

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company (FPL) for authority to charge FPL rates to former City of Vero Beach customers and for approval of FPL's accounting treatment for City of Vero Beach transaction.

DOCKET NO. 20170235-EI

In re: Joint petition to terminate territorial agreement, by Florida Power & Light and the City of Vero Beach.

DOCKET NO. 20170236-EU

CIVIC ASSOCIATION'S [CAIRC] MOTION FOR PROTECTIVE ORDER FROM INDIAN RIVER COUNTY'S IMPROPERLY SCHEDULED DEPOSITION

CAIRC, pursuant to Rules 1.280 & 1.310, Florida Rules of Civil Procedure, hereby files this Motion for Protection from an improperly scheduled deposition, and in support thereof states as follows:

1. Intervenor INDIAN RIVER COUNTY ["COUNTY"], represented by attorney Dylan Reingold, has set for deposition on Friday, September 28, 2018, a witness who has filed pre-hearing testimony on behalf of CAIRC. See "Notice," attached hereto as Exhibit A. The COUNTY'S stated purpose is "to clarify" the testimony of that witness.

2. COUNTY requested of CAIRC dates for a deposition of Jay Kramer via emails on or about September 19, 2018, in response to our request on Tuesday, September 18, 2018, to depose Vero Beach Mayor Harry Howle. See Exhibit B, Emails, attached.

3. The County did not enter as a party to this matter until just a few days prior to their request for this deposition.

4. While CAIRC found it difficult to fit this request into their own schedule, especially since CAIRC was unsure when the City of Vero Beach ["COVB"] would be able to produce Mayor Howle in the week before the Pre-Hearing Conference and discovery deadline, CAIRC contacted Mr. Kramer [who is not a member of CAIRC] in order to determine his availability. Mr. Kramer informed the attorney for CAIRC that he would be traveling that next week for his business, something he does quite regularly, and he had already purchased his airline tickets for the travel.

5. Attorney for CAIRC thereafter informed the COUNTY via Mr. Reingold of Mr. Kramer's travel and offered to have him respond to interrogatories instead. See Exhibit B.

6. In response to this suggestion, Mr. Reingold filed a Notice of Deposition for the 28th of September and threatened to move to strike Mr. Kramer's testimony should Mr. Kramer fail to attend. He states incorrectly that CAIRC "refuses" to produce Mr. Kramer when in fact that is far from accurate. See Docket Entry dated September 20, 2018, Notice filed by COUNTY/REINGOLD, and Exhibit B, emails. The Commission will note that it is a Notice "Duces Tecum" requesting a series of documents unrelated to Mr. Kramer's testimony and over which Mr. Kramer has no control or oversight.

7. While all parties are quite alarmingly aware of the very short time frame we have to accomplish a great deal in addressing the issues in this Docket, CAIRC has attempted in every way to adapt and comply with deadlines and requests for discovery.

[The only other discovery propounded by the COUNTY are interrogatories, requests for production, and requests for admissions directed to CAIRC, no other party.]

8. CAIRC did not object to the COUNTY'S request to intervene in this action, as our position is to be more inclusive without bringing many duplicate parties with identical issues into the proceedings. While both the COVB and FPL each have large law firms capable of doing multiple tasks covering multiple issues, if the COUNTY needed to appear as a party, alongside these well-equipped joint petitioners, bringing additional input for the PSC to consider, we did not oppose same.

9. Now it would appear rather obviously that the COUNTY'S sole reason for intervention is to create havoc for CAIRC. While we can only surmise as to intention, each step taken by the COUNTY and its legal representative has fairly screamed this conclusion.

10. Mr. Kramer will be available for examination at the full hearing on this docket. He has conflicts in scheduling for next week that cannot be avoided, especially since he is attempting to clear his schedule for October 9-10, 2018. He has agreed to take written questions/interrogatories.

11. The COUNTY is exhibiting unprofessional, harassing and threatening behavior, similar to that of several COVB officials. See Exhibit C, examples of COVB threats to parties opposing their actions. This has been a continuing problem of threats and intimidation by COUNTY and COVB officials attempting to shut off any voice seeking answers to questions regarding this DOCKET.

12. While CAIRC members and other citizens in our area have faced this threatening behavior for years, we hope that such behavior can terminate at the County

lines. As is normal for PSC actions, we know the Commission will see that the importance of maintaining a professional standard of conduct includes protecting some parties' rights against such harassment being brought by the COUNTY against CAIRC.

WHEREFORE CAIRC hereby respectfully requests that the Commission issue an order protecting Mr. Jay Kramer from the improperly set deposition, pursuant to Rule 1.280, FRCP [20018] (annoyance, embarrassment, oppression, or undue burden or expense that justice requires, that no hearing, deposition be forced upon a party that cannot attend), for sanctions in the form of fees and costs be assessed against the COUNTY and in favor of CAIRC for having to take the steps to protect themselves and their witnesses pursuant to Rule 1.380(a)(4) , and for any further relief this Commission would deem just and proper.

CERTIFICATION

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been electronically filed and forwarded via email this 21st day of September, 2018, to: PARTIES listed below.

LYNNE A. LARKIN, ESQ.
5690 Hwy. A1A, Unit 101
Vero Beach, FL 32963
Phone: 772-234-5565
lynnelarkin@bellsouth.net

By /s/ LYNNE A. LARKIN
Florida Bar # 56693

SERVICE LIST OF PARTIES

Office of the General Counsel

Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850
cmurphy@psc.state.fl.us

Florida Power and Light

700 Universe Blvd.
Juno Beach, FL 33408
bryan.anderson@fpl.com
ken.rubin@fpl.com

Office of the Public Counsel

111 West Madison Street, Suite 812
Tallahassee, FL 32399-1400
KCowdery@leg.state.fl.us

City of Vero Beach, Florida

J. Michael Walls
4221 W. Boy Scout Blvd.
Tampa, FL 33607
mwalls@cfjblaw.com

Brian Heady

brianheady@msn.com

Indian River County, Florida

1801 27th Street
Vero Beach, FL 32960
dreingold@ircgov.com

Michael Moran

mmoran@veronet.com

Indian River Shores, Florida

Holland & Knight, LLP
315 S. Calhoun St., Ste. 600
Tallahassee, FL 32301
bruce.may@hkllaw.com

EXHIBIT A

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Petition by Florida Power & Light Company (FPL) for authority to charge FPL rates to former City of Vero Beach customers and for approval of FPL's accounting treatment for City of Vero Beach transaction.

Docket No. 20170235-EI

In re: Joint petition to terminate territorial agreement, by Florida Power & Light and the City of Vero Beach

Docket No. 20170236-EU

Filed: September 20, 2018

NOTICE OF TAKING DEPOSITION DUCES TECUM

YOU ARE HEREBY NOTIFIED that INDIAN RIVER COUNTY, by and through its undersigned attorney, will take the deposition by oral examination for purposes of discovery and for use as evidence in said cause:

<u>Date</u>	<u>Time</u>	<u>Witness</u>	<u>Location</u>
9/28/18	9:00a.m.	Jay Kramer	County Attorney's Office Indian River County 1801 27 th Street, Building A, Vero Beach, FL 32960

And the witnesses are to have with him at that time and place the following:

See attached Exhibit "A"

Said deposition will be taken before *Atlantic Reporting* or any officer authorized to administer oaths by the laws of the State of Florida, and a person who is neither a relative, nor employee, nor attorney, nor counsel of any of the parties and who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action.

Said deposition will be taken pursuant to the Florida Rules of Civil Procedure in such cases provided. The said oral examination will continue from hour to hour and from day to day until completed.

No person may attend the deposition with the exception of those persons provided under §90.616, Fla. Stats. (Evidence Code) unless prior notice is provided to the undersigned to permit an order of exclusion or sequestration to be obtained. Lack of notice may cause the deposition to be continued until an order can be obtained.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by e-mail to: Lynne A. Larkin, Esq., 5690 Highway A1A, #101, Vero Beach, Florida 32963, lynnelarkin@bellsouth.net and that a true copy has been furnished to the following by electronic mail this 20th day of September, 2018.

Kathryn G. W. Cowdery, Esq.
Jennifer Crawford, Esq.
Charles Murphy, Esq.
Office of General Counsel
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850
kcowdery@psc.state.fl.us
jcrawfor@psc.state.fl.us
cmurphy@psc.state.fl.us
Florida Public Service Commission

Mr. Ken Hoffman
215 South Monroe Street, Suite 810
Tallahassee FL 32301
ken.hoffman@fpl.com
Florida Power & Light Company

Bryan S. Anderson
Kenneth M. Rubin
700 Universe Boulevard
Juno Beach FL 33408
bryan.anderson@fpl.com
ken.rubin@fpl.com

Michael Moran
P.O. Box 650222
Vero Beach, FL 32965
Mmoran@veronet.net

J. R. Kelly, Esq.
Stephanie Morse, Esq.
Charles Rehwinkel, Esq.
c/o The Florida Legislature
111 West Madison Street, Room 812
Tallahassee, Florida 32399
kelly.jr@leg.state.fl.us
morse.stephanie@leg.state.fl.us
Rehwinkel.charles@leg.state.fl.us
Office of Public Counsel

James O'Connor
Wayne R. Coment
City Manager
P. O. Box 650222
Vero Beach, FL 32961
citymgr@covb.org
wcoment@covb.org
City of Vero Beach

J. Michael Walls, Esq.
Carlton Fields
4221 Boy Scout Blvd., Suite 1000
Tampa, FL 33607
mwalls@carltonfields.com

Brian T. Heady
406 19th Street
Vero Beach, FL 32960
brianheady@msn.com

/s/ Dylan Reingold
DYLAN REINGOLD, County Attorney
Indian River County
Florida Bar No: 544701
1801 27th Street, Vero Beach, Florida 32960
E Primary Email Address: e-service@ircgov.com
Secondary Email Address: dreingold@ircgov.com
Telephone Number: (772) 226-1427
Facsimile Number: (772) 569-4317

Exhibit "A"

<u>Term</u>	<u>Definition</u>
Person/Persons:	"Person" or "persons" include any natural person, proprietorship or partnership and any organization, including any private, public, or municipal corporation, and federal, state, or local government entity.
Communication:	Communication" means any verbal or written contact with another person, including, but not limited to, any conversation, correspondence, interview, or interrogation.
Document/Documents:	<p>The terms "document" and "documentation" mean any writing of any type, kind or nature, whether an original, facsimile, extract of a copy, carbon copy, photostatic or photographic copy, or other copy, including, by way of example but not by way of limitation: ledgers, books, diaries, records, letters, papers, correspondence, messages, memoranda, including any memoranda or transcripts of oral communications, pamphlets, lists, reports, contracts, agreements, notes, statements, bills, checks, claims, telephone logs, correspondence logs, accounts, books of account, studies, working papers, photographs, computer programs, computer printouts, commentaries, files, file memoranda, notebooks, forms, certificates, notices, telegrams, notebooks, forms, certificates, notices, telegrams, telexes, notations, minutes, resolutions, motions, contracts, summaries, business records of any type or kind (whether on microfilm or stored in computer data banks or tapes), or other written, recorded, typewritten or imprinted item of any type of kind, having corporeal existence, and in any language, including mathematical symbols, in the possession, custody or control of Mr. Kramer.</p> <ol style="list-style-type: none">1. All documents that have been requested in Indian River County's First Request for Production of Documents To Civic Association Of Indian River County, Inc.2. All documents that pertain to any of the questions asked in Indian River County's First Request for Admissions to Civic Association Of Indian River County, Inc. and

3. All documents that pertain to any of the interrogatories in Indian River County's First Set Of Interrogatories to Civic Association Of Indian River County, Inc.
4. All documents that evidence communications between Mr. Kramer and any persons such as the Florida Municipal Electric Association concerning the sale of the City of Vero Beach electric utility.
5. All documents evidencing communications with any and all other persons regarding the subject matter of this proceeding.

EXHIBIT B
EMAILS

On Wednesday, September 19, 2018 9:27 AM, Lynne Larkin <lynnelarkin@bellsouth.net> wrote:

Dylan, I just spoke with Jay, and his business travel will be taking him out of town for the next week and several days. He already has his plane tickets. I'm sorry he won't be available.

I'm not sure what you mean about "wasting time" at the hearing. This is what the hearing is for, addressing the issues. Even though you've not submitted any issues on which your clients are taking a position, those issues already submitted will be the subject of two days of hearings.

Perhaps you'd like to submit even more interrogatories as an alternative means of clarifying whatever is unclear in Jay's testimony since, again, you will be able to question any witness on October 9-10.

Lynne

[Sent from Yahoo Mail for iPad](#)

On Wednesday, September 19, 2018, 8:54 AM, Dylan Reingold <dreingold@ircgov.com> wrote:

Ms. Larkin,

A deposition would be helpful in better understanding Mr. Kramer's testimony thus reducing the amount of wasted time at the hearing.

Dylan

From: Lynne Larkin <lynnelarkin@bellsouth.net>
Sent: Wednesday, September 19, 2018 8:46 AM
To: Dylan Reingold <dreingold@ircgov.com>; J. Michael Walls <mwalls@cfjblaw.com>
Cc: Charles Murphy <cmurphy@psc.state.fl.us>; JR Kelly <kelly.jr@leg.state.fl.us>; Bryan Anderson <bryan.anderson@fpl.com>; Ken Rubin <ken.rubin@fpl.com>; Charles Rehwinkel <rehwinkel.charles@leg.state.fl.us>; Stephanie Morse <morse.stephanie@leg.state.fl.us>; Brian T. Heady <brianheady@msn.com>; Michael Moran <mmoran@veronet.net>; Kenneth Hoffman <ken.hoffman@fpl.com>; Kathryn Cowdery <kcowdery@psc.state.fl.us>; James O'Connor <citymgr@covb.org>; Mary Anne Helton <mhelton@psc.state.fl.us>; Wayne R. Coment <wcoment@covb.org>; Keith Hetrick <khetrick@psc.state.fl.us>; bruce.may@hklaw.com

Subject: Re: FPSC [20170235](#) [20170236](#): Request for deposition availability

Mr. Reingold,

He'll be available for testifying at the hearing. Is there some reason you can't wait until then? We have a tiny window of time available, as you may have realized. Your courtesy in recognizing these limitations would be appreciated.

Lynne Larkin

[Sent from Yahoo Mail for iPad](#)

On Wednesday, September 19, 2018, 8:34 AM, Dylan Reingold <dreingold@ircgov.com> wrote:

Ms. Larkin,

Good morning!

As a follow-up to your email on deposing Mayor Howle, Indian River County is interested in setting a deposition of Jay Kramer. Can you please provide some dates.

Thank you!
Dylan

From: Lynne Larkin <lynnelarkin@bellsouth.net>
Sent: Tuesday, September 18, 2018 10:37 AM
To: J. Michael Walls <mwalls@cfjblaw.com>
Cc: Charles Murphy <cmurphy@psc.state.fl.us>; JR Kelly <kelly.jr@leg.state.fl.us>; Bryan Anderson <bryan.anderson@fpl.com>; Ken Rubin <ken.rubin@fpl.com>; Charles Rehwinkel <rehwinkel.charles@leg.state.fl.us>; Stephanie Morse <morse.stephanie@leg.state.fl.us>; Brian T. Heady <brianheady@msn.com>; Michael Moran <mmoran@veronet.net>; Kenneth Hoffman <ken.hoffman@fpl.com>; Kathryn Cowdery <kcowdery@psc.state.fl.us>; James O'Connor <citymgr@covb.org>; Mary Anne Helton <mhelton@psc.state.fl.us>; Wayne R. Coment <wcoment@covb.org>; Keith Hetrick <khetrick@psc.state.fl.us>; Dylan Reingold

<dreingold@ircgov.com>

Subject: FPSC [20170235](#) [20170236](#): Request for deposition availability

Good morning Mr. Walls,

Since the City of Vero Beach has not entered any pre-filed testimony, the Civic Association would like to set for deposition Mr. Harry Howle, Mayor of Vero Beach, in re the above-cited case.

Can you provide us with possible dates for same?

I have also copied the parties and intervenors on this email, as we will have to do a lot of coordinating [hopefully by phone] to accomplish this.

Thank you to everyone for your efforts in getting this accomplished as soon as possible under our very tight time constraints.

All best,

Lynne A. Larkin
Counsel for CAIRC
5690 Hwy A1A, Unit 101
Vero Beach, FL 32963
[772-234-5565](tel:772-234-5565)

EXHIBIT C

Bursick, Tammy

From: Charlie Wilson <mediaartsgroup@yahoo.com>
Sent: Tuesday, July 24, 2018 12:09 PM
To: Harry; Bursick, Tammy; City Attorney; Russ Lemmon; Charlie Wilson
Subject: Larkin admission
Attachments: larkin response.pdf



This is an exchange on Facebook with Lynn Larkin. Here she says that Charlie Vitunac was not party to the complaint. Then how was the "group" authorized? No vote. No authorization as a group. No standing? Can you move for immediate dismissal since filed as a group and the deadline has passed for her to file individually.

Response please. I am considering suing her for legal costs of unauthorized action. The city should consider action against them both with financial damages. I am guessing they only do things like this if there are no consequences.

Charlie Wilson
 772-316-9632



Harry Howle

Timeline About Friends Photos More

DO YOU KNOW HARRY?

To see what he shares with friends, send him a friend request.

Intro

Lives in Vero Beach, Florida
 From Vero Beach, Florida

Photos

Friends · 968





Harry Howle is with Heather Hargrave Howle.
 2 hrs ·

For those of you living in, and paying electrical bills within, the City of Vero Beach and the County of Indian River. By now you have heard that a group of three selfish people have protested the decision of the Public Service Commission to allow the sale of the Vero Beach Electrical utility to FPL. The sale that will save us all \$20,000,000 per year. That's \$20M left in our hands to spend in our county.

Who would be so idiotic that they would want to subvert this sale? No other than Lynne Larkin, Ken Daige, and Charlie Vitunac (who is, in my opinion, criminally culpable for putting us in these contracts in the first place). These three neophytes started a not for profit called THE CIVIC ASSOCIATION OF INDIAN RIVER COUNTY. I'm not sure what in the hell that means but it sounds like a really broad way to describe three single called, parasitic, eukaryotes. What's worse? One person, of the same mindset, is running for City Council this year. Linda Hillman cannot win.

If you are part of the vast majority who voted twice to sell the electric utility; if you are for keeping \$20,000,000 in our community every year, let these three

INSTANT GAMES MORE



YOUR GAMES MORE



-  Shane Hoben
-  Susan Gontero Bregar
-  Alex Clarke
-  Audrey Fink Mullinix
-  Linda Keenan Drellim...
-  Shannon Jeffords Bur...
-  Holly Pruitt
-  Allan Greene 15h
-  Maria Tadros
-  Conor Greene 1d
-  Matt Manus 19m
-  Victoria Rixon
-  Denise Miller 15h
-  Michelle Morgan Kat... 1d

GROUP CONVERSATIONS

Creates New Group



See what you have in common with Harry's friends. [View](#)

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

Privacy · Terms · Advertising · Ad Choices · Cookies · More
Facebook © 2018

cave dwelling zygotes know how you feel. They may be reached at the following addresses:

Lynne Larkin, 5690 HWY A1A, # 101N, Vero Beach, FL 32963

Kenneth Daige, 1846 21st Ave., Vero Beach, FL 32960

Finally the Grand Poobah himself, fired from the City of Vero Beach in 2011 (a move exulted by the public),

Charles Vitunac, 2606 Mockingbird Dr., Vero Beach, FL, 32963

[Like](#) [Comment](#) [Share](#)

31

16 Shares



Nicholas Caporrino Please make post public and shareable

[Like](#) · [Reply](#) · 2h



Harry Howle How about now? Working?

[Like](#) · [Reply](#) · 2h



Nicholas Caporrino Yes and shared!

[Like](#) · [Reply](#) · 2h



Write a reply...



Robb T. Falana II We just got our COVB Power Bill at our home in the county and we are getting KILLED by paying way to much! They all will be getting a letter today!

[Search](#)

<https://www.facebook.com/profile.php?id=100005201207234>

1/3

Harry Howle



Gabrielle [Home](#) [Find Friends](#)



Harry Howle So many of us have dedicated our lives to getting this sale through. Thank you for taking a moment to put pen to paper Robb. I wish everyone disgusted with these three would just take a moment to do the same.

[Like](#) · [Reply](#) · 2h

INSTANT GAMES

MORE

 Write a reply...

 **Alli Meyer-Golden** Seriously !! What is wrong with these people ???
Like · Reply · 2h 2

 **Kathleen Provancher** I was just googling the same. Thanks Harry.
Like · Reply · 2h 2

 **Mark Mucher** As I mentioned in several other venues, the City of Vero Beach now has the distinction of having the **SECOND HIGHEST RATES** of all the municipal power companies in Florida (@1,200 kwh per month), and is **28% HIGHER** than FPL residential.

Now consider that one of the Civic Association's claims is that Vero's rates could be **LOWER** than FPL's in the future - HAHAHAHA
Like · Reply · 2h 2

 **Harry Howle** Look at this! How and WHY would anyone be against this? I hope they have their collective bags packed.
Like · Reply · 2h 1

 Write a reply...

 **Bob Soos** All three also happen to be on FaceBook
Like · Reply · 2h 1

 **Harry Howle** Well point them in the direction of my accurate description of them above.
Like · Reply · 1h

 Write a reply...

 **Concie Fowler** What!?!? 3 people can't possibly stop the process?!? Can they?
Like · Reply · 1h

 **Heather Hargrave Howle** I doubt they have a valid argument. In fact, in 2016, Lynne Larkin attempted the same tactics with the federal energy regulatory commission. She was laughed out of the room with her arguments being described as baseless
Like · Reply · 1h

YOUR CHATS

- Shane Hoben
- Susan Gontero Bregar
- Alex Clarke
- Audroy Fink Mullinix
- Linda Keenan Drellm...
- Shannon Jeffords Bur...
- Holly Pruitt
- Allen Greene 15h
- Meria Tadros
- Conor Greene 1d
- Matt Marcus 19m
- Victoria Rixon
- Denise Miller 15h
- Michelle Morgan Kel... 1d

GROUP CONVERSATIONS

Create New Group

Like · Reply · 1h

 Harry Howle At the very least they are slowing down the process with these petty, baseless, and frivolous actions. You see, these three are no scholars (how many people have a law degree today?). Each of them have only one goal in life; to have the feeling of relevancy. Without actions like this PSC protest, they are nothing. I sneeze creates more attention.

Like · Reply · 1h

 Jeffrey T. Zachary They had their time.... end of story.

Like · Reply · 53m

 Concie Fowler How absolutely ridiculous people can be. I can't stand arrogance and entitlement. "15 minutes of fame" at the expense of so many people, and so many who actually need the relief from the cost of utilities. How can those bored, self-serving idiots not get it.

Like · Reply · 43m

 R. Scott Prosser Lynn Larkin is evil

Like · Reply · 23m

 Whit Hazelton Is their twisted end game to keep electric rates high so as to disincentivise people from moving to Vero? Or is it a desire for attention, or some combo....?

Like · Reply · 16m

Search

is://www.facebook.com/profile.php?id=100005201207234

2/3



Harry Howle f...Council's Post



For those of you living in, and paying electrical bills within, the City of Vero Beach and the County of Indian River. By now you have heard that a group of three selfish people have protested the decision of the Public Service Commission to allow the sale of the Vero Beach Electrical utility to FPL. The sale that will save us all \$20,000,000

per year. That's \$20M left in our hands to spend in our county. Who would be so idiotic that they would want to subvert this sale? No other than Lynne Larkin, Ken Daige, and Charlie Vitunac (who is, in my opinion, criminally

2

Harry Howle f...Council's Post ...

culpable for putting us in these

contracts in the first place).

These three neophytes started a not for profit called **THE CIVIC ASSOCIATION OF INDIAN RIVER COUNTY**. I'm not sure what in the hell that means but it sounds like a really broad way to describe three single celled, parasitic, eukaryotes.

What's worse? One person, of the same mindset, is running for **City Council** this year. **Linda Hillman** cannot win.

If you are part of the vast majority who voted twice to sell the electric utility; if you are for keeping \$20,000,000 in our community every year, let these three cave dwelling votes

3

< Harry Howle f...Council's Post ...

know how you feel. They may be reached at the following addresses:

**Lynne Larkin, 5690 HWY A1A, #
101N, Vero Beach, FL 32963**

**Kenneth Daige, 1846 21st Ave.,
Vero Beach, FL 32960**

**Finally the Grand Poobah
himself, fired from the City of
Vero Beach in 2011 (a move
exulted by the public),
Charles Vitunac, 2606
Mockingbird Dr., Vero Beach, FL,
32963**

Best regards,

Harry G. Howle III
Gottzmann & Associates
Phone: (772) 213-3845
Fax: (888) 837-6102
e-mail: Harry@GottzmannGroup.com
2801 Ocean Drive, Suite 101
Vero Beach, FL 32963

Sent from my iPhone... Please excuse typos!

Any numbers above reflect quotation rates, and are based on the information available. Any quotation provided is not a guarantee of acceptance by the carrier nor is it a binder of any kind. Your application information must be submitted to and accepted by the carrier in order to bind coverage.