

**STATE BOARD OF ADMINISTRATION
OF FLORIDA**

JUSTIN T. MCNEILL,

Petitioner,

vs.

DOAH Case No. 25-0915

SBA Case No. 2023-0479

STATE BOARD OF ADMINISTRATION,

Respondent.

_____ /

FINAL ORDER

On June 12, 2025, the Administrative Law Judge submitted his Recommended Order to the State Board of Administration of Florida (SBA) in this proceeding. The Recommended Order indicates that copies were served upon the *pro se* Petitioner, Justin T. McNeill, and upon counsel for the Respondent. No exceptions were filed. A copy of the Recommended Order is attached hereto as Exhibit A. The matter is now pending before the Chief of Defined Contribution Programs for final agency action.

STATEMENT OF THE ISSUE

The Statement of the Issue as set forth in the Recommended Order is adopted in its entirety.

PRELIMINARY STATEMENT

The Preliminary Statement as set forth in the presiding officer's Recommended Order is adopted in its entirety.

STANDARDS OF AGENCY REVIEW OF RECOMMENDED ORDERS

An agency may not reject or modify the findings of fact in a recommended order in a final order "unless the agency first determines from a review of the entire record, and states

with particularity in the order, that the findings were not based upon competent substantial evidence” § 120.57(1)(I), Fla. Stat. *See also Dunham v. Highlands Cty. Sch. Bd.*, 652 So. 2d 894, 896 (Fla. 2d DCA 1995); *Dietz v. Fla. Unemployment Appeals Comm’n*, 634 So. 2d 272, 273 (Fla. 4th DCA 1994); *Fla. Dep’t of Corr. v. Bradley*, 510 So. 2d 1122, 1123 (Fla. 1st DCA 1987). The Florida Supreme Court has defined “competent substantial evidence” to mean “such evidence sufficiently relevant and material that a reasonable mind would accept it as adequate to support the conclusion reached.” *De Groot v. Sheffield*, 95 So. 2d 912, 916 (Fla. 1957). An agency reviewing a recommended order may not “weigh the evidence presented, judge credibility of witnesses, or otherwise interpret the evidence.” *Walker v. Bd. of Prof’l Eng’rs*, 946 So. 2d 604, 605 (Fla. 1st DCA 2006) (quoting *Heifetz v. Dep’t of Bus. & Prof’l Regulation*, 475 So. 2d 1277, 1281 (Fla. 1st DCA 1985)). Thus, if the record discloses any competent substantial evidence supporting a finding of fact in the Recommended Order, the Final Order will be bound by such factual finding.

Pursuant to section 120.57(1)(I), Florida Statutes, however, a reviewing agency has the general authority to “reject or modify the conclusions of law over which it has substantive jurisdiction and interpretation of administrative rules over which it has substantive jurisdiction.” When rejecting or modifying any conclusion of law, the reviewing agency must state with particularity its reasons for the rejection or modification and further must make a finding that the substituted conclusion of law is as reasonable, or more reasonable, than that which was rejected or modified. § 120.57(1)(I), Fla. Stat.

Florida courts have consistently applied the “substantive jurisdiction limitation” to prohibit an agency from modifying conclusions of law that are outside of the agency’s substantive jurisdiction. *See Deep Lagoon Boat Club, Ltd. v. Sheridan*, 784 So. 2d 1140, 1141-

42 (Fla. 2d DCA 2001); *Barfield v. Dep't of Health*, 805 So. 2d 1008, 1011 (Fla. 1st DCA 2001). Conclusions of law that are based upon the administrative law judge's application of legal concepts, such as collateral estoppel and hearsay, are in the purview of the administrative law judge.

FINDINGS OF FACT

The State Board of Administration adopts and incorporates in this Final Order the Findings of Fact set forth in the Recommended Order as if fully set forth herein.

CONCLUSIONS OF LAW

The State Board of Administration adopts and incorporates in this Final Order the Conclusions of Law set forth in the Recommended Order as if fully set forth herein.

ORDERED


The Recommended Order (Exhibit A) is hereby adopted in its entirety. Petitioner forfeited all of his rights and benefits under the Florida Retirement System, except for employee contributions of \$26,829.19, when he was convicted of specified offenses as defined in sections 112.3173(2)(e)2. and 6., Florida Statutes, committed during his employment with Jefferson County. Accordingly, Petitioner is not entitled to the relief requested.

Any party to this proceeding has the right to seek judicial review of the Final Order pursuant to section 120.68, Florida Statutes, by the filing of a Notice of Appeal pursuant to Rule 9.110, Florida Rules of Appellate Procedure, with the Clerk of the State Board of Administration of Florida in the Office of the General Counsel, State Board of Administration of Florida, 1801 Hermitage Boulevard, Suite 100, Tallahassee, Florida 32308; and by filing a copy of the Notice of Appeal accompanied by the applicable filing

fees with the appropriate District Court of Appeal. The Notice of Appeal must be filed within thirty (30) days from the date the Final Order is filed with the Clerk of the State Board of Administration.

DONE AND ORDERED this 10th day of September, 2025, in Tallahassee, Florida.

STATE OF FLORIDA
STATE BOARD OF ADMINISTRATION
OF FLORIDA



Daniel Beard
Chief of Defined Contributions Programs
State Board of Administration of Florida
1801 Hermitage Boulevard, Suite 100
Tallahassee, FL 32308
(850) 488-4406

FILED ON THIS DATE PURSUANT TO
SECTION 120.52, FLORIDA STATUTES,
WITH THE DESIGNATED CLERK OF THE
STATE BOARD OF ADMINISTRATION,
RECEIPT OF WHICH IS HEREBY ACKNOWLEDGED.



Hillary Eason
Agency Clerk

CERTIFICATE OF SERVICE

I **CERTIFY** that a true and correct copy of the foregoing Final Order was served this 10th day of September, 2025, by mail and electronic mail to the following:

Justin T. McNeill



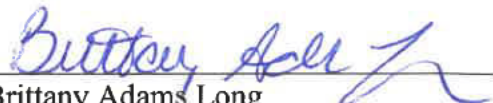
Petitioner

And by electronic mail only to:

Rex D. Ware
Moffa, Sutton & Donnini, P.A.
3500 Financial Plaza, Suite 330
Tallahassee, Florida 32312

Jonathan W. Taylor
Moffa, Sutton & Donnini, P.A.
100 NW 62nd Street, Suite 930
Fort Lauderdale, Florida 33309-2190

Counsel for Respondent


Brittany Adams Long
Assistant General Counsel
State Board of Administration of Florida
1801 Hermitage Boulevard, Suite 100
Tallahassee, FL 32308

**STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS**

JUSTIN T. MCNEILL,

Petitioner,

vs.

Case No. 25-0915

STATE BOARD OF
ADMINISTRATION,

Respondent.

RECOMMENDED ORDER

Pursuant to notice, a formal administrative hearing was conducted via Zoom on May 15, 2025, before Administrative Law Judge Garnett W. Chisenhall of the Division of Administrative Hearings (“DOAH”).

APPEARANCES

For Petitioner: Justin T. McNeill, pro se



For Respondent: Rex D. Ware, Esquire
Moffa, Sutton, & Donnini, P.A.
3500 Financial Plaza, Suite 330
Tallahassee, Florida 32312

Jonathan W. Taylor, Esquire
Moffa, Sutton, & Donnini, P.A.
100 NW 62nd Street, Suite 930
Fort Lauderdale, Florida 33309-2190

STATEMENT OF THE ISSUE

The issue is whether, pursuant to section 112.3173, Florida Statutes (2024),¹ Petitioner (“Mr. McNeill”) forfeited his Florida Retirement System

¹ Unless stated otherwise, all statutory references shall be to the 2024 version of the Florida Statutes. In *Garay v. Department of Management Services*, 46 So. 3d 1227 (Fla. 1st DCA

("FRS") Investment Plan account by entering a nolo contendere plea to charges of Grand Theft and participating in an Organized Scheme to Defraud.

PRELIMINARY STATEMENT

Article II, Section 8(d) of the Florida Constitution mandates that "[a]ny public officer or employee who is convicted of a felony involving a breach of public trust shall be subject to forfeiture of rights and privileges under a public retirement system or pension plan in such manner as may be provided by law." Section 112.3173 implements Article II, section 8 and sets forth a list of "specified offenses" that will result in a public officer or employee forfeiting "all rights and benefits under any public retirement system of which he or she is a member, except for the return of his or her accumulated contributions as of the date of termination." The "specified offenses" collectively establish that a public employee or officer will forfeit his or her retirement benefits by using his or her position to achieve an unlawful benefit.

The State Board of Administration ("the State Board") issued a letter to Mr. McNeill on January 17, 2025 stating "[t]his is to officially notify you that your rights and benefits under the [FRS] Investment Plan have been forfeited as a result of your plea of No Contest in the Circuit Court of the Second Judicial Circuit, in and for Jefferson County, Florida for acts committed while employed with the Jefferson County Supervisor of Elections." The letter noted that Mr. McNeill, on October 2, 2024, pled nolo contendere to: (a) one count of committing Grand Theft of over \$20,000; and (b) one count of participating in an Organized Scheme to Defraud involving over \$20,000.

2010), the First District Court of Appeal held that "[u]nder section 112.3173(3), it is clear that the time the offense is committed controls forfeiture, not the time of the ultimate conviction." While the offenses at issue occurred between 2017 and 2023, the 2024 version of section 112.3173 can still be utilized because the statute has not been amended since 2012.

As for the amount that Mr. McNeill allegedly forfeited, the State Board's letter stated that

[o]ur records indicate you received a distribution of your Investment Plan account of \$167,310.50 on March 1, 2023. You have forfeited your rights to a retirement benefit under the FRS. Therefore, your distribution totaling \$140,481.31 (not including employee contributions of \$26,829.19), must be returned to the Investment Plan by February 7, 2025. If you do not return the money by February 7, 2025, [the State Board] may seek legal action against you.

Mr. McNeill responded by petitioning for a hearing, and this matter was referred to DOAH on February 18, 2025.

The final hearing was scheduled for, convened, and concluded on May 15, 2025. Mr. McNeill testified on his own behalf and did not move any exhibits into evidence. The State Board presented testimony from Valendia N. Still, the State Board's Director of Policy, Risk Management, and Compliance. Respondent's Exhibits 1 through 11² were accepted into evidence.³

A transcript of the final hearing was filed on May 21, 2025. The State Board was the only party to file a Proposed Recommended Order, and that pleading was considered in the preparation of this Recommended Order.

² Respondent's Exhibits 1 through 7 were the subject of a "Motion for Official Recognition" that was granted via an Order issued on April 16, 2025.

³ Respondent's Exhibit 5 titled, "Judgement and Sentence," was erroneously marked prior to the final hearing as Respondent's Exhibit 4. As explained by Respondent's counsel during the final hearing, Respondent's Exhibit 4 is a form titled "Plea and Acknowledgment of Rights."

FINDINGS OF FACT

Based on the oral and documentary evidence adduced at the final hearing, the entire record of this proceeding, and matters subject to official recognition, the following Findings of Fact are made:

Background

1. In July of 2007, Mr. McNeill began working for Jefferson County's Clerk of Court's Office. He remained in the Clerk of Court's Office until being appointed as Jefferson County's Supervisor of Elections in October of 2021. Mr. McNeill did not seek re-election and finished his term of office in November of 2022.

2. On September 20, 2023, the State Attorney for the Second Judicial Circuit filed an Information alleging that Mr. McNeill and two others committed Grand Theft and participated in an Organized Scheme to Defraud.

3. An Amended Information was filed on October 23, 2023 setting forth the following allegations against Mr. McNeill and his co-defendants:

COUNT 1: On or between 2017 and September 20, 2023, did knowingly obtain, use, or did endeavor to obtain or to use [] the value of \$100,000 or more, the property of Jefferson County, with the intent to either temporarily or permanently deprive the other person of a right to the property or a benefit therefrom or to appropriate the property to his or her own use or to the use of any person not entitled thereto, contrary to Section 812.014(2)(a)1, Florida Statutes.

COUNT 2: On or between 2017 and September 20, 2023, did unlawfully engage in a scheme to defraud, a systematic, ongoing course of conduct with the intent to defraud or obtain, U.S. Currency, of the value of \$50,000 or more from Jefferson County by false or fraudulent pretenses, representations, or promises or willful misrepresentations of a future act, contrary to Section 817.034(4)(a)1, Florida Statutes.

4. Mr. McNeill pled nolo contendere, on August 15, 2024, to two second degree felonies: Grand Theft (over \$20,000) and participating in an Organized Scheme to Defraud (over \$20,000).

5. On October 2, 2024, Mr. McNeill was sentenced to 10 years of probation and 90 days in jail. The Judgment specified that Mr. McNeill was to have no contact with Jefferson County's Clerk of Court's Office and that restitution would be established at a later date. On October 29, 2024, Mr. McNeill was ordered to be jointly and severally responsible for paying \$139,051.81 for investigation/prosecution costs and \$63,455 for "partial restitution."

6. The State Board issued a "Notice of Forfeiture of Retirement Benefits" on January 17, 2025 notifying Mr. McNeill that he had violated section 112.3173(2)(e) and forfeited his "rights to a retirement benefit" by pleading nolo contendere to Grand Theft and participating in an Organized Scheme to Defraud. The Notice also stated that Mr. McNeill had received a retirement distribution of \$167,310.50 and that \$140,481.31 of that distribution had to be returned to FRS by February 7, 2025.⁴

7. An "Order of Restitution and Forfeiture" entered by the Jefferson County Circuit Court on February 5, 2025 noted that Mr. McNeill and his co-defendants caused "Jefferson County" to sustain a loss. The Order also noted that the "Jefferson County Board of County Commissioners" sustained losses "due to unauthorized budget transfers." The Order specified that "Warren Culp and Justin McNeill [owe] the sum of \$98,782.50, joint and severally, for county funds shared pursuant to an organized kickback scheme."

8. As noted in the Preliminary Statement above, Mr. McNeill petitioned for an administrative hearing, and the State Board referred this matter to DOAH on February 18, 2025.

⁴ The \$26,829.19 difference between the distribution Mr. McNeill received and the amount the State Board is seeking to recover represents Mr. McNeill's contributions to FRS.

9. The State Board issued requests for admissions and interrogatories to Mr. McNeill. Mr. McNeill responded to a request for admission by admitting “that the alleged acts that led to the charges against [him] in *State of Florida v. McNeill*, Jefferson County Circuit Court Case No. 2023-178-CFC, occurred during [his] employment with the Jefferson County Clerk of Court’s Office.”⁵

10. In response to a question asking him to admit “that the alleged acts that led to the charges in *State of Florida v. McNeill*, Jefferson County Circuit Court Case No. 2023-178-CFC, occurred during your employment with the Jefferson County Supervisor of Elections,” Mr. McNeill stated that “[t]he alleged acts and my involvement pertain to my time employed with the Jefferson County Clerk of Court.”

11. Mr. McNeill responded to an interrogatory by stating that “[t]he alleged acts and subsequent plea of no contest pertain to actions/employment with the Clerk of Court, not [the] subsequent [employment as the] Supervisor of Elections.”

Ultimate Findings

12. The preponderance of the evidence does not demonstrate that Mr. McNeill committed a “specified offense” within the meaning of section 112.3173(2)(e)1. by embezzling funds from Jefferson County. The evidence clearly and convincingly establishes that Mr. McNeill stole money from his employer, Jefferson County, and thus committed a “specified offense” within the meaning of section 112.3173(2)(e)2. Finally, the State Board proved that Mr. McNeill also committed a “specified offense” within the meaning of section 112.3173(2)(e)6.

⁵ Mr. McNeill’s discovery responses are admissible under section 90.803(18), Florida Statutes, which creates a hearsay exception for a statement offered against a party that is that party’s “own statement in either an individual or a representative capacity.”

CONCLUSIONS OF LAW

13. DOAH has jurisdiction over the parties to, and subject matter of, this proceeding pursuant to sections 120.569 and 120.57(1), Florida Statutes.

14. FRS is a public retirement system as defined by Florida Law and, as such, the State Board's proposed action to forfeit Mr. McNeill's FRS rights and benefits is subject to administrative review. See § 112.3173(5)(a), Fla. Stat.

15. Article II, section 8, Florida Constitution, entitled "Ethics in Government," states, in pertinent part:

A public office is a public trust. The people shall have the right to secure and sustain that trust against abuse. To assure this right:

* * *

(d) Any public officer or employee who is convicted of a felony involving a breach of public trust shall be subject to forfeiture of rights and privileges under a public retirement system or pension plan in such manner as may be provided by law.

16. Section 112.3173 implements Article II, section 8, Florida Constitution, and is part of the statutory code of ethics for public officers and employees. Section 112.3173(3) mandates that

[a]ny public officer or employee who is convicted of a specified offense committed prior to retirement, or whose office or employment is terminated by reason of his or her admitted commission, aid, or abatement of a specified offense, shall forfeit all rights and benefits under any public retirement system of which he or she is a member, except for the return of his or her accumulated contributions as of the date of termination.

17. Section 112.3173(2)(e) defines "specified offenses" as:

1. The committing, aiding, or abetting of an embezzlement of public funds;

2. The committing, aiding, or abetting of any theft by a public officer or employee from his or her employer;
3. Bribery in connection with the employment of a public officer or employee;
4. Any felony specified in chapter 838, except ss. 838.15 and 838.16;
5. The committing of an impeachable offense;
6. The committing of any felony by a public officer or employee who, willfully and with intent to defraud the public or the public agency for which the public officer or employee acts or in which he or she is employed of the right to receive the faithful performance of his or her duty as a public officer or employee, realizes or obtains, or attempts to realize or obtain, a profit, gain, or advantage for himself or herself or for some other person through the use or attempted use of the power, rights, privileges, duties, or position of his or her public office or employment position.

18. Section 112.3173(2)(e) “makes clear that the legislature did not create a framework under which any crime or misconduct by a public employee results in a forfeiture of retirement benefits.” *Houston v. City of Tampa Firefighters and Police Officers’ Pension Fund Bd. of Trustees*, 303 So. 3d 233, 236 (Fla. 2d DCA 2020). Instead, the crimes leading to forfeiture “involve a breach of public trust.” *Id.* at 237.

19. Section 112.3173(2)(e)6. is “sometimes referred to as the catch-all provision because it does not identify a specific crime.” *Id.* at 237. The catch-all provision applies when the conduct at issue is: (a) a felony; (b) committed by a public official; (c) done willfully and with intent to defraud the public or the public employer of its right to faithful performance of the employee’s duties; (d) done to obtain a profit, gain, or advantage for the employee or

another person; and (e) done through the use of the employee's public position.

20. With regard to the instant case, the State Board bears the burden of proof because it is asserting that Mr. McNeill forfeited his rights and benefits. *See Fla. Dep't of Transp. v. J.W.C. Co.*, 396 So. 2d 778 (Fla. 1st DCA 1981), *Balino v. Dep't of HRS*, 348 So. 2d 349 (Fla. 1st DCA 1977).

21. Because section 112.3173(3) is not penal and does not involve disciplinary action against a license, the standard of proof in this proceeding is a preponderance of the evidence. § 120.57(1)(j), Fla. Stat.; *Childers v. Dep't of Mgmt. Servs.*, Case No. 07-2128 (Fla. DOAH July 17, 2007), modified in part, OGC Case No. 04-03615 (Fla. SBA Sept. 28, 2007).

22. The State Board argues that Mr. McNeill committed a "specified offense" within the meaning of sections 112.3173(2)(e)1., 2., and 6. Each of the State Board's arguments will be addressed below.

23. As noted above, section 112.3173(2)(e)1. defines a "specified offense" as "[t]he committing, aiding, or abetting of an embezzlement of public funds." In *Houston*, 303 So. 3d at 241, the Second District Court of Appeal construed this provision and concluded that "an embezzlement occurs when a person *lawfully* comes into possession of the property (whether public or otherwise) of another (such as through a public office) and fraudulently converts it to his or her own use." (emphasis added)

24. The evidence regarding the details of how Mr. McNeill committed his crimes and his duties with the Jefferson County Clerk of Court's Office is exceedingly sparse. The State Board presented virtually no evidence regarding the details of how Mr. McNeill came into possession of Jefferson County's funds. While Mr. McNeill's former position in the Jefferson County Clerk of Court's Office likely enabled him to lawfully possess Jefferson County funds, it is certainly conceivable that he used that position to unlawfully possess the funds at issue. As a result, the State Board did not prove this aspect of its case by a preponderance of the evidence. *See Houston*,

303 So. 3d at 241 (stating “[t]his case, in contrast, does not involve anyone coming into possession of property lawfully. On the record developed before the Board, Ms. Givens filed phony income-tax returns pretending to be someone she was not and claiming an entitlement to a refund that did not exist, had the refunds deposited into a bank account in someone else’s name, and then shared the refunds with Ms. Houston, who knew they were the product of a fraud on the government. This is not a case of anyone coming into possession of property lawfully, such as through a public office or employment; everyone who came into the possession of the tax refunds did so entirely unlawfully.”).

25. Section 112.3173(2)(e)2. defines a “specified offense” as “[t]he committing, aiding, or abetting of any theft by a public officer or employee from his or her employer.” On this point, the evidence clearly and convincingly establishes that Mr. McNeill stole money from his employer, Jefferson County, and thus committed a “specified offense.”

26. As for the State Board’s third argument that Mr. McNeill’s offenses fall under the “catch-all” provision in section 112.3173(2)(e)6., the State Board must prove that Mr. McNeill: (a) committed a felony; (b) was a public official of Jefferson County when he committed the felony; (c) committed the felony willfully and with intent to defraud Jefferson County its right to faithful performance of his duties; (d) committed the felony in order to obtain a profit, gain, or advantage for himself or another person; and (e) committed the felony through the use of his position in the Jefferson County Clerk’s Office.

27. Based on the evidence of record, there can be no colorable dispute that Mr. McNeill committed two felonies, that he was employed by Jefferson County when he committed the felonies, and that he committed the felonies in order to obtain a profit, gain, or advantage for himself or another person. Because one cannot inadvertently participate in an organized scheme to defraud, Mr. McNeill’s nolo contendere plea to participating in an Organized

Scheme to Defraud conclusively demonstrates that he committed his felonies willfully and with the intent to defraud Jefferson County of its right to faithful performance of his duties. Finally, Mr. McNeill stated in an interrogatory response that “[t]he alleged acts and subsequent plea of no contest pertain to actions/employment with the Clerk of Court . . .” That statement proves, by a preponderance of the evidence, that he committed his felonies through the use of his position in the Jefferson County Clerk’s Office.

28. Mr. McNeill’s only defense is that the State Board’s January 17, 2025 letter is insufficiently precise because it alleged that he committed his felonies “while employed with the Jefferson County Supervisor of Elections.” As indicated by his discovery responses, Mr. McNeill admitted that the acts leading to his felony convictions occurred during his employment with Jefferson County’s Clerk of Court’s Office. The implication behind his argument is that the State Board’s case should be dismissed because Mr. McNeill was not sufficiently apprised of the conduct at issue. *See generally Weatherspoon v. State*, 214 So. 3d 578, 587-88 (Fla. 2017)(holding that a criminal defendant was prejudiced because the charging document at issue was “defective because it neither cited to the correct statute nor alleged the essential elements of the crime of attempted felony murder.”).

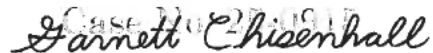
29. This argument is meritless because it is well established that “charges in administrative proceedings need not be set forth with the technical nicety or formal exactness required of pleadings in court.” *Jacker v. Sch. Bd. of Dade Cnty.*, 426 So. 2d 1149, 1150 (Fla. 3d DCA 1983). Moreover, there was no indication throughout this proceeding that Mr. McNeill was insufficiently apprised of the State Board’s allegations or that he experienced any surprise

or prejudice due to any imprecision in the State Board's January 17, 2025 letter.⁶

RECOMMENDATION

Based on the foregoing Findings of Fact and Conclusions of Law, it is RECOMMENDED that the State Board of Administration enter a final order determining that Justin McNeill forfeited all of his rights and benefits under the Florida Retirement System, except for employee contributions of \$26,829.19, when he was convicted of specified offenses, as defined in section 112.3173(2)(e)2. and 6., committed during his employment with Jefferson County.

DONE AND ENTERED this 12th day of June, 2025, in Tallahassee, Leon County, Florida.



G. W. CHISENHALL
Administrative Law Judge
DOAH Tallahassee Office

Division of Administrative Hearings
1230 Apalachee Parkway
Tallahassee, Florida 32301-3060
(850) 488-9675
www.doah.state.fl.us

Filed with the Clerk of the
Division of Administrative Hearings
this 12th day of June, 2025.

⁶ While Mr. McNeill did not raise this argument, the undersigned notes that there is no issue with the State Board recovering retirement benefits that have already been paid. *See Garay*, 46 So. 3d at 1228 (holding that Florida law “expressly provides for forfeiture of retirement benefits whenever FRS receives notice of criminal activity which occurred while a person was employed in the public trust.”).

COPIES FURNISHED:

Rex D. Ware, Esquire
(eServed)

Jonathan W. Taylor, Esquire
(eServed)

Justin T. McNeill
(Address of Record)

Chris Spencer, Executive Director
(eServed)

NOTICE OF RIGHT TO SUBMIT EXCEPTIONS

All parties have the right to submit written exceptions within 15 days from the date of this Recommended Order. Any exceptions to this Recommended Order should be filed with the agency that will issue the Final Order in this case.