OFFICE OF THE COUNTY ATTORNEY

MITCHELL O. PALMER, COUNTY ATTORNEY*
William E. Clague, Chief Assistant County Attorney
Sarah A. Schenk, Assistant County Attorney**
Christopher M. De Carlo, Assistant County Attorney
Pamela J. D'Agostino, Assistant County Attorney
Anne M. Morris, Assistant County Attorney
Katharine M. Zamboni, Assistant County Attorney
Alexandria C. Nicodemi, Assistant County Attorney
Douglas E. Polk, Assistant County Attorney

MEMORANDUM

DATE: September 9, 2019

TO: Board of County Commissioners

THROUGH: Mitchell O. Palmer, County Attorney Approved by *M. Palmer 9-9-2019*

FROM: Katharine M. Zamboni, Assistant County Attorney Approved by *K. Zamboni*

RE: Panhandling; CAO Matter 2019-0386

Issue Presented:

During the July 23, 2019 regular meeting of the Board of County Commissioners, the Board instructed the County Attorney's Office to look into ways to regulate panhandling, to include examining other county ordinances in the State of Florida.

Brief Answer:

Panhandling is a form of expressive speech that is protected by the First Amendment of the United States Constitution. Attempts to ban panhandling, while permitting other First Amendment activities within traditional public forums, is unlikely to survive legal challenge.

The presence of pedestrians, including panhandlers, near moving vehicles, however, is a serious public safety concern that likely can be addressed by amending the County's ordinance regulating activities within public roads and rights-of-way without referring to speech content.

Recommendation:

Adopting an ordinance that alters where people engage in panhandling will address the public safety concerns associated with the presence of pedestrians near moving vehicles. Adopting such an ordinance, however, should be viewed as a small component of a comprehensive strategy for addressing the needs of panhandlers in Manatee County.

* Board Certified in Construction Law

** Board Certified in City, County, & Local Government Law

1112 Manatee Avenue West, Suite 969, P.O. Box 1000, Bradenton, FL 34206
(941) 745-3750 • Fax (941) 749-3089

Solutions to the overall panhandling issue in Manatee County should address not only where people panhandle, but the reasons people panhandle. The Board should direct staff to gather information about why people panhandle in Manatee County and assess what services are needed to address the specific needs of those who panhandle. A comprehensive solution to panhandling will require helping individuals solve the problem(s) that underlie their need to panhandle by connecting them to services that can address those needs.

I have drafted an ordinance proposing amendments to Article VII of Chapter 2-21 of the Manatee County Code that would: (1) prohibit the presence of pedestrians on the medians of Manatee County's busiest roads, except for the limited purpose of crossing the road; and (2) prohibit any kind of solicitation for an exchange between pedestrians and occupants of vehicles within the traveled portion of Manatee County's busiest roads. In addition, the draft ordinance proposes to further detail conduct that constitutes an express or implied threat of injury to persons or property to improve enforcement of the ordinance.

Factual Background:

During the July 23, 2019 regular meeting of the Board of County Commissioners, several citizens expressed a concern about an increase in panhandling within Manatee County and the City of Bradenton, and in particular, panhandling that is accompanied by threatening conduct. The following information is a summary of the findings of several panhandling studies conducted in the United States.

Panhandling is a term used in the United States as an alternative way to describe "begging." Studies on panhandling have found that homeless people account for roughly 5% to 40% of those who engage in panhandling, depending on the city.[1] Thus, some panhandlers are homeless (or live in extreme poverty), but that is not the case for all panhandlers. False narratives regarding whether people living in poverty are deserving or undeserving of sympathy from society have been used to justify criminalizing conduct, such as panhandling and food sharing programs in public places.[2]

Studies have also revealed that while some panhandlers suffer from mental illness, most do not. Some, but not all panhandlers, suffer from substance abuse and addiction issues. Some panhandlers are transient, but most have been in their community for long periods of time. Many panhandlers have criminal records, but panhandlers are equally as likely to have been the victim of a crime as the perpetrator of the crime.[3]

Some panhandlers lie as a way to induce others to give them money, but not all do. Generally, panhandlers are aware that being hostile will not motivate people to give

---

[1] Barrett A. Lee & Chad R. Farrell, *Buddy Can You Spare a Dime? Homelessness, Panhandling and the Public*, 38 URB. AFFS. REV. 299, 303 (2003).

[2] Sydney Rosenblum, *Homeless and Hungry: Demanding the Right to Share Food*, 46 FORDHAM URB. L. J. 1004, 1009-11 (2019).

[3] Michael S. Scott, *Panhandling: Problem-Oriented Guides for Police Report*, U.S. DEPT. OF JUSTICE 5-7 (2002).

them money. Therefore, many panhandlers are polite and appreciative, regardless of whether someone gives them money.[4] According to one study of panhandlers in Austin, Texas, the majority of panhandlers were childless, working-age adults who failed to qualify for short-term cash assistance from the state.[5]

Studies also reveal that panhandlers go to specific locations to maximize the opportunity to collect money. These are places that have a lot of pedestrians and motorists. Among the most common places for panhandling to occur are:

- on highway exits and entrance ramps;
- at intersections with traffic signals;
- near ATMs and parking meters;
- near public transportation station exits/entrances;
- near building entrances/exits;
- places that provide panhandlers shade and shelter from bad weather;
- near convenience stores and grocery stores; and
- near gas stations.[6]

Additionally, the state of the economy and social connections affect how much panhandling occurs. As the economy declines or as government benefit programs become more restrictive, panhandling increases. Similarly, weak social bonds and a lack of social networks on which indigent people can rely for emotional and financial support tends to lead to an increase in panhandling. Substance abuse levels also tend to correspond with panhandling levels. These studies have found that when people with mental illnesses are released into the community without adequate follow-up care, panhandling tends to increase and that communities that have inadequate detoxification and substance-abuse treatment facilities tend to have more panhandling.[7]

Most studies conclude that all panhandlers share this characteristic – they have made a rational economic choice to panhandle as the most efficient way to address a need – whether the need is shelter, food, medical care, or a substance to which the person is addicted.[8]

Legal Framework:

The First Amendment guarantees all people the right to engage in communications and expressive conduct that qualifies as "symbolic speech." Panhandling and the solicitation of charitable contributions are considered communications that are entitled to some degree of First Amendment protection. Ledford v. State, 652 So. 2d 1254, 1256 (Fla. 2d DCA 1995); Reynolds v. Middleton, 779 F.3d 222 (4th Cir. 2015). An

[4] *Id*. at 6

[5] Amanda Tillotson & Laura Lein, *The Policy Nexus: Panhandling, Social Capital and Policy Failure,* 44 J. SOC. & SOC. WELFARE 79, 81 (2017).

[6] Scott, *supra* note 3, at 9.

[7] *Id*. at 11.

[8] *Id*. at 6-7 (noting that an unwillingness or inability to commit to regular work hours may be caused by substance abuse issues).

ordinance that enables the government to "deny access to a forum for expression before the expression occurs" is considered a "prior restraint" on speech that will trigger First Amendment concerns due to the dangers associated with government censorship. Wright v. City of St. Petersburg, Florida, 833 F.3d 1291, 1298-99 (11th Cir. 2016); see also Ward v. Rock Against Racism, 491 U.S. 781, 795 n.5 (1989) (citing Southeastern Promotions, Ltd. v. Conrad, 420 U.S. 546, 553 (1975)) (A prior restraint on First Amendment activities exists when the government has the "power to deny use of a forum in advance of actual expression.").

The extent to which the government can restrict expressive activity before it occurs depends on the nature of the forum. "Public places," such as streets, sidewalks and parks, are traditionally associated with the free exercise of expressive activities and are considered to be "public forums." Widmar v. Vincent, 454 U.S. 263 (1981); Perry Educ. Ass'n v. Perry Local Educators' Ass'n, 460 U.S. 37, 45 (1983). Public property that has been opened for use by the public as a place for expressive activity is also a public forum, even if the government was not required to create the forum in the first place.[9] Government property that is not by tradition or designation a forum for public communication is a nonpublic forum.

The government may restrict expression, even in a public forum, as long as the restrictions on the time, place, and manner of the protected speech are reasonable. The restrictions must be "justified without reference to the content of the regulated speech, . . . [be] narrowly tailored to serve a significant governmental interest, and . . . leave open ample alternative channels for communication of the information." Frandsen v. Dep't of Envtl. Prot., 829 So. 2d 267, 269-70 (Fla. 1st DCA 2002) (citing Daley v. Sarasota, 752 So. 2d 124, 126 (Fla. 2d DCA 2000) (quoting Ward v. Rock Against Racism, 491 U.S. at 791). When evaluating the constitutionality of particular laws, the outcome often depends on which "level of scrutiny" the reviewing court uses. The following is a discussion of the varying levels of scrutiny that apply to prior restraints on speech.

Levels of Legal Scrutiny

Courts apply one of three levels of scrutiny to prior restraints on speech, depending on the category of speech and the location of the restraints. For example, commercial speech generally is entitled to less protection than political speech, while obscenity and

[9] See, e.g., Widmar v. Vincent, 452 U.S. 263 (university meeting facilities); City of Madison, Joint Sch. Dist. No. 8v. Wisconsin Emp't Relations Comm'n, 429 U.S. 167 (1976) (school board meeting); Southeastern Promotions, Ltd. v. Conrad, 420 U.S. 546 (1975) (municipal theater). Public forums may also be created for a limited purpose, such as use by certain groups, e.g., Widmar v. Vincent (student groups), or for the discussion of certain subjects, e.g., City of Madison Joint Sch. Dist. No.8 (school board business), or for a limited amount of time, e.g., Heffron v. Int'l Society for Krishna Consciousness, Inc., 452 U.S. 640 (1981) (12-day state fair).

incitement of violence (such as "fighting words" and threats) are not protected forms of speech.[10]

1. Strict Scrutiny.

The highest level of scrutiny, known as strict scrutiny, applies when the government attempts to regulate the message being conveyed, i.e., content-based regulations, within a public forum. Content-based laws are presumptively unconstitutional and may be justified only if the government proves that: (1) the regulation serves a compelling state interest; and (2) the regulation is the least restrictive means possible to achieve that compelling state interest. Nearly all laws subject to strict scrutiny fail to pass the test.

2. Intermediate Scrutiny.

The next level of scrutiny is referred to as intermediate scrutiny. Intermediate scrutiny applies to content-neutral laws (i.e., regulations that are neutral about the message being conveyed, but incidentally affect speech) and commercial speech. Content-neutral laws are often referred to as "time, place and manner" restrictions on speech. "[R]estrictions of this kind are valid provided that they are justified without reference to the content of the regulated speech, that they are narrowly tailored to serve a significant governmental interest, and that they leave open ample alternative channels for communication of the information." Clark v. Cmty. for Creative Non-Violence, 468 U.S. 288, 293 (1984).

Under the intermediate scrutiny test, the government must demonstrate that (1) the regulation serves a significant governmental interest, (2) that the regulation is narrowly tailored to serve that significant governmental interest, and (3) that ample alternatives are left open to communicate the speech. Rock Against Racism, 491 U.S. at 800 ("So long as the means chosen are not substantially broader than necessary to achieve the government's interest, however, the regulation will not be invalid simply because a court concludes that the government's interest could be adequately served by some less-speech-restrictive alternative.").[11]

3. Rational Basis Review.

The lowest level of scrutiny applies to limitations on expressive activity conducted in nonpublic forums – even if owned by the government.[12] Under this test, referred to as the rational basis review test, the government need only demonstrate that (1) the

---

[10] Central Hudson Gas & Elec. Corp. v. Pub. Serv. Comm'n of N.Y., 447 U.S. 557, 565–66 (1980); Roth v. U.S., 354 U.S. 476, 486 (1957) and R.A.V. v. City of St. Paul, 505 U.S. 377, 382 (1992).

[11] For limited public forums, even though the government is not required to retain the open character of the facility indefinitely, as long as it does, the government is bound by the same standards that apply to traditional public forums – reasonable time, place, and manner regulations. Widmar, 454 U.S. at 269-70.

[12] "[T]he First Amendment does not guarantee access to property simply because it is owned or controlled by the government." U.S. Postal Serv. v. Council of Greenburgh Civic Ass'ns., 453 U.S. 114, 129 (1981).

regulation serves a legitimate governmental interest, and (2) the regulation is a reasonable means of accomplishing the government's interest. Prior restraints in a nonpublic forum have been upheld as long as they are reasonable and viewpoint-neutral. Cornelius v. NAACP Legal Def. & Educ. Fund, Inc., 473 U.S. 788, 813 (1985); Perry v. McDonald, 280 F.3d 159, 171-72 (2d Cir. 2001).

Discussion:

A. Distinguishing Among Types of Speech is Content-Based Regulation.

In 2015, the U.S. Supreme Court held that "speech regulation targeted at specific subject matter is content based even if it does not discriminate among viewpoints within that subject matter." Reed v. Town of Gilbert, __ U.S. __, 135 S. Ct. 2218, 2230 (2015). In Reed, the Town of Gilbert, Arizona adopted an ordinance prohibiting the display of outdoor signs without a permit, but exempting 23 categories of signs, such as ideological signs, political signs, and temporary directional signs. The lower courts reviewing the ordinance deemed the regulation "content neutral" because the Town did not adopt the ordinance based on a disagreement with the messages being conveyed and the justifications for regulating signs were not related to content. Id. at 2227. The U.S. Supreme Court disagreed and explained that whether a law is content-neutral is determined by what the law actually says (on its face), not the government's motivation or justification for the law:

> Innocent motives do not eliminate the danger of censorship presented by a facially content-based statute, as future government officials may one day wield such statutes to suppress disfavored speech. That is why the First Amendment expressly targets the operation of the laws – i.e., the "abridge[ement] of speech" – rather than merely the motives of those who enacted them.

Id. at 2228-30. Thus, the U.S. Supreme Court found that the Town's ordinance imposed content-based restrictions on speech within a traditional public forum, and therefore was subject to strict scrutiny.

B. Courts Apply Strict Scrutiny to Regulations that Target Panhandling.

Following Reed, the U.S. District Court for the Middle District of Florida reviewed the City of Tampa's ordinance regulating the solicitation of money within traditional public forums. Homeless Helping Homeless, Inc. v. City of Tampa, Florida, 8:15-CV-1219-T-23AAS, 2016 WL 4162882, at *2 (M.D. Fla. Aug. 5, 2016). In that case, the court found that "[s]oliciting 'donations or payment' is a form of speech protected by the First Amendment." Id. at *3 (quoting Schaumburg v. Citizens for a Better Env't, 444 U.S. 620, 632 (1980) ("[C]haritable appeals for funds, on the street or door to door, involve a variety of speech interests — communication of information, the dissemination and propagation of views and ideas, and the advocacy of causes — that are within the protection of the First Amendment.")).

One section of Tampa's ordinance made it unlawful for "any person to solicit donations or payment when either the solicitor or the person being solicited is located in, on or at any of the following locations or premises thereof," which included an area of downtown

Tampa and Ybor City. The court applied Reed in finding that Tampa's ordinance was facially content-based regulation because it distinguished based on the communicative content of the speech, i.e., whether the solicitation is for donations or payments, as opposed to a speaker asking someone to sign a petition or passing out brochures. Id. at *4-5.

As a result, the court found that Tampa's ordinance was subject to strict scrutiny and that the City had failed to demonstrate a compelling government interest. Id. at *5.

C. Regulating Pedestrian Interactions with Motor Vehicles Is Subject to Intermediate Scrutiny.

Every court that has reviewed an ordinance regulating panhandling on public streets and sidewalks since Reed has struck down the ordinance as unconstitutional under the strict scrutiny test.[13] However, an ordinance that regulates interactions between pedestrians and occupants of vehicles at traffic lights was found to be content-neutral. Watkins v. City of Arlington, 123 F. Supp. 3d 856 (N.D. Tex. 2015).

In Watkins, the U.S. District Court for the Northern District of Texas concluded the following ordinance language was subject to the intermediate level of scrutiny:

> No person who is within a public roadway may solicit or sell or distribute any material to the occupant of any motor vehicle stopped on a public roadway in obedience to a traffic control signal light. It is specifically provided, however, that a person, other than a person twelve years of age or younger may solicit or sell or distribute material to the occupant of a motor vehicle on a public roadway so long as he or she remains on the surrounding sidewalks and unpaved shoulders, and not in or on the roadway itself, including the medians and islands.

Id. at 861. In that case, the court found that pedestrian and traffic safety is a significant governmental interest. Id. at 867. The court, however, also concluded that the City of Arlington ***bore the burden of producing objective evidence to demonstrate that the restriction served its public safety interest***. The City was able to satisfy that burden by presenting evidence of substantial deaths and injuries to pedestrians at traffic-light controlled intersections between 2009 and 2014. Id. Furthermore, the City demonstrated that the ordinance was narrowly tailored to serve its interest. Finally, the court found that the ordinance left open ample alternative channels of communications because it did not prohibit individuals from using areas adjacent to the road (i.e., the sidewalks) or from entering roads that are not controlled by traffic light signals. Id. at 869-70.

---

[13] See, e.g., Toombs v. State of Florida, 25 Fla. L. Weekly Supp. 505a, Case No. 15-220 AC (Fla. 11th Jud. Cir. 2017); Norton v. City of Springfield, 806 F.3d 411 (7th Cir. 2015); Blitch v. City of Slidell, 2017 WL 2840009 (E.D. La., June 22, 2017); Champion v. Commonwealth, 2017 WL 636420 (Ky., Feb. 16, 2017); City of Lakewood v. Willis, 375 P.3d 1056 (Wash. 2016); McLaughlin v. City of Lowell, 140 F. Supp. 3d 177 (D. Mass. 2015); Browne v. City of Grand Junction, 136 F. Supp. 3d 1276 (D. Colo. 2015); Thayer v. City of Worcester, 144 F. Supp. 3d 218 (D. Mass. 2015).

In Florida, Pasco County, Hillsborough County, the City of St. Petersburg and the City of Sarasota have adopted ordinances that restrict pedestrian-vehicle solicitations that are intended to result in the transfer of a physical item between a pedestrian and the occupant of a vehicle on busy roads, identified as collector and arterial roads.[14]

The City of St. Petersburg successfully defended its ordinance in the Middle District of Florida in Times Pub. Co. v. City of St. Petersburg, 8:10-CV-1273-T-26MAP (decided June 10, 2010). While that case was decided before Reed, the ordinance at issue does not target panhandling on its face or distinguish between categories of speech. In that case, the City of St. Petersburg stated that it had a significant governmental interest in pedestrian safety and traffic flow and presented evidence of traffic fatalities involving pedestrians and the fact that its medians and roadways were not designed to be used by solicitors. The City further argued that the ordinance was narrowly tailored because the ordinance allows for sidewalk campaigning and because the prohibition is limited to the City's busiest roads, not all roads. Finally, the City argued that the ordinance left open ample alternative channels of communication, which in this case concerned the sale of newspapers. While the court did not reach the merits of the case, the court denied issuing a temporary restraining order and found that the ordinance – which it called an "interaction ordinance," not a "distraction ordinance" – was content neutral and subject to intermediate scrutiny.

D. The Proposed Draft Ordinance Could Satisfy the Intermediate Scrutiny Test.

The attached proposed draft ordinance 19-41 addresses pedestrian safety concerns by prohibiting pedestrians from remaining on the medians of the County's busiest roads and restricting pedestrian-vehicle interactions within the traveled portion of the County's arterial and collector roads (see attached map). In response to the concerns about threatening behavior, the proposed draft ordinance includes additional detail regarding prohibited threatening conduct.

If adopted, I believe such an ordinance would be subject to intermediate scrutiny because it regulates the time, place and manner of speech activities within a traditional public forum, but is neutral as to the content of the message under Reed. First, the prohibition against pedestrians remaining on medians (except for the purpose of lawfully crossing a road) applies equally to all persons, regardless of whether they are engaged in any First Amendment speech activities. Similarly, the restriction against solicitations that would result in an exchange between pedestrians and occupants of vehicles within the traveled portion of a roadway applies even handedly to any kind of exchange that involves a pedestrian and vehicle occupant – whether it is the distribution of a brochure or free samples of a product, the sale of newspapers from the street or the sales of ice cream cones from a truck, or a request for a donation or to sign a petition.

[14] Section 82-1, Pasco County Code of Ordinances; Article II of Chapter 42 of the Hillsborough County Code of Ordinances; Section 25-9 of the City of St. Petersburg Code of Ordinances; Section 23-1 of the City of Sarasota Code of Ordinances.

1. Vehicle and pedestrian safety is a significant governmental interest.

The County has a significant interest in vehicle and pedestrian safety and the free flow of traffic. Sun-Sentinel Co. v. City of Hollywood, 274 F. Supp. 2d 1323, 1331 (S.D. Fla. 2003) (citing Ass'n of Cmty. Orgs. for Reform Now v. St. Louis Cty, 930 F.2d 591, 594 (8th Cir. 1991) and Denver Pub. Co. v. City of Aurora, 896 P.2d 306, 313 (Colo. 1995)). "It requires neither towering intellect nor an expensive 'expert' study to conclude that mixing pedestrians and temporarily stopped motor vehicles in the same space at the same time is dangerous." News & Sun-Sentinel Co. v. Cox, 702 F. Supp. 891, 900 (S.D. Fla. 1988) (quoting Int'l Soc'y for Krishna Consciousness of New Orleans v. City of Baton Rouge, 668 F. Supp. 527, 530 (M.D. La.1987)).

In unincorporated Manatee County, there were 27 and 30 collisions involving pedestrians in 2017 and 2016, respectively. In 2018, that number increased by 159% to 70. Of those 70 collisions in 2018, 22 collisions resulted in fatality or incapacitating injuries – a 633% increase from the previous two years, each of which had only three collisions resulting in fatality or incapacitating injuries. And of those 22 collisions in 2018, six of them resulted in a fatality, which is a 500% increase from the previous two years.

Pedestrian Crashes in Unincorporated Manatee County	2018	2017	2016	% Change 2018-2017	% Change 2018-2016
All	70	27	30	159%	133%
Resulting in Fatality or Incapacitating Injuries	22	3	3	633%	633%
Resulting in Fatality	6	1	1	500%	500%

2. The proposed ordinance is narrowly tailored to serve the governmental interest in vehicle and pedestrian safety.

First, the main purpose of medians is to separate travel lanes and moving vehicles. Medians are not intended to be used by pedestrians, except as a momentary place of refuge while crossing multiple lanes of traffic. Thus, keeping pedestrians off medians on the County's collector and arterial roads, except for that limited purpose, promotes pedestrian safety and unnecessary distractions to drivers resulting from the unexpected presence of pedestrians. The proposed ordinance is narrowly tailored because it permits pedestrians to use medians on the County's collector and arterial roads for the limited purpose of momentary refuge and does not prohibit pedestrians from remaining on the medians of roads that are not classified as collector and arterial roads.

Similarly, the restrictions against solicitations that would result in an exchange between pedestrians and occupants of motor vehicles within the traveled portion of a roadway is narrowly tailored to prevent conduct that would induce a motor vehicle to stop unexpectedly in order to engage in the exchange of something with a pedestrian and

likewise to prevent conduct that would induce a pedestrian to enter the traveled portion of a roadway. It is also narrowly tailored because it does not prohibit pedestrians from communicating with occupants of motor vehicles, as long as the communication does not anticipate an interaction that would take place in the traveled portion of a roadway. Thus, if someone is seeking a donation and the sign asks the motor vehicle to pull into a parking lot to make a contribution or sign a petition, that activity would not be prohibited. Finally, as with the provision on pedestrians on medians, this provision is narrowly tailored because it only applies to the County's busiest roads – the ones classified as arterial and collector roads – and does not apply to all roads.

3. The proposed ordinance leaves open ample alternative channels of communications.

There are ample alternative channels of communications left open under the proposed ordinance. Speech activities that do not anticipate an interaction or exchange between a pedestrian and vehicle occupant within the traveled portion of a road may still occur on the sidewalks of all County roads, to the extent such activity does not interfere with the passage of people, and as long as the pedestrian remains off the medians of the County's busiest roads. Thus, sign holders can still promote a business, a car wash, or communicate any other kind of message, as long as there is no expectation that a person will enter into the traveled portion of the roadway to engage in an exchange with the occupant of a vehicle.

Speech activities that anticipate an interaction or exchange between a pedestrian and vehicle occupant within the traveled portion of a road may still occur on roads that are not classified as arterial or collector roads. Furthermore, to the extent the speech activities anticipate an interaction or exchange with the occupant of a vehicle, nothing in the proposed ordinance prohibits that exchange from occurring with a vehicle that is lawfully parked. Thus, there are ample alternative channels of communications left open. See, e.g., Watkins, 123 F. Supp. 3d at 869 (finding that ample alternative channels of communication were left open because the city's ordinance did not prohibit individuals from exercising other forms of speech at intersections controlled by traffic signals and because individuals could enter roadways at intersections that were not controlled by traffic signals).

Conclusion:

This concludes my response to this Request for Legal Services. By way of reminder, a proposed ordinance title must be advertised appropriately at least ten (10) days prior to adoption by the Board. Should you have any further questions or if I can be of further assistance, please do not hesitate to contact this Office.

KMZ
Enclosures

Copies to: Cheri Coryea, County Administrator
John Osborne, Deputy County Administrator
Karen Stewart, Acting Deputy County Administrator
Ava Ehde, Director, Neighborhood Services Department
John Barnott, Director, Building and Development Services Department
Chad Butzow, Director, Public Works Department
Renese Remy, Criminal Justice Liaison, Neighborhood Services Department
Jeff Bowman, Chief, Code Enforcement Division, Building and Development Services Department
Vishal Kakkad, Traffic Design Division Manager, Public Works Department
Anne M. Morris, Assistant County Attorney, County Attorney's Office