

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION**

The City of Pinellas Park, Florida,
The City of Clearwater, Florida,
The City of Largo, Florida,
The City of St. Petersburg, Florida,
The Town of North Redington Beach, Florida,
The City of Oldsmar, Florida,
The City of Belleair Bluffs, Florida,
The City of Tarpon Springs, Florida,
The Town of Indian Shores, Florida,
The City of Safety Harbor, Florida,
The Town of Belleair, Florida,
The Town of Redington Shores, Florida,
The City of Belleair Beach, Florida,
The Town of Belleair Shore, Florida,
The City of Gulfport, Florida
The Town of Kenneth City, Florida,
The Town of St. Pete Beach, Florida,
The City of Seminole, Florida,
The City of Treasure Island, Florida,
The City of South Pasadena, Florida,
The City of Madeira Beach, Florida,

Florida municipal corporations.

Plaintiffs

v.

Case No. _____

Deborah Clark, Supervisor of Elections for Pinellas County, Florida;
Pinellas County Board of County Commissioners;
Pinellas County Charter Review Commission.

Defendants.

**REQUEST FOR ADMISSIONS TO
DEFENDANT PINELLAS COUNTY CHARTER REVIEW COMMISSION**

Plaintiff City of Pinellas Park, by and through its undersigned attorneys, pursuant to Rule 1.370, Fla. R. Civ. P., hereby requests Defendant Pinellas County Charter Review Commission respond to the request for admissions within forty-five (45) days from the date of service upon

Defendant, and admit in this action that each of the following statements are true:

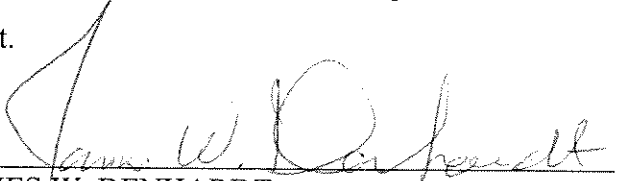
1. If proposed Referendum Question 4 passes and, thereafter there is a countywide vote concerning each of the following issues which is approved by a majority of the voters of the County but is not approved by a majority of the voters within a certain City, admit that residents of that certain City could be subject to the following:
 - a. Admit that Pinellas County could require that no landscaping improvements, including trees and shrubs, be placed in street rights of way, including the medians of all roadways in Pinellas County.
 - b. Admit that Pinellas County could force all cities within Pinellas County to remove all trees, shrubs and/or other vegetation which has been planted in the medians of roadways by cities.
 - c. Admit that Pinellas County would have the power to regulate all noise within Pinellas County, including increasing the allowed noise levels and expanding the hours of operations of outdoor patios of restaurants and bars.
 - d. Admit that Pinellas County would have the power to regulate hours during which bars and other adult establishments could be open, including increasing the hours which are currently limited by certain cities.
 - e. Admit that Pinellas County would have the power to standardize street surfaces which could be or would have to be used within Pinellas County, including requiring cement paving over brick streets or hexblock sidewalks.
 - f. Admit that Pinellas County would have the power to standardize street surfaces which could not be used, such as brick streets or hexblock sidewalks.
 - g. Admit that Pinellas County would have the power to require a lower the number of police officers and firefighters than is currently provided per person.
 - h. Admit that Pinellas County could increase the distance between fire stations (establish a minimum distance between stations).
 - i. Admit that Pinellas County could force the closure of fire stations.
 - j. Admit that Pinellas County could increase the distance between fire stations which could increase response time of firefighters and emergency medical services.

- k. Admit that Pinellas County could expand the nighttime hours for bars and restaurants to serve or sell alcohol.
- l. Admit that Pinellas County could reduce the hours established by cities allowing businesses to sell alcohol so that citizens would not be able to purchase alcohol before 1:00 p.m. on Sundays.
- m. Admit that Pinellas County could reduce the restrictions on adult use establishments which have been placed by the cities.
- n. Admit that Pinellas County would have the power to regulate parking on private parking and could allow boats or recreational vehicles to be parked in driveways.
- o. Admit that Pinellas County would have the power to regulate billboards and other signs, including allowing billboards within cities where billboards are currently prohibited.
- p. Admit that Pinellas County would have the power to regulate the accumulation of junk, trash and other debris in residential yards and could allow inoperative cars on blocks in residential yards.
- q. Admit that Pinellas County would have the power to regulate parking at beaches, including hours and monetary charges.

- r. Admit that Pinellas County would have the power to regulate roadside vendors and the clothing requirements of those vendors.
- s. Admit that Pinellas County would have the power to regulate the hours of local parks, including requiring that each and every park in the county be closed and locked at sundown.
- t. Admit that Pinellas County would have the power to regulate the hours of all libraries located within the county.
- u. Admit that Pinellas County would have the power to regulate the hours of all municipal marinas located within the county.
- v. Admit that Pinellas County would have the power to prohibit cities from charging city residents less for city provided services, including recreation fees, library fees and marina fees.
- w. Admit that Pinellas County would have the power to regulate the quality of water

including prohibiting cities from having requirements that the quality of their water be above minimum standards.

2. Admit that if any of the proposed charter amendments have been illegally placed on the ballot that it would be illegal for Pinellas County through its Board of County Commissioners to expend public monies to urge the citizens of Pinellas County to support the amendment.
3. Admit that if any of the proposed charter amendments have been illegally placed on the ballot that the each commissioner on the Pinellas County Board of County Commissioners could be personally responsible to repay any public monies expended to urge the citizens of Pinellas County to support the amendment.
4. Admit that if any of the proposed charter amendments have been illegally placed on the ballot that it would be illegal for Pinellas County through the Pinellas County Charter Review Commission to expend public monies to urge the citizens of Pinellas County to support the amendment.
5. Admit that if any of the proposed charter amendments have been illegally placed on the ballot that the each commissioner on the Pinellas County Charter Review Commission could be personally responsible to repay any public monies expended to urge the citizens of Pinellas County to support the amendment.



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