

IN THE CIRCUIT COURT FOR THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

JONATHAN PERLMAN, as President and on
behalf of, PETITIONERS COMMITTEE TO
AMEND THE BOCA RATON CHARTER
REGARDING ALIENATION, LEASE OR
SALE OF CITY-OWNED LAND GREATER
THAN ONE HALF ACRE and PETITIONERS
COMMITTEE TO AMEND THE BOCA
RATON CODE OF ORDINANCES
REGARDING ALIENATION OF LAND
GREATER THAN ONE HALF ACRE

Petitioner

v.

Case No: _____

CITY OF BOCA RATON, a municipality
and
SUPERVISOR OF ELECTIONS OF
PALM BEACH COUNTY

Respondents

COMPLAINT - PETITION FOR WRIT OF MANDAMUS

with SUPPORTING BRIEF REGARDING REFERENDUM

Petitioner, JONATHAN PERLMAN as chairman and on behalf of
Petitioners' Committees for a Citizen's Ballot Initiative regarding the City of
Boca Raton PETITIONERS COMMITTEE TO AMEND THE BOCA
RATON CHARTER REGARDING ALIENATION, LEASE OR SALE OF
CITY-OWNED LAND GREATER THAN ONE HALF ACRE and

PETITIONERS COMMITTEE TO AMEND THE BOCA RATON CODE OF ORDINANCES REGARDING ALIENATION OF LAND GREATER THAN ONE HALF ACRE called ("PETITIONERS COMMITTEES"), files this Complaint / Petition for Writ of Mandamus under *Florida Rule of Civil Procedure* 1.630 (extraordinary writs) seeking a writ of mandamus ordering the CITY OF BOCA RATON to perform a ministerial act under Fla. R. Civ. Pro. 1.630 (Extraordinary Remedies). The Court must review this complaint for a prima facie case and issue an Alternative Writ of Mandamus ordering Defendant Respondents to respond.

Petitioners give notice of related cases brought by a third non-party citizen in opposition to the referendum questions in Circuit Court Case No. 50-2025-CA-010277-XXXA-MB - Division AD (Honorable Judge Jaimie Goodman), which case was then voluntarily dismissed and refiled as an identical case by the same third non-party citizen in opposition to the referendum questions as case Case No. 50-2025-CA-011366-XXXA-MB - Division AI (Honorable Judge G. Joseph Curley), which is still pending.

As prima facie grounds in support of this action, Petitioner states as follows:

1. Petitioner seeks an order compelling the City clerk to perform the ministerial act of placing a citizens' initiative for a ballot referendum to

amend the City CHARTER and Land Development Code pursuant the procedures set forth in the City of Boca Raton Charter, Articles 6 and 7.01.

2. The PETITIONERS COMMITTEES are the Committees formed to collect enough qualified voters to sign the two Petitions to satisfy the City Charter requirements to adopt a City Ordinance by referendum pursuant to City Charter Sections 6.05 and 6.06 to require an election be held on the referendums pursuant to City Charter Section 6.08 and to amend the City Charter by referendum pursuant to existing City Charter 7.01. See, Appendix Bates # 03 and App. Bates # 10.

3. PETITIONERS COMMITTEE TO AMEND THE BOCA RATON CHARTER REGARDING ALIENATION, LEASE OR SALE OF CITY-OWNED LAND GREATER THAN ONE HALF ACRE, filed its Affidavit with the City Clerk's Office with the City of Boca Raton, Florida, on **June 25, 2025**, in accordance with Boca Raton City Charter Section 7.01 "Charter amendment". See, Appendix Bates # 03.

The Petitioners Committees' Affidavit advised the City of Boca Raton that it had commenced an initiative and referendum proceeding to amend the City **Charter**. See, Appendix Bates # 17

4. PETITIONERS COMMITTEE TO AMEND THE BOCA RATON CODE OF ORDINANCES REGARDING ALIENATION OF LAND

GREATER THAN ONE HALF ACRE, filed its Affidavit on **June 23, 2025**, in accordance with Boca Raton City Charter Section 6.04 “Commencement Proceedings”. See, Appendix App. Bates # 10.

The Petitioners Committees’ Affidavit advised the City of Boca Raton that it had commenced an initiative and referendum proceeding to adopt an **Ordinance** of the City of Boca Raton, Florida amending the City Code of Ordinances. See, Appendix Bates # 19.

5. On or about **September 23, 2025**, the Boca Raton City Clerk filed a Certificate of Sufficiency on the *Initiative Petition – Proposed Ordinance to Create Section 2.4, Protection of City-Owned Land Greater Than One-Half Acre*. A copy of this Certificate of Sufficiency is attached hereto as Appendix Bates # 21 and made a part hereof. The Certificate of Sufficiency issued by the City Clerk stated that according to the certification of the Palm Beach County Supervisor of Elections dated September 22, 2025, a total of **3,689** of the signatures transmitted for verification were determined to be qualified electors of the City. Accordingly, pursuant to the City Charter Section 6.06(a), the Boca Raton City Clerk certified the initiative petition as sufficient. App Bates # 21.

6. On or about **October 2, 2025**, the Boca Raton City Clerk filed a Certificate of Sufficiency on the *Initiative Petition – Proposed Ordinance*

to Create City Charter Section 7.11, Protection of City-Owned Land Greater Than One-Half Acre. A copy of this Certificate of Sufficiency is attached as Appendix Bates # 22 and made a part hereof. The Certificate of Sufficiency issued by the City Clerk stated that according to the certification of the Palm Beach County Supervisor of Elections dated October 2, 2025, a total of **6,201** of the signatures transmitted for verification were determined to be qualified electors of the City. Accordingly, pursuant to the City Charter Section 6.06(a), the Boca Raton City Clerk certified the initiative petition as sufficient. Appendix Bates # 22

7. On **October 2, 2025**, Intervenor PETITIONERS COMMITTEES requested that the Boca Raton City Clerk's office place the Charter amendment on the ballot in **December 2025 within the time frame set forth in Boca Raton City Charter section 6.08 and section 7.01. Charter amendment.** Appendix Bates # 23.

8. On or about **October 28, 2025**, the City of Boca Raton approved putting both the "Save Boca ordinances" on the ballot for a special election to be held on **January 13, 2026 outside the time frame set forth in the City Charter**, which special election was then temporarily enjoined by the Circuit Court, in part because the election was not within the time frames of City Charter Sections 6.08 and 7.01 in a case brought

by a citizen in opposition to the referendum questions in Circuit Court in which Petitioners were dropped prior to the temporary injunction hearing to present applicable controlling case law and Florida Statute 166.031(3), which expressly provides for citizen referendum under Florida Statutes as well as the City Charter: **“(3) A municipality may amend its charter pursuant to this section notwithstanding any charter provisions to the contrary.”** Florida Statute 166.031(3).

9. The January 13, 2026 election date for the referendum on the two ballot questions (adoption of an ordinance and adoption of a charter amendment) as originally set by the City would not take place within the mandatory sixty (60) to ninety (90) days required by the City of Boca Raton Charter.

However, Florida Statute 166.031(3) expressly provides for citizen referendum under Florida Statutes as well as the City Charter: **“(3) A municipality may amend its charter pursuant to this section notwithstanding any charter provisions to the contrary”** and does not contain a 60-90 day time frame instead only requires the election be set **“at the next general election held within the municipality or at a special election called for such purpose.”** Florida Statute 166.031(1) and (3)

10. City Charter in Article 6 and specifically section **6.08 for adoption of Ordinance by Referendum** and specifically section **7.01 for adoption of Charter Amendments by Referendum**, which mandate that the referendum questions be placed on the ballot for an election of the voters of the City of Boca Raton:

Section 6.08. Action on petitions

(a) *Action by council. When an initiative or referendum petition has been finally determined sufficient, the council shall promptly consider the proposed initiative ordinance in the manner provided in Article III for nonemergency ordinances, or reconsider the referred ordinance or resolution by voting its repeal. If the council fails to adopt a proposed initiative ordinance without any change in substance within sixty (60) days or fails to repeal the referred ordinance or resolution within thirty (30) days, or if the council sooner takes final action having the same effect, the council **shall submit** the proposed or referred ordinance or resolution to the voters of the city.*

(b) **Submission to voters.** *The vote of the city on a proposed or referred ordinance or resolution shall be held **not less than thirty (30) days and not later than sixty (60) days** after the time provided in subsection (a) of this section for action by council has expired, or after the council sooner takes final action having the same effect, whichever occurs first. **If no regular city election is to be held within the period prescribed by this subsection, the council shall provide for a special election. The council may, in its discretion, provide for a special election within the prescribed period at a date***

earlier than a regular election. Copies of the proposed or referred ordinance or resolution shall be made available at the polls.

Section 7.01. Charter amendment.

This Charter may be amended in either of two (2) ways:

...

(b) *Initiation by petition. The electors of the city may propose amendments to this Charter by petition signed by qualified voters of the city equal in number to at least ten (10) percent of the total number of qualified voters registered to vote in the last regular city election.*

...

(3) *Certification of petition. Upon certification of the petition by the city clerk in accordance with the procedures established in section 6.06 for initiative petitions, **the council shall place the proposed amendments to a vote of the electors not less than sixty (60) days after certification at the next regularly scheduled election or at a special election called for such purpose. In no event shall the charter amendment be voted upon later than three (3) months from the date of certification.***

11. The COMMITTEE seeks a writ of mandamus compelling the City to place the referendum questions on the ballot at an election as required by Section 6.08 and 7.01 of the City Charter.

12. Mandamus is available to compel a ministerial act by a public body where performance is directed by law, including placing a citizens' initiative on the ballot pursuant to a City Charter. Wright v. Frankel, 965 So.2d 365 (Fla. 4th DCA, 2007).

13. This court granted mandamus for similar referendum by similar Petitioners Committees in the City of Boca Raton that was upheld by the Fourth District Court of Appeals in the case of **City of Boca Raton v. Siml**, 96 So.3d 1140 (Fla. 4th DCA, 2012)

14. The proposed amendment to the land development code by citizens' initiative does not conflict with state statutes or the constitution. There is nothing in the proposed amendments to the Charter or the Code of Ordinances in the Petitions that would violate state statutes or the Constitution. Florida courts, including controlling precedent from the 4th DCA on this circuit, have already overruled a previous order from the fifteenth circuit court in another case involving the City of West Palm Beach, on electorate's right to a referendum prior to the sale of property. In **Brooks v. Watchtower and City of West Palm Beach** 706 So.2d 85 (Fla. 4th DCA 1998), at 89,, Attached in Appendix p. 24 (Case Law)

15. The Ballot Question Summary is clear, not misleading and restates in their entirety the amendments within the 75 word limit allowed by Florida Statutes **101.161**.

16. Many Florida cities require referendum prior to vacating, selling or leasing lands and this is not prohibited by Florida Statutes or the constitution, including the City of Fernandina Beach, the City of

Clearwater, the City of St Petersburg and the City of St Pete Beach among many other municipalities in Florida.

For example:

CITY OF FERNANDINA BEACH, FLORIDA

PART I - CHARTER OF CITY OF FERNANDINA BEACH¹

Sec. 10A. Referendum required for sale of city-owned recreational facilities and land.

- (a) A referendum election is required prior to the sale or lease for a period of more than 40 years of "recreational facilities" such as golf courses, swimming pools, and parks.
- (b) For a referendum election under this Section 10A, the City Commission must first adopt an ordinance by unanimous vote of the **Commission to put a sale or lease of recreational facilities on a ballot for the voters, and the referendum must then pass by 70% of the voters in that referendum election.**
- (c) "Conservation lands", including City-owned lands protected by conservation easements, must not be leased or sold by the City and are held by the City for the benefit of the public in perpetuity.
- (d) "Recreational facilities" and "conservation lands" are each defined in the City's Comprehensive Plan and mean lands or places with a Recreation or Conservation designation, respectively, on the City's Future Land Use Map of the City's Comprehensive Plan. Conservation lands may also include lands owned or leased by the City and protected by conservation easements.

¹ https://library.municode.com/fl/fernandina_beach/codes/code_of_ordinances?nodeId=PTICHFEBE

CITY OF CLEARWATER, FLORIDA

CITY CHARTER²

Section 2.01. Council; composition; powers.

(d) *Limitations.* The legislative power provided herein shall have the following limitations:

- (v) No municipally owned real property which was identified as recreation/open space on the city's comprehensive land use plan map on November 16, 1989, or at any time thereafter, **may be sold, donated, leased for a new use, or otherwise transferred without prior approval at referendum**, except when the council determines it appropriate to dedicate right-of-way from, or easement over, such property. Such recreation/open space property may be leased for an existing use, without referendum, unless such lease is otherwise prohibited by charter or ordinance.
- (vi) No right-of-way or easement which terminates at, or provides access to, the water's edge of a body of fresh or salt water may be vacated for private benefit. Nothing contained in this section shall prevent an easement solely for utility purposes from being vacated, exchanged for a new easement for similar purposes or from converting a fee interest for utility purposes into an easement for such purposes.
- (vii) The council may lease municipal real property for five years or less without declaring it surplus. Municipal real property declared surplus may be leased for a term up to 65 years, provided, however, nothing herein shall preclude renewal of any lease for a maximum of 30 years. Municipal property declared surplus may be leased for an initial period of more than 65 years or a renewal period exceeding 30 years, **if approved at referendum**, but not to exceed 95 years total.

²https://library.municode.com/fl/clearwater/codes/code_of_ordinances?nodeId=PTICHRELA_SPACH_ARTIILEP_O_S2.01COCOPO

CITY OF ST. PETERSBURG, FLORIDA

PART I – CITY CHARTER³

ARTICLE I. - POWERS

Sec. 1.01. - General powers.

Sec. 1.02. - Park and waterfront property; use, disposition.

(c) *The disposition of park and waterfront property.* With respect to the disposition of waterfront or park property the following shall govern:

(2) Sale or Lease. A lease of three (3) years or less of residentially zoned waterfront or park property, a lease of five (5) years or less of commercially zoned waterfront or park property, a lease not exceeding the lease terms permitted for the waterfront or park properties listed in Section 1.02(c) (4) or a lease not exceeding the lease terms permitted by the City Park and Waterfront Map requires approval by the affirmative vote of at least six (6) members of City Council. **With the exception of those encumbrances permitted by Section 1.02(c)(5) of this Charter, a lease of waterfront or park property of greater than these respective time periods or a sale requires approval by the referendum procedure contained in Section 1.02(d). Approval authority for leases not requiring a referendum and having a term of one (1) year or less may be delegated by City Council to the Mayor or the Mayor's designee by the affirmative vote of at least five members of Council.**

CITY OF ST. PETE BEACH, FLORIDA

CHARTER⁴

ARTICLE I. - CREATION AND POWERS

Sec. 1.01. Creation and powers.

The City of St. Pete Beach is created which shall have all governmental, corporate and proprietary powers to enable it to conduct municipal government, perform municipal functions and render municipal services, and may exercise any power for municipal purposes except as otherwise provided by law.

³ https://library.municode.com/FL/st._petersburg/codes/code_of_ordinances?nodeId=PTICH

⁴ https://library.municode.com/fl/st._pete_beach/codes/code_of_ordinances?nodeId=PTICH_ARTICRPO_S1.03VARI-W

...

Sec. 1.03. Vacation of right-of-way.

...

Any lands conveyed to the public to be used for streets, parks, playgrounds, recreation centers, swimming pools, or libraries can only be disposed of in any **way upon specific authorization of a majority vote of a city-wide referendum.**

No easement, dedicated or granted to the city, right-of-way, or access to the gulf, bay or other waterfront shall be vacated.

17. The proposed referendums are not contrary to any Florida statute or constitutional home rule. FLA CONST. Art. VIII, § 2.

HOME RULE NOT VIOLATED & CONTROLLING 4th DCA CASE LAW

18. Under the proposed ordinance and charter amendment if it passes at referendum, the electors of the city could vote to decide whether to sell, lease city public lands. This does not violate home rule.

19. Home rule allows the City of Boca Raton City Charter provisions set forth in the City Charter Article 6, section 6.08 and 7.01. A brief explanation of “home rule” is warranted – it is the broad constitutional authority of the city to act unless contrary to Florida Statutes or unconstitutional. Under the Florida Constitution, the original authority for local governments to regulate was constrained by Dillon’s Rule⁵, which limited local government’s authority to areas where express power was

⁵ FLA. CONST. art. VIII, § 8 (repealed 1968).

granted by the Legislature. In 1968, the Florida Constitution was revised to give local governments broad “governmental, corporate and proprietary powers unless otherwise provided by law”. FLA. CONST. art. VIII, § 2(a).

20. The constitutional revisions granted ‘home rule authority’ to municipalities within Florida to regulate and manage the affairs of local government. See FLA CONST. Art. VIII, § 2(b), which simply provides:

“Municipalities shall have governmental, corporate and proprietary powers to enable them to conduct municipal government, perform municipal functions and render municipal services, and may exercise any power for municipal purposes except as otherwise provided by law. Consequently, local governing boards have full authority to act unless the Legislature has pre-empted the regulation.” See also Chapter 73-129, section 5 Laws of Florida, adopting the Municipal Home Rule Powers Act (now section 166.042, Florida Statutes) provides that Florida Statutes, "shall not be interpreted to limit or restrict the powers of municipal officials," and that it is the legislative intent that "*municipalities continue to exercise all powers ... at their own discretion, subject only to the terms and conditions which they choose to prescribe.*"

21. Florida courts, including controlling precedent from the 4th DCA on this circuit, have already overruled this circuit court, on

electorate's right to a referendum prior to the sale of property expressly ruling this does not violate home rule in Florida.

In Brooks v. Watchtower and City of West Palm Beach 706 So.2d 85 (Fla. 4th DCA 1998), at 89, See Appendix p. 25 (Case Law):

"I. Electorate's Right to a Referendum Article I, Section 1 of the Florida Constitution declares that "[a]ll political power is inherent in the people. The enunciation herein of certain rights shall not be construed to deny or impair others retained by the people." As the Supreme Court has noted, "[t]he citizens of the State of Florida in drafting and adopting the 1968 Constitution reserved certain powers to themselves, choosing to deal directly with some governmental measures. The **referendum, then, is the essence** of a reserved power." See *Florida Land Co. v. City of Winter Springs*, 427 So.2d 170, 172 (Fla. 1983). Under the Florida Constitution, the people elect the Legislature, and it is the Legislature which enacts the general laws under which the citizens of Florida live. The general laws of Florida encompass the creation of municipalities. See Ch. 165, Fla. Stat. (1997). A municipal corporation derives not only its existence but its power from the Legislature. See Article VIII, § 2(a), Fla. Const.; *Town of Palm Beach v. City of West Palm Beach*, 55 So.2d

566, 572 (Fla.1951). The Legislature adopted the Charter of West Palm by special law in 1965. See Chs. 65-2381, 65-2382, at 4153-4267, Laws of Fla. Pursuant to the home rule powers granted in chapter 166, Florida Statutes (1997), the City Charter was amended by a referendum vote of the people to its present form in 1988. The Charter now provides that "[a]ll powers of the City shall be vested in the City Commission except those powers specifically given to the Mayor ... and except those powers specifically reserved in this Charter to the electors of the City." See Charter § 2.03 (emphasis added). One of the powers specifically reserved to the electors is the power of initiative and referendum. See Charter § 6.02...we see no reason why the sale of a public building cannot be the subject of a referendum also. We distinguish People v. City of Centralia, 1 Ill.App.2d 228, 117 N.E.2d 410 (1953), cited by the trial court, in which the [Illinois] court found that the sale of municipal airport property was not subject to a referendum. In that case, a state statute not only limited the power of referendum to legislative matters but another statute provided for the method and manner of selling municipal real estate. As the municipal authorities would merely be exercising an administrative function in following the

statutory duties as agents of the state government, their act would not be considered legislative. **In Florida, under home rule provisions, the same result does not follow. See Ch. 166, Fla. Stat.** We therefore determine **that the ordinance authorizing the sale of the Auditorium and surrounding land is the proper subject of a referendum under the Florida Constitution, state statutes, and the Charter and Code of the City of West Palm Beach.**”

Brooks v. Watchtower and City of West Palm Beach, 706 So.2d 85 (Fla. 4th DCA 1998), 89 (emphasis added) See Appendix p. 25.

As the court further explained:

“Both because of the reservation of political power to the people in the Florida Constitution and the specific reservation of the power of referendum to the voters in the Charter, we must interpret the Code and Charter provisions in a light most favorable to sustaining the exercise of that power. *Id.* With that in mind, St. Petersburg's narrow holding does not compel us to agree with the trial court that an ordinance authorizing the sale of a major city asset cannot be the subject of a referendum. See also City of Lake Worth v. State, 111 So.2d 433 (Fla.1959).”

Brooks v. Watchtower and City of West Palm Beach 706 So.2d 85

(Fla. App. 1998), 88. See Appendix p. 25.

“However, unless it is demonstrated that the ordinance is unconstitutional in its entirety, there is no ground, including futility, to prevent the holding of the election. See Dade County v. Dade County League of Municipalities, 104 So.2d 512 (Fla.1958) at 514-16; West Palm Beach Ass'n of Firefighters, Local Union 727 v. Board of City Comm'rs of City of West Palm Beach, 448 So.2d 1212, 1214 (Fla. 4th DCA 1984); City of Coral Gables v. Carmichael, 256 So.2d 404, 408-09 (Fla. 3d DCA 1972)(the **referendum procedure** provided in city charter constitutes integral step in legislative process and "in the absence of demonstrated illegality the legislative processes of the state ... which are provided for by law may not be impeded or prevented by the courts").

Brooks v. Watchtower and City of West Palm Beach, 706 So.2d 85 (Fla. 4th DCA 1998), at 90. See Appendix p. 25.

Private Use of Public Lands Referendum.

Another 4th DCA case setting controlling precedent by the 4th District Court in City of Boca Raton v. Siml, 96 So.3d 1140 (Fla. 4th DCA 2012) also required referendum with an outright prohibition on private use of public lands be put before voters. Attached Case Law, Appendix p. 29.

Florida Statutes.

Florida Statutes specifically allows and does not preempt the Petitioner's proposed amendment to the City Charter:

Florida Statutes 166.031 Charter amendments.

(1) The governing body of a municipality may, by ordinance, **or the electors of a municipality may, by petition signed by 10 percent of the registered electors as of the last preceding municipal general election, submit to the electors of said municipality a proposed amendment to its charter**, which amendment may be to any part or to all of said charter except that part describing the boundaries of such municipality. **The governing body of the municipality shall place the proposed amendment contained in the ordinance or petition to a vote of the electors at the next general election held within the municipality or at a special election called for such purpose.**

(2) Upon adoption of an amendment to the charter of a municipality by **a majority of the electors voting in a referendum upon such amendment**, the governing body of said municipality shall have the amendment incorporated into the charter and shall file the revised charter with the Department of State. All such amendments are effective on the date specified therein or as otherwise provided in the charter.

(3) **A municipality may amend its charter pursuant to this section notwithstanding any charter provisions to the contrary.** This section shall be supplemental to the provisions of all other laws relating to the amendment of municipal charters and is not intended to diminish any substantive or procedural power vested in any municipality by present law. A municipality may, by ordinance and without referendum, redefine its boundaries to include only those lands previously annexed and shall file said redefinition with the Department of State pursuant to the provisions of subsection (2)."

Florida Statutes 166.031.

If the election cannot be held within 30 days under the City Charter, then Florida Statutes 166.031 (1), (2) and (3) states that it must be placed on “the next general election held within the municipality or at a special election called for such purpose” pursuant to subsection (1) and the “municipality may amend its charter pursuant to this section notwithstanding any charter provisions to the contrary” under subsection (3). This means that even if the 30 days is missed under the City Charter, then Florida Statutes allows the amendment to be placed on a ballot for **“a vote of the electors at the next general election held within the municipality or at a special election called for such purpose.”** Petitioners request such relief, it was not their fault that the City did not hold an election within the 60-90 day time frame in the City Charter once the City certified the Petitions, even after the Petitioners requested the matter be placed on the ballot. See Appendix Documents:

Certification of Signatures re Charter Petition at App. Bates 21

Certification of Signatures re Code of Ordinances Petition at App. Bates 22

Petitioners Committee Requests for Timely Election at App. Bates 23.

WHEREFORE, Petitioner seeks a writ of mandamus ordering the City to process and place the initiative question on the ballot at an election held pursuant to City Charter Article Section 6.08 and 7.01 or Florida Statutes 166.031(1), (2) and (3) (i.e., **“at the next general election held within the municipality or at a special election called for such purpose.”**).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via E-portal on or before Monday, December 15, 2025 to:

City Attorney, CITY OF BOCA RATON, SAMUEL I. ZESKIND, Esq., and DAN ABOTT, Esq. c/o Weiss Serota Helfman Cole & Bierman, P.L., 200 E. Broward Blvd. Suite 1900, Fort Lauderdale, Florida 33301, email: szeskind@wsh-law.com and dabott@wsh-law.com

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