at Gary Ruskin; U.S. Right to Know; 6026A Harwood Ave; Oakland, CA 94618.

I can be reached at (415) 944-7350. Please call rather than write if there are any questions or if you need additional information from me.

Thank you so much for your help in filling this request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'GR', with a stylized flourish extending to the right.

Gary Ruskin
Co-Director

From: Folta, Kevin M.
Date: Fri, 18 Apr 2014 06:44:13 EDT
To: AgBioChatter@yahoogroups.com,
CC:
BCC:
Subject: ... as toxic as ...

There was a nice graphic that Prakash posted on GMO LOL that had roundup next to a dozen other household compounds in terms of toxicity - can someone repost a hi-res version?

Thanks

Kevin

Kevin M. Folta
Associate Professor and Chair
Horticultural Sciences Department
Plant Molecular and Cellular Biology Program and
Plant Innovation Program
University of Florida
Gainesville, FL 32611

352-273-4812

"Don't tell me what can't be done. Tell me what needs to be done, and let me do it." - Norman Borlaug

Illumination (blog) <http://kfolta.blogspot.com>
Twitter @kevinfolta

From: Folta, Kevin M.
Date: Sat, 23 Aug 2014 22:30:06 EDT
To: AgBioChatter@yahoogroups.com,
CC:
BCC:
Subject: RE: Chatter: Kevin Folta's excellent answers on Reddit AMA

Prakash,

When the Reddit moderators stopped unproductive accusations and comments, they established their own Reddit thread, "Kevin Folta Monsanto Cheerleader/Scientist"

I was happy to crawl into that viper's den as well. Sometimes a soft voice and presentation of evidence is a compelling contrast to those on the fence, so I was happy to poop that party.

Kevin

Kevin M. Folta
Professor and Chairman
Horticultural Sciences Department
Plant Molecular and Cellular Biology Program and
Plant Innovation Program
University of Florida
Gainesville, FL 32611

352-273-4812

"Don't tell me what can't be done. Tell me what needs to be done, and let me do it." - Norman Borlaug.

Illumination (blog) <http://kfolta.blogspot.com>
Twitter @kevinfolta

From: AgBioChatter@yahoogroups.com [AgBioChatter@yahoogroups.com]
Sent: Saturday, August 23, 2014 10:27 PM
To: AgBioChatter
Subject: Chatter: Kevin Folta's excellent answers on Reddit AMA

Reddit is a very popular site among young people especially the geeky types and they feature "Ask Me Anything" by notable personalities on a range of topics. Last week our own Kevin Folta faced the crowd (second time as I know) and did a superb job in answering so many questions thrown at him. Clearly the Reddit crowd is far more smarter and better informed than most other online venues

http://www.reddit.com/r/science/comments/2dz070/science_ama_series_ask_me_anything_about/

Posted by: "Prakash, Channapatna S." <prakash@mytu.tuskegee.edu>

[Reply via web post](#) • [Reply to sender](#) • [Reply to group](#) • [Start a New Topic](#) • [Messages in this topic \(1\)](#)



Did you Know?
Learn about creating and deleting Groups Tables

[VISIT YOUR GROUP](#)

YAHOO! GROUPS

[Privacy](#) • [Unsubscribe](#) • [Terms of Use](#)

From: "Folta, Kevin M." kfolta@ufl.edu [AgBioChatter] <AgBioChatter@yahoogroups.com>
Date: Fri, 30 Jan 2015 05:30:37 EST
To: "AgBioChatter@yahoogroups.com" <AgBioChatter@yahoogroups.com>
CC:
BCC:
Subject: RE: Chatter: Re: Event(s): Univ of Iowa announce speakers series including anti-GMO/pesticide stakeholders author Mark Bittman and "physicist" Vandana Shiva

The good news is that plant scientists there invited me to speak at ISU the week after Shiva. Glad they took charge to balance the crazy.

This one will take some finesse, but I'm going to try to watch her talk/grab transcripts and do something that works.

Kevin

Kevin M. Folta
Professor and Chairman
Horticultural Sciences Department
Plant Molecular and Cellular Biology Program and
Plant Innovation Program
University of Florida
Gainesville, FL 32611

352-273-4812

"Don't tell me what can't be done. Tell me what needs to be done, and let me do it." – Norman Borlaug.

Illumination (blog) <http://kfolta.blogspot.com>
Twitter @kevinfolta

From: AgBioChatter@yahoogroups.com <AgBioChatter@yahoogroups.com> on behalf of Shanthu Shantharam sshooballi@gmail.com [AgBioChatter] <AgBioChatter@yahoogroups.com>
Sent: Tuesday, January 27, 2015 6:29 PM
To: Chatter
Subject: Re: Chatter: Re: Event(s): Univ of Iowa announce speakers series including anti-GMO/pesticide stakeholders author Mark Bittman and "physicist" Vandana Shiva

Will someone please let me know who is in charge of inviting Vandana at ISU?

Shanthu

On Jan 27, 2015 5:57 PM, "Wayne Parrott wparrott@uga.edu [AgBioChatter]" <AgBioChatter@yahoogroups.com> wrote:

Ms Shiva goes to Iowa State after her U of Iowa State.

Any suggestions to pass along to the ISU folks?

Wayne Parrott
Department of Crop & Soil Sciences, and
Institute for Plant Breeding, Genetics & Genomics
111 Riverbend Road, University of Georgia
Athens, GA 30602-6810
Tel: 706-542-0928; FAX: 706-563-6120
[Lab Web Site](#)

"Farming looks mighty easy when your plow is a pencil
and you're a thousand miles from the corn field." DD Eisenhower

From: AgBioChatter@yahoogroups.com <AgBioChatter@yahoogroups.com> on behalf of Jay Byrne jay.byrne@v-fluence.com [AgBioChatter] <AgBioChatter@yahoogroups.com>
Sent: Tuesday, January 27, 2015 2:41 PM
To: AgBioChatter@yahoogroups.com

From: "Folta, Kevin M." <kfolta@ufl.edu [AgBioChatter]> <AgBioChatter@yahoogroups.com>
Date: Wed, 11 Mar 2015 17:36:05 EDT
To: "AgBioChatter@yahoogroups.com" <AgBioChatter@yahoogroups.com>
CC:
BCC:
Subject: Chatter Drucker

Any useful reviews of the new Drucker book? I need a quick update to be able to field potential questions.

kf

Kevin M. Folta
Professor and Chairman
Horticultural Sciences Department
Plant Molecular and Cellular Biology Program and
Plant Innovation Program
University of Florida
Gainesville, FL 32611

352-273-4811

"Don't tell me what can't be done. Tell me what needs to be done, and let me do it." – Norman Borlaug.

Bioinformatics (blog) <http://kfolta.blogspot.com>
Twitter @kfolta



October 27, 2015

Sandra L. Mitchell
University of Florida
Office of the General Counsel
123 Tigert Hall
P.O. Box 113125
Gainesville, FL 32611-3125

RE: Florida Sunshine Law Request Regarding Jack Payne

Dear Ms. Mitchell:

This is a request under the Florida Sunshine Law seeking expedited processing for the production of documents. I request a complete and thorough search of all filing systems and locations for all records maintained by the University of Florida pertaining to Jack Payne, senior vice president for agriculture and natural resources at the University of Florida.

This FOIA request seeks all email correspondence between Mr. Payne and any staff or employees of any of the following organizations or persons:

- Monsanto
- Syngenta
- Bayer or Bayer CropScience
- BASF
- DuPont or Pioneer
- Dow or Dow AgroSciences
- Ketchum
- GMO Answers
- Biotechnology Industry Organization
- Council for Biotechnology Information
- Grocery Manufacturers Association
- Coalition for Safe and Affordable Food
- FP1 Strategies
- American Council on Science and Health
- Genetic Literacy Project
- Jon Entine (jon@jonentine.com)

In addition, this request also seeks all email correspondence between Mr. Payne and any staff or employees of the University of Florida Foundation that includes any of the following keywords:

Exposing what the food industry *doesn't* want us to know

USRTK.ORG • 6026A HARWOOD AVE. • OAKLAND, CA 94618 • (415) 944-7350

Exhibit C

- BASF
- Bayer
- Cargill
- Coca-Cola or Coke
- Dow Chemical or Dow
- General Mills
- Kellogg
- Monsanto
- Nestle
- PepsiCo or Pepsi
- DuPont or Pioneer Hi-Bred
- Syngenta
- Unilever

The time period covered by this request is from January 1, 2013 to the present.

I request that you disclose these documents and materials as they become available to you, without waiting until all the documents have been assembled.

If documents are denied in whole or in part, please specify which exemption(s) is (are) claimed for each passage or whole document denied. Give the number of pages in each document and the total number of pages pertaining to this request and the dates of documents withheld. I request that excised material be "blacked out" rather than "whited out" or cut out and that the remaining non-exempt portions of documents be released as provided under the Florida Sunshine Law. Please send a memo (with a copy or copies to me) to the appropriate unit(s) in your office to assure that no records related to this request are destroyed.

Please advise of any destruction of records and include the date of and authority for such destruction. As I expect to appeal any denials, please specify the office and address to which an appeal should be directed.

I am making this request on behalf of U.S. Right to Know, a 501(c)(3) nonprofit food research organization. The records disclosed pursuant to this request will be used in the preparation of articles for dissemination to the public. Accordingly, I request that you waive all fees in the public interest because furnishing of the information sought by this request will primarily benefit the public. Please send the documents to me at Gary Ruskin; U.S. Right to Know; 6026A Harwood Ave; Oakland, CA 94618.

I can be reached at (415) 944-7350. Please call rather than write if there are any questions or if you need additional information from me.

Thank you so much for your help in filling this request.

Sincerely,

A handwritten signature in blue ink, appearing to read 'GR' followed by a long horizontal stroke.

Gary Ruskin
Executive Director

From: @ UR Public Record Requests <pr-request@ufl.edu>
Date: Tue, Dec 15, 2015 at 11:20 AM
Subject: RE: Florida Sunshine Law request for records
To: Gary Ruskin <gary@usrtk.org>
Cc: "@ UR Public Record Requests" <pr-request@ufl.edu>, "Wood,Barbara L" <blwood@ufl.edu>, "Mitchell, Sandy" <sandralmitchell@ufl.edu>, "Holt,Rebecca J" <bholt@ufl.edu>

Mr. Ruskin:

The General Counsel's Office has reviewed and approved the attached responsive public records for requests 1 & 2.

Redactions were made pursuant to FS 1006.52 (student privacy), FS 119.071(5)(c) (child in government sponsored recreational program) and FS 1004.28 (DSO exemption).

Sincerely,

Florida Bridgewater-Alford, APR | Campus Communications Outreach Director | UF | Office of the Vice President for University Relations | 101 Tigert Hall | Gainesville, FL 32611-0200 | (: [352-846-3903](tel:352-846-3903) (v) | [352-846-3908](tel:352-846-3908) (f) | bridgefl@ufl.edu



From: Quillen,Amy [mailto:abquillen@ufl.edu]
Sent: Friday, June 17, 2016 3:25 PM
To: Jessica Krupke <Krupke@sandlerreiff.com>
Cc: @ UR Public Record Requests <pr-request@ufl.edu>; Hines,John <jkhines@ufl.edu>; Sikes, Janine <jysikes@ufl.edu>; Bridgewater-Alford,Florida A <bridgefl@ufl.edu>; Wood,Barbara L <blwood@ufl.edu>; Quillen,Amy <abquillen@ufl.edu>
Subject: FW: Florida Sunshine Law - Records of Kevin Folta

Dear Ms. Krupke,

The University has reviewed your letter dated June 2nd, 2016, regarding Mr. Ruskin's public records requests.

With respect to Mr. Ruskin's public records request dated September 3rd, 2015, related to AgBioChatter@yahoogroups.com, the University undertook further review and provides the attached additional records.

With respect to Mr. Ruskin's public records request dated October 27th, 2015, the University has no further responsive public records to produce. As stated previously, and clarified here, public records responsive to part one of the October 27th, 2015 letter, were redacted pursuant to FS 119.071(5)(c) and FS 1006.52. In response to part two of the same public records request, the University withheld some potentially responsive records as confidential and exempt pursuant to FS 1004.28(5).

Sincerely,

Amy

Amy B. Quillen
Assistant University Counsel
Office of the General Counsel
University of Florida
123 Tigert Hall
P.O. Box 113125
Gainesville, Florida 32611
[352-392-1358](tel:352-392-1358) (Tel)
[352-392-4387](tel:352-392-4387) (Fax)