

IN THE CIRCUIT COURT OF THE FIRST
JUDICIAL CIRCUIT, IN AND FOR
SANTA ROSA COUNTY, FLORIDA

LEONARD J. ACCARDO and
LYNN M. ACCARDO, et. al.,

Plaintiffs,

vs.

CASE NO.: 06-1064 CA

GREGORY S. BROWN, Property Appraiser
of Santa Rosa County, Florida and
ROBERT G. McCLURE, Tax Collector
for Santa Rosa County, Florida,

Defendants.

ANSWERS TO PLAINTIFFS' REQUESTS FOR ADMISSIONS

DEFENDANT GREGORY S. BROWN, in his official capacity as Property Appraiser of Santa Rosa County (the "Property Appraiser"), and ROBERT McCLURE, in his official capacity as Tax Collector of Santa Rosa County (the "Tax Collector") jointly answer the Plaintiffs' Requests for Admissions, served on January 26, 2007, as follows:

1. Admitted. *See* §194.171, Fla.Stat. (2006).
- 2-3. Objection on the grounds that the request is ambiguous, particularly with respect to the term "provide." Such information was available on the Property Appraiser website and was provided to any and all taxpayers who contacted the office to request such information. A "written document" containing that precise information, including the value of the improvements and the applicable tax rate, could have been obtained by printing the information from the website.

4. Objection of the grounds of vagueness. The Property Appraiser contends that the condominium owners have legal and equitable title to their condominium units.

5. Admitted that the statute provides as quoted in the request, and that such statute must be read in the context of the entirety of Chapter 718, Florida Statutes.

6. Admitted that the statute provides as quoted in the request, and that such statute must be read in the context of the entirety of Chapter 718, Florida Statutes.

7. Admitted that the statute provides as quoted in the request, and that such statute must be read in the context of the entirety of Chapter 718, Florida Statutes.

Respectfully submitted this 8 day of February, 2007



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by U.S. Mail to Danny L. Kepner, Esq., Shell, Fleming, Davis & Menge, P.A., 226 South Palafox Street, 9th Floor, Pensacola, FL 32502 this 8 day of February, 2007.



THOMAS M. FINDLEY