

**CITY OF VERO BEACH, FLORIDA
SPECIAL CALL CITY COUNCIL MEETING
MONDAY, OCTOBER 25, 2021 1:30 P.M.
CITY HALL, COUNCIL CHAMBERS, VERO BEACH, FLORIDA**

A G E N D A

1. CALL TO ORDER

- A) Pledge of Allegiance
- B) Roll Call

2. DISCUSSION ITEMS

- A) Introduction of Panhandling Ordinance – Michael Kahn
 - 1) Testimony from Charles Callahan, M.D., Infectious Disease Specialist
 - 2) Testimony from Jim Kirkpatrick, GIS Specialist

3. PUBLIC HEARING

- A) [An Ordinance of the City of Vero Beach, Florida; Amending Chapter 62 of the Code of The City of Vero Beach; Creating Article VII; Providing for Findings and Intent; Providing for Definitions; Providing for Prohibited Conduct, Proximity and Location Restrictions for Panhandling, Solicitation, or Begging; Providing for Penalties; Providing for Codification; Providing for Repeal of Conflicting Ordinances; Providing for Severability; and Providing for an Effective Date. – Requested by the City Council](#)

4. PUBLIC COMMENTS

5. ADJOURNMENT

This is a public meeting. Should any interested party seek to appeal any decision made by the City Council with respect to any matter considered at such meeting or hearing, he will need a record of the proceedings made which includes the testimony and evidence upon which the appeal is to be based. Anyone who needs a special accommodation for this meeting may contact the City's Americans with Disabilities Act (ADA) Coordinator at 978-4920 at least 48 hours in advance of the meeting.

ORDINANCE NO. 2021-____

AN ORDINANCE OF THE CITY OF VERO BEACH, FLORIDA; AMENDING CHAPTER 62 OF THE CODE OF THE CITY OF VERO BEACH; CREATING ARTICLE VII; PROVIDING FOR FINDINGS AND INTENT; PROVIDING FOR DEFINITIONS; PROVIDING FOR PROHIBITED CONDUCT, PROXIMITY AND LOCATION RESTRICTIONS FOR PANHANDLING, SOLICITATION, OR BEGGING; PROVIDING FOR PENALTIES; PROVIDING FOR CODIFICATION; PROVIDING FOR REPEAL OF CONFLICTING ORDINANCES; PROVIDING FOR SEVERABILITY; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, Section 166.041, Florida Statutes, provides for procedures for the adoption of ordinances and resolutions by municipalities; and

WHEREAS, the City of Vero Beach recognizes that panhandling, including but not limited to solicitation and begging are activities that are protected by the First Amendment to the United States Constitution; and

WHEREAS, the City Council finds that panhandlers and beggars sometimes use profane language when requesting money from people; that panhandlers and beggars sometimes physically touch or threaten to touch the people they solicit for money; and that panhandlers and beggars sometimes block the path of people they solicit for money, or follow the people they solicit for money in an apparent effort to intimidate people into making a donation or as retribution for refusing to make a donation; and

WHEREAS, the City Council finds that the foregoing activities constitute "aggressive panhandling or begging," and that the increase in aggressive panhandling or begging throughout the City of Vero Beach has become extremely disturbing, dangerous and disruptive to residents, visitors, and businesses, and has contributed to an enhanced sense of fear, intimidation, and

disorder resulting in the loss of access to and enjoyment of public places throughout the City; and

WHEREAS, the City of Vero Beach has experienced a significant number of complaints made to the Vero Beach Police Department and other city authorities regarding panhandling and problematic panhandling behaviors; and,

WHEREAS, the City of Vero Beach has a compelling governmental interest in preserving and protecting the lives of its citizens which can be imperiled by numerous panhandlers which results in, *inter alia*, traffic and pedestrian congestion which among other things can delay deployment of life saving fire and police vehicles and personnel and otherwise endanger the lives of drivers of automobiles and other pedestrians; and

WHEREAS, in one tragic instance, the compelling state interest of Vero Beach was illustrated during an incident involving a panhandler who committed homicide against a tourist at a business within the limits of the City; and

WHEREAS, the City of Vero Beach has a compelling governmental interest in protecting the health, safety, and welfare of its citizens and visitors from health hazards spread by habits of panhandlers including but not limited to open urination and open defecation; and

WHEREAS, according to the statistics from the Florida Department of Health, Division of Disease Control and Health Protection, as of September 9, 2021, there were total cases of COVID-19 in Florida of 3,409,165, with 48,772 total deaths in Florida from COVID-19; and

WHEREAS, according to the statistics from the Florida Department of Health, Division of Disease Control and Health Protection, as of September 9, 2021, in Indian River County there were total cases of COVID-19 of 20,654 and as of June 3, 2021 there were 306 deaths of Florida residents from COVID-19; and

WHEREAS, since the advent of COVID-19, there also have been several mutations of

COVID-19, including but not limited to the delta variant of COVID-19 which is much more contagious than COVID-19, some studies suggesting 1000 times more contagious which has acted to cause overflow of hospital capacity and increased incidences of COVID with accompanying health hazards, including death; and

WHEREAS, the City of Vero Beach has a compelling governmental interest in protecting the health, safety, and welfare of its citizens and visitors from the contracting and spread of COVID-19 and any other pandemic which is spread through unhealthy hygienic habits attributed by testimony to panhandlers including but not limited to open urination and open defecation; and

WHEREAS, the City of Vero Beach has, unrelated to suppression of the freedoms guaranteed by the First Amendment, a compelling governmental interest in protecting the health, safety, and welfare of its citizens and visitors from contracting and spread of COVID-19 and any other pandemic which is spread by unhealthy hygienic habits such as open urination, open defecation, lack of social distancing when panhandling, and touching the people solicited for money when handed it. *Tabbaa v. Chertoff*, 509 F.3d 89 (2d Cir. 2007); *Roberts v. United States Jaycees*, 468 U.S. 609 (1984); and

WHEREAS, the City of Vero Beach can adopt regulations of speech which satisfy strict scrutiny if the regulation employs the least restrictive means of advancing such government interest. *United States v. Playboy Entm't Group, Inc.*, 529 U.S. 803, 813 (2000); and

WHEREAS, in the alternative, the City of Vero Beach can adopt and enforce regulations of behavior that implicate First Amendment activity when the regulations affect the time, place, and manner of expression, are content neutral, are narrowly tailored to serve a significant governmental interest, and leave open ample alternative channels of communication; and

WHEREAS, the City Council finds that, in the alternative, regulation of panhandling and

begging, based on the time, place, or manner of the solicitation including but not limited to panhandling or begging, arguably is a content neutral and narrowly tailored way to promote public safety, and protect residents and visitors in areas where they may be or reasonably perceive themselves to be vulnerable and/or unable to leave; and

WHEREAS, the City Council finds that regulation of panhandling and begging in public places where people feel particularly vulnerable and/or unable to leave provides ample alternative avenues of communication and is narrowly drawn to address the City's substantial interests; and

WHEREAS, the City of Vero Beach has a significant interest in providing a safe and pleasant environment and in eliminating nuisance activity. *Smith v. City of Fort Lauderdale, Florida*, 177 F. 3d 954, 956 (11th Cir. 1999); and

WHEREAS, the City of Vero Beach has a significant interest in preserving the safety of traffic flow and preventing traffic congestion wherever possible in the City of Vero Beach. *Ayres v. City of Chicago*, 125 F.3d 1010 (7th Cir. 1997); and

WHEREAS, the City of Vero Beach has a significant interest in the safety of pedestrians and individuals traveling in vehicles throughout the City of Vero Beach. *Heffron v. International Soc'y for Krishna Consciousness*, 452 U.S. 640, 650, 101 S. Ct. 2559, 69 L.Ed. 2d 298 (1981); and

WHEREAS, the City of Vero Beach has a significant interest in promoting tourism, and aesthetics of downtown Vero Beach. *Young v. American Mini Theaters*, 427 U.S. 50, 96 S. Ct. 440, 49 L.Ed. 2d 310 (1976); *Smith v. City of Fort Lauderdale, Florida*, 177 F. 3d 954, 956 (11th Cir. 1999); and

WHEREAS, the City of Vero Beach has a significant interest in promoting the safety and convenience of its citizens on public streets. *Madsen v. Women's Health Center*, 512 U.S. 753, 768, 114 S. Ct. 2516, 129 L.Ed. 2d 593 (1994); and

WHEREAS, the City of Vero Beach has a significant interest in ensuring the public safety and order and in promoting the free flow of traffic on public streets and sidewalks. *Ayres v. City of Chicago*, 125 F.3d 1010 (7th Cir. 1997); and

WHEREAS, the City of Vero Beach has a significant interest in the safety and convenience of citizens using public fora such as streets and sidewalks. *Heffron v. International Soc'y for Krishna Consciousness*, 452 U.S. 640, 650, 101 S. Ct. 2559, 69 L.Ed. 2d 298 (1981); *Cox v. New Hampshire*, 312 U.S. 569, 61 S.Ct. 762, 85 L.Ed. 1049 (1941); and

WHEREAS, the City of Vero Beach has a significant interest in recognizing the safety and convenience on public roads. *Cox v. New Hampshire*, 312 U.S. 569, 574, 61 S. Ct. 762, 85 L.Ed. 1049 (1941); and

WHEREAS, the City of Vero Beach has a significant interest in controlling traffic and pedestrian congestion. *Ayres v. City of Chicago*, 125 F. 3d 1010, 1015 (7th Cir. 1997); and

WHEREAS, the City of Vero Beach has a significant interest in preventing crime, protecting the City's retail trade, maintaining property values, and generally protecting and preserving the quality of the City's neighborhoods, commercial districts and the quality of urban life. *Young v. American Mini Theaters*, 427 U.S. 50, 96 S.Ct. 2440, 49 L.Ed.2d 310 (1976); and

WHEREAS, the City of Vero Beach has a significant interest in appearance of the City and aesthetics. *Metromedia Inc. v. City of San Diego*, 453 U.S. 490, 101 S.Ct. 2882 (1981); and

WHEREAS, the City of Vero Beach has a significant interest in maintaining safe ingress and egress into and out of commercial establishments in order to, *inter alia*, control pedestrian congestion, facilitate pedestrian safety and order, and a compelling interest to provide for access for emergency vehicles and personnel both fire and police to promote public health, safety, and welfare; and

WHEREAS, the City Council of the City of Vero Beach has determined that the following regulations promote and protect the general health, safety, and welfare of the residents of the City of Vero Beach; and

WHEREAS, after application of the distance parameters set forth in this Ordinance regarding the time, place, and manner of panhandlers' ability to panhandle within the city limits of Vero Beach, ample alternative avenues of communication exist for panhandlers to panhandle within the city limits of Vero Beach; and

WHEREAS, the City Council for the City of Vero Beach finds that it is in the best interest of public health, safety, and general welfare that the following amendments be adopted consistent with the requirements of Section 166.021(4), Florida Statutes; and

NOW, THEREFORE, BE IT ORDAINED BY THE CITY COUNCIL OF THE CITY OF VERO BEACH, FLORIDA, THAT:

Section 1 – Adoption of “WHEREAS” clauses.

The foregoing “WHEREAS” clauses are hereby adopted and incorporated herein as forming the legislative findings, purpose, and intent of this Ordinance.

Section 2 – Creating ARTICLE VII – PANHANDLING, BEGGING AND SOLICITATION.

Chapter 62 of the Code of Ordinances, City of Vero Beach, Florida, hereby establishes Article VII to read as follows:

ARTICLE VII. - PANHANDLING, BEGGING AND SOLICITATION

Sec. 62-176. - Intent.

The purpose and intent of this article is to recognize the constitutional right of persons to panhandle, including but not limited to solicit and beg, in a peaceful and non-threatening manner; however, an increase in aggressive panhandling and begging throughout the City has become extremely disturbing and disruptive to residents and businesses, and has contributed not only to the loss of access to and enjoyment of public places but also to an enhanced sense

of fear, intimidation, and disorder as well as actual danger to the health, safety and welfare of citizens and tourists alike. Aggressive panhandling and begging usually includes approaching or following pedestrians, repetitive requests for donations of money despite refusals, the use of abusive or profane language, unwanted physical contact, and the intentional, or as incident to the aggressive panhandling and begging, blocking of pedestrian and vehicular traffic. Additionally, the presence of panhandlers and beggars, who request money from persons in specific public areas such as outdoor cafes, automated teller machines, entrances and exits from commercially zoned properties, and while standing in line to enter an event or a building, is especially harmful because persons cannot readily escape from the undesired conduct, which often carries with it an implicit threat to both persons and property imperiling the health, safety and welfare of the citizens of and visitors to Vero Beach. . Also, unless mitigated by regulation, some of the habits attributable to panhandlers, including but not limited to open urination and open defecation, pose a threat to the health, safety, and welfare of citizens and tourists who visit the City of Vero Beach as well as the possibility of catching or spreading of COVID-19 or any other pandemic that is spread by unhealthy hygienic habits such as the foregoing.

This article is not intended to limit any persons from exercising their constitutional right to panhandle, including but not limited to beg, or solicit funds, or engage in any other constitutionally protected activity, when conducted in a legal manner. The goal of this article is instead to ensure the foregoing constitutional rights while through regulation acting to protect citizens from the fear and intimidation accompanying certain kinds of panhandling and begging that have become an unwelcome and overwhelming presence in the City by prohibiting aggressive panhandling and begging throughout the City and by regulating through time, place, and manner ordinance provisions regulating panhandling and begging in certain public places, based upon the foregoing compelling, significant, important and substantial governmental interests set forth in the predicate clauses and an overriding compelling governmental interest to protect the health, safety, and welfare of the citizens of Vero Beach and visitors from the adverse secondary effects, including but not limited to open urination and open defecation, of panhandling which definition includes all solicitation and begging, in public areas. The restrictions contained in this article are neither overbroad nor vague and are narrowly tailored to serve compelling and substantial governmental interests, and preserve ample alternative areas for the valid exercise of constitutional rights of panhandling which they do as set forth more particularly herein.

If such regulations were to be deemed to trigger strict scrutiny, regulating certain behaviors attributed to panhandlers including but not limited to open urination and open defecation implicates the compelling governmental interest of Vero Beach in protecting the health, safety, and welfare of its citizenry and visitors, preventing the contracting or spread of COVID-19 or any other pandemic which can be contracted or spread by such unhealthy habits linked by testimony to panhandlers and in preserving police and fire department access to such rights of way in order to save lives.

Sec. 62-177. - Definitions.

For purposes of this article, the following words and phrases shall have the meanings ascribed to them as follows:

After Dark means from one half hour after sunset until one-half hour before sunrise. The times of sunset and sunrise will be established by the times listed in any local publication of general distribution.

Aggressive Panhandling means:

- (1) To approach or speak to a person and solicit, demand, request or beg for money or a donation of valuable property in such a manner as would cause a reasonable person to believe that the person is being threatened with imminent bodily injury or the commission of a criminal act upon the person approached or another person in the solicited person's company, or upon property in the person's immediate possession (for example, placing oneself within 2 feet of a solicited person and/or using abusive or profane language in a loud voice while demanding or requesting money); or
- (2) To maintain contact with a solicited person and continue demanding, requesting or begging for money or a donation of valuable property after the solicited person has made a negative response to an initial demand or request for money or a donation (for example, walking in front of, next to, or behind a solicited person while continuing to demand, request or beg for money from that person after that person has refused to donate or give money); or
- (3) To obstruct, block or impede, either individually or as part of a group of persons, the passage or free movement of a solicited person or a person in the company of a solicited person, including persons on foot, on bicycles, in wheelchairs or operating motor vehicles or persons attempting to enter or exit motor vehicles (for example, walking, standing, sitting, lying, or placing an object in such a manner as to block passage of another person or vehicle, or to require another person or driver of a vehicle to take evasive action to avoid physical contact); or
- (4) To touch or cause physical contact or to threaten to touch or cause physical contact to a solicited person or a person in the company of a solicited person, or to touch any vehicle occupied by a solicited person or by a person in the company of the solicited person, without the person's express consent; or
- (5) To engage in conduct that would reasonably be construed as intended to intimidate, compel or force a solicited person to accede to demands.

Drive through with regard to the regulation of restaurant drive throughs means the line of cars from the window where the food is disbursed to the customer after he has paid to the last car in the line of cars which is in line to order food.

Panhandle means to beg or make any demand or request made in person for an immediate donation of money or some other article of value from another person for the use of one's self or others, including but not limited for a charitable or sponsor purpose or that will benefit a charitable organization or sponsor. As used in this article, the word "solicit" and "beg" and its forms are included in this definition. Panhandling is considered as having taken place regardless of whether

the person making the solicitation received any contribution. Panhandling is considered as having taken place without a word being spoken but with an individual having next to him an open can or container of any sort with any indication on the can or container or by the solicitor that money or some other article of value is being requested. Any purchase of an item for an amount far exceeding its value, under circumstances where a reasonable person would understand that the purchase is in substance a donation, constitutes a donation as contemplated in this definition. Begging is included in this definition of Panhandling. Soliciting is included in this definition of Panhandling.

Prohibited areas for panhandling including but not limited to soliciting and begging means the following locations throughout the City in which it is unlawful to engage in panhandling, including but not limited to solicitation or begging, when either the panhandler or beggar or the person being panhandled is located in, on or at the following locations:

- (1) Within twenty (20) feet, outside the building, from any entrance or exit of a commercial establishment;
- (2) Within twenty (20) feet, in any direction, outside any building, from a vehicular exit from commercially zoned property onto a public roadway;
- (3) Within twenty (20) feet, in any direction, of any bus or trolley stop or any public transportation facility;
- (4) Within twenty (20) feet, in any direction, outside any building, of an automated teller machine or any electronic information processing device which accepts or dispenses cash in connection with a credit, deposit or convenience account with a financial institution;
- (5) Within twenty (20) feet, in any direction, of any parking lot, parking garage, parking meter or parking pay station owned or operated by the governmental entity or agency;
- (6) Within twenty (20) feet, in any direction, of any public restroom owned and operated by a governmental entity or agency;
- (7) Within one hundred (100) feet, in any direction from the parcel boundary, of any daycare or school, including pre-kindergarten through grade 12;
- (8) Sidewalk approach within one hundred and fifty (150) feet of any signalized intersection of: 1) arterial roads; 2) collector roads; and 3) arterial and collector roads, as such roads are defined by the Florida Department of Transportation;
- (9) Restaurant drive-throughs;
- (10) On or about the premises of the Heritage Center—including the benches adjoining it as visibly defined by the Map, attached hereto as Exhibit A.

Sec. 62-178. - Prohibited conduct, proximity and location restrictions.

- (a) It shall be unlawful for any person to engage in Aggressive Panhandling within the City of Vero Beach.
- (b) It shall be unlawful for any person to engage in Panhandling when either the person engaged in Panhandling or the panhandler or the person being panhandled, is located in, on or at the following locations:
- (1) Within twenty (20) feet, outside the building, from any entrance or exit of a commercial establishment;
 - (2) Within twenty (20) feet, in any direction, outside any building, from a vehicular exit from commercially zoned property onto a public roadway;
 - (3) Within twenty (20) feet, in any direction, of any bus or trolley stop or any public transportation facility;
 - (4) Within twenty (20) feet, in any direction, outside any building, of an automated teller machine or any electronic information processing device which accepts or dispenses cash in connection with a credit, deposit or convenience account with a financial institution;
 - (5) Within twenty (20) feet, in any direction, of any parking lot, parking garage, parking meter or parking pay station owned and operated by a governmental entity;
 - (6) Within twenty (20) feet, in any direction, of any public restroom owned and operated by a governmental entity or agency;
 - (7) Within one hundred (100) feet, in any direction from the parcel boundary, of any daycare or school, including pre-kindergarten through grade 12;
 - (8) Sidewalk approach within one hundred and fifty (150) feet of any signalized intersection of: 1) arterial roads; 2) collector roads; and 3) arterial and collector roads, as such roads are defined by the Florida Department of Transportation;
 - (9) Restaurant drive-throughs;
 - (10) On or about the premises of the Heritage Center-including the benches adjoining it as visibly defined by the Map attached hereto as Exhibit A.
- (c) It shall be unlawful for any person to engage in the following prohibited conduct:
- (1) Panhandle or solicit or beg at any lawfully permitted outdoor dining area, amphitheater, amphitheater seating area, playground or lawfully permitted outdoor merchandise area, provided such areas are in active use at the time;

- (2) Panhandle, solicit or beg at any transit stop or taxi stand or in a public transit vehicle
 - (3) Panhandle, solicit or beg while the person or persons being solicited is standing in line waiting to be admitted to a commercial establishment;
 - (4) Panhandle, solicit or beg while under the influence of alcohol or after having illegally used any controlled substance, as defined in the Chapter 893 of the Florida Criminal Statutes; or
 - (5) Panhandle, solicit or beg After Dark.
- (d) All of the foregoing regulations which are applied to panhandling under the provisions of this ordinance apply to all areas within the jurisdictional limits of the City of Vero Beach.

Sec. 62-179. Penalty.

- (a) Any person found guilty of violating the provisions of this Article is guilty of a second degree misdemeanor and shall face a penalty prescribed in this Section.
- (b) The first violation of this provision shall be punishable by a fine of not more than \$100.00 and no more than 30 days imprisonment. Any person found guilty of a second and subsequent violation shall be subject to a fine not to exceed \$200.00 and shall be sentenced to a term of imprisonment not to exceed 60 days, or by both such fine and imprisonment.
- (c) In addition to, or as an alternative to, the penalties provided herein, a person found guilty of violating any provision of this Code may be sentenced to or otherwise be:
 - i. assessed Court costs and restitution in accordance with Florida Statutes, Chapters 775 and 921;
 - ii. ordered by the Court to perform public service in accordance with Florida Statutes Chapters 775 and 921;
 - iii. allowed to participate in the pretrial intervention program as set forth in Florida Statutes Chapter 948, if such violator meets the qualifications enumerated therein and participation in the program is approved by the State Attorney's office;
 - iv. ordered by the Court to undergo psychiatric, psychological, and/or drug and alcohol abuse evaluation treatment and/or counseling; and/or
 - v. ordered by the Court to comply with the terms and provisions of any authorized and legal sentence.

- (d) Nothing contained herein shall limit the discretion of the police, court personnel, and judges from referring individuals suspected, charged, or convicted of a violation of this provision to treatment programs or facilities as an alternative to prosecution or imprisonment, provided that the individual freely consents.

Section 3 – Amending Chapter 62, ARTICLE III, Section 62-84.

Article III, Division 2, Section 62-84, shall be amended to delete the following subparts:

- ~~(b) — It shall be unlawful for any person to beg, peddle, or canvass on any right-of-way, other than the following:-~~
- ~~(1) — On public sidewalks;-~~
- ~~(2) — On median strips within any road right-of-way so long as such strips:-~~
- ~~a. — Have curbs constructed as "nonmountable"; and-~~
- ~~b. — Measure 15 feet from outside face to outside face of such curbs.-~~
-

The remainder of Chapter 62, Article III shall be unchanged.

Section 4 – Amending Chapter 62, ARTICLE IV, Section 62-113

Article IV, Section 62-113, shall be amended to delete the following subparts:

- ~~(b) — It shall be unlawful for any person to beg, peddle, or canvass on any right-of-way, other than the following:-~~
- ~~(1) — On public sidewalks;-~~
- ~~(2) — On median strips within any road right-of-way so long as such strips:-~~
- ~~a. — Have curbs constructed as "nonmountable"; and-~~
- ~~b. — Measure 15 feet from outside face to outside face of such curbs.-~~

The remainder of Article IV shall be unchanged.

Section 5 – Codification.

The provisions of this Ordinance shall be codified in the Code of the City of Vero Beach, Florida.

Section 5 – Conflict and Severability.

In the event any provision of this Ordinance conflicts with any other provision of this Code or any other ordinance or resolution of the City of Vero Beach on the subject matter of this Ordinance, the more strict provision shall apply and supersede. If any provision of this Ordinance is held to be invalid, unconstitutional, or unenforceable for any reason by a court of competent jurisdiction, such invalidity shall not affect the validity of the remaining portions of this Ordinance, which shall be deemed separate, distinct, and independent provisions enforceable to the fullest extent possible.

Section 6 – Scrivener’s Errors.

The City Attorney may correct scrivener’s errors found in this Ordinance by filing a corrected copy of this Ordinance with the City Clerk.

Section 7 – Effective Date.

This Ordinance shall become effective upon final adoption by the city council.

This Ordinance was read by title for the first time on the ____ day of _____ 2021, and was advertised on the ____ day of _____ 2021, for a public hearing to be held on the ____ day of _____ 2021, at the conclusion of which hearing it was moved for adoption by Councilmember _____, seconded by Councilmember _____, and adopted by the following vote of the City Council:

Mayor Robert Brackett _____
Vice-Mayor Rey Neville _____
Councilmember Honey Minuse _____
Councilmember Bob McCabe _____
Councilmember Richard Winger _____

ATTEST:

CITY OF VERO BEACH, FLORIDA

Tammy K. Bursick
City Clerk

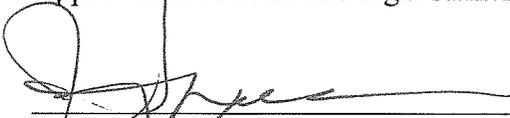
By: _____
Robert Brackett
Mayor

Seal:

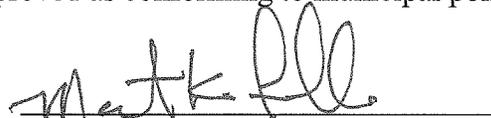
ADMINISTRATIVE REVIEW
(For Internal Use Only-Sec. 2-77 COVB Code)

Approved as to form and legal sufficiency:

Approved as conforming to municipal policy:



Jenny M. Flanigan
Assistant City Attorney



Monte K. Falls, P.E.
City Manager