

CRIMINAL JUSTICE STANDARDS AND TRAINING COMMISSION

(ADDENDUM 1/14/19)

*Police Benevolent Association (PBA) Opposition Letters to Proposed
CJSTC Rule change regarding AGENDA ITEM 10 – Final Reversal of
Discipline Imposed by the Employing Agency Relating to Alleged
Misconduct – Amends Rule 11B-27.004(10)(b), F.A.C.*



OFFICER DISCIPLINE PENALTY GUIDELINES TASK FORCE MEETING

JANUARY 16, 2019



FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

The Voice of Florida's Law Enforcement Officers

To: Criminal Justice Standards and Training
Task Force Committee
Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

Dear Task Force Committee,

In 2015, the Task Force Committee met and reviewed a possible change to Rule 11B-27.004(10)(b). After lengthy discussion and debate, the Task Force overwhelmingly decided NOT to change the rule. Now, just four years later, we are revisiting the decision of the 2015 Task Force for the very same issue despite having only a mere eight cases affected over the last four years. (3 cases in 2015, 0 cases in 2016, 3 cases in 2016, and 2 cases in 2018) The rule, enacted in 2004, has accomplished exactly what the drafters of the rule envisioned- it protects officers from having to prove their innocence repeatedly. Innocent officers who do not have the financial support of a union or independent wealth will simply be convicted by the overwhelmingly expensive process of fighting each step of the process. This is fundamentally unfair to our law enforcement officers.

The current rule already forces an officer that has been arrested, to go to a jury trial and be found not guilty in order to avoid review by CJSTC. If the officer's criminal charge is ultimately dismissed by a prosecutor before trial for any reason, including the officer's innocence, the case will still be forwarded to CJSTC for review. If the officer's agency moves forward with discipline, the officer will be forced to go to and pay for an arbitration to keep his or her job. After getting criminal charges dismissed and prevailing at arbitration, this proposed rule change would require the officer to still appear before the Criminal Justice Standards and Training Commission and prevail a third time at a formal hearing. This lengthy, expensive process is not only unfair, but it is also unnecessary. There can be no doubt that an officer, who has proven innocence during the criminal process and subsequent arbitration, will elect to have a formal hearing at the Department of Administrative Hearings during the CJSTC process. It is highly unlikely that an agency can prevail on charges against an officer with a higher burden of proof at a DOAH hearing if the agency before it could not prevail at an arbitration with a much lower burden of proof. This proposed new process is senseless and will continue to punish innocent officers. Our system should not require an officer to have to repeatedly prove his or her innocence. Common sense should prevail here, not political pressure.

On behalf of all the officers of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Ernie George
Former Treasurer Florida PBA
Former Criminal Justice Standards and Training Commissioner



FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

The Voice of Florida's Law Enforcement Officers

To: Criminal Justice Standards and Training
Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 14, 2019

Dear Task Force Committee member:

If it ain't broke don't fix it. As a former CJSTC commissioner and task force member, I recall this issue being discussed ad nauseum, most recent as of 2015. After exhaustive discussions, it was determined that the Task Force did not wish to make it to where due process was trampled upon.

"How many bites of the apple is enough" was mentioned repeatedly. The question remains. The desire of some might be go against the rule of American justice, but it's a principle that those of us in law enforcement live by and accept that not guilty is not guilty, is not guilty. An officer who endures the tribulations of the criminal process, then the comprehensive administrative arbitration process should have had enough bites.

Treating a success (what we currently have) as a failure because a few reject the good thing in the name of serving the imagined (proposed police change) perfect thing, you may never enjoy the benefits of the good and never achieve the perfect. Don't reinvent the wheel if it rolls smoothly. "Fair and Just" is what we currently practice and to change it is to reject a standard much higher than the rule.

Simply put, statistics don't bear out a need for change and if it ain't broke, don't fix it!

Sincerely,

John Rivera
President Emeritus Florida PBA
Former CJSTC Task Force member and Commissioner



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On behalf of all the officers of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Steven B. Slade, Vice President of Chapters



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Sincerely,

Nick Marolda
Sergeant-At-Arms Florida PBA
Former Criminal Justice Standards and Training Commissioner



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Sincerely,

Abe Carmack
Secretary Florida PBA



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On behalf of all the officers of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

William Smith
Vice President for Legislative Affairs and Charities Florida PBA



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On behalf of all the officers of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Jeff Marano
Vice President for Charters Florida PBA



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Sincerely,

James Baiardi
Vice President for Services Florida PBA



**Gulf Coast Chapter
of the Florida Police Benevolent Association, Inc.**

(239) 980-0473 ❖ mattsellers@flpba.org

P.O. Box 2151

Fort Myers, Florida 33902

To: Criminal Justice Standards and Training
Task Force Committee
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On behalf of all the officers of the Gulf Coast Chapter of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Sellers", with a long horizontal flourish extending to the right.

Matt Sellers, President
Gulf Coast PBA



BIG BEND CHAPTER

OF THE FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

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On behalf of all the officers of the Big Bend Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Steven B. Slade, President



CENTRAL FLORIDA POLICE BENEVOLENT ASSOCIATION

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On behalf of all the officers of the Central Florida Police Benevolent Association, we absolutely oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Michael K. Morris



WEST CENTRAL FLORIDA POLICE BENEVOLENT ASSOCIATION

412 E. Madison Street, Suite 1102 ♦ Tampa, Florida 33602-4618
(813) 225-1300 ♦ 1-800-267-9201 ♦ FAX: (813) 225-1344
www.wcfpba.org

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On behalf of all the officers of the West Central Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Nicholas Marolda, President

Nicholas Marolda, *President* ♦ Steven McDonald, *Vice President*
Edward Lutz, *Secretary/Treasurer* ♦ Jim Diamond, *Director of Operations*



SOUTHWEST FLORIDA CHAPTER

of the Florida Police Benevolent Association, Inc.

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On behalf of all the officers of the Southwest Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Michael T. McHale
Senior Vice President Florida PBA
President of Southwest Florida PBA
Former Criminal Justice Standards and Training Commissioner



STATE LAW ENFORCEMENT OFFICERS CHAPTER OF THE FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

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To: Criminal Justice Standards and Training
Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

Dear Task Force Committee,

In 2015, the Task Force Committee met and reviewed a possible change to Rule 11B-27.004(10)(b). After lengthy discussion and debate, the Task Force overwhelmingly decided NOT to change the rule. Now, just four years later, we are revisiting the decision of the 2015 Task Force for the very same issue despite having only a mere eight cases affected over the last four years. (3 cases in 2015, 0 cases in 2016, 3 cases in 2016, and 2 cases in 2018) The rule, enacted in 2004, has accomplished exactly what the drafters of the rule envisioned-it protects officers from having to prove their innocence repeatedly. Innocent officers who do not have the financial support of a union or independent wealth will simply be convicted by the overwhelmingly expensive process of fighting each step of the process. This is fundamentally unfair to our law enforcement officers.

The current rule already forces an officer that has been arrested, to go to a jury trial and be found not guilty in order to avoid review by CJSTC. If the officer's criminal charge is ultimately dismissed by a prosecutor before trial for any reason, including the officer's innocence, the case will still be forwarded to CJSTC for review. If the officer's agency moves forward with discipline, the officer will be forced to go to and pay for an arbitration to keep his or her job. After getting criminal charges dismissed and prevailing at arbitration, this proposed rule change would require the officer to still appear before the Criminal Justice Standards and Training Commission and prevail a third time at a formal hearing. This lengthy, expensive process is not only unfair, but it is also unnecessary. There can be no doubt that an officer, who has proven innocence during the criminal process and subsequent arbitration, will elect to have a formal hearing at the Department of Administrative Hearings during the CJSTC process. It is highly unlikely that an agency can prevail on charges against an officer with a higher burden of proof at a DOAH hearing if the agency before it could not prevail at an arbitration with a much lower burden of proof. This proposed new process is senseless and will continue to punish innocent officers. Our system should not require an officer to have to repeatedly prove his or her innocence. Common sense should prevail here, not political pressure.

On behalf of all the officers of the State Law Enforcement Officers Chapter of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Scott Hoffman, President



SOUTHWEST FLORIDA CHAPTER

of the Florida Police Benevolent Association, Inc.

The Voice of Florida's Law Enforcement Officers

To: Criminal Justice Standards and Training Task Force Committee

From: Michael McHale, Senior Vice President Florida PBA, President Southwest Florida PBA

Re: **Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations**

Date: January 11, 2019

Dear Task Force Committee,

In 2015, the Task Force Committee met and reviewed a possible change to Rule 11B-27.004(10)(b). After lengthy discussion and debate, the Task Force overwhelmingly decided NOT to change the rule. Now, just four years later, we are revisiting the decision of the 2015 Task Force for the very same issue despite having only a mere eight cases affected over the last four years. (3 cases in 2015, 0 cases in 2016, 3 cases in 2016, and 2 cases in 2018) The rule, enacted in 2004, has accomplished exactly what the drafters of the rule envisioned-it protects officers from having to prove their innocence repeatedly. Innocent officers who do not have the financial support of a union or independent wealth will simply be convicted by the overwhelmingly expensive process of fighting each step of the process. This is fundamentally unfair to our law enforcement officers.

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On behalf of all the officers of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael T. McHale', with a long horizontal flourish extending to the right.

Michael T. McHale
Senior Vice President Florida PBA





Northwest Chapter of Florida PBA

To: Criminal Justice Standards and Training

Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

Dear Task Force Committee,

In 2015, the Task Force Committee met and reviewed a possible change to Rule 11B-27.004(10)(b). After lengthy discussion and debate, the Task Force overwhelmingly decided NOT to change the rule. Now, just four years later, we are revisiting the decision of the 2015 Task Force for the very same issue despite having only a mere eight cases affected over the last four years. (3 cases in 2015, 0 cases in 2016, 3 cases in 2016, and 2 cases in 2018) The rule, enacted in 2004, has accomplished exactly what the drafters of the rule envisioned-it protects officers from having to prove their innocence repeatedly. Innocent officers who do not have the financial support of a union or independent wealth will simply be convicted by the overwhelmingly expensive process of fighting each step of the process. This is fundamentally unfair to our law enforcement officers.

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Northwest Chapter of Florida PBA

officers. Our system should not require an officer to have to repeatedly prove his or her innocence. Common sense should prevail here, not political pressure.

On behalf of all the officers of the Northwest Chapter of the Florida PBA, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Lee Tyree

Northwest Chapter President

Florida Police Benevolence Association



THE VOICE OF LAW ENFORCEMENT

DADE COUNTY POLICE BENEVOLENT ASSOCIATION, INC.

Criminal Justice Standards and Training Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b);
Probable Cause Determinations

January 14, 2019

Dear Committee,

Less than five years ago, your Task Force Committee met and reviewed a possible change to Rule 11B-27.004(10)(b) to incorporate the very changes that are now once again at issue, how the Criminal Justice Standards and Training Commission (CJSTC) addresses cases where an officer prevailed at arbitration. The crux of the issue is whether the officer would have to go through another hearing related to their state certification after prevailing at the administrative arbitration stage where the employer has a far lower burden of proof than in a Division of Administrative Hearing (DOAH) hearing regarding state certification.

After many lengthy discussions and debates approximately four years ago, the Task Force overwhelmingly made the right decision and decided **not** to change the rule. Now, the very same issue is being revisited, even though nothing has changed in the interim to have demanded attention. The rule as it stands, and as we believe it should remain, has accomplished exactly what the creators of the rule envisioned - it protects officers from having to repeatedly prove their innocence, at great cost to the officer and/or labor organization representing the officer. Undoing that is fundamentally unfair, and flies in the face of common sense.

If the rule change is adopted, it would require officers who get arrested to fight the criminal process and force their case to trial and obtain an acquittal, even where the prosecutor wants to dismiss the charges. Where the officer's criminal charge is ultimately dismissed by a prosecutor (a process over which the officer has no control) and no criminal trial occurs, the officer's agency generally moves forward with discipline, as the burden of proof of "preponderance of the evidence" for administrative discipline is lower than the criminal standard of "beyond a reasonable doubt". The officer is then required to pay for the arbitration to keep his or her job. That obviously makes sense as there very well may be a preponderance of the evidence to support administrative discipline while lacking the lofty criminal law standard.

However, if the proposed rule change is adopted, an officer, after getting the criminal charges dismissed and prevailing at arbitration, would then have to still appear before the CJSTC and prevail a **third time** at a formal hearing on the exact same facts that surrounded the administrative disciplinary hearing. Further, that very same evidence that failed to support a finding of a preponderance of the evidence must now support the even higher standard of "clear and convincing evidence" required in a DOAH hearing. Add to that the further time and expenses involved on both sides, and the proposed rule change simply makes no sense. The proposed change will result in an unfair and unnecessary process.

An officer who has fought and prevailed at both the criminal stage and the administrative stage (at a much lower burden of proof to the employer) will have no choice but to once again, at great time and expense, exercise his or her right to fight to retain their certification, even though once again, the underlying incident giving rise to the case has already found **not** to be supported at a lower burden of proof to the employer. How does it make sense to force both the officer and CJSTC to re-litigate the very same issue at a higher burden of proof to CJSTC? It simply makes no sense, and is why the Dade County Police Benevolent Association, on behalf of our members and all sworn law enforcement officers in the State of Florida, object to the proposed changes to Rule 11B-27.004(10(b)).

We urge you to do the right thing, and keep the rule as it has properly functioned since it was enacted.

Sincerely,



Steadman Stahl,
President

BROWARD COUNTY POLICE BENEVOLENT ASSOCIATION



To: Criminal Justice Standards and Training
Task Force Committee

From: Broward County Police Benevolent Association

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

Date: January 13, 2019

Dear Task Force Committee,

In 2015, the Task Force Committee met and reviewed a possible change to Rule 11B-27.004(10)(b). After lengthy discussion and debate, the Task Force overwhelmingly decided NOT to change the rule. Now, just four years later, we are revisiting the decision of the 2015 Task Force for the very same issue despite having only a mere eight cases affected over the last four years. (3 cases in 2015, 0 cases in 2016, 3 cases in 2016, and 2 cases in 2018) The rule, enacted in 2004, has accomplished exactly what the drafters of the rule envisioned-it protects officers from having to prove their innocence repeatedly. Innocent officers who do not have the financial support of a union or independent wealth will simply be convicted by the overwhelmingly expensive process of fighting each step of the process. This is fundamentally unfair to our law enforcement officers.

The current rule already forces an officer that has been arrested, to go to a jury trial and be found not guilty in order to avoid review by CJSTC. If the officer's criminal charge is ultimately dismissed by a prosecutor before trial for any reason, including the officer's innocence, the case will still be forwarded to CJSTC for review. If the officer's agency moves forward with discipline, the officer will be forced to go to and pay for an arbitration to keep his or her job. After getting criminal charges dismissed and prevailing at arbitration, this proposed rule change would require the officer to still appear before the Criminal Justice Standards and Training Commission and prevail a third time at a formal hearing. This lengthy, expensive process is not only unfair, but it is also unnecessary. There can be no doubt that an officer, who has proven innocence during the criminal process and subsequent arbitration, will elect to have a formal hearing at the Department of Administrative Hearings during the CJSTC process. It is highly unlikely that an agency can prevail on charges against an officer with a higher burden of proof at a DOAH hearing if the agency before it could not prevail at an arbitration with a much lower burden of proof. This proposed new process is senseless and will continue to punish innocent officers. Our system should not require an officer to have to repeatedly prove his or her innocence. Common sense should prevail here, not political pressure.

On behalf of all the officers of the Broward County Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Rod Skirvin
President

2650 W. STATE ROAD 84 • FORT LAUDERDALE, FLORIDA 33312
(954) 584-7600 • FAX (954) 583-0405



COASTAL FLORIDA POLICE BENEVOLENT ASSOCIATION

COASTAL FLORIDA PUBLIC EMPLOYEES ASSOCIATION

810 Fentress Court, Suite 150 ☐ Daytona Beach, Florida 32117

(386) 304-2393 ☐ 1-800-625-5451 ☐ Fax: (386) 788-2126



To: Criminal Justice Standards and Training
Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

Dear Committee,

In 2015, the Task Force Committee met and reviewed possible change to Rule 11B-27.004(10)(b). After many lengthy discussions and debates, the Task Force overwhelmingly decided not to change the rule. Now, just four years later, we are revisiting the very same issue. The rule, enacted in 2004, has accomplished exactly what the creators of the rule envisioned-it protects officers from having to prove their innocence repeatedly. Innocent officers that do not have the financial support of a union or independent wealth will simply be convicted by the overwhelmingly expensive process of fighting each step of the process. This is fundamentally unfair to our officers.

This rule change requires officers that get arrested to fight the criminal process and force their case to trial and obtain an acquittal even if the prosecutor wants to dismiss the charges. If the officer's criminal charge is ultimately dismissed by a prosecutor (a process which the officer has no control over) and no criminal trial occurs, and the officer's agency moves forward with discipline, the officer will be forced to go to and pay for an arbitration to keep his or her job. After getting criminal charges dismissed and prevailing at arbitration, this proposed rule change would require the officer to still appear before the Criminal Justice Standards and Training Commission and prevail a third time at a formal hearing. This lengthy, expensive process is not only unfair, but it is also unnecessary. There can be no doubt that an officer who has proven his innocence during the criminal process and proven his innocence during the arbitration process (which has a very low burden of proof for an agency to prove), will go forward to an administrative law hearing (with a higher agency burden of proof) once again in order to prove his innocence to CJSTC. This is senseless and is a continued punishment to an officer that has likely been dealing with a very stressful period to repeatedly have to prove innocence.

On behalf of all the officers of the Coastal Florida Police Benevolent Association, we vehemently oppose the proposed changes to Rule 11B-27.004(10)(b). We urge you to do the right thing, and keep the rule as it has properly functioned since it was enacted.

Sincerely,

Marlon Buggs

President; Coastal Florida PBA/PEA



TAMPA POLICE BENEVOLENT ASSOCIATION

1302 West Busch Boulevard, Tampa, Florida 33612
Office: 813-228-8900 Facsimile: 813-223-3069
www.tampapba.org

To: Criminal Justice Standards and Training
Task Force Committee
Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

Dear Task Force Committee,

In 2015, the Task Force Committee met and reviewed a possible change to Rule 11B-27.004(10)(b). After lengthy discussion and debate, the Task Force overwhelmingly decided NOT to change the rule. Now, just four years later, we are revisiting the decision of the 2015 Task Force for the very same issue despite having only a mere eight cases affected over the last four years. (3 cases in 2015, 0 cases in 2016, 3 cases in 2016, and 2 cases in 2018) The rule, enacted in 2004, has accomplished exactly what the drafters of the rule envisioned-it protects officers from having to prove their innocence repeatedly. Innocent officers who do not have the financial support of a union or independent wealth will simply be convicted by the overwhelmingly expensive process of fighting each step of the process. This is fundamentally unfair to our law enforcement officers.

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On behalf of all the officers of the Tampa Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.
Sincerely,

Abe Carmack, President

ABE CARMACK, President
BRANDOND BARCLAY, 2nd Vice President



DARLA PORTMAN, Sr. Vice President
GENE HAINES, Secretary / Treasurer

PROTECTING AND SERVING THOSE WHO PROTECT AND SERVE



FLORIDA CORRECTIONAL PROBATION OFFICERS CHAPTER

OF THE FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

300 East Brevard Street, Tallahassee, Florida 32301-1218
(850) 222-3329 ♦ 1-800-733-3722 ♦ FAX: (850) 561-0192

To: Criminal Justice Standards and Training
Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

Dear Task Force Committee,

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On behalf of all the officers of the Correctional Probation Officers Chapter of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

Tammy Marcus, President



FLORIDA HIGHWAY PATROL CHAPTER OF THE FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

The Voice of Florida's Law Enforcement Officers

To: Criminal Justice Standards and Training

Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

Dear Task Force Committee,

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On behalf of all the Troopers of the Florida Highway Patrol Chapter of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,

William Smith, President



STATE CORRECTIONS CHAPTER OF THE FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

The Voice of Florida's Law Enforcement Officers

To: Criminal Justice Standards and Training
Task Force Committee
Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

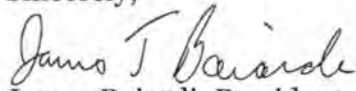
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On behalf of all the State Corrections Chapter of the Florida Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,


James Baiardi, President



FDLE AGENTS ASSOCIATION CHAPTER OF THE FLORIDA POLICE BENEVOLENT ASSOCIATION, INC.

The Voice of Florida's Law Enforcement Officers

To: Criminal Justice Standards and Training
Task Force Committee

Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

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On behalf of all the officers of the Florida Police Benevolent Association FDLE Agents Association, we vehemently oppose the proposed changes to Rule 11B-27.004(10)(b). We urge you to do the right thing, and keep the rule as it has properly functioned since it was enacted.

Very truly yours,

Carl J. Shedlock, President FDLEAA

SUN COAST POLICE BENEVOLENT ASSOCIATION, INC.

Telephone (727) 532-1722
Fax (727) 530-4816



14141 46th Street N #1205
Clearwater, Florida 33762

To: Criminal Justice Standards and Training
Task Force Committee
Re: Proposed Rule Amendment 11B-27.004(10)(b); Probable Cause Determinations

January 10, 2019

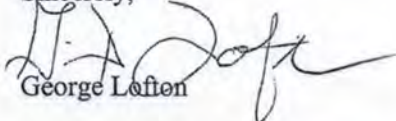
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On behalf of all the officers of the Sun Coast Police Benevolent Association, we vehemently oppose the proposed change to this rule and we urge each of you to do the right thing and reject the proposed change. Enough is enough.

Sincerely,



George Lofton

George Lofton, President • L.E. Cox, Senior Vice President
Markus Hughes, Executive Vice President • Jonathan Van Houten, Treasurer
Michael Blickensdorf, Secretary • Michael I. Krohn, Esquire, Executive Director
www.SunCoastPBA.com