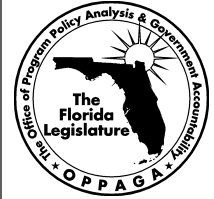




## Office of Program Policy Analysis And Government Accountability



John W. Turcotte, Director

March 1998

# Review of the Bureau of Condominiums Complaint Investigation Process

## Abstract

- **The Bureau of Condominiums does not complete investigations or close cases in a timely manner. Several factors affect the investigation process: the bureau's policy to expand investigations to additional issues; delays in obtaining needed legal or financial analysis; and the bureau's lengthy investigation reports review process.**
- **The bureau is unable to resolve many of the complaints that it receives relating to master associations.**
- **The bureau lacks an effective system to ensure that persons found to have violated program requirements pay administrative fines in a timely manner.**

## Purpose

The Joint Legislative Auditing Committee requested the Office of Program Policy Analysis and Government Accountability to review the bureau of Condominiums. Specifically, we examined the bureau's timeliness in investigating and resolving complaints filed by condominium owners. We also reviewed the bureau's collection efforts when it imposes fines and penalties for violations of Department rules, and issues pertaining to the regulation of master associations.

## Background

The Condominium Act (currently Ch. 718, F.S.) was enacted in 1963 to recognize and regulate condominium ownership. Condominiums are a form of ownership of real property in which persons buy individual living units but a developer or owners' association controls the maintenance of common property, such as landscaping. Unit owners pay fees for this maintenance and upkeep.

The Bureau of Condominiums, within the Department of Business and Professional Regulation's Division of Florida Land Sales, Condominiums and Mobile Homes, enforces the Act. The bureau has three primary responsibilities: educating condominium owners and the public about legal requirements; examining documents that developers must provide to condominium purchasers to check for compliance with legal requirements; and investigating complaints alleging violations of program requirements. Complaints can allege that developers and associations have misused funds, have not complied with legal requirements, or have not provided required information to condominium owners. In Fiscal Year 1996-97, the bureau received 1,163 complaints.

The bureau can take several actions when it investigates complaints and finds violations. These actions can include negotiating a consent agreement in which the developer or owners' association agrees to correct a violation, issuing a cease and desist order, initiating civil court action, imposing a civil penalty of not greater than \$5,000 for any offense, or a combination of these remedies.

The bureau's 1996-97 funding allocation was \$2,897,391 from the Division of Florida Land Sales, Condominiums, and Mobile Homes Trust Fund. In addition to the fines and penalties, the trust fund also receives developer filing fees and an annual association's fee of \$4 per condominium unit.<sup>1</sup> According to bureau records, there are approximately 981,000 condominium units in Florida. The bureau is authorized 74.5 staff and has offices in Tallahassee, Tampa, and Fort Lauderdale.

## Findings

### The bureau does not complete investigations and close cases in a timely manner.

It is important for the bureau to conduct timely investigations when it receives complaints from condominium owners. The more responsive the bureau is to complaints, the more quickly it can resolve violations of program requirements and resolve problems that citizens have with developers and condominium associations. For example, misuse of association funds could continue until the bureau completes its investigations and takes enforcement action.

Section 718.501, F.S., provides that the Division shall conduct its investigation and take action within 90 days of receipt of a complaint, but may take longer if reasonable cause exists to believe that a violation has occurred. Bureau managers assert that it is not possible to complete some investigations within 90 days due to factors such as the need to obtain additional information from parties and case complexity. However, the bureau's policy manual concludes that most investigations can be completed within 90 or 120 days of assignment.

To determine whether the bureau conducts investigations and closes cases in a timely manner, we reviewed a purposive sample of 100 complaints that were closed between July 1, 1996, and August 31, 1997. Of these cases, the bureau determined that 11 were outside of its jurisdiction or did not lend themselves to investigation, while it conducted full investigations of the remaining 89 cases.

As shown in Exhibit 1, the bureau generally took over a year to close cases. The bureau took an average of

<sup>1</sup> Every developer is required to pay a \$20 developer filing fee for each residential unit to be sold, a document amendment filing fee of \$100 per filing, and a \$250 fee for each filing of a proposed reservation program.

429 days, or 1.2 years, to complete its investigations in the 89 cases that it determined were within its jurisdiction. In six instances, the bureau took over three years to close the cases. Only 11 of the 89 complaints were completed within the 120-day time frame established by the bureau.

### Exhibit 1 On the Average, It Took the Bureau Over One Year to Complete the Investigations of the Cases Reviewed

Time to Complete Investigation	Number of Cases	Percent of Cases
Days: 1 - 120	11	12%
121 - 180	3	3%
180 - 365	32	36%
Years: 1 - 2	30	34%
2 - 3	7	8%
Over 3	6	7%
<b>Total</b>	<b>89</b>	<b>100%</b>
<b>Average Time Period</b>	<b>432 days</b>	

The bureau took an average of 196 days or a little more than a half of a year, to close the 11 cases that it determined were outside its jurisdiction or did not lend themselves to investigation. Three of these cases were closed within 120 days and the remaining eight cases took from 126 days to 467 days to close. Thus, in eight cases the complainants had to wait lengthy periods of time before learning the bureau would take no action on their behalf.

### Reasons for Lengthy Investigations

Several factors delay complaint investigations. These include: (1) the bureau's policy to investigate issues not raised by complainants; (2) the bureau's policy to not take formal actions against parties until all issues are resolved; (3) the practice of placing complaints in hold status for extended periods of time; (4) delays in obtaining needed legal or financial analysis help; and (5) the bureau's slow and duplicative investigative report review process. In addition, the bureau does not have a tracking system that provides reliable data on how long it takes to complete investigations.

**The bureau expands the scope of investigations.** A primary reason why it takes a long time to close cases is that bureau management requires staff to examine several additional issues in all investigations, regardless of whether these issues were raised by the complainants. For example, staff are required to

examine the adequacy of fidelity bonds carried by condominium association officers during all investigations, even if the complainant did not raise this issue. Similarly, for complaints involving developers, staff must determine whether annual budgets have been proposed and adopted, financial reports or statements have been issued, and annual meetings were held each year of developer control. Investigative staff we talked with indicated that including these issues can add from six months to a year to the time needed to complete investigations because some parties do not provide requested information in a timely manner.

Bureau managers state that these additional issues are added to investigations as a proactive measure because these areas could impose a financial hardship on condominium owners if violations occur. However, these additional issues cause the bureau to be less timely in closing cases. We believe that the bureau should place higher priority on being responsive to complainants and expand the scope of investigations only when it has reasonable cause to suspect that actual violations have occurred.

**No formal action is taken until all issues are examined.** Another factor affecting the length of investigations is that the bureau does not take formal action on a case until all issues raised during the investigation are resolved. This becomes a problem when complainants allege a number of issues or new potential violations are found during investigations. For example, if while investigating a complaint about the possible misuse of association funds, investigative staff finds a lack of association board meeting minutes, the bureau would not take administrative action to resolve the original complaint until the issue of board minutes was also resolved. This policy can delay resolution of citizen complaints.

**Some complaints are placed on hold.** At times, the bureau suspends investigations for extended periods of time due to staffing limits or while awaiting additional information. This occurred in 12 of cases that we examined, with the complaints on hold from 21 to 255 days. While it may be appropriate for bureau management to place some complaints on hold because of staffing constraints, none of the files we reviewed contained information to indicate why they remained on hold for as long as they did.

**Legal and financial review can delay investigations.** Delays in obtaining legal and financial analysis assistance can also delay complaint investigations. If field staff need legal help (such as a subpoena or a legal opinion) or assistance in analyzing financial

statements, they must write a memorandum expressing the needs to the bureau central office, which in turn writes another memo to the Department's legal or financial offices. Bureau staff indicated that it generally takes several weeks to obtain the requested assistance.

For example, in one case we reviewed, legal staff took six months to provide a requested legal opinion. The opinion was necessary in determining whether to proceed or close the complaint investigation. The file had no documentation indicating why the legal opinion took six months to complete. Similarly, in another case involving the possible misuse of association funds, it took over five months to obtain the requested financial analysis assistance. The file indicated that the financial analyst was reassigned to a higher priority assignment, which delayed the financial review.

**The bureau's investigative report review process was lengthy.** Another factor that delayed the investigations we examined is that the bureau often took a long time to review and approve investigative reports. Prior to the Spring of 1997, the bureau required investigative reports to be approved at both the field office and central office levels. It took more than 120 days for the bureau to review and approve investigative reports in 25 of the cases that we examined. To address this problem, the bureau has changed its procedures and no longer requires investigative reports to be reviewed by the central office if approved by the field office supervisor. This change should help expedite the complaint process. Files we examined that were submitted for review after the policy change were reviewed in a timely manner.

**The bureau lacks reliable information on complaint timeliness.** A final factor we identified that can hinder timely resolution of citizen complaints is that the bureau does not have a complaint tracking system to monitor case timeliness. The bureau uses a computer system to track case status and the number of days that investigators take to process complaints. However, the system is not used to track how long it has taken to resolve complaints. The bureau temporarily closes cases that have not yet been assigned to investigators, which stops the system's day count. When the cases are assigned and reopened, the system resets the case life to one day, regardless of when the complaint was received. Bureau staff stated this is done so investigators are not held responsible for days the complaints are pending assignment.

This limits the bureau's ability to identify and expedite cases that have been open for long periods of time. The system did not reflect the age of 32 of the cases we

reviewed. For example, one complaint took 427 days for the bureau to close; yet the system showed that the case was only 79 days old.

**Some complaints involving master associations are outside the bureau's jurisdiction or provisions of the Condominium Act cannot be applied.**

The bureau has a problem responding to complaints involving master associations because its jurisdiction over these associations is often unclear. Master associations operate or maintain other real property in which condominium unit owners may have use rights (such as golf courses). Although the bureau often receives complaints regarding master associations, it frequently determines, after a lengthy investigation, that it has no jurisdiction over the association or that statutory provisions do not apply to the complaint.

The Condominium Act provides that certain master associations are subject to bureau regulation, but others are not.<sup>2</sup> For example, the bureau lacks authority over master associations in which membership is optional, or where membership includes owners of single family homes or other types of property. Thus, the bureau would lack jurisdiction over a masters association that administers a country club if it included membership from private homeowners as well as owners of condominium units in the subdivision. Such master associations may, in effect, be homeowners associations that fall under the definitions in s. 617.301, F.S., rather than the Condominium Act. The Legislature made this distinction in 1992, when it enacted ss. 617.301 through 617.312, F.S., and excluded homeowners associations from agency regulation.

When the bureau receives a complaint involving a master association, staff must make an extensive review of the legal documents governing the association to determine jurisdiction and the applicability of Ch. 718, F.S. Even when the bureau determines that the master association falls under the statutory provisions of Ch. 718, F.S., it may be unable to resolve the complaint because the problem may not be covered by the current wording of condominium statutes. Thus, staff spend valuable investigative resources reviewing complaints related to master associations that they are unable to resolve.

<sup>2</sup> Subsection 718.103(2), F.S., provides that "*Association* means, in addition to those entities responsible for the operation of common elements owned in undivided shares by unit owners, any entity which operates or maintains other real property in which condominium unit owners have use rights, where unit owner membership in the entity is composed exclusively of condominium unit owners or their elected or appointed representatives, and where membership in the entity is a required condition of unit ownership."

We believe that citizen problems with masters associations can best be resolved by educating condominium owners about the differences between master associations and traditional condominium associations. The Legislature could also clarify the bureau's jurisdiction by removing master associations from regulation under Ch. 718, F.S., and specifying that they are subject to the provisions of Ch. 617 F.S., relating to homeowners associations.

**The bureau needs to assess complaints it closes due to lack of jurisdiction.**

During the 1996-97 fiscal year, the bureau closed 682 complaints because the issues raised in these cases were outside the bureau's jurisdiction or did not lend themselves to investigation. This represented over half of the complaints received by the bureau during the year.

While it is appropriate for the bureau to dismiss cases that it cannot take action, it should periodically examine these cases to determine whether they represent areas where changes in the bureau's activities are needed to better protect consumers. If, for example, the bureau began receiving many complaints relating to a new type of association fee, it could determine that it needed to change its public information efforts or seek statutory authority to address this issue. This would enable the bureau to better recognize and adapt to changes in the condominium industry and enhance the protection it can provide to condominium owners.

**The bureau needs to improve several important aspects of its collection process.**

Although the bureau can impose various penalties when its complaint investigations find that violations have occurred, the impact of these sanctions can be weakened because the bureau lacks an effective system for ensuring that fines and penalties are paid by developers and condominium associations. The bureau does not have adequate controls in place to maintain accurate records of amounts owed and to ensure that sufficient efforts are made to collect these amounts.

The bureau does not maintain an accounts receivable ledger containing summary information on all fines and penalties that it has imposed. Instead, the bureau maintains this information in individual case files and a database. The bureau does not routinely examine this information to determine if penalties have been paid. Consequently, it generally lacks summary information on what penalties remain unpaid, who owes what amount, or how long fines have been outstanding.

Several important aspects of the collection process need to be improved:

- Although the Department records the amounts due, it has not clearly defined follow-up procedures in the event of nonpayment. The bureau's collection efforts consist of sending reminder letters and/or contacting parties by telephone of amounts due. The bureau sometimes pursues the collection of large penalties (greater than a \$1,000) through the courts, but does not do so for smaller fines.
- The Department does not routinely track the age of its unpaid fines. If the Department developed an aging schedule for these penalties, it could also take increasingly more diligent collection attempts, as fines and fees remain unpaid.
- As individual cases remain unpaid for long periods of time, management sometimes authorizes staff to close these files and stop collection efforts. No procedures have been developed regarding when cases should be classified as uncollectable.
- The Department has not referred delinquent accounts that are more than six months old to the Department of Banking and Finance for further action as required by Rule 3A-21.003, F.A.C.<sup>3</sup>

At our request, the bureau reviewed its records and determined that \$175,550 in assessed fines and penalties were unpaid on open files as of July 31, 1997. According to bureau records, approximately \$48,000 of this uncollected balance are from fines and penalties assessed during the 1996-97 fiscal period; the bureau assessed \$232,550 in fines and penalties, and collected \$184,250 (79%). However, bureau staff estimated that over a number of years they had closed approximately 1,000 files with unpaid balances. The bureau cannot readily identify the amount of unpaid fines and penalties on these files.

## Conclusions and Recommendations

The Bureau of Condominiums does not complete investigations and close cases in a timely manner, and can take up to three years to complete investigations and take enforcement action. Complaints involving master associations are frequently outside of the bureau's jurisdiction or provisions of the Condominium Act cannot be applied. The bureau also lacks an effective system to ensure that persons found to have

<sup>3</sup> Rule 3A-21.003, F.A.C., provides for the reporting of delinquent receivables within six months unless the Department of Banking and Finance approves another period or the reporting entity is pursuing other lawful collection efforts.

violated program requirements pay fines and penalties in a timely manner.

To address these issues, we recommend that the bureau revise its procedures regarding complaint investigations. Until the current backlog of complaints is resolved, the bureau should eliminate its requirement to add additional issues to investigations unless they are directly pertinent to the complaint. The bureau should also revise its policy and take enforcement action as soon as it resolves individual issues in complaints, rather than waiting until all issues are resolved. Staff should be directed to place priority on resolving complainant issues first, and then pursue additional issues that may be found during investigations. These steps would enable the bureau to more quickly take formal action on original complaints.

We also recommend that the bureau improve the reliability and accuracy of its tracking system to better monitor complaint investigations. The bureau should implement procedures to ensure that personnel are diligent in complying with procedures relating to case monitoring, records maintenance, deadlines, and supervisory case reviews.

To improve the effectiveness of the bureau's collection process, we recommend that bureau staff develop procedures to determine when to classify cases uncollectable. The bureau should also determine when more aggressive collection efforts are appropriate. We also recommend that the bureau review its closed files to determine the amount of receivables that remain uncollected from these files and determine which, if any, cases warrant pursuing collection. The bureau should clearly assign primary responsibility for follow-up activities in the event of nonpayment; develop an accounts receivable aging schedule to track the status of outstanding accounts; and refer delinquent accounts to Florida Department of Banking and Finance as required by Rule 3A-21.003, F.A.C.

In addition, we recommend that the Legislature amend Ch. 718, F.S., to remove master associations from regulation under the Condominium Act and to clarify that these associations are subject to the provisions of Ch. 617, F.S., governing homeowners associations. The Legislature should direct the bureau to develop an education program advising condominium associations and condominium unit buyers about the differences between master associations and traditional condominium associations. Educating condominium owners and potential buyers about master associations will allow these individuals to be more informed about

issues relating to this form of ownership and its limitations.

We also recommend the bureau periodically examine cases that fall outside its jurisdiction or did not lend themselves to investigation to determine if changes in the bureau's activities are needed to better protect consumers. If the bureau determines it needs additional authority it should propose statutory revisions for the Legislature's consideration.

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## **Response from the Department of Business and Professional Regulation**

March 3, 1998

Mr. John W. Turcotte  
Director  
OPPAGA  
Post Office Box 1735  
Tallahassee, FL 32399-1735

Dear Mr. Turcotte:

Pursuant to Section 11.45(7)(d), Florida Statutes, attached is the Department's response to the preliminary findings and recommendations for your review of the Bureau of Condominiums Complaint Investigation Process.

Most of the findings identified in the report have been corrected or are in the process of being resolved. Where necessary, additional corrective actions will be taken according to the tentative completion dates noted.

The Department appreciates the work of your staff and will diligently pursue appropriate resolution of the findings. If I may be of further assistance, please let me know.

Sincerely,

/s/ Richard T. Farrell  
Secretary

RTF/KC/vbh

Enclosure

cc: Delane Anderson, Deputy Secretary  
Hank Osborne, Deputy Secretary  
Lynda Goodgame, General Counsel

## **Florida Department of Business and Professional Regulation Division of Land Sales, Condominiums and Mobiles Homes Bureau of Condominiums**

March 4, 1998

### **DBPR Response to OPPAGA's Preliminary Findings**

#### ***Background***

The Condominium and Cooperative Acts (Chapters 718 and 719, F.S) were enacted in 1977. In addition to the Bureau of Condominium's responsibilities to protect the rights of condominium owners, it also educates cooperative owners, reviews cooperative documents and investigates complaints regarding cooperatives. The Bureau's records indicate there are currently 67,552 cooperative units in the state.

Based on the Legislative mandate in Chapter 97-301, Laws of Florida, the Bureau has drafted resolution guidelines that will be used in its enforcement activities. These rules, which are being filed for adoption this month, will allow the Bureau, in most cases, to take proactive steps in educating associations and developers prior to imposition of penalties. This should reduce the number of actual investigations resulting in penalties and other administrative actions.

Also, in the Spring of 1997, the Bureau decentralized its enforcement functions. Supervisors in each office are now reviewing all cases in that office, with the Bureau Chief's office in Tallahassee only overseeing and coordinating these efforts.

***Finding #1: The bureau does not complete investigations and close cases in a timely manner.***

***The bureau expands the scope of investigations.***

Since December 1997, the Bureau only investigates issues not raised by complainants when, in the course of its investigation, it discovers an infraction likely to cause substantial harm. Before such an infraction can be added to the investigation, it must first be approved by the Bureau Chief.

**No formal action is taken until all issues are examined.**

The Bureau will not add a new issue to a case subsequently raised by a complainant, if, in doing so, it delays the resolution of the case. The Bureau now opens up a new case for such additional issues. Furthermore, under the proposed resolution guidelines, the type of resolution, education or enforcement, is based upon whether the violation is minor or major or has been repeated within a two-year period. This necessitates the handling and tracking of violations separately, rather than cumulatively. However, when it is more expeditious to do so, those violations that require administrative action will continue to be handled together. The rationale for this policy is that it provides better notice to the affected parties when all violations are identified before the Bureau initiates formal administrative action. At this stage, consolidating the violations is more likely to expedite rather than delay the final resolution.

**Some complaints are placed on hold.**

Currently, only one field office has cases on hold due to lack of fully trained staff. The Bureau is actively closing out older pending cases, through educational resolution, specified corrective action or penalty imposition based upon the proposed resolution guidelines. Resolving cases through education has decreased the time it takes to resolve a complaint. In the past several months, staff turnover has been substantially reduced. New cases will only be placed on hold when there are staffing limits, with a policy directive that they be activated within a period not exceeding 60 days. However, once the backlog of older cases has been disposed of and the resolution guidelines adopted, it is unlikely that any cases will need to be put on hold.

**Legal and financial review can delay investigations.**

Field office supervisors now contact the legal section directly for informal advice or assistance. Requests for legal opinions and reviews of subpoenas and Notices to Show Cause are now handled on an expedited basis as needed. Investigators enforcing major infractions now have authority to draft consent orders. Prior policy had the case file sent to Tallahassee for this purpose.

Prior to 1996, the Division's financial section provided all consultations for the Bureau. The

Bureau now staffs eight Financial Examiner/Analysts and one Financial Examiner/Analyst Supervisor, divided among the Bureau's three offices. The financial section not only performs its own investigations, primarily on developer cases, but also work as a team with investigators from the enforcement section, when a case's facts dictate the need for such expertise.

**The bureau's investigative report review process was lengthy.**

The Bureau has decentralized its enforcement procedures. These procedures were implemented several months ago. As acknowledged by OPPAGA, investigative reports are now reviewed by the immediate supervisor in each office. Since the policy change, reviews occur in a timely manner. Furthermore, under the proposed resolution guidelines, cases will require investigative reports only when an enforcement action is taken.

**The bureau lacks reliable information on complaint timeliness.**

Previously, the Bureau would close cases that had been placed on hold, subsequently reopen them, and then enter the date the case was reopened as the date opened. Cases are no longer closed after being placed on hold. The opened date now indicates the date when the case was accepted, and the closed date when it was resolved. For each case, the number of days indicated now reflects this time frame. Under the previous policy, this total was incorrect.

The Bureau will soon be making other recommendations to DBPR's technical support staff for changes to its data tracking system. Under the new resolution guidelines, the Bureau will have to monitor compliance following resolution of each violation for a two-year period. The Bureau is presently working on new codes to categorize violations and other information consistent with the guidelines. New fields will have to be created. The changes will better enable the Bureau to monitor the effectiveness of its actions, including the time taken to resolve a complaint through education or enforcement.

**Finding #2: Some complaints involving master associations are outside the bureau's jurisdiction or provisions of the Condominium Act cannot be applied.**

As acknowledged by OPPAGA, the Bureau's jurisdiction over master associations is often

unclear. Consequently, as further indicated, the Bureau spends valuable investigative resources reviewing such complaints that can't be resolved under the Condominium Act.

The Bureau will devise materials to educate condominium owners on the differences between master associations and traditional condominium associations. However, the ambiguities associated with the jurisdiction issue may make this effort difficult. OPPAGA also recommends that the legislature clarify the Bureau's jurisdiction by removing master associations from the Condominium Act and making them subject to Chapter 617, F.S., which relates to homeowners associations. DBPR concurs with this recommendation.

***Finding #3: The bureau needs to assess complaints it closes due to lack of jurisdiction (or those that did not lend themselves to investigation <sup>1</sup>).***

The proposed resolution guidelines indicate the type of violations that will be resolved through educational resolution. Those that fall in this category will not lend themselves to investigation. The guidelines will also define "accepted complaint." The Bureau will incorporate a system that tracks rejected complaints and the reasons for rejection. Should the data evidence a problem area that might be best addressed through a statutory change, DBPR will make that recommendation to the legislature.

Bureau staff now routinely do educational seminars, speaking engagements and other public outreach activities. In performing these endeavors, staff receives direct feedback from participants on the kind of protection they want and the services they need.

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<sup>1</sup> The inclusion of cases that did not lend themselves to investigation is contained in the first paragraph of this OPPAGA finding.

***Finding #4: The bureau needs to improve several important aspects of its collection process.***

The Bureau is currently developing procedures to track and monitor those actions where penalties are imposed. All open docket cases are being reviewed to monitor what has been assessed and what remains uncollected. A request has been made to the Division Director's office to modify the current LCM503 (docket report) to add a field showing the civil penalties assessed for the month and year to date. A request has also been made for an accounts receivable report for all open dockets where civil penalties have not been paid in full. The Bureau plans to go through available closed files to determine if any uncollected receivables warrant collection.

With the reorganization of the Bureau, the investigator involved with the case will be responsible for tracking compliance which includes the payment of penalties. Division personnel are looking at available software to be used for this in all three offices. The legal section will also be working with the Bureau to establish a formal process for referring outstanding civil penalties to the Department of Banking and Finance for further action.

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