

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

\_\_\_\_\_ and

Plaintiffs,

VS.

UNION COUNTY, a political subdivision  
of the State of Florida,

Defendant.

Case No.

## VERIFIED COMPLAINT

### **Injunctive and Declaratory Relief Requested, and Damages**

Plaintiffs [REDACTED] and [REDACTED] sue Union County for injunctive and declaratory relief, and damages, and allege as follows:

## INTRODUCTION

1. Under Union County Ordinance 2025-04 (the Ordinance), those persons required under Florida law to register with the State of Florida as sexual offenders or predators (registrants) are not permitted to “*travel through* nor *remain within* the 2,500-foot buffer zone surrounding any school, daycare center, park, playground, or school bus stop,” except under limited circumstances.

2. The “travel through” restriction is so extensive that a registrant is effectively banned from driving through Lake Butler, the county seat of Union

County, without violating the Ordinance. The two major roads which pass through Lake Butler—State Roads 100 and 121—cut through the 2500-foot buffer zones surrounding a school, park, playground, and school bus stops. And within Lake Butler, there is virtually nowhere a registrant can go without passing through a prohibited buffer zone.

3. The “remain within” restriction effectively bans a registrant from stopping in Lake Butler—even momentarily—and engaging in routine commercial activity, and from conducting government business in a public building. All government buildings and many stores and private businesses in Lake Butler are located within the twenty-five hundred buffer zones surrounding a park, school, daycare center, or school bus stop.

4. Further, the Ordinance is vague because it fails to provide registrants fair notice as to where within Union County they may travel and remain without violating the Ordinance and it fails to sufficiently inform registrants as to when travel through and being in a prohibited zone may be justified. Law enforcement officers have unbridled discretion in deciding who is subject to arrest under the Ordinance.

5. Registrants driving through and stopping in Lake Butler do so at great peril. A violation of the Ordinance is punishable by imprisonment in the county jail, not to exceed 60 days, or by a fine not to exceed \$500.00 or by both such fine and imprisonment.

6. Plaintiffs [REDACTED] and [REDACTED] are registrants who live in Florida counties near Union County. Out of necessity and choice, Plaintiffs want to travel to and through Union County to go to businesses and to government buildings. But Plaintiffs are unable to do so because they fear being arrested under the Ordinance and taken to jail.

7. As a result of Union County's adoption of the Ordinance, Plaintiffs have been hindered in the exercise of fundamental constitutional rights and face a continuing threat of citation and arrest for merely driving through or being present in Union County.

8. Plaintiffs bring this civil rights action pursuant to 42 U.S.C. § 1983 seeking declaratory and injunctive relief and damages against Defendant Union County for violations of the First, Eighth, and Fourteenth Amendments to the United States Constitution which secure the right to speech, the right to be free from arrest under vague criminal laws, to be free from deprivations of liberty without due process of law, and to be free from ex post facto laws. In addition, Plaintiffs bring this action to vindicate the right to intrastate travel as guaranteed by Article I, Section II of the Florida Constitution, and the right to attend and speak at a public meeting as guaranteed by Fla. Stat. §286.011.

### **JURISDICTION AND VENUE**

9. This case arises under the First, Eighth, and Fourteenth Amendments to the United States Constitution and 42 U.S. C. §1983, and under Article I, Section, II of the Florida Constitution and Fla. Stat. §286.011.

10. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. §§ 1331 and 1343, and on the supplemental jurisdiction of this court to entertain claims arising under state law pursuant to 28 U.S.C. §1367. The Court also has jurisdiction to grant declaratory relief pursuant to 28 U.S.C. § 2201.

11. Venue is proper in this district pursuant to 28 U.S.C. §1391(b) because the events giving rise to the claims occurred in this judicial district.

### **PARTIES**

12. Plaintiff [REDACTED] is a citizen of the United States and a resident of Duval County, Florida. In 2007, Mr. [REDACTED] was adjudicated and designated as a sexual offender as defined by Fla. Stat. § 944.606(1) and is required to register with Florida state and local officials. Mr. [REDACTED] has completed all aspects of the sentence for the offense he committed and is not currently on probation, parole, or any form of court supervision. The offenses for which he was convicted are the only criminal charges he has ever faced.

13. Plaintiff [REDACTED] is a citizen of the United States and a resident of Bradford County, Florida. In 2016, Mr. [REDACTED] was adjudicated and designated as a sexual offender as defined by Fla. Stat. § 944.606(1) and is required to register

with Florida state and local officials. He has completed all aspects of the sentence for the offense he committed and is not currently on probation, parole, or any form of court supervision.

14. Defendant Union County is a political subdivision organized under the laws of the State of Florida. The County is sued based on the acts of its officials, agents, and employees. At all relevant times, the County and its officials, agents, and employees were acting under color of state law.

### **STATEMENT OF FACTS**

#### **A. Union County Ordinance 2025-04**

15. On September 15, 2025, the Union County Commission enacted Ordinance 2025-04, an ordinance that imposes certain restrictions on both registered sexual offenders and predators in Union County.<sup>1</sup> Other than a draft of the Ordinance, no evidence or supporting materials were submitted to support the restrictions. The Ordinance was passed unanimously without any discussion or debate.

16. Like ordinances in many Florida counties, the Union County Ordinance imposes restrictions on where sexual offenders and predators can

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<sup>1</sup> The Ordinance applies to anyone designated as a “sexual offender” as defined by Florida Statutes Section 944.606(1) and whose victim was at the time of the offense less than 16 years old. Plaintiffs are subject to the restrictions imposed by the Ordinance.

reside. However, unlike most Florida counties, the Ordinance also imposes restrictions on where sexual offenders may “travel through” and “remain.”

17. Specifically, the restriction in Section 6 (a) states as follows:

(a) No sexual predator nor sexual offender shall travel through nor remain within the 2500-foot<sup>2</sup> buffer surrounding any school, daycare center, park, playground, or school bus stop except to:

1. Attend a scheduled meeting with an attorney who is recognized as a licensed member of the Bar of the State of Florida.
2. Attend a scheduled interview with a social service provider licensed by the State of Florida.
3. Attend a bona fide educational institution as a registered student.
4. Attend to medical or healthcare needs with a licensed physician.
5. Attend to familial or parental obligations.
6. Be gainfully employed or as part of duties imposed by gainful employment.
7. Seek refuge during times of impending natural disasters or acts of terrorism, if such schools have been designated by Union County or the State of Florida as place of refuge.

18. After listing the exceptions, the Ordinance states: “A law enforcement officer shall, prior to an arrest under this section, afford the offender an opportunity to explain his or her presence in that area and the purpose thereof.” The Ordinance, however, does not define criteria as to what facts or circumstances may justify a registrant’s presence in the prohibited zone. For example, the Ordinance does not define what “familial” or “parental” “obligations” are or what type of duty or responsibility constitutes an “obligation.” §6 (a)(5). Nor does it

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<sup>2</sup> Twenty-five hundred feet is .473 of a mile.

define what constitutes legitimate “duties imposed by gainful employment.” §6 (a)(6).

19. A violation of the Ordinance is punishable by imprisonment in the county jail, not to exceed 60 days, or by a fine not to exceed \$500.00 or by both such fine and imprisonment. § (3) (c).

20. By its terms the Ordinance applies to any registrant traveling through Union County, not just registrants who are residents of the County.

21. The Ordinance directly impairs the ability of registrants to travel through and within Union County on public roads and sidewalks and to stop and engage in everyday activities such as going to stores and entering government buildings.

22. The Ordinance requires that for purposes of “determining the minimum distance separation, the requirement shall be measured by following a straight line from the outer property line of the permanent residence/address or temporary residence/address to the nearest outer property line of a school, daycare center, park, playground, or school bus stop or other place where children regularly congregate.” § 3 (b).

23. “School” is defined as: “Any public or private [school] as defined in F.S. 1000.04(1) and 1002.01 (2004), excluding facilities dedicated exclusively to the education of adults.” Section 1., Sub-Section A. Definitions

24. “School Bus Stop” is defined as: “Any public-school bus stop as defined by the Union County School Bus garage and its map (see attached). This map is subject to change at any time.” School bus stops are not posted in Union County. *Id.*

25. “Daycare center” is defined as: “Any family or childcare facility licensed by the State of Florida pursuant to Chapter 402 F. S. For purposes of this code, a daycare center includes the parking lot, curtilage, yards, landscaped areas, playgrounds, accessory buildings and all outdoor areas of the facility. It is the intent to include all areas reasonably included in and around or part of the facility.” *Id.*

26. “Park” is defined as: “A publicly owned or operated area used or available for the public’s use as a recreational facility, including by way of example and not limitation, linear parks and the state, county, and municipal recreational trails systems.” *Id.*

27. “Playground” is defined as: “An established or dedicated outdoor area for recreation and play, including by way of example and not limitation, soccer fields, baseball and softball fields, football fields, and location with outdoor equipment, such as by way of example and not by limitation, swing sets, climbing apparatus and slides. It is the intent to include all areas reasonably included in and around or part of the facility.” *Id.*

28. The Ordinance by its terms is not limited to public playgrounds. Its terms extend to all public and private playgrounds. Private playgrounds such as those in an apartment or other private housing complexes are covered by the Ordinance. The buffers zones created by private playgrounds often extend to public streets and sidewalks but the playground themselves are often not visible from public streets and are not listed on maps.

29. Union County is the smallest county by area in the State of Florida.

30. In Lake Butler and Worthington Springs, the second largest town in Union County, the buffer zones surrounding schools and parks encompass many if not most, public roads, sidewalks, and privately owned businesses. The buffer zones overlap to make large areas of the towns off limits. A registrant driving through Lake Butler and Worthington Springs en route to another destination cannot stop to obtain gas or food without violating the Ordinance.

31. Moreover, Union County provides no signs or warnings regarding the buffer zones. In many cases, the location of a school, daycare center, park, or playground is not readily apparent or ascertainable.

32. And while the definition of a School Bus Stop is listed as “any public-school bus stop as defined by the Union County School Bus garage and its map,” the Ordinance warns, “[t]his map is subject to change at *any* time.” Section 1., Sub-Section A. Definitions (*italics added*).

33. In many places in Union County, the outermost property line of school, daycare center, park, playground, or school bus stop is not readily apparent or ascertainable.

34. There is no feasible way for a registrant traveling through or stopping within Union County to determine where the buffer zones are located.

**B. Impact of the Ordinance on Plaintiff [REDACTED]**

35. Plaintiff [REDACTED] is retired from the U.S. Army. He served in the military for nearly thirty-five years, both on active duty and as a civilian administrator. During the Iraq war, he served in an active combat zone and as a senior administrative employee of the US Army, he once supervised a unit of over 300 people. Upon retirement, Mr. [REDACTED] was honorably discharged.

36. Mr. [REDACTED] lives in a remote country home off Florida State Road 100 in rural Bradford County, less than two miles from the Union County line. While his home is located approximately five miles from Lake Butler, his post office address is listed as being in Lake Butler. Lake Butler, the county seat of Union County, is the closest commercial center to where he lives. But merely traveling into and through Union County puts Mr. [REDACTED] in jeopardy of violating the Ordinance and being arrested.

37. For example, from where Mr. [REDACTED] lives in Bradford County, the most direct route to travel northwest to where his daughter lives in Monticello, Georgia, is to take Interstate 10 to get to Interstate 75. To get there, however, he

must travel on State Road 100 and pass through Lake Butler (State Road 100 turns into Main Street as it cuts west through the center of Lake Butler). By traveling on Main Street, however, Mr. [REDACTED] is forced to violate the Ordinance by passing through the prohibited buffer zones surrounding a park and a daycare center.

38. Even though his home is in Bradford County, the U.S. Post Office which services his residence is in Lake Butler. So, whenever Mr. [REDACTED] has an issue with a package delivery or needs to send a parcel with a return receipt, he would have to travel into Lake Butler and violate the Ordinance because the US Post Office in Lake Butler is located within the 2500 buffer zone surrounding Lakeside Park, as demonstrated by the figure below.



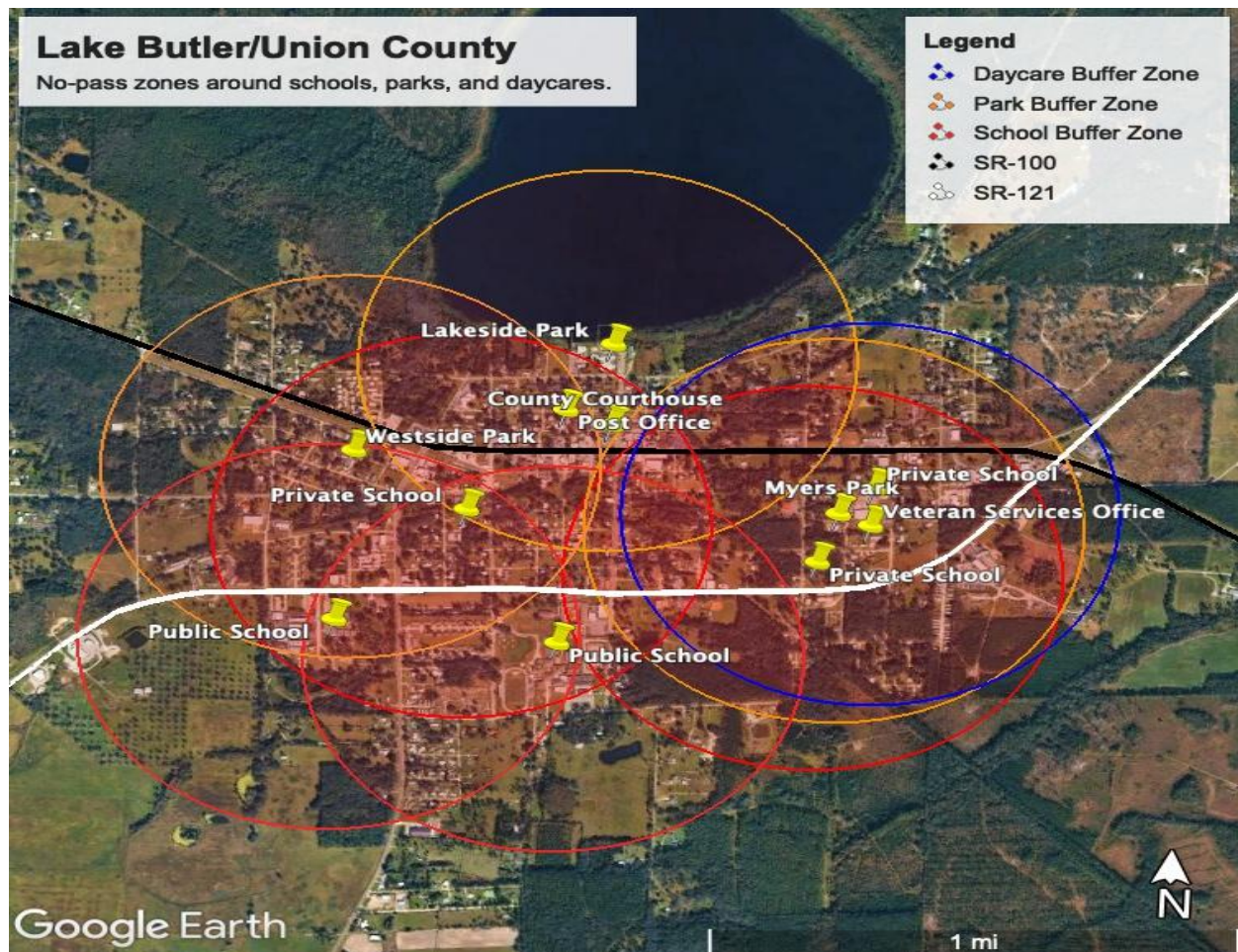
39. As a veteran of the U.S. Army who was honorably discharged, Mr. [REDACTED] is entitled to veterans' benefits. The nearest Veterans Services Office (VSO) from where he lives is in Lake Butler. To access services at the VSO in Lake Butler, however, he is forced to violate the Ordinance because the VSO is located next to and within the 2500-foot buffer zones surrounding the Little Rainbow daycare center and Fletcher Myers Park, as shown below.



40. Every state and local government office in Lake Butler is located within a prohibited buffer zone. Because of the “travel through” and “remain within” provisions, Mr. [REDACTED] cannot access basic government services to which he is entitled without risking arrest for a violation of the Ordinance.

41. And the same provisions also combine to restrict Plaintiff [REDACTED] access to basic commercial activities. The major grocery store, Spires IGA, and most stores and businesses in Lake Butler are located either on or just off Main Street and are located within the 2500-foot buffer zones surrounding a school, park, and daycare center. For Mr. [REDACTED] the Ordinance makes the simple, everyday task of going to the Post Office and shopping for groceries in Lake Butler a crime.

42. In fact, as demonstrated below, nearly all of Lake Butler is within a 2500-foot buffer zone and therefore inaccessible to registrants.



43. Mr. [REDACTED] wants to travel in and through Union County in the future to transact business, visit the post office, and conduct other government business, but refrains from doing so because of the Ordinance.

**C. Impact of the Ordinance on Plaintiff [REDACTED]**

44. Plaintiff [REDACTED] is retired and resides in Jacksonville in Duval County. Union County is nearby and Lake Buter is only fifty-miles from where Mr. [REDACTED] lives.

45. Mr. [REDACTED] has a master's degree in public health and graduated from law school. As a licensed attorney in North Carolina, Mr. [REDACTED] worked as a public interest lawyer for a non-profit organization which worked to protect and educate consumers. In retirement, Mr. [REDACTED] has become active in civic affairs and volunteers as an advocate on behalf of homeless people and other registrants on a wide range of issues. His advocacy efforts have included speaking before a legislative committee of the Florida legislature.

46. Mr. [REDACTED] is also active in the Florida Action Committee (FAC), a non-profit advocacy and support organization for people on the sexual offender registries and their families. Through FAC, Mr. [REDACTED] stays updated on state laws and local and county ordinances that impact registrants.

47. Mr. [REDACTED] advocacy efforts have included writing to and speaking before elected officials to express his concerns on proposed legislation. On November 5, 2025, he went to Tallahassee and spoke before a legislative

committee of the Florida legislature on HB 45, a proposed state law which would expand the 1,000-foot residency restriction to include public swimming pools.

48. In September 2025, Mr. [REDACTED] became aware of the Union County Ordinance. In October, he obtained a copy of the Ordinance from the Union County Clerk's Office by a public records request.

49. Mr. [REDACTED] immediately recognized the onerous provisions in the Ordinance which restricted the right to freely travel through and within Union County. As an avid long-distance cyclist, he realized that simply riding his bicycle into Union County could put him at risk of being arrested for a violation of the Ordinance.

50. Mr. [REDACTED] contacted a law firm in Jacksonville to challenge the Ordinance but the firm would not take the case.

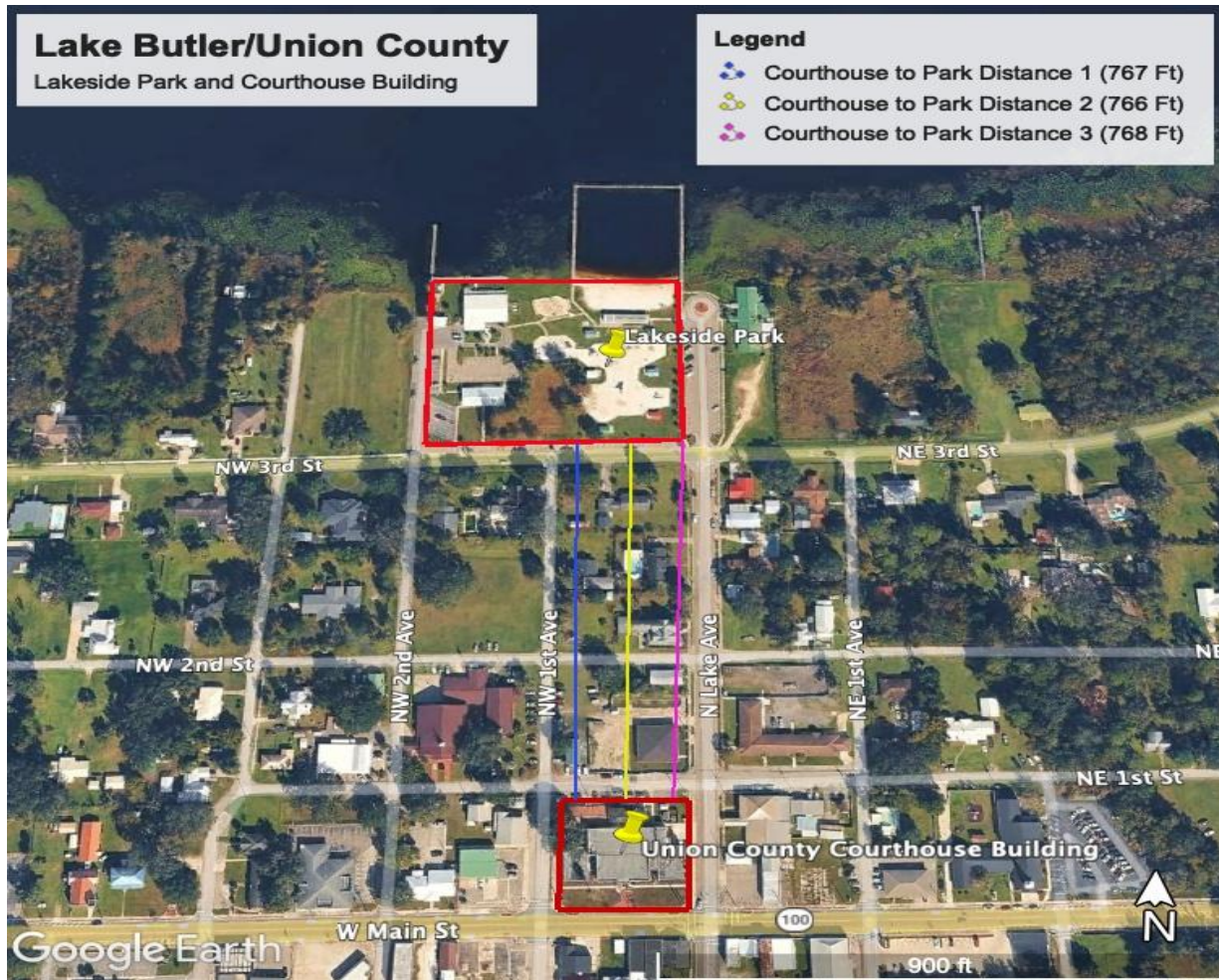
51. Mr. [REDACTED] wants to appear before the county commission at a regularly scheduled public meeting to explain that the Ordinance violates basic constitutional rights and creates undue hardships for law abiding registrants living in Union County and for people like him, who want merely to travel through and stop within Union County without being arrested.

52. In compliance with Florida law, Union County allows members of the public a reasonable opportunity to be heard on a proposition before the Board of County Commissioners at its public meetings. Upon recognition by the Chair,

any person may address the Board on any subject on or off the agenda for three minutes.

53. The meetings of the Union County Board of Commissioners are not available remotely or by videoconference. Attending in person is the only way to speak at such meetings.

54. But Mr. [REDACTED] cannot travel to Lake Butler and speak before the Union County Commission because by doing so, he would have to violate the Ordinance. To travel from Jacksonville to Lake Bulter, the county seat where the commission meets, Mr. [REDACTED] would have to travel through prohibited buffer zones surrounding a park and a daycare center. And by entering the public building where the County Commission has its chambers and holds public hearings, the Union County Courthouse, Mr. [REDACTED] would be remaining within the prohibited buffer zone of a nearby public park, also in violation of the Ordinance, as shown below.



55. Plaintiff [REDACTED] has been deterred from traveling to Union County and speaking before the County Commission because he does not want to risk being arrested for a violation of the Ordinance. He wishes to attend and speak at a future public meeting of the County Commission in Lake Butler but will not because he fears that if travels to Lake Butler and enters the County Courthouse, he will be arrested and prosecuted for a violation of the Ordinance.

### **CLAIMS FOR RELIEF**

#### **COUNT I – Plaintiff [REDACTED] First Amendment Right to Speech**

56. Plaintiff [REDACTED] incorporates and re-alleges all paragraphs preceding the Claims for Relief section and incorporates them by reference herein.

57. The application of Union County Ordinance 2025-04 to Plaintiff [REDACTED] has violated and continues to violate his right to free speech and free expression in violation of the First Amendment to the United States Constitution.

58. Union County Ordinance 2025-04 is an unconstitutional content-based restriction of protected speech that is subject to strict scrutiny. As applied to Plaintiff [REDACTED] it singles out and targets Plaintiff based solely on his status as a registered sexual offender, and is not narrowly tailored to, nor is it the least restrictive means of furthering, any compelling government interest.

59. Should the Ordinance be construed as content-neutral rather than content-based, this regulation is nonetheless unconstitutional because as applied to Plaintiff [REDACTED] it is not a reasonable time, place, and manner restriction, in that it is not narrowly tailored to serve a significant governmental interest, and it does not leave open ample alternative channels of communication.

60. Because Union County has acted and threatened to act to deprive Plaintiff [REDACTED] of his right guaranteed by the First Amendment to the United States Constitution, Plaintiff sues and seeks relief pursuant to 42. U.S.C. § 1983.

61. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff [REDACTED] has and will suffer irreparable harm and damages, which will continue absent relief.

62. As a result, Plaintiff [REDACTED] is entitled to injunctive relief, a declaratory judgment, and damages.

**COUNT II– Plaintiff [REDACTED] First Amendment Right to Petition for Redress of Grievances**

63. Plaintiff [REDACTED] incorporates and re-alleges all paragraphs preceding the Claims for Relief section and incorporates them by reference herein.

64. The application of Union County Ordinance 2025-04 to Plaintiff [REDACTED] has violated and continues to violate his right to petition government for the redress of grievances in violation of the First Amendment to the United States Constitution.

65. As applied to Plaintiff [REDACTED] the Ordinance targets Plaintiff as an individual based solely on his status as a registered sexual offender and effectively prohibits him from redressing his grievances at a public meeting of the Union County Commission.

66. Because Union County has acted and threatened to act to deprive Plaintiff of his right guaranteed by the First Amendment to the United States Constitution, Plaintiff sues and seeks relief pursuant to 42. U.S.C. § 1983.

67. As a direct and proximate result of Defendant's unlawful conduct, Plaintiff has and will suffer irreparable harm and damages, which will continue absent relief.

68. As a result, Plaintiff is entitled to injunctive relief, a declaratory judgment, and damages.

**COUNT III – Plaintiff [REDACTED] Violation of Florida’s Sunshine in  
Government Law, Fla. Stat. § 286.014(6)**

69. Plaintiff [REDACTED] incorporates and re-alleges all paragraphs preceding the Claims for Relief section and incorporates them by reference herein.

70. The meetings of the Union County Commission are public meetings subject to the rules and requirements of Florida Statutes, Ch. 286.

71. The regularly scheduled meetings of the Union County Commission are held on the first and third Mondays of each month, wherein the Commission holds public hearings and conducts public business, violate Fla. Stat. §286.011(6), because by prohibiting registered sexual offenders and predators from attending the meetings, Defendant Union County operates “in such a manner as to unreasonably restrict public access” to a public meeting.

72. Plaintiff [REDACTED] by virtue of his status as a registered sexual offender, cannot enter the Union County Courthouse because he fears being arrested and prosecuted for a violation of the Ordinance.

73. By holding the meetings at the Union County Courthouse in Lake Butler, Union County unreasonably restricts access to Plaintiff, as a registered sexual offender, and effectively bars him from attending and speaking at the Commission’s public meetings.

74. The actions of the Union County Commission which restrict access and result in the exclusion of Plaintiff [REDACTED] from attending and being present at County Commission meetings amount to irreparable public injury and Plaintiff

██████ thus seeks declaratory and injunctive relief pursuant to Fla. Stat. §286.011(1), (2) and (4).

**COUNT IV – Plaintiff ██████ Violation of Florida’s Sunshine in Government Law, Fla. Stat. § 286.014(2), (4)**

75. Plaintiff ██████ incorporates and re-alleges all paragraphs preceding the Claims for Relief section and incorporates them by reference herein.

76. The meetings of the Union County Commission are public meetings subject to the rules and requirements of Florida Statutes, Ch. 286.

77. The regularly scheduled meetings of the Union County Commission are held on held on the first and third Mondays of each month, wherein the Commission holds public hearings and conducts public business, violate Fla. Stat. §286.014(2), because by prohibiting registered sexual offenders and predators from attending the meetings, Defendant Union County denies Plaintiff ██████ a reasonable opportunity to be heard on a proposition before a board or commission.

78. Plaintiff ██████ by virtue of his status as a registered sexual offender, cannot enter the County Courthouse and address the County Commission because he fears being arrested and prosecuted for a violation of the Ordinance.

79. Defendant Union County’s effective exclusion of Plaintiff ██████ from speaking at the public hearing violates Fla. Stat. §286.0114(2) because Plaintiff, as members of the public, is denied “a reasonable opportunity to be heard on a proposition before a board or commission.”

80. Plaintiff thus seeks declaratory and injunctive relief pursuant to Fla. Stat. §286.0114 (1), (2), and (4)

**COUNT V – Plaintiffs [REDACTED] and [REDACTED] Fourteenth Amendment Due Process, Vagueness**

81. Plaintiffs incorporate and re-allege all paragraphs preceding the Claims for Relief section and incorporate them by reference herein.

82. Union County Ordinance 2025-04, a law that provides criminal penalties, both on its face and as applied fails to provide notice that is adequate to enable an ordinary person to know or understand what conduct is prohibited, where it is prohibited, and how to comply with its provisions.

83. The Ordinance fails to provide sufficient notice as to where schools, daycare centers, parks, playgrounds, and school bus stops are located and there is no way for Plaintiffs to determine whether their travel through public streets passes within a prohibited buffer zone, or whether their mere presence at a certain location is within a prohibited buffer zone.

84. The Ordinance both on its face and as applied fails to provide adequate guidelines to law enforcement and thus encourages arbitrary and discriminatory enforcement. Plaintiffs have no way of knowing whether they will be arrested for violating the ordinance when they travel through or stop at any location within Union County.

85. The Ordinance is void for vagueness, in violation of the Due Process Clause of the Fourteenth Amendment.

86. As a direct and proximate result of Defendant's unlawful conduct, Plaintiffs have and will suffer irreparable harm and damages, which will continue absent relief.

87. As a result, Plaintiffs are entitled to preliminary and permanent injunctive relief, a declaratory judgment, and damages.

**COUNT VI – Plaintiffs [REDACTED] and [REDACTED] Ex Post Facto Law**

88. Plaintiffs incorporate and re-allege all paragraphs preceding the Claims for Relief section and incorporate them by reference herein.

89. The Ex Post Facto Clause of Article I, Section IX of the U.S. Constitution prohibits Defendant Union County from retroactively increasing an individual's punishment beyond that authorized by the law in effect at the time the offense was committed.

90. Defendant Union County passed the Union County Ordinance 2025-04 with the intent to punish those convicted of the offenses specified by the Ordinance irrespective of the date the individual committed the offense.

91. Regardless of the legislative intent, the retroactive application of the Ordinance to Plaintiffs whose offenses predate the Ordinance violates the Ex Post Facto Clause because its debilitating effects are clearly punitive.

**COUNT VII – Plaintiffs [REDACTED] and [REDACTED] Right to Intrastate Travel, Article I, Section II of the Florida Constitution**

92. Plaintiffs incorporate and re-allege all paragraphs preceding the Claims for Relief section and incorporate them by reference herein.

93. Article I, Section II of the Florida Constitution guarantees the right to intrastate travel.

94. Union County Ordinance 2025-04, with its prohibition on traveling along public streets, roadways and sidewalks, restricts the ability of Plaintiffs to travel through and within Union County.

95. The Ordinance criminalizes otherwise innocent behavior and restricts Plaintiffs' right to engage in non-criminal routine commercial activities and public business.

96. The Ordinance does not advance a compelling state interest, is not narrowly tailored to achieve any compelling state interest and is not the least restrictive manner of achieving any such interest.

### **PRAYER FOR RELIEF**

**Wherefore,** Plaintiffs [REDACTED] and [REDACTED] demand judgment against Union County and request the following relief:

#### **As to Counts I and II:**

A. A declaratory judgment that the application of Union County Ordinance 2025-04 to Plaintiff [REDACTED] prevents him from attending and speaking at public meetings of the Union County Commission at the Union County Courthouse in Lake Buter, Florida, violates the First Amendment to the United States Constitution;

- B. A permanent injunction prohibiting Union County from applying and enforcing Union County 2025-04 in such manner that prevents Plaintiff [REDACTED] from attending and speaking at public meetings of the Union County Commission at the Union County Courthouse in Lake Buter, Florida;
- C. All damages permitted by law, including but not limited to compensatory, nominal, and punitive damages;
- D. An award of attorneys' fees and costs pursuant to 42 U.S.C. §1988; and,
- E. Any such other relief that may be appropriate.

**As to Counts III and IV:**

- F. A declaratory judgment that Defendant Union County violated Fla. Stat. §286.011(6) and Fla. Stat. §286.0114(2);
- G. A permanent injunction prohibiting Union County from applying and enforcing Union County Ordinance 2025-04 in such a manner that prevents Plaintiff [REDACTED] and other registered sexual offenders from attending and speaking at a public meeting of the Union County Commission;
- H. An award of attorney's fees and costs pursuant to Chapter 286 of the Florida Statutes.
- I. Any such other relief that may be appropriate.

**As to Count V:**

- A. A declaratory judgment that Union County Ordinance 2025-04 is void for vagueness in violation in violation the of Due Process Clause of the Fourteenth Amendment to the United States Constitution.
- B. A permanent injunction prohibiting Union County from applying and enforcing Union County 2025-04 against Plaintiffs [REDACTED] and [REDACTED] and all other registrants.
- C. All damages permitted by law, including but not limited to compensatory, nominal, and punitive damages;
- D. An award of attorneys' fees and costs pursuant to 42 U.S.C. §1988; and,
- E. Any such other relief that may be appropriate.

**As to Count VI:**

- A. A declaratory judgment that Union County Ordinance 2025-04 violates the Ex Post Facto-Clause of Article I, Section IX of the U.S. Constitution.
- B. A permanent injunction prohibiting Union County from applying and enforcing Union County 2025-04 against Plaintiffs [REDACTED] and [REDACTED] and all other registrants.
- C. All damages permitted by law, including but not limited to compensatory, nominal, and punitive damages;
- D. An award of attorneys' fees and costs pursuant to 42 U.S.C. §1988; and,
- E. Any such other relief that may be appropriate.

**As to Count VII:**

- A. A declaratory judgment that Union County Ordinance 2025-04 violates Article I, Section II of the Florida Constitution.
- B. A permanent injunction prohibiting Union County from applying and enforcing Union County 2025-04 against Plaintiffs [REDACTED] and [REDACTED] and all other registrants; and,
- C. Any other relief that may be appropriate.

**Jury Demand**

Plaintiffs demand trial by jury on all issues so triable.

Respectfully submitted,

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By: *s/Ray Taseff*  
Ray Taseff

**Attorneys for Plaintiffs**

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

\_\_\_\_\_ and

Plaintiffs,

VS.

UNION COUNTY, a political subdivision  
of the State of Florida,

Defendant.

Case No.

## DECLARATION OF

I, [REDACTED] make this Declaration Under Penalty of Perjury, and declare that the statements below are true, and state:

My name is [REDACTED] I have reviewed the Verified Complaint above, and state that the facts which pertain to me are true and accurate to the best of my knowledge and belief.

I understand that a false statement in this declaration will subject me to penalties for perjury.

I declare under penalty of perjury that the foregoing is true and correct.

Date: August 10, 2026

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
JACKSONVILLE DIVISION**

\_\_\_\_\_ and \_\_\_\_\_  
\_\_\_\_\_

Plaintiffs,

VS.

UNION COUNTY, a political subdivision  
of the State of Florida,

Defendant.

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## DECLARATION OF

I, [REDACTED] make this Declaration Under Penalty of Perjury, and declare that the statements below are true, and state:

My name is [REDACTED] I have reviewed the Verified Complaint above, and state that the facts which pertain to me are true and accurate to the best of my knowledge and belief.

I understand that a false statement in this declaration will subject me to penalties for perjury.

I declare under penalty of perjury that the foregoing is true and correct.

\_\_\_\_\_

Date: August 10, 2026